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15
16 **SUPERIOR COURT OF CALIFORNIA**

17 **COUNTY OF LOS ANGELES**

18 ANDREW ARELLANO and ELIZABETH
19 RUVALCABA, on behalf of the State of
California and other aggrieved persons,

20 Plaintiffs,

21 v.

22 GK MANAGEMENT CO., INC., a California
23 corporation; and DOES 1 through 10, inclusive,

24 Defendants.

Case No. **24STCV06468**

DECLARATION OF KYLE
NORDREHAUG IN SUPPORT OF
MOTION FOR APPROVAL OF PAGA
SETTLEMENT

Date:

Time:

Department: 56

Judge: Hon. Steven A. Ellis

Action filed: August 14, 2023

1 **DECLARATION OF KYLE NORDREHAUG IN SUPPORT OF PLAINTIFFS' MOTION**
2 **FOR APPROVAL OF SETTLEMENT UNDER PRIVATE ATTORNEYS GENERAL ACT**

3 I, Kyle Nordrehaug, declare:

4 1. I am a partner of the law firm of Blumenthal Nordrehaug Bhowmik De Blouw LLP
5 ("BNBD"), counsel for Plaintiff Elizabeth Ruvalcaba. As such, I am fully familiar with the facts,
6 pleadings and history of this matter. The following facts are within my own personal knowledge,
7 and if called as a witness, I could testify competently to the matters stated herein.

8 2. This declaration is being submitted in support of the Motion for an Order granting
9 approval of the Private Attorneys General Act of 2004, California Labor Code § 2698 et seq.
10 ("PAGA") representative action settlement. The settlement Plaintiffs Andrew Arellano
11 ("Arellano") and Elizabeth Ruvalcaba ("Ruvalcaba") (collectively, "Plaintiffs") reached with
12 Defendant GK Management Co., Inc. ("Defendant") is set forth in the Joint Stipulation for
13 Representative Action Settlement (the "Stipulation") submitted with this motion.

14 Experience of BNBD

15 3. I have represented hundreds of thousands of employees in hundreds of legal matters,
16 including PAGA lawsuits and hundreds of employment class actions. Blumenthal Nordrehaug
17 Bhowmik De Blouw LLP's practice is devoted almost entirely to the prosecution of wage and hour
18 class action and PAGA action matters. The attorneys at Blumenthal Nordrehaug Bhowmik De
19 Blouw LLP have been appointed lead counsel in hundreds of contested motions for class
20 certification including many consolidated wage and hour matters.

21 (a) Blumenthal Nordrehaug Bhowmik De Blouw LLP was responsible for
22 handling the briefing and argument that resulted in the landmark ruling of *Sakkab v. Luxottica*
23 *Retail N. Am., Inc.*, 803 F.3d 425 (9th Cir. 2015). There, Blumenthal Nordrehaug Bhowmik De
24 Blouw LLP overcame opposition by Littler Mendelson and amici Curiae briefs submitted by Mayer
25 Brown LLP to persuade the Ninth Circuit of the importance of the substantive rights of the State of
26 California under the California Private Attorney General Act of 2004 ("PAGA"). Blumenthal
27 Nordrehaug Bhowmik De Blouw LLP took the lead on this case where the ruling was the
28 reaffirmation of the PAGA statute and the Iskanian rule. Blumenthal Nordrehaug Bhowmik De

1 Blouw LLP also has engaged in noted appellate work on the subject of class actions in the
2 California Court of Appeals resulting in the opinions handed down in *Securitas Sec. Services USA,*
3 *Inc. v. Superior Court*, 234 Cal. App. 4th 1109, 184 Cal. Rptr. 3d 568 (2015) (class or
4 representative action waiver in an employment-related arbitration agreement was unenforceable);
5 *Altman v. Solarcity Corp.*, No. D067582, 2016 Cal. App. Unpub. LEXIS 3536 (Ct. App. May 13,
6 2016) (same). In 2015, Blumenthal Nordrehaug Bhowmik De Blouw LLP received an award from
7 the Daily Journal for Top Appellate Reversal, and I received an award from the Daily Journal as
8 Top Labor & Employment Attorney 2016.

9 (b) Blumenthal Nordrehaug Bhowmik De Blouw LLP has litigated hundreds of
10 PAGA claims. In particular, in the last several years Blumenthal Nordrehaug Bhowmik De Blouw
11 LLP negotiated court-approved PAGA settlements with: (i) Mattress Firm in the amount of
12 \$3,750,000 (*Miller v. Mattress Firm*, Santa Clara County Superior Court Case No. 17CV313148);
13 (ii) CH Robinson in the amount of \$630,000 (*Poublon v. C.H. Robinson*, U.S.D.C. Central District
14 of California Case No. 12-06654); (iii) Accentcare in the amount of \$500,000 (*Lanuza v.*
15 *Accentcare*, San Francisco Superior Court Case No. CGC-18-565521); (iv) Prime Healthcare in the
16 amount of \$700,000 (*Ortega v. Prime Healthcare Paradise Valley, LLC*, Superior Court of
17 California for the County of San Diego, Case No. 37-2014-00011240); (v) Planet Beauty in the
18 amount of \$200,000 (*Sanchez v. Beena Beauty Holding, Inc.*, Superior Court of California for the
19 County of Los Angeles, Case No. BC566065); (vi) Holman Automotive Group in the amount of
20 \$580,000 (*Gabriel v. KUNI SDI, LLC*, et al., Superior Court of California for the County of San
21 Diego, Case No. 37-2017-00025191); (vii) Aircraft Service International in the amount of
22 \$1,100,000 (*Martin v. Aircraft Service International, Inc.*, et al., Superior Court of California,
23 County of San Francisco Case No. CGC-18-566072); (viii) Easy Driving School in the amount of
24 \$896,000 (*Thomas v. Easy Driving School*, Superior Court for the County of San Diego, Case No.
25 37-2018-00047639); (ix) Café Rio in the amount of \$835,000 (*Quincho v. Café Rio*, Superior Court
26 for the County of San Bernardino, Case No. CIVDS2011822); (x) Altamed in the amount of
27 \$1,570,000 (*Meek v. Altamed Health Services*, Superior Court for the County of Los Angeles, Case
28 No. 20STCV47464); (xi) Lululemon in the amount of \$1,200,000 (*O'Donnell v. Lululemon USA*,

1 *Inc.*, Superior Court for the County of Ventura, Case No. 56-2020-00542441); (xii) Yourmechanic
2 in the amount of \$1,285,000 (*Provost v. Yourmechanic, Inc.*, Superior Court for the County of San
3 Diego, Case No. 37-2017-00024056); (xiii) Oakhurst in the amount of \$380,000 (*Neff v. Oakhurst*
4 *Industries*, Superior Court for the County of Los Angeles, Case No. 21STCV21110); (ix) Gurnick
5 Academy of Medical Arts in the amount of \$545,000 (*Serna v. Gurnick Academy of Medical Arts*,
6 Superior Court for the County of San Mateo, Case No. 22-CIV-01185); and, (xi) *Gonzalez v.*
7 *Lancaster Hospital Corporation* (Los Angeles Superior Court Case No. 22AVCV00254). Based
8 upon our significant experience litigating claims for PAGA penalties, the opinion of experience
9 counsel is that this is an excellent settlement and the PAGA Payment here is greater on a per pay
10 period basis than similar settlements that my firm has previously negotiated, and which courts have
11 approved.

12 (c) Then Chief Judge Irma Gonzales in a consolidated class action representing
13 hundreds of armed forces officers held that Blumenthal Nordrehaug Bhowmik De Blouw LLP was
14 "qualified counsel with extensive experience in class action litigation." *McPhail v. First Command*
15 *Fin. Planning, Inc.*, 247 F.R.D. 598, 611 (S.D. Cal. 2007). Examples of other contested actions
16 where class certification was granted Blumenthal Nordrehaug Bhowmik De Blouw LLP was
17 appointed lead class counsel in wage and hour class actions in Federal Court include *Schulz v.*
18 *Qualxserv, LLC*, 2012 U.S. Dist. LEXIS 58561 (S.D. Cal. 2012); *Dobrosky v. Arthur J. Gallagher*
19 *Serv. Co., LLC*, No. EDCV 13-0646 JGB (SPx), 2014 U.S. Dist. LEXIS 106345 (C.D. Cal. July 30,
20 2014); *Culley v. Lincare Inc.*, No. 2:15-cv-00081-MCE-CMK, 2016 U.S. Dist. LEXIS 105704
21 (E.D. Cal. Aug. 10, 2016); *Nelson v. Avon Prods.*, No. 13-cv-02276-BLF, 2015 U.S. Dist. LEXIS
22 51104 (N.D. Cal. Apr. 17, 2015); *Orozco v. Illinois Tool Works*, U.S.D.C. Case No. 14-cv-02113-
23 MCE, 2016 U.S. Dist. LEXIS 158115 (E.D. Cal. February 17, 2017); *Metrow v. Liberty Mutual*,
24 U.S.D.C. Case No. EDCV 16-1133 JGB (C.D. Cal. May 1, 2017). Some examples of heavily
25 contested State Court wage and hour class actions where class certification was obtained and BNBD
26 was appointed lead class counsel include *Vakili v. Dignity Health, et al.*, San Francisco Superior
27 Court, Case No. CGC-18-569456 (December 16, 2021); *Armstrong v. Ruan Transport*, San
28 Bernardino Superior Court, Case No. CIVDS1605897 (August 11, 2020); *Spears v. Health Net of*

1 *California*, Sacramento County Superior Court, Case No. 34-2017-00210560 (Oct. 8, 2019); *El*
2 *Pollo Loco Wage and Hour Cases*, Orange County Superior Court, JCCP Case No. 4957 (July 30,
3 3018); *Torrento v. Lucile Packard Children's Hospital*, Santa Clara County Superior Court Case
4 No. 2016-1-CV-291035 (July 17, 2018); *Salem v. Alliance*, San Bernadino Superior Court, Case
5 No. CIVRS1401129 (March 8, 2016); *Rivers v. Veolia*, Sonoma County Superior Court Case No.
6 SCV 255350 (March 9, 2016); *Mathies v. Union Bank*, San Francisco Superior Court Case No.
7 CGC-10-498077 (Sept. 11, 2013); *Jefferson v. Bottling Co, LLC*, Orange County Superior Court
8 Case No. 30-2009-00180102-CU-OE-CXC (Sept. 7, 2010); *Rangel v. Balboa Ambulance Co.*, 37-
9 2008-00095700-CU-BT-CTL (Fe. 11, 2010); *Tan v. CSAA*, Orange County Superior Court, Case
10 No. 30-2008-00231219 (Nov. 23, 2009).

11 (d) Over the course of the litigation, a number of attorneys in my firm have
12 worked on this matter. Their credentials are reflected in the Blumenthal Nordrehaug Bhowmik De
13 Blouw LLP firm resume, a true and correct copy of which is attached hereto as Exhibit #1. Some of
14 the major cases our firm has undertaken are also set forth in Exhibit #1. The bulk of the attorneys
15 involved in this matter at Blumenthal Nordrehaug Bhowmik De Blouw LLP have had extensive
16 representative and class litigation experience, much of it in the area of employment class actions,
17 unfair business practices and other complex litigation. The attorneys at my firm have extensive
18 experience in cases involving labor code violations and overtime claims. Class Counsel has
19 litigated similar wage and hour cases against other employers on behalf of employees, including
20 cases against Sharp Healthcare, Walmart, Legoland, See's Candies, Securitas, Okta, El Pollo Loco,
21 Automobile Association, Marriott, Total Renal, Solarcity, Penske, Universal Protection Services,
22 Panda Express, Redfin, Instacart, Verizon, Apple, Wells Fargo, Kaiser, Culinart, Space Exploration,
23 Time Warner, and California State Automobile Association. It is this level of experience which
24 enabled the firm to undertake the instant matter and to successfully combat the resources of the
25 defendants and their capable and experienced counsel. On account of the concerted and dedicated
26 effort this case required in order to properly handle and prosecute, Class Counsel were precluded
27 from taking other cases, and in fact, had to turn away other potential fee generating cases.
28

1 The Settlement Is Fair, Reasonable and Adequate:

2 4. On August 29, 2023, Plaintiff Ruvalcaba filed with the LWDA and served on
3 Defendant a notice under Labor Code section 2699.3, stating that Plaintiff Ruvalcaba intended to
4 serve as a proxy of the LWDA to recover civil penalties on behalf of Aggrieved Employees for
5 alleged Labor Code violations (the “Ruvalcaba PAGA Notice”). A true and correct copy of the
6 Ruvalcaba PAGA Notice is attached hereto as Exhibit #2. The Ruvalcaba PAGA Notice alleged
7 violations of California Labor Code §§ 201, 202, 203, 204 et seq., 210, 218, 221, 226(a), 226.7,
8 227.3, 246, 510, 512, 558(a)(1)(2), 1194, 1197, 1197.1, 1198, 2802, California Code of
9 Regulations, Title 8, Section 11040, Subdivision 5(A)-(B), California Code of Regulations, Title 8,
10 Section 11070(14) (Failure to Provide Seating), and the applicable Industrial Welfare Commission
11 Wage Order(s), and attached a copy of the complaint by Plaintiff Ruvalcaba as an exhibit to the
12 Ruvalcaba PAGA Notice. The LWDA elected not to investigate the alleged violations.
13 Accordingly, by operation of law (Labor Code § 2699(a) and § 2699.3(a)), Plaintiff Ruvalcaba was
14 “deputized” to proceed with a civil lawsuit for civil penalties on behalf of herself, the LWDA, and
15 other allegedly “aggrieved employees.”

16 5. On December 22, 2023, Ruvalcaba filed a civil lawsuit asserting a single cause of
17 action under PAGA against Defendant in Santa Clara County Superior Court, Case Number
18 23CV428019. As part of this Settlement, the Parties stipulated to the filing of a First Amended
19 Complaint in the Arellano PAGA Action that adds the claims and parties pending in the Ruvalcaba
20 PAGA Action, and Plaintiffs will seek approval of this Settlement in the Arellano PAGA Action.
21 The First Amended Complaint was filed on January 9, 2026.

22 6. On August 6, 2024, the Parties attended private mediation with experienced wage
23 and hour mediator, David Rotman, Esq., but the Parties were unable to reach a resolution. The
24 Parties agreed to attend a second mediation with Mr. Rotman on October 16, 2024, which resulted
25 in a settlement. The Parties reached a settlement at the Gross Settlement Amount of Three Hundred
26 Seventy-Five Thousand Dollars and Zero Cents (\$375,000.00).

27 7. In this case, the Settlement reached in the total non-reversionary amount of \$375,000
28 as the Gross Settlement Amount is the product of substantial effort by the Parties and counsel

1 should be approved as fair, reasonable and adequate. The Settlement was the result of arms-length
2 negotiations during mediation and extensive follow up thereafter between experienced counsel. The
3 Settlement was only reached after factual and legal investigation and research, careful evaluation of
4 the respective parties' strengths and weaknesses, and diligent negotiation efforts. The settlement is
5 a negotiated compromise which took into account risks related to liability, damages, and all the
6 defenses asserted by Defendant. I believe in the fairness of the settlement that is based on factoring
7 in the uncertainty and risks to Plaintiffs involved in not prevailing on the PAGA claim or the
8 theories alleged and potential for appeals. Based on the foregoing data and our own independent
9 investigation and evaluation, I am of the opinion that the settlement with the Defendant for the
10 consideration and on the terms set forth in the Settlement is fair, reasonable, and adequate in light of
11 all known facts and circumstances, including the risk of significant delay, the defenses asserted by
12 Defendant, and numerous potential appellate issues.

13 8. PAGA Counsel seek approval of attorneys' fees from the PAGA settlement in the
14 amount of \$125,000 representing one-third of the \$375,000 Gross Settlement Amount. PAGA
15 Counsel Fees Payment shall be allocated among PAGA Counsel as follows: 50% to BNBD, and
16 50% to WLF. BNBD's 50% share will further be allocated as follows: 77.5% to Blumenthal
17 Nordrehaug Bhowmik De Blouw LLP, and 22.5% to Centurion Trial Attorneys, APC. The
18 payment of attorneys' fees to PAGA Counsel under the Agreement is supported by several factors.
19 First, the requested fees are justified by the result achieved. Plaintiffs' Counsel negotiated a
20 recovery of \$375,000, and this result justifies the requested fees equal to one third of this recovery.
21 This percentage is within the standard contingent recovery percentage of one-third, and this
22 percentage is what was expressly approved by the Supreme Court in *Laffitte v. Robert Half Int'l*
23 *Inc.*, 1 Cal.5th 480, 504, (2016). Second, the fee award is justified by the work performed and
24 contributions to the case. Third, the consideration of the enhancement factors justifies the
25 enhancement of the lodestar. Courts multiply the lodestar by a factor to account for the risk of non-
26 payment, delay in payment, the quality of work, and the novelty and difficulty of the issues
27 involved.
28

1 9. **Lodestar.** As detailed in the accompanying billing statement, true and correct
2 copies of which is attached hereto as Exhibit #3, the current lodestar for my firm in this court matter
3 as of January 21, 2026 is \$ 55,717.50 for more than 83 hours of work prosecuting the claims being
4 resolved by this Settlement.

5 10. **Hourly Rates.** The hourly rates for staff at Blumenthal Nordrehaug Bhowmik De
6 Blouw LLP are as follows: Partner Attorneys from \$850 to \$995, Associate Attorneys from \$450 to
7 \$750, Paralegals from \$250 to \$275. My firm's hourly rates are based upon the Laffey Matrix with
8 the appropriate 2% increase adjustment for Southern California. A true and correct copy of the
9 current Laffey Matrix is attached hereto as Exhibit #4. These hourly rates have been approved by
10 Court's throughout California, including the Courts in the Superior Court of California. In fact, on
11 August 1, 2018, District Judge Andre Birotte Jr. explicitly found that Class Counsel's "rates
12 generally appear reasonable and 'in line with those prevailing in the [relevant] community'—the
13 Central District of California". Finally, the reasonableness of Class Counsel's hourly rates is
14 further confirmed by comparing such rates with the rates of comparable counsel practicing complex
15 and class litigation as detailed in the National Law Journal Billing Survey. See e.g. *Zest IP*
16 *Holdings, LLC v. Implant Direct MFG., LLC*, 2014 U.S. Dist. LEXIS 167563 (S.D. Cal. 2014)
17 (finding that "Mayer Brown's \$775 average billing rate for partners" and "Mayer Brown's \$543
18 average associate billing rate" are reasonable rates when compared within 21 other firms practicing
19 in the Southern District of California.) This survey is useful to show that Class Counsel's rates are
20 in line with the comparable rates of the defense counsel that opposes these types of class claims,
21 such as Mayer Brown noted above who is defense counsel in cases currently being prosecuted by
22 Class Counsel. In another example from several years ago, Sheppard Mullin Richter & Hampton,
23 who is opposing counsel in many cases prosecuted by Class Counsel (one of the most frequent
24 opposing counsel), charged rates as high as \$875 for partners and \$535 for associates. Similarly,
25 Paul Hastings, another opposing counsel in these types of cases, in years past historically charged
26 between \$900 and \$750 for partners and \$755 and \$335 for associates. Thus, the rates charged by
27 my firm for comparable work are less than these examples and are therefore undoubtedly
28 reasonable.

1 11. **Expenses.** The litigation expenses incurred by my firm in the amount of \$26,275.23
2 were all reasonably necessary to the litigation of the claims resolved by this settlement and are
3 detailed in Exhibit #3 attached hereto.
4

5 I declare under the penalty of perjury under the laws of the State of California that the
6 foregoing is true and correct. Executed this 21st day of January, 2026, at San Diego, California.
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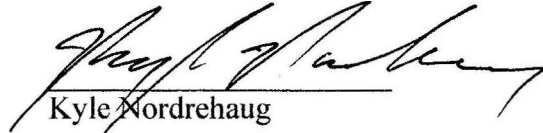
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9 Kyle Nordrehaug
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EXHIBIT #1

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FIRM RESUME

Areas of Practice: Employee, Consumer and Securities Class Actions, Wage and Hour Class Actions, Civil Litigation, Business Litigation.

ATTORNEY BIOGRAPHIES

Norman B. Blumenthal

Partner, Blumenthal Nordrehaug Bhowmik De Blouw LLP (2018 to present)

Practice Areas: Consumer and Securities Class Action, Civil Litigation, Wage and Hour Class Actions, Transactional Law

Admitted: 1973, Illinois; 1976, California

Biography: Law Clerk to Justice Thomas J. Moran, Illinois Supreme Court, 1973-1975, while on Illinois Court of Appeals. Instructor, Oil and Gas Law: California Western School of Law, 1981; University of San Diego School of Law, 1983. Sole Practitioner 1976-1987. Partner, Blumenthal & Ostroff, 1988-1995. Partner, Blumenthal, Ostroff & Markham, 1995-2001. Partner, Blumenthal & Markham, 2001-2007. Partner, Blumenthal & Nordrehaug, 2007. Partner, Blumenthal, Nordrehaug & Bhowmik, 2008-2018. Partner, Blumenthal Nordrehaug Bhowmik De Blouw LLP, 2018 - present.

Member: San Diego County, Illinois State and American Bar Associations; State Bar of California.

Educated: University of Wisconsin (B.A., 1970); Loyola University of Chicago (J.D., 1973);

Summer Intern (1971) with Harvard Voluntary Defenders

Kyle R. Nordrehaug

Partner, Blumenthal Nordrehaug Bhowmik De Blouw LLP (2018 to present)

Practice Areas: Consumer and Securities Class Actions, Wage and Hour Class Actions, Civil Litigation

Admitted: 1999, California

Biography: Associate, Blumenthal, Ostroff & Markham, 1999-2001. Associate, Blumenthal & Markham, 2001-2007. Partner, Blumenthal & Nordrehaug, 2007. Partner, Blumenthal, Nordrehaug & Bhowmik, 2008-2017

Member: State Bar of California, Ninth Circuit Court of Appeals, Third Circuit Court of Appeals

Educated: University of California at Berkeley (B.A., 1994); University of San Diego School of Law (J.D. 1999)

Awards: Top Labor & Employment Attorney 2016; Top Appellate Reversal - Daily Journal 2015; Super Lawyer 2015-2018

Aparajit Bhowmik

Partner, Blumenthal Nordrehaug Bhowmik De Blouw LLP (2018 to present)

Practice Areas: Civil Litigation; Consumer Class Actions, Wage and Hour Class Actions

Admitted: 2006, California

Educated: University of California at San Diego (B.A., 2002); University of San Diego School of Law (J.D. 2006)

Biography: Partner, Blumenthal, Nordrehaug & Bhowmik, 2008-2017

Awards: Rising Star 2015

Nicholas J. De Blouw

Partner, Blumenthal Nordrehaug Bhowmik De Blouw LLP (2018 to present)

Practice Areas: Civil Litigation; Consumer Class Actions, Wage and Hour Class Actions

Admitted: 2011, California

Educated: Wayne State University (B.A. 2008); California Western School of Law (J.D. 2011)

Piya Mukherjee

Associate Attorney

Practice Areas: Civil Litigation; Consumer Class Actions, Wage and Hour Class Actions

Admitted: 2010, California

Educated: University of California, San Diego (B.S. 2006); University of Southern California, Gould School of Law (J.D. 2010)

Victoria Rivapalacio

Associate Attorney

Practice Areas: Civil Litigation; Consumer Class Actions, Wage and Hour Class Actions

Admitted: 2011, California

Educated: University of California at San Diego (B.A., 2003); George Washington University Law School (J.D. 2010)

Ricardo Ehmman

Associate Attorney

Practice Areas: Civil Litigation; Wage and Hour Class Actions

Admitted: 2018, California; 2004, Nevada

Educated: University of California, San Diego (B.A. 1998); Loyola Law School (J.D. 2001)

Jeffrey S. Herman

Associate Attorney

Practice Areas: Civil Litigation; Wage and Hour Class Actions

Admitted: 2011, California; 2016 Arizona

Educated: University of Michigan (B.A. 2008); California Western School of Law (J.D. 2011)

Charlotte James

Associate Attorney

Practice Areas: Civil Litigation; Wage and Hour Class Actions

Admitted: 2016, California

Educated: San Diego State University; California Western School of Law

Christine Levu

Associate Attorney

Practice Areas: Civil Litigation; Wage and Hour Class Actions

Admitted: 2012, California

Educated: University of California, Irvine; California Western School of Law

Andrew Ronan

Associate Attorney

Practice Areas: Civil Litigation; Wage and Hour Class Actions

Admitted: 2016, California

Educated: Arizona State University; University of San Diego School of Law

Scott Blumenthal

Associate Attorney

Practice Areas: Civil Litigation; Wage and Hour Class Actions

Admitted: 2020, New Mexico

Educated: University of Southern California; California Western School of Law

Sergio Julian Puche

Associate Attorney

Practice Areas: Civil Litigation; Wage and Hour Class Actions

Admitted: 2013, California

Educated: University of California, Irvine; California Western School of Law

Trevor Moran

Associate Attorney

Practice Areas: Civil Litigation; Wage and Hour Class Actions

Admitted: 2020, California

Educated: University of Rhode Island; California Western School of Law

Adolfo Sanchez Contreras

Associate Attorney

Practice Areas: Civil Litigation; Wage and Hour Class Actions

Admitted: 2024, California; 2014, Mexico

Educated: The Juarez University

Brooke Wilkinson Waldrop

Associate Attorney

Practice Areas: Civil Litigation; Wage and Hour Class Actions

Admitted: 2017, California;

Educated: Westminster University (B.A. 2004); University of Utah (J.D. 2008)

REPORTED CASES

Sakkab v. Luxottica Retail N. Am., Inc., 803 F.3d 425 (9th Cir. 2015) (The panel reversed the district court's order granting Luxottica Retail North America, Inc.'s motion to compel arbitration of claims and dismissing plaintiff's first amended complaint, in a putative class action raising class employment-related claims and a non-class representative claim for civil penalties under the Private Attorney General Act.);

Securitas Security Services USA, Inc. v. Superior Court, 234 Cal. App. 4th 1109 (Cal. Feb. 27, 2015) (Court of Appeal concluded the trial court correctly ruled that *Iskanian* rendered the PAGA waiver within the parties' dispute resolution agreement unenforceable. However, the Court of Appeal then ruled the trial court erred by failing to invalidate the non-severable class action waiver from the agreement and remanded the entire complaint, including class action and PAGA claims, be litigated in the Superior Court);

Sussex v. United States Dist. Court for the Dist. of Nev., 781 F.3d 1065 (9th Cir. 2015) (The panel determined that the district court clearly erred in holding that its decision to intervene mid-arbitration was justified under *Aerojet-General*. Specifically, the panel held that the district court erred in predicting that an award issued by the arbitrator would likely be vacated because of his "evident partiality" under 9 U.S.C. § 10(a)(2).);

Provost v. YourMechanic, Inc., 2020 Cal. App. Lexis 955 (Oct. 15, 2020) (Court of Appeals affirmed denial of arbitration of PAGA claim, and held in a case of first impression, that there was

no additional standing rules for PAGA claim brought by independent contractor); In re Tobacco Cases II, 41 Cal. 4th 1257 (2007); Washington Mutual Bank v. Superior Court, 24 Cal. 4th 906 (2001); Rocker v. KPMG LLP, 148 P.3d 703; 122 Nev. 1185 (2006); PCO, Inc. v. Christensen, Miller, Fink, Jacobs, Glaser, Weil & Shapiro, LLP, 150 Cal. App. 4th 384 (2007); Hall v. County of Los Angeles, 148 Cal. App. 4th 318 (2007); Coshov v. City of Escondido, 132 Cal. App. 4th 687 (2005); Daniels v. Philip Morris, 18 F.Supp 2d 1110 (S.D. Cal.1998); Gibson v. World Savings & Loan Asso., 103 Cal. App. 4th 1291 (2003); Jordan v. Department of Motor Vehicles, 75 Cal. App. 4th 445 (1999); Jordan v. Department of Motor Vehicles, 100 Cal.App. 4th 431 (2002); Norwest Mortgage, Inc. v. Superior Court, 72 Cal.App.4th 214 (1999); Hildago v. Diversified Transp. Sya, 1998 U.S. App. LEXIS 3207 (9th Cir. 1998); Kensington Capital Mgal. v. Oakley, Inc., 1999 U.S. Dist LEXIS 385; Fed.Sec.L.Rep. (CCH) P90, 411 (1999 C.D. Cal.); Lister v. Oakley, Inc., 1999 U.S. Dist. LEXIS 384; Fed. Sec. L. Rep. (CCH) P90,409 (C.D Cal. 1999); Olszewski v. Scripps Health, 30 Cal. 4th 798 (2003); Steroid Hormone Product Cases, 181 Cal. App. 4th 145 (2010); Owen v. Macy's, Inc., 175 Cal. App. 4th 462 (2009); Taiheiyo Cement Corp. v. Superior Court, 117 Cal. App. 4th 380 (2004); Taiheiyo Cement Corp. v. Superior Court, 105 Cal.App. 4th 398 (2003); McMeans v. Scripps Health, Inc., 100 Cal. App. 4th 507 (2002); Ramos v. Countrywide Home Loans, 82 Cal.App. 4th 615 (2000); Tevssier v. City of San Diego, 81 Cal.App. 4th 685 (2000); Washington Mutual Bank v. Superior Court, 70 Cal. App. 4th 299 (1999); Silvas v. E*Trade Mortg. Corp., 514 F.3d 1001 (9th Cir. 2008); Silvas v. E*Trade Mortg. Corp., 421 F. Supp. 2d 1315 (S.D. Cal. 2006); McPhail v. First Command Fin. Planning, Inc., 2009 U.S. Dist. LEXIS 26544 (S.D. Cal. 2009); McPhail v. First Command Fin. Planning, Inc., 251 F.R.D. 514 (S.D. Cal. 2008); McPhail v. First Command Fin. Planning, Inc., 247 F.R.D. 598 (S.D. Cal. 2007); Barcia v. Contain-A-Way, Inc., 2009 U.S. Dist. LEXIS 17118 (S.D. Cal. 2009); Barcia v. Contain-A-Way, Inc., 2008 U.S. Dist. LEXIS 27365 (S.D. Cal. 2008); Wise v. Cubic Def. Applications, Inc., 2009 U.S. Dist. LEXIS 11225 (S.D. Cal. 2009); Gabisan v. Pelican Prods., 2009 U.S. Dist. LEXIS 1391 (S.D. Cal. 2009); La Jolla Friends of the Seals v. Nat'l Oceanic & Atmospheric Admin. Nat'l Marine Fisheries Serv., 630 F. Supp. 2d 1222 (S.D. Cal. 2009); La Jolla Friends of the Seals v. Nat'l Oceanic & Atmospheric Admin. Nat'l Marine Fisheries Serv., 2008 U.S. Dist. LEXIS 102380 (S.D. Cal. 2008); Louie v. Kaiser Found. Health Plan, Inc., 2008 U.S. Dist. LEXIS 78314 (S.D. Cal. 2008); Weltman v. Ortho Mattress, Inc., 2010 U.S. Dist. LEXIS 20521 (S.D. Cal. 2010); Weltman v. Ortho Mattress, Inc., 2008 U.S. Dist. LEXIS 60344 (S.D. Cal. 2008); Curry v. CTB McGraw-Hill, LLC, 2006 U.S. Dist. LEXIS 5920; 97 A.F.T.R.2d (RIA) 1888; 37 Employee Benefits Cas. (BNA) 2390 (N.D. Cal. 2006); Reynov v. ADP Claims Servs. Group, 2006 U.S. Dist. LEXIS 94332 (N.D. Cal. 2006); Kennedy v. Natural Balance Pet Foods, Inc., 2010 U.S. App. LEXIS 248 (9th Cir. 2010); Kennedy v. Natural Balance Pet Foods, Inc., 2008 U.S. Dist. LEXIS 38889 (S.D. Cal. 2008); Kennedy v. Natural Balance Pet Foods, Inc., 2007 U.S. Dist. LEXIS 57766 (S.D. Cal. 2007); Sussex v. Turnberry/MGM Grand Towers, LLC, 2009 U.S. Dist. LEXIS 29503 (D. Nev. 2009); Picus v. Wal-Mart Stores, Inc., 256 F.R.D. 651 (D. Nev. 2009); Tull v. Stewart Title of Cal., Inc., 2009 U.S. Dist. LEXIS 14171 (S.D. Cal. 2009); Keshishzadeh v. Gallagher, 2010 U.S. Dist. LEXIS 46805 (S.D. Cal. 2010); Keshishzadeh v. Arthur J. Gallagher Serv. Co., 2010 U.S. Dist. Lexis 116380 (S.D. Cal. 2010); In re Pet Food Prods. Liab. Litig., MDL Docket No. 1850 (All Cases), 2008 U.S. Dist. LEXIS 94603 (D.N.J. 2008); In re Pet Food Prods. Liab. Litig., 629 F.3d 333 (3rd Cir. 2010); Puentes v. Wells Fargo Home Mortgage, Inc., 160 Cal. App. 4th 638 (2008); Rezec v. Sony Pictures Entertainment, Inc., 116 Cal. App. 4th 135 (2004); Badillo v. Am. Tobacco Co., 202 F.R.D. 261 (D. Nev. 2001); La Jolla Friends of the Seals v. Nat'l Oceanic & Atmospheric Admin., 2010 U.S. App. Lexis 23025 (9th Cir. 2010); Dirienzo v. Dunbar Armored, Inc., 2011 U.S. Dist. Lexis 36650 (S.D. Cal. 2011); Rix v. Lockheed Martin Corp., 2011 U.S. Dist Lexis 25422 (S.D. Cal. 2011); Weitzke v. Costar Realty Info., Inc., 2011 U.S. Dist Lexis 20605 (S.D. Cal. 2011); Goodman v. Platinum Condo. Dev., LLC, 2011 U.S. Dist. LEXIS 36044 (D. Nev. 2011); Sussex v. Turnberry/MGM Grand Towers, LLC, 2011 U.S. Dist. LEXIS 14502 (D. Nev 2011); Smith v. Kaiser Foundation Hospitals, Inc., 2010 U.S. Dist. Lexis 117869 (S.D. Cal. 2010); Dobrosky v. Arthur J. Gallagher Serv. Co.,

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18CV321677; Shahbazian v. Fast Auto Loans, Inc. – U.S. District Court, Central District of California, Case No. 2:18-cv-03076-ODW-KS; Salazar v. Johnson & Johnson Consumer Inc. – Los Angeles County Superior Court, Case No. BC702468; Conti v. L’Oreal USA S/D, Inc. – U.S. District Court, Eastern District of California, Fresno, Case No. 1:19-CV-00769-LJO-SKO; Mercado v. Security Industry Specialists, Inc. – Santa Clara County Superior Court, Case No. 17CV320059; Vikili v. Dignity Health – San Francisco County Superior Court, Case No. CGC-18-569456; Bagby v. Swissport SA, LLC – Los Angeles County Superior Court, Case No. BC691058; Henry v. Motion Entertainment Group, LLC – San Francisco County Superior Court, Case No. CGC18565643; Dandoy v. West Coast Convenience, LLC – Alameda County Superior Court, Case No. HG20051121; Lanuza v. AccentCare, Inc. – San Francisco County Superior Court, Case No. CGC-18-565521; Thomas v. Easy Driving School, LLC – San Diego County Superior Court, Case No. 37-2018-00047639-CU-OE-CTL; Erickson v. Erickson – Contra Costa County Superior Court, Case No. MSC18-00307; Martin v. Menzies Aviation (USA) Inc. – San Francisco County Superior Court, Case No. CGC-18-566072; Mortimer v. Healthsouth Bakersfield Rehabilitation Hospital, LLC – Kern County Superior Court, Case No. BCV-18-102761; Alcaraz v. Red Lion Hotels Corporation – San Francisco County Superior Court, Case No. CGC-18-570310; Calhoun v. Total Transportation and Distribution, Inc. – San Diego County Superior Court, Case No. 37-2018-00058681-CU-OE-CTL; Rataul v. Overton Security Services, Inc. – Alameda County Superior Court, Case No. RG18891882; Beltran v. Compass Bank – San Diego County Superior Court, Case No. 37-2019-00024475-CU-OE-CTL; Kirshner v. Touchstone Golf, LLC – San Diego County Superior Court, Case No. 37-2018-00028865-CU-OE-CTL; Pizarro v. The Home Depot, Inc. – U.S. District Court for the Northern District of Georgia-Atlanta Division; Hatanaka v. Restore Rehabilitation, LLC – San Diego County Superior Court, Case No. 37-2018-00034780-CU-OE-CTL; Faria v. Carriage Funeral Holdings, Inc. – Contra Costa County Superior Court, Case No. MSC18-00606; Ontiveros v. Baker Concrete Construction, Inc. – Santa Clara County Superior Court, Case No. 18CV328679; Morales v. Redlands Automotive Services, Inc. – San Bernardino County Superior Court, Case No. CIVDS1807525; Ramirez v. Carefusion Resources, LLC – U.S. District Court, Southern District of California; Amster v. Starbucks Corporation – San Bernardino Superior Court, Case No. CIVDS1922016; Kutzman v. Derrel’s Mini Storage, Inc. – U.S. District, Eastern District of California, Case No. 1:18-cv-00755-AWI-JLT; Marks v. Universal Propulsion Company, Inc. – Solano County Superior Court, Case No. FCS051608; Martinez v. Geil Enterprises, Inc. – Fresno County Superior Court, Case No. 17CECG01480; Teniente v. Cirrus Asset Management, Inc. – Los Angeles County Superior Court, Case No. 20STCV16302; Blackshear v. California Fine Wine & Spirits LLC – Sacramento County Superior Court, Case No. 34-2018-00245842; Warnick v. Golden Gate America West LLC – Los Angeles County Superior Court, Case No. BC714176; Bennett v. Dnata Aviation USA, Inc. – San Francisco County Superior Court, Case No. CGC-18-566911; George v. PF Stockton Fitness LLC – Sacramento County Superior Court, Case No. 34-2019-00261113-CU-OE-GDS; Oshana v. Farmers and Merchants Bank of Central California – Stanislaus County Superior Court, Case No. CV-19-003427; Vasquez v. Packaging Corporation of America, – U.S. District Court, California Central District, Case No. 2:19-cv-01935-PSG-PLA; Palomino v. Zara USA Inc. – Orange County Superior Court, Case No. 30-2018-00992682-CU-OE-CXC; Simmons v. Joe & The Juice LA, LLC – San Francisco County Superior Court; Pacia v. CIM Group, L.P. – Los Angeles County Superior Court, Case No. BC709666; Flores v. Plastic Express – Los Angeles County Superior Court, Case No. BC71971; Madera v. William Warren Properties, Inc. – Orange County Superior Court, Case No. 30-2019-01055704-CU-OE-CXC; Hernandez v. Quality Custom Distribution – Orange County Superior Court, Case No. 30-2018-01010611-CU-OE-CXC; Arango v. Schlumberger Technology Corporation – Orange County Superior Court, Case No. 30-2019-01056839-CU-OE-CXC; Dandoy v. West Coast Convenience, LLC – Alameda County Superior Court, Case No. HG20051121; Ramirez v. J E H Enterprises, Inc. – San Francisco County Superior Court, Case No. CGC-19-574691; Sullen v. First Service Residential California, LLC – San Francisco County Superior Court, Case No. CGC-19-575131; Valentino v. East Bay Tire Co. –

Solano County Superior Court, Case No. FCS053067; Murphy v. Rockler Retail Group, Inc. – Sacramento Superior Court, Case No. 34-2019-00251220; Shahbazian v. Onewest Bank – Los Angeles County Superior Court, Case No. 19STCV23722; Bruemmer v. Tempur Retail Stores LLC – Marin County Superior Court, Case No. CIV1803646; Antonios v. Interface Rehab, Inc. – Orange County Superior, Case No. 30-2019-01067547-CU-OE-CXC; Tavallodi v. DC Auto, Inc. – San Bernardino, Case No. CIVDS1833598; Miranda v. The Lloyd Pest Control Co. – San Diego County Superior Court, Case No. 37-2018-00052510-CU-OE-CTL; Soenardi v. Magnussen Imports, Inc. – Santa Clara County Superior Court, Case No. 18CV340003; Thai v. Team Industrial Services, Inc. – Los Angeles County Superior Court, Case No. 19STCV21953; Castillo v. A.J. Kirkwood & Associates, Inc. – Los Angeles County Superior Court, Case No. 19STCV04435; Moss v. Jabil Inc. – Alameda County Superior Court, Case No. HG20050536; Billosillo, Jr. v. Crown Energy Services, Inc. – San Diego County Superior Court, Case No. 37-2018-00058254-CU-OE-CTL; Tarkington v. Freetime, Inc. – San Diego County Superior Court, Case No. 37-2019-00011473-CU-OE-CTL; McIntyre v. J.J.R. Enterprises, Inc. – Sacramento County Superior Court, Case No. 34-2019-00251220; Bucur v. Pharmaca Integrative Pharmacy, Inc. – San Diego County Superior Court, Case No. 37-2019-00009409-CU-OE-CTL; Batin v. McGee Air Services, Inc. – Santa Clara County Superior Court, Case No. 19CV347733; Terry v. McGee Air Services, Inc. – King County Superior Court of Washington, Case No. 19-2-3321-5 KNT; Weiss v. Niznik Behavioral Health Resources, Inc. – San Diego County Superior Court, Case No. 37-2019-00039441-CU-OE-CTL; Cavada v. Inter-Continental Hotels Group, Inc. – U.S. District Court, Southern District of California, Case No. 3:19-cv-01675-GPC-AHG; Lesevic v. Spectraforce Technologies, Inc. – U.S. District Court, Northern District of California, Case No. 5:19-cv-03126-LHK; Mutchler v. Circle K Stores, Inc. – San Diego County Superior Court, Case No. 37-2020-00016331-CU-OE-CTL, Azima v. CSI Medical Group, – Santa Clara County Superior Court, Case No. 19CV345450; Porras v. Baypointe Enterprises, LLC – Los Angeles County Superior Court, Case No. 19STCV31015; Mitchell v. Mack Trucking, Inc. – San Bernardino County Superior Court, Case No. CIVDS1928334; Watts v. T.R.L. Systems, Incorporated – Orange County Superior Court, Case No. 30-2019-01102457-CU-OE-CXC; Price v. DMSD Restaurants Inc. – San Diego County Superior Court, Case No. 37-2019-00024062-CU-OE-CTL; Jacobs v. Nortek Security & Control LLC – San Diego County Superior Court, Case No. 37-2019-0019735-CU-OE-CTL; Gonzalez v. Hub International Midwest – San Bernardino County Superior Court, Case No. CIVDS1900463; Cisneros v. Bluepearl California, Inc. – San Mateo Superior Court, Case No. 19-CIV-05707; Garcia v. Gallagher Basset Services – San Bernardino Superior Court, Case No. CIVDS2004140; Callow v. Adventist Health System/West – Placer County Superior Court, Case No. SCV0043607; Dominguez v. Kimco Facility Services, LLC – Los Angeles County Superior Court, Case No. 19STCV37592; Searles v. Robert Heath Trucking, Inc. – Los Angeles County Superior Court, Case No. 19STCV30808; Rangel v. Pioneer Hi-Bred international, Inc. – Yolo County Superior Court, Case No. CV-19-1797; Ivon v. Sinclair Television of California, Humboldt County Superior Court, Case No. DR190699; Williams v. Henkels & McCoy, Inc. – San Bernardino County Superior Court, Case No. CIVDS2003888; Cano v. Larry Green Chrysler Jeep Dodge, Inc. – Riverside County Superior Court, Case No. BLC1900184; Lopez v. Cepheid – Santa Clara County Superior Court, Case No. 19CV358827; Hernandez v. Quick Dispense, Inc. – Los Angeles County Superior Court, Case No. 19STCV29405; Lopez v. Lacoste USA, Inc. – San Bernardino County Superior Court, Case No. CIVDS1914626; Duhe v. Hospital Couriers Nevada, LLC – Contra Costa County Superior Court, Case No. MSC19-01377; Law v. Sequoia Equities, Incorporated – Contra Costa Superior Court, Case No. C19-01925; Dvorak v. Rockwell Collins, Inc. – San Diego County Superior Court, Case No. 37-2019-00064397-CU-OE-CTL; Noguera v. Metal Container Corporation – Riverside County Superior Court, Case No. RIC2003235; Leon v. Miller Event Management, Inc. – San Luis Obispo Superior Court, Case No. 19CV-0435; Leon v. Miller Event Management, Inc. – San Luis Obispo County Superior Court, Case No. 19CV-0435, Camacho-Bias v. Serve U Brands Inc. – Butte County Superior Court, Case No. 20CV00603; La Pietra v. Entertainment Partners Services, LLC – Los Angeles County Superior

Court, Case No. 19STCV39529; Celis v. Theatre Box - San Diego, LLC – San Diego County Superior Court, Case No. _____; Ignacio v. Laboratory Corporation of America – U.S. District Court, California Central District, Case No. 2:19-cv-06079-AB-RAO; Kovnas v. Cahill Contractors LLC – Alameda County Superior Court, Case No. RG19037852; Hersh v. Mrs. Gooch's Natural Food – Los Angeles County Superior Court, Case No. 19STCV10444; Miller v. The Permanente Medical Group – Alameda County Superior Court, Case No. RG19045904; Vasquez v. Autoalert, LLC – Orange County Superior Court, Case No. 30-2019-01114549-CU-OE-CXC; Cavanaugh v. Morton Golf, LLC – Sacramento County Superior Court, Case No. 34-2019-00270176; Coley v. Monroe Operations, LLC – Alameda County Superior Court, Case No. RG20063188; Ramirez v. Sierra Aluminum Company – U.S. District Court, California Central District Court, Case No. 5:20-cv-00417-JGB-KK; Marrero v. Stat Med, P.C. – Alameda County Superior Court, Case No. HG19043214; Enriquez v. Solari Enterprises, Inc. – Los Angeles County Superior Court, Case No. 20STCV11129; Craig v. Hometown Heart – San Francisco County Superior Court, Case No. CGC-20-582454; Lopez v. Hy0Lang Electric California, Inc. – San Diego County Superior Court, Case No. 37-2020-00012543-CU-OE-CTL; Heuklom v. Clara Medical Group, P.C. – San Francisco County Superior Court, Case No. CGC-20-585918; Dominguez v. Lifesafer of Northern California – Monterey County Superior Court, Case No. 20CV002586; Kiseleva v. Totalmed Staffing Inc. – U.S. District Court, California Northern District, Case No. 5:19-cv-06480; Vires v. Sweetgreen, Inc. – Santa Clara County Superior Court, Case No. 20CV365918; Kim v. Wireless Vision, LLC – San Bernardino County Superior Court, Case No. CIVDS2000074; Senoren v. Air Canada Corporation – Los Angeles County Superior Court, Case No. 20STCV13942; Clark v. Quest Diagnostics Incorporated – San Bernardino County Superior Court, Case No. CIVDS2018707; Green v. Shipt, Inc. – Los Angeles County Superior Court, Case No. 20STCV01001; Respass v. The Scion Group LLC – Sacramento County Superior Court, Case No. 34-2020-00285265; Jackson v. Decathlon USA LLC – Alameda County Superior Court, Case No. RG2003024; Avacena v. FTG Aerospace Inc. – Los Angeles County Superior Court, Case No. 20STCV28767; Perez v. Butler America, LLC – Los Angeles County Superior Court, Case No. 20STCV20218; Christensen v. Carter's Retail, Inc. – Orange County Superior Court, Case No. 30-2020-01138792-CU-OE-CXC; Astudillo v. Torrance Health Association, Inc. – Los Angeles County Superior Court, Case No. 20STCV18424; Hansen v. Holiday AI Management Sub LLC – Contra Costa County Superior Court, Case No. CIVMSC20-00779; Almahdi v. Vitamin Shoppe Industries Inc – Santa Clara County Superior Court, Case No. 20CV365150; Krisinda v. Loyal Source Government Services LLC – U.S. District Court, California Southern District, Case No. 3:20-cv-879-LAB-NLS; Ettedgui v. WB Studio Enterprises Inc – U.S. District Court, California Central District, Case No. 2:20-CV-08053-MCS (MAAx); Fernandez v. Nuvision Federal Credit Union – Orange County Superior Court, Case No. 30-2020-01161691-CU-OE-CJC; Aviles v. UPS Supply Chain Solutions, Inc. – Riverside County Superior Court, Case No. RIC2000727; Alcocer v. DSV Solutions, LLC – San Bernardino Superior Court, Case No. CIVDS2010345; Wilson v. Wholesome Harvest Baking, LLC – U.S. District Court, California Northern District, Case No. 4:20-cv-05186-YGR; Gregory v. Verio Healthcare, Inc. – Los Angeles County Superior Court, Case No. 20STCV37254; Rose v. Impact Group, LLC – Orange County Superior Court, Case No. 30-2020-01141107-CU-OE-CXC; Monasterio v. Citibank, N.A. – San Mateo County Superior Court, Case No. 20-CIV-03650; Martinez-Lopez v. Medamerica, Inc. – San Diego County Superior Court, Case No. 37-2020-00034393-CU-OE-CTL; Cox v. PRB Management, LLC – Solano County Superior Court, Case No. FCS055514; Nash v. K. Hovnanian Companies, LLC – Riverside County Superior Court, Case No. RIC2003319; Kyler v. Harbor Freight Tools USA, Inc. – San Diego County Superior Court, Case No. 37-2020-00015828-CU-OE-CTL; Roberts v. Solantic Corporation – Los Angeles County Superior Court, Case No. 20STCV41117; Price v. Mistras Group, Inc. – Los Angeles County Superior Court, Case No. 20STCV22485; Macias v. ABM Electrical & Lighting Solutions, Inc. – San Diego County Superior Court, Case No. 37-2020-00024997-CU-OE-CTL; Basu-Kesselman v. Garuda Labs, Inc. – San Francisco County Superior Court, Case No. CGC-20-585229; Armstrong v. Prometric LLC – Los Angeles County Superior

Court, Case No. 20STCV29967; Ashlock v. Advantis Medical Staffing, LLC – San Diego County Superior Court, Case No. 37-2020-00022305-CU-OE-CTL; Wilson v. WXI Global Solutions, LLC – Los Angeles County Superior Court, Case No. 20STCV25007; Gandhale v. Select Rehabilitation, LLC – Monterey County Superior Court, Case No. 20CV002240; Starvoice v. G4S Secure Solutions (USA) Inc. – San Diego County Superior Court, Case No. 37-2020-00029421-CU-OE-CTL; Mbise v. Axlehire, Inc. – Alameda County Superior Court, Case No. RG20067350; Points v. C&J Services, Inc. – Kern County Superior Court, Case No. BCV-20-102483; Marshall v. PHI Air Medical, LLC – Lassen County Superior Court, Case No. 62973; Jauregui v. Cytotec Engineered Materials, Inc. – Orange County Superior Court, Case No. 30-2020-01164932-CU-OE-CXC

EXHIBIT #2

BLUMENTHAL NORDREHAUG BHOWMIK DE BLOUW LLP

**2255 CALLE CLARA
LA JOLLA, CALIFORNIA 92037**

Web Site: www.bamlawca.com

San Diego | San Francisco | Sacramento | Los Angeles | Riverside | Santa Clara | Orange | Chicago

Phone: (858) 551-1223

Fax: (858) 551-1232

WRITERS E-MAIL:
Nick@bamlawca.com

WRITERS EXT:
1004

August 29, 2023
CA3080

VIA ONLINE FILING TO LWDA AND CERTIFIED MAIL TO DEFENDANT

Labor and Workforce Development Agency
Online Filing

GK Management Co., Inc.
Certified Mail #9589071052700182374019
MICHAEL EVAN DRANDELL
5150 OVERLAND AVENUE
CULVER CITY, CA 90230

Re: Notice Of Violations Of California Labor Code Sections §§ 201, 202, 203, 204 *et seq.*, 210, 218, 221, 226(a), 226.7, 227.3, 246 *et seq.*, 510, 512, 558(a)(1)(2), 1194, 1197, 1197.1, 1198, 2802, California Code of Regulations, Title 8, Section 11040, Subdivision 5(A)-(B), California Code of Regulations, Title 8, Section 1 1070(14) (Failure to Provide Seating), Violation of Applicable Industrial Welfare Commission Wage Order(s), and Pursuant To California Labor Code Section 2699.5.

Dear Sir/Madam:

“Aggrieved Employees” refers to all individuals who are or previously were employed by GK Management Co., Inc. and/or Goldrich & Kest Industries, LLC and/or Goldrich Kest, LLC in California, including any employees staffed with GK Management Co., Inc. and/or Goldrich & Kest Industries, LLC and/or Goldrich Kest, LLC by a third party, and classified as non-exempt employees during the time period of August 29, 2022 until a date as determined by the Court. Our offices represent Plaintiff Elizabeth Ruvalcaba (“Plaintiff”) and other Aggrieved Employees in a lawsuit against GK Management Co., Inc. and/or Goldrich & Kest Industries, LLC and/or Goldrich Kest, LLC (“Defendant”). Plaintiff was employed by Defendant in California from July of 2017 to September fo 2023. Plaintiff was at all times classified by Defendant as a non-exempt employee, paid on an hourly basis, and entitled to the legally required meal and rest periods and payment of minimum and overtime wages due for all time worked. Defendant, however, unlawfully failed to record and pay Plaintiff and other Aggrieved Employees for, including but not limited to, all of their time worked, including minimum and overtime wages and sick pay wages at the correct rate, for all of their missed meal and rest breaks at the correct regular rates, and for all of their time spent working off the clock. Moreover, when Defendant required Plaintiff and Aggrieved Employees to report for work, but “furnished less than half said employee’s usual or scheduled day’s work,” Defendant violated Cal. Code Regs., tit. 8 § 11040, subd. 5(A) by failing to pay Plaintiff and Aggrieved Employees for at least two (2) hours’ worth of work at their regular rate of pay. In addition, when Defendant required Plaintiff and Aggrieved Employees to respond to and engage in additional work, this resulted in a second reporting for work in a single workday, and Defendant failed to pay these employees

reporting time pay as required by Cal. Code Regs., tit. 8, § 11040, subd. 5(B). Further, Defendant failed to advise Plaintiff and the other Aggrieved Employees of their right to take separately and hourly paid duty-free ten (10) minute rest periods. *See Vaquero v. Stoneledge Furniture, LLC*, 9 Cal. App. 5th 98, 110 (2017). Additionally, pursuant to Labor Code § 204 *et seq.*, Defendant failed to timely provide Plaintiff and other Aggrieved Employees with their wages. Plaintiff further contends that Defendant failed to provide accurate wage statements to her, and other Aggrieved Employees, in violation of California Labor Code section 226(a). Specifically, PLAINTIFF and the AGGRIEVED EMPLOYEES were paid on an hourly basis. As such, the wage statements should reflect all applicable hourly rates during the pay period and the total hours worked, and the applicable pay period in which the wages were earned pursuant to California Labor Code Section 226(a). The wage statements Defendant provided to PLAINTIFF and the AGGRIEVED EMPLOYEES failed to identify such information. More specifically, the wage statements failed to identify the accurate total hours worked each pay period in violation of Cal. Lab. Code Section 226(a)(2). Additionally, Plaintiff contends that Defendant failed to comply with Industrial Wage Order 7(A)(3) in that Defendant failed to keep time records showing when Plaintiff began and ended each shift and meal period. Plaintiff and other Aggrieved Employees perform tasks that reasonably permit sitting, and a seat would not interfere with their performance of any of their tasks that may require them to stand. Defendant failed to provide Plaintiff and other Aggrieved Employees with suitable seats. Said conduct, in addition to the foregoing, as well as the conduct alleged in the incorporated Complaint, violates Labor Code §§ 201, 202, 203, 204 *et seq.*, 210, 218, 221, 226(a), 226.7, 227.3, 246, 510, 512, 558(a)(1)(2), 1194, 1197, 1197.1, 1198, 2802, California Code of Regulations, Title 8, Section 11040, Subdivision 5(A)-(B), California Code of Regulations, Title 8, Section 11070(14) (Failure to Provide Seating), Violation of the applicable Industrial Welfare Commission Wage Order(s), and is therefore actionable under California Labor Code section 2699.3.

A true and correct copy of the Complaint by Plaintiff against Defendant, which (i) identifies the alleged violations, (ii) details the facts and theories which support the alleged violations, (iii) details the specific work performed by Plaintiff, (iii) sets forth the people/entities, dates, classifications, violations, events, and actions which are at issue to the extent known to Plaintiff, and (iv) sets forth the illegal practices used by Defendant, is attached hereto. This information provides notice to the Labor and Workforce Development Agency of the facts and theories supporting the alleged violations for the agency's reference. Plaintiff therefore incorporates the allegations of the attached Complaint into this letter as if fully set forth herein. If the agency needs any further information, please do not hesitate to ask.

This notice is provided to enable Plaintiff to proceed with the Complaint against Defendant as authorized by California Labor Code section 2699, *et seq.* The lawsuit consists of other Aggrieved Employees. As counsel, our intention is to vigorously prosecute the claims as alleged in the Complaint, and to procure civil penalties as provided by the Private Attorney General Statute of 2004 on behalf of Plaintiff and all Aggrieved Employees.

Your earliest response to this notice is appreciated. If you have any questions of concerns, please do not hesitate to contact me at the above number and address.

Respectfully,

/s/ Nicholas J. De Blouw

Nicholas J. De Blouw, Esq.

EXHIBIT #3

Blumenthal Nordrehaug Bhowmik DeBlouw LLP

2255 CALLE CLARA
LA JOLLA, CA - California 92037-3107

INVOICE

Invoice # 1
Date: 01/21/2026
Due On: 02/20/2026

Elizabeth Ruvalcaba
1819 S Gramery PI 304
Los Angeles, CA 90010

CA3080

GK Management

Services

Attorney	Date	Notes	Quantity	Rate	Total
JH	10/18/2023	Review/analyze 1198.5 docs and Plaintiff's docs; create exhibit book and update case notes	1.50	\$750.00	\$1,125.00
RE	11/24/2023	Review case notes/damage analysis	0.50	\$675.00	\$337.50
RE	11/24/2023	Review & analyze employment file documents	2.00	\$675.00	\$1,350.00
RE	11/25/2023	Review, edit & revise class action complaint; finalize draft	2.70	\$675.00	\$1,822.50
RE	11/27/2023	Draft summons & civil case cover sheet re class action	0.50	\$675.00	\$337.50
RE	11/27/2023	Review & finalize class action complaint package; file in LA Sup. Ct.	0.50	\$675.00	\$337.50
RE	11/28/2023	Review court returned docs re class action; review docket; memo to firm re judicial/department assignment and status of initial case management conference	0.50	\$675.00	\$337.50
RE	12/22/2023	Draft PAGA Only Complaint	3.70	\$675.00	\$2,497.50
RE	12/22/2023	Draft summons & civil case cover sheet re PAGA action	0.50	\$675.00	\$337.50
RE	12/22/2023	Review & finalize PAGA only complaint package; file in santa clara sup. ct.	0.50	\$675.00	\$337.50

RE	12/26/2023	Review court returned docs re PAGA only action; review docket; memo to firm re judicial/department assignment and status of initial case management conference	0.50	\$675.00	\$337.50
RE	12/26/2023	Provide notice to LWDA of PAGA action filing	0.40	\$675.00	\$270.00
HD	01/02/2024	Review filed Class and Paga complaint. Add case to Master Case Sheet. Create Case Management Flow Chart. Email introductory correspondence to client now that Complaint has been filed. Register to track the case via Lexis-Court Link.	0.50	\$250.00	\$125.00
TM	01/04/2024	Reviewed Court's initial status conference order and minute order.	0.30	\$450.00	\$135.00
HD	01/04/2024	Receive and download Initial Status Conference Order and the Court's Minute Order. Upload and save to the electronic file. Prepare and send correspondence to handling attorneys and staff.	0.50	\$250.00	\$125.00
TM	01/19/2024	Reviewed order deeming case complex.	0.20	\$450.00	\$90.00
HD	01/19/2024	Obtain and download Order Deeming Case Complex and Staying Discovery and Responsive Pleading Deadline to file. Circulate to Team and staff.	0.30	\$250.00	\$75.00
RE	01/22/2024	Review file; prep initial docs re service of process re class action; identify reg. agent(s); send out for service via Knox	0.75	\$675.00	\$506.25
RE	01/29/2024	File proof of service of summons re 3 defendants/ class action; memo to firm re post service written discovery	0.50	\$675.00	\$337.50
RE	02/15/2024	Prep initial docs for service of process re PAGA action; identify reg agent; send out for service via knox	0.75	\$675.00	\$506.25
RE	02/21/2024	File proof of service of summons re 3 defendants; memo to firm re post service written discovery re PAGA action	0.50	\$675.00	\$337.50
TM	02/28/2024	Reviewed Court's notice of rescheduled CMC.	0.20	\$450.00	\$90.00
KN	02/29/2024	Analysis of arbitration issues; review arb agreement	0.30	\$950.00	\$285.00
JH	03/07/2024	Review file; correspondence with new defense counsel re introductory meet and confer	0.50	\$750.00	\$375.00
JH	03/11/2024	Meet and confer call with defense counsel re arb agreement and potential mediation	0.50	\$750.00	\$375.00
HD	03/11/2024	Draft Request and Proposed Order for Dismissal of Class Action Without Prejudice and Declaration ISO. Forward to Attorney Puche for review and	0.50	\$250.00	\$125.00

		finalization.			
HD	03/11/2024	Execute and finalize Proof of Service. Process and submit Request and Proposed Order for Dismissal and Declaration ISO to Court for filing via One Legal and served via email.	0.50	\$250.00	\$125.00
SB	03/11/2024	Review complaint, analyze, advise ND	2.80	\$450.00	\$1,260.00
HD	03/14/2024	Research the ROA to inquire the status on the Request and Proposed Order for Dismissal.	0.10	\$250.00	\$25.00
JH	03/19/2024	F/u corresp. with defense counsel re mediation	0.30	\$750.00	\$225.00
SB	03/21/2024	Revise complaint, advise ND	2.60	\$450.00	\$1,170.00
JH	03/26/2024	Discuss with AJB; f/u corresp with defense counsel re mediation and related matter	0.40	\$750.00	\$300.00
JH	04/01/2024	Call with co-counsel re claims and potential JPA; discuss with AJB; draft JPA	0.70	\$750.00	\$525.00
JH	04/02/2024	Finalize JPA; f/u corresp. with co-counsel re mediation selection/availability	0.40	\$750.00	\$300.00
JH	04/02/2024	Prepare for and attend meet and confer call with co-counsel and defense counsel re global mediation	0.50	\$750.00	\$375.00
JH	04/08/2024	F/u corresp with defense counsel re mediation	0.30	\$750.00	\$225.00
JH	04/25/2024	F/u with co-counsel re JPA; advise SP	0.30	\$750.00	\$225.00
JH	04/26/2024	Review revisions to JPA; discuss with AJB	0.40	\$750.00	\$300.00
SP	04/29/2024	Reviewed correspondence, case calendar, notes and docket. Communicated with Client.	0.40	\$675.00	\$270.00
JH	04/29/2024	Review co-counsel revisions to JPA; discuss with AJB; call with co-counsel	0.40	\$750.00	\$300.00
JH	05/02/2024	Call with co-counsel re JPA; revise proposed revisions and discuss with AJB	0.40	\$750.00	\$300.00
JH	05/02/2024	Review/revise draft mediation data request letter; advise SP	0.30	\$750.00	\$225.00
JH	05/23/2024	Review file; draft/revise Joint CMC Stmt; circulate to defendant for review	0.50	\$750.00	\$375.00
JH	05/24/2024	Review Defendants' proposed revisions to joint; further revise; finalize; circulate for execution	0.40	\$750.00	\$300.00
TM	05/29/2024	Reviewed Court's order continuing CMC.	0.20	\$450.00	\$90.00
SP	05/31/2024	Reveiwed correspondence. Revised, finalized and served Mediation Data Request.	0.50	\$675.00	\$337.50

JH	06/10/2024	Review/analyze proposed revisions to Mediation Data Request	0.40	\$750.00	\$300.00
SP	06/17/2024	Reveiwed correspondence, case notes and case file. Sent correspondence to Defendant re: Mediation Data Request.	0.40	\$675.00	\$270.00
SP	07/23/2024	Reveiwed case notes, docket and documents. Sent correspondence to Opp Counsel re: Mediation Data.	0.30	\$675.00	\$202.50
SP	07/24/2024	Discussed internally. reviewed correspondence and went mediation follow up to opposing counsel.	0.50	\$675.00	\$337.50
SP	07/25/2024	Reviewed correspondence and drafted communication re: Mediation Data. Reveiwed spreadsheet and arranged for HD access to Mediation data and documents. Reveiwed documents. Arranged for data to be sent to Expert.	1.20	\$675.00	\$810.00
JH	07/25/2024	Review/analyze Defendant's mediation document/ data production	2.00	\$750.00	\$1,500.00
HD	07/25/2024	Download and save Defendant's Mediation Documents from opposing counsel to electronic file. Upload and share them with expert.	0.50	\$250.00	\$125.00
SP	07/26/2024	Reveiwed document production. Added to exhibit book and Mediation Prep document. Drafted and sent correspondence to Opp Counsel re: missing data. Communicated with AJB and Expert.	3.30	\$675.00	\$2,227.50
HD	07/26/2024	Receive and review email correspondence from opposing counsel. and update service list accordingly	0.20	\$250.00	\$50.00
JH	07/29/2024	Review/analyze updated mediation numbers from defendant; update file; further analyze exhibit book and advise SP re claims	1.50	\$750.00	\$1,125.00
HD	07/29/2024	Review and download additional documents from Defendant. Upload to electronic file and share with experts.	0.50	\$250.00	\$125.00
SP	07/29/2024	Reveiwed production, ensured documents sent to Experts. Revised Exhibit Book and created draft Mediation Brief.	5.90	\$675.00	\$3,982.50
SP	07/30/2024	Reviewed correspondence and Mediation data. Communicated with Co-Counsel and team. Followed up with Expert.	1.10	\$675.00	\$742.50
AB	07/31/2024	Draft mediation brief.	4.00	\$895.00	\$3,580.00
NB	08/01/2024	Review docs, analyze re mediation. Advise AJ.	3.00	\$995.00	\$2,985.00

SP	08/02/2024	Reveiwed and revised case notes intake and harassment chart. Reviewed Exhibit book and documents. Discussed with AJB.	0.70	\$675.00	\$472.50
JH	08/06/2024	Review docs and assist with mediation; discuss with AJB re outcome of mediation and second half day mediation	2.00	\$750.00	\$1,500.00
TM	09/17/2024	Reviewed file; drafted Joint CMC Statement; discussed with team; email to and from OPC re joint CMC Statement.	1.40	\$450.00	\$630.00
JH	09/17/2024	Review/revise draft report; advise TM	0.40	\$750.00	\$300.00
TM	09/18/2024	Finalized and signed joint cmc statement; advised HD re filing and service.	0.40	\$450.00	\$180.00
SP	09/30/2024	Reveiwed correspondence. Reviewed pleadings and case notes. Sent updated correspondence to Client.	0.40	\$675.00	\$270.00
SP	10/02/2024	Reviewed calendar, docket and correspondence for upcoming deadline/appearance and advised team.	0.20	\$675.00	\$135.00
JH	10/17/2024	Discuss with AJB and SB re outcome of mediation and mediators proposal; advise team	0.70	\$750.00	\$525.00
SP	11/11/2024	Reviewed case notes, calendar, correspondence and Mediation folder. Sent update to client via email.	0.40	\$675.00	\$270.00
JH	12/03/2024	Review draft MOU; discuss with AJB	0.50	\$750.00	\$375.00
JH	12/05/2024	Review/analyze additional proposed revision to MOU	0.40	\$750.00	\$300.00
JH	12/12/2024	Review/analyze file; draft joint report; circulate to defense counsel fore review	0.50	\$750.00	\$375.00
TM	12/16/2024	Reviewed Court's notice of CMC.	0.20	\$450.00	\$90.00
JH	01/05/2025	Review co-counsel proposed revisions to MOU	0.40	\$750.00	\$300.00
HD	03/28/2025	Review fully executed MOU. Prepare and send email correspondence to team to discuss necessary work and related action.	0.50	\$250.00	\$125.00
HD	04/08/2025	Review ROA and status of the matter. Including recent orders. Draft shell for Joint CMC Statement . Forward to attorney Herman for completion and finalization.	0.40	\$250.00	\$100.00
JH	04/09/2025	Review file; draft/revise joint report; circulate to defense counsel for review.	0.50	\$750.00	\$375.00
JH	04/14/2025	Review draft stip re SAC; advise team	0.40	\$750.00	\$300.00

JH	04/21/2025	Review/analyze Defendant's draft longform agreement; discuss with co-counsel and circulate proposed revisions	1.50	\$750.00	\$1,125.00
JH	05/21/2025	Corresp from co-counsel; circulate Plaintiffs' revisions to draft longform agreement	0.40	\$750.00	\$300.00
SP	05/21/2025	Reviewed and analyzed case file, pleadings, MOU, Settlement agreement and calendar. Discussed with JSH. Sent Co-Counsel correspondence confirming PAGA Approval draft and PAGA Approval Motion Hearing date.	0.50	\$675.00	\$337.50
SP	05/27/2025	Reveiwed and analyzed correspondence and discussed hearing date for PAGA approval motion with team.	0.40	\$675.00	\$270.00
JH	06/12/2025	Review corresp w defense counsel re size of AE settlement group; request settlement admin bids	0.30	\$750.00	\$225.00
JH	06/18/2025	Review Defendant's additional revisions to longform; further revise; discuss with KN; corresp w co-counsel re costs	0.60	\$750.00	\$450.00
JH	06/19/2025	Discuss agreement with co-counsel; revise accordingly	0.40	\$750.00	\$300.00
JH	07/14/2025	F/u with defense counsel; discuss with co-counsel; circulate final agreement for execution	0.30	\$750.00	\$225.00
SP	07/30/2025	Reviewed and analyzed correspondence, documents, pleadings, orders and calendar. Drafted Joint Status Report and sent to OPC.	0.90	\$675.00	\$607.50
HD	07/31/2025	Edit, execute and finalize Proof of Service. Process and submit Joint Case Management Conference Statement to Court for filing via One Legal and serve via email.	0.50	\$250.00	\$125.00
TM	08/05/2025	Review file; planned and prepared for upcoming CMC.	0.50	\$450.00	\$225.00
TM	10/02/2025	Email to and from co-counsel re amended complaint; reviewed file and court docket.	0.40	\$450.00	\$180.00
TM	10/09/2025	Review file; discussed case status with team; email to co-counsel re joint statement.	0.50	\$450.00	\$225.00
TM	10/10/2025	Drafted joint CMC statement; discussed with team; email to OPC re joint statement.	0.80	\$450.00	\$360.00
TM	10/16/2025	Reviewed Court's minute order re CMC.	0.20	\$450.00	\$90.00
JH	10/23/2025	Review/analyze draft amended complaint; advise SP	0.40	\$750.00	\$300.00
JH	01/05/2026	Corresp. w defense counsel re operative complaint; discuss with KN; advise SP	0.30	\$750.00	\$225.00

SP	01/05/2026	Reveiwed and analyzed correspondence with Co-Counsel re: Consolidated vs. Amended Complaint. Discussed with JSH and KN. Responded to co-counsel.	0.40	\$675.00	\$270.00
KN	01/15/2026	Review notice; review status and check billing for accuracy; memo to staff	0.50	\$950.00	\$475.00
TM	01/21/2026	Review file; drafted declaration of Plaintiff ISO MPA; email and telephone call to client.	2.50	\$450.00	\$1,125.00
JH	01/21/2026	Discuss with co-counsel re PAGA Approval Motion; advise SP and TM; discuss with KN	1.00	\$750.00	\$750.00
KN	01/21/2026	Review emails; respond to issues; review final billing; review draft motion; prepare declaration ISO motion; email co-counsel	2.50	\$950.00	\$2,375.00
				Quantity Subtotal	83.5
				Services Subtotal	\$55,717.50

Expenses

Type	Date	Notes	Quantity	Rate	Total
Expense	08/29/2023	PAGA Filing Fee	1.00	\$75.00	\$75.00
Expense	11/28/2023	Onelegal/Court Fees	1.00	\$1,494.99	\$1,494.99
Expense	12/22/2023	Onelegal/Court Fees	1.00	\$1,496.64	\$1,496.64
Expense	01/24/2024	KNOX Filing and Messenger Service	1.00	\$166.45	\$166.45
Expense	01/24/2024	KNOX Filing and Messenger Service	1.00	\$70.95	\$70.95
Expense	01/24/2024	KNOX Filing and Messenger Service	1.00	\$70.95	\$70.95
Expense	01/30/2024	Onelegal/Court fees	1.00	\$19.71	\$19.71
Expense	01/31/2024	Onelegal/Court Fees	1.00	\$51.48	\$51.48
Expense	01/31/2024	Onelegal/Court fees	1.00	\$51.48	\$51.48
Expense	02/19/2024	KNOX Filing and Messenger Service	1.00	\$62.55	\$62.55
Expense	02/19/2024	KNOX Filing and Messenger Service	1.00	\$62.55	\$62.55
Expense	02/19/2024	KNOX Filing and Messenger Service	1.00	\$158.05	\$158.05
Expense	02/22/2024	Onelegal/court fees	1.00	\$21.28	\$21.28
Expense	05/23/2024	Mediation Fees - David Rotman	1.00	\$6,625.00	\$6,625.00
Expense	05/25/2024	One Legal Invoice No. 06064710	1.00	\$21.28	\$21.28
Expense	08/08/2024	Expert Fees - Berger Consulting	1.00	\$11,245.00	\$11,245.00

Expense	09/06/2024	Mediation Fees- D. Rotman.	1.00	\$3,313.00	\$3,313.00
Expense	10/24/2024	Berger Consulting Group.	1.00	\$1,170.00	\$1,170.00
Expense	12/16/2024	One Legal/Court Fees	1.00	\$21.42	\$21.42
Expense	04/15/2025	One Legal/Court Fees	1.00	\$24.92	\$24.92
Expense	07/31/2025	One Legal/Court Fees	1.00	\$25.75	\$25.75
Expense	10/10/2025	One Legal/Court Fees	1.00	\$26.78	\$26.78
Expenses Subtotal					\$26,275.23

Time Keeper	Quantity	Rate	Total
AJ Bhowmik	4.0	\$895.00	\$3,580.00
Norm Blumenthal	3.0	\$995.00	\$2,985.00
Scott Blumenthal	5.4	\$450.00	\$2,430.00
Ricardo Ehmann	14.8	\$675.00	\$9,990.00
Jeffrey Herman	22.7	\$750.00	\$17,025.00
Trevor Moran	7.8	\$450.00	\$3,510.00
Kyle Nordrehaug	3.3	\$950.00	\$3,135.00
Sergio Puche	17.5	\$675.00	\$11,812.50
Heather Drosi	5.0	\$250.00	\$1,250.00
Quantity Total			83.5
Subtotal			\$81,992.73
Total			\$81,992.73

Detailed Statement of Account

Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
1	02/20/2026	\$81,992.73	\$0.00	\$81,992.73
Outstanding Balance				\$81,992.73
Total Amount Outstanding				\$81,992.73

Please make all amounts payable to: Blumenthal Nordrehaug Bhowmik DeBlouw LLP

Please pay within 30 days.

EXHIBIT #4

LAFFEY MATRIX

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			Years Out of Law School *				
Year	Adjustmt Factor**	Paralegal/ Law Clerk	1-3	4-7	8-10	11-19	20 +
6/01/24- 5/31/25	1.080182	\$258	\$473	\$581	\$839	\$948	\$1141
6/01/23- 5/31/24	1.059295	\$239	\$437	\$538	\$777	\$878	\$1057
6/01/22- 5/31/23	1.085091	\$225	\$413	\$508	\$733	\$829	\$997
6/01/21- 5/31/22	1.006053	\$208	\$381	\$468	\$676	\$764	\$919
6/01/20- 5/31/21	1.015894	\$206	\$378	\$465	\$672	\$759	\$914
6/01/19- 5/31/20	1.0049	\$203	\$372	\$458	\$661	\$747	\$899
6/01/18- 5/31/19	1.0350	\$202	\$371	\$455	\$658	\$742	\$894
6/01/17- 5/31/18	1.0463	\$196	\$359	\$440	\$636	\$717	\$864
6/01/16- 5/31/17	1.0369	\$187	\$343	\$421	\$608	\$685	\$826
6/01/15- 5/31/16	1.0089	\$180	\$331	\$406	\$586	\$661	\$796
6/01/14- 5/31/15	1.0235	\$179	\$328	\$402	\$581	\$655	\$789
6/01/13- 5/31/14	1.0244	\$175	\$320	\$393	\$567	\$640	\$771
6/01/12- 5/31/13	1.0258	\$170	\$312	\$383	\$554	\$625	\$753
6/01/11- 5/31/12	1.0352	\$166	\$305	\$374	\$540	\$609	\$734
6/01/10- 5/31/11	1.0337	\$161	\$294	\$361	\$522	\$589	\$709
6/01/09- 5/31/10	1.0220	\$155	\$285	\$349	\$505	\$569	\$686
6/01/08- 5/31/09	1.0399	\$152	\$279	\$342	\$494	\$557	\$671
6/01/07-5/31/08	1.0516	\$146	\$268	\$329	\$475	\$536	\$645
6/01/06-5/31/07	1.0256	\$139	\$255	\$313	\$452	\$509	\$614
6/1/05-5/31/06	1.0427	\$136	\$249	\$305	\$441	\$497	\$598
6/1/04-5/31/05	1.0455	\$130	\$239	\$293	\$423	\$476	\$574
6/1/03-6/1/04	1.0507	\$124	\$228	\$280	\$405	\$456	\$549
6/1/02-5/31/03	1.0727	\$118	\$217	\$267	\$385	\$434	\$522
6/1/01-5/31/02	1.0407	\$110	\$203	\$249	\$359	\$404	\$487
6/1/00-5/31/01	1.0529	\$106	\$195	\$239	\$345	\$388	\$468
6/1/99-5/31/00	1.0491	\$101	\$185	\$227	\$328	\$369	\$444
6/1/98-5/31/99	1.0439	\$96	\$176	\$216	\$312	\$352	\$424
6/1/97-5/31/98	1.0419	\$92	\$169	\$207	\$299	\$337	\$406
6/1/96-5/31/97	1.0396	\$88	\$162	\$198	\$287	\$323	\$389

6/1/95-5/31/96	1.032	\$85	\$155	\$191	\$276	\$311	\$375
6/1/94-5/31/95	1.0237	\$82	\$151	\$185	\$267	\$301	\$363

The methodology of calculation and benchmarking for this Updated Laffey Matrix has been approved in a number of cases. See, e.g., *DL v. District of Columbia*, 267 F.Supp.3d 55, 69 (D.D.C. 2017)

* $i_{\frac{1}{2}}$ Years Out of Law School $i_{\frac{1}{2}}$ is calculated from June 1 of each year, when most law students graduate. $i_{\frac{1}{2}}1-3$ " includes an attorney in his 1st, 2nd and 3rd years of practice, measured from date of graduation (June 1). $i_{\frac{1}{2}}4-7$ " applies to attorneys in their 4th, 5th, 6th and 7th years of practice. An attorney who graduated in May 1996 would be in tier $i_{\frac{1}{2}}1-3$ " from June 1, 1996 until May 31, 1999, would move into tier $i_{\frac{1}{2}}4-7$ " on June 1, 1999, and tier $i_{\frac{1}{2}}8-10$ " on June 1, 2003.

** The Adjustment Factor refers to the nation-wide Legal Services Component of the Consumer Price Index produced by the Bureau of Labor Statistics of the United States Department of Labor.