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SANDI ORTIZ CUEVAS

[Additional Counsel on following page]

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

SANDI ORTIZ CUEVAS and MARIA L.
YANEZ ZEPEDA, individually, on behalf of all
others similarly situated, and on behalf of the
State of California and other aggrieved persons;
JOSE LUIS RAMIREZ, individual, and on behalf
of all others similarly situated,

Plaintiffs,

v.

TMI AUTOMOTIVE PRODUCTS INC., a
California corporation; TMI PRODUCTS, INC., a
California corporation; IPC IMPORT PARTS
CONNECTION INC., a California corporation,
and DOES 1 through 10, inclusive

Defendants.

Case No. CVRI2304340

*[Assigned for all Purposes to the Hon. Harold W.
Hopp, Dept. 1]*

**DECLARATION OF ALEXANDRA ROSE
IN SUPPORT OF PLAINTIFFS' MOTION
FOR FINAL APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT**

Date: August 14, 2026

Time: 8:30 a.m.

Dept: 1

Action Filed: August 21, 2023

FAC Filed: December 29, 2025

1 Barbara DuVan-Clarke (State Bar No. 259268)
bdc@blackstonepc.com

2 Alexandra Rose (State Bar No. 329407)
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3 Lizeth Marin (State Bar No. 360465)
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15 Attorney for Plaintiff

16 MARIA YANEZ ZEPEDA

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1 5. On August 6, 2024, the Court entered a Ruling on the Motion to Compel, which denied
2 the Motion to Compel.

3 6. On March 21, 2025, Plaintiffs Jose Luis Ramirez, Sandi Ortiz Cuevas, and Maria Yanez
4 Zepeda (collectively, “Plaintiffs”) and Defendants TMI Automotive Products, Inc., TMI Products,
5 Inc., and IPC Import Parts Connection Inc. (collectively, “Defendants”) (collectively, with Plaintiffs,
6 the “Parties”) participated in a formal mediation conducted by Christopher M. Barnes, Esq., a neutral
7 and respected mediator with extensive experience in complex wage and hour matters, and with the
8 assistance of the mediator’s evaluations, the Parties were able to reach an agreement to resolve the
9 Ramirez Action, the case entitled *Sandi Ortiz Cuevas v. TMI Automotive Products Inc.*, Riverside
10 County Superior Court Case No. CVRI2304340 (“Cuevas Action”), and the case entitled *Maria Yanez*
11 *Zepeda v. TMI Automotive Products Inc.*, Riverside County Superior Court Case No. CVRI2305081
12 (“Zepeda Action”) (collectively, “Actions”). The Parties then worked diligently to negotiate and
13 memorialize the terms in a long form settlement agreement.

14 7. On December 11, 2025, the Parties executed the Class Action and PAGA Settlement
15 Agreement (“Settlement” or “Settlement Agreement”).

16 8. On December 29, 2025, Plaintiffs filed a First Amended Consolidated Class &
17 Representative Action Complaint, which consolidated the Ramirez Action, Zepeda Action, and
18 Cuevas Action into the Cuevas Action.

19 9. On December 29, 2025, Plaintiffs filed a Motion for Preliminary Approval of Class
20 Action and PAGA Settlement (“Motion for Preliminary Approval”) and supporting documents.

21 10. On March 3, 2026, the Court issued a Tentative Ruling, which requested certain
22 information regarding the Motion for Preliminary Approval and ordered the Parties to revise the Class
23 Notice and proposed order.

24 11. On March 25, 2026, Plaintiffs’ filed supplemental papers in support of the Motion for
25 Preliminary Approval.

26 12. On April 1, 2026, the Court issued another Tentative Ruling, requesting that additional
27 revisions be made to the proposed order.

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1 13. On April 6, 2026, the Court entered the Revised Order Granting Plaintiffs’ Motion for
2 Preliminary Approval of Class Action and PAGA Settlement.

3 **Attorneys’ Fees and Costs**

4 14. Class Counsel seeks one-third (1/3) of the Gross Settlement Amount (i.e., \$180,666.67)
5 for fees for the time spent litigating this matter and reimbursement of actual costs and expenses. The
6 requested fees and costs are fair compensation for undertaking complex, risky, expensive, and time-
7 consuming litigation on a contingent fee basis, especially in light of the substantial benefits achieved
8 by Class Counsel for the Class Members.

9 15. Blackstone Law, APC (“Blackstone”) was started in February 2018, representing
10 plaintiffs in individual and representative employment litigation. The firm has grown exponentially
11 over the past eight-plus years, now maintaining over thirty highly pedigreed attorneys working on
12 almost exclusively labor and employment class actions, PAGA cases, and individual matters, with
13 roughly 15% of the firm focused on other complex general litigation matters. Blackstone has been
14 counsel of record on several class and PAGA actions that have since been resolved, the most recent of
15 which are attached hereto as **Exhibit 1**. The attorneys who worked on this matter are all experienced
16 in litigating wage and hour matters as follows:

17 a. Jonathan M. Genish is the founder of Blackstone. He received his law degree from
18 Benjamin N. Cardozo School of Law and was admitted to the California State Bar in 2008. During
19 law school, he clerked at the litigation firm Oved & Oved, LLP and was published several times in
20 various small publications. Upon graduation, he was rehired by Freedman & Taitelman, LLP as an
21 associate and remained employed there from September 2008 through August 2015. During his
22 tenure, he managed hundreds (perhaps thousands) of complex litigation cases, ranging from
23 employment, corporate, entertainment, and general business litigation matters, though his primary area
24 of expertise was employment, both single plaintiff and representative actions. On the vast majority of
25 those cases, he was the only or primary attorney managing the case and thus obtained extensive
26 experience. In that capacity, he conducted wage and hour and wrongful termination labor and
27 employment intakes; was the primary contact for all clients; took and defended hundreds (if not
28 thousands) of depositions; propounded and responded to all discovery; prepared and opposed all

1 motions and pleadings, including dispositive and certification motions; strategized on all cases;
2 attended all hearings; attended all mediations; coordinated with class action administrators; prepared
3 and worked with experts; first and second chaired multiple trials and arbitrations; and engaged in all
4 other intricate facets of litigation. During that time, he represented a wide range of clients from sole
5 proprietorships to Fortune 500 companies in state, federal, complex, and appellate courts. Many of
6 the cases he managed were highly publicized, with articles written about them in the Los Angeles
7 Times, Deadline, The Hollywood Reporter, Business Insider, Law360, and others. Super Lawyers has
8 regularly honored him as a Southern California Rising Star since 2012. His hourly rate of \$1,295 is
9 reasonable based on his education and experience and is in line with the market rate.

10 b. Barbara DuVan-Clarke is a 16-year litigator who joined Blackstone in September 2022
11 as a Senior Trial Attorney and Team Lead, building on her entire career of litigating single-plaintiff
12 employment, catastrophic injury, and class/PAGA matters with well-known plaintiff-side wage and
13 hour law firms in Los Angeles. She earned her Bachelor of Arts degree from the University of
14 California at Los Angeles in 2003, and then obtained her Juris Doctorate from Case Western Reserve
15 University in Cleveland, Ohio in 2007. Ms. DuVan-Clarke also maintains leadership roles in the
16 California Employment Lawyers' Association ("CELA") and other organizations. Her hourly rate of
17 \$1,050 is reasonable based on her education and experience and is in line with the market rate.

18 c. Alexander K. Spellman is a former senior associate attorney who worked on this matter
19 when he worked at Blackstone. He graduated from University of California at Los Angeles in 2001,
20 with a Bachelor of Arts degree in American Literature and Culture. He then obtained his Juris
21 Doctorate from Loyola Law School, graduating in 2006, and was admitted to the California State Bar
22 in July 2007. He practiced exclusively plaintiff's side labor and employment law from 2016 through
23 2024. His hourly rate of \$950 is reasonable based on his education and experience and is in line with
24 the market rate.

25 d. P.J. Van Ert is an accomplished attorney who joined Blackstone in 2023, after having
26 worked at an employment litigation firm for 2 years, and prior to that, having served as a District
27 Attorney for over 13 years. In that role, she was a prolific trial attorney, and it is my understanding
28 that she tried over 50 jury trials to verdict. She graduated from University of California at Davis in

1 2000, with a Bachelor of Arts degree, and from University of California at Los Angeles School of Law
2 with a Juris Doctorate in 2004. She was admitted to the State Bar of California in December 2004.
3 Her hourly rate of \$850 is reasonable based on her education and experience and is in line with the
4 market rate.

5 e. Danielle L. GruppChang is a senior associate attorney at Blackstone. She graduated
6 from California Polytechnic University San Luis Obispo in 2013, with a Bachelor of Arts degree in
7 Political Science with a minor in Communication Studies. She then obtained her Juris Doctorate from
8 University of California Law San Francisco (formerly known as University of California Hastings
9 College of the Law), graduating in 2016, and was admitted to the California State Bar in January 2017.
10 She has practiced exclusively plaintiff's side labor and employment class and representative action
11 law from 2017 through the present. Her hourly rate of \$825 is reasonable based on her education and
12 experience and is in line with the market rate.

13 f. I joined Blackstone from a highly reputable employment law firm. I graduated from
14 the University of California, Los Angeles with a Bachelor of Arts degree in 2016 and from New
15 England Law | Boston with a Juris Doctor degree in 2019. I was admitted to the State Bar of California
16 in December of 2019 and the State Bars of New York and New Jersey in 2023. I am additionally
17 licensed in all federal district courts of California. I manage the post-settlement department at
18 Blackstone. In that capacity, I oversee and handle over 100 wage-and-hour putative class actions
19 and/or representative actions under PAGA that are in settlement. My hourly rate of \$750 is reasonable
20 based on my education and experience and is in line with the market rate.

21 g. Lizeth Marin is an Associate Attorney at Blackstone, where she focuses on representing
22 employees in wage-and-hour class actions and PAGA representative matters. Ms. Marin joined
23 Blackstone from a highly reputable employment law firm and previously worked as an employment
24 and labor attorney at an Am Law 100 law firm, where she advised and represented employers in a
25 broad range of employment litigation. She graduated from the University of Oregon with a Bachelor
26 of Science degree in 2015 and from Lewis & Clark Law School (Lewis & Clark) with a Juris Doctor
27 degree in 2018. While at Lewis & Clark, Ms. Marin served as an Associate Editor for the
28 Environmental Law Review. She was admitted to practice law in Oregon in 2018 and in California in

2025. Since 2019, she has focused her practice exclusively on employment law, representing clients in individual actions, class actions, and PAGA matters. Her hourly rate of \$675 is reasonable based on her education and experience and is in line with the market rate.

16. Blackstone has spent approximately 258.50 total hours litigating this matter. To date, our total fees incurred amount to \$247,031. Each attorney who worked on this matter engaged in a multitude of tasks, including communicating with the client and defense counsel; investigating the facts and researching applicable legal issues; drafting pleadings, informal discovery requests, and joint statements; reviewing documents; preparing for and attending mediation; and assisting with facilitating the settlement. A summary of Blackstone's lodestar for each attorney who worked on this matter is as follows:

<u>Attorney</u>	<u>Position</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Jonathan M. Genish	Managing Partner	26.80	\$1,295	\$34,706
Barbara DuVan-Clarke	Senior Trial Attorney and Team Lead	75.60	\$1,050	\$79,380
Alexander K. Spellman	(former) Senior Associate	43.20	\$950	\$41,040
P.J. Van Ert	Senior Associate	54.60	\$850	\$46,410
Danielle L. GruppChang	Senior Associate	34.80	\$825	\$28,710
Alexandra Rose	Senior Associate	12.30	\$750	\$9,225
Lizeth Marin	Associate Attorney	11.20	\$675	\$7,560

17. Blackstone seeks reimbursement of actual litigation costs and expenses in the amount of Eleven Thousand Two Hundred Fifty-One Dollars and Twenty-Six Cents (\$11,251.26). A true and correct itemized list of Blackstone's litigation costs and expenses is attached hereto as **Exhibit 2**. This amount was reasonable and necessary in the prosecution of this matter.

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Class Representative Service Payments

18. As part of the Settlement Agreement, Plaintiffs are requesting reasonable Class Representative Service Payments in the aggregate amount of Twenty-Two Thousand Five Hundred Dollars and Zero Cents (\$22,500.00), of which Seven Thousand Five Hundred Dollars and Zero Cents (\$7,500.00) is requested as a reasonable Class Representative Service Payment to Plaintiff Ramirez. The requested Class Representative Service Payments are eminently reasonable given the time and effort Plaintiffs spent on this matter, and the benefit to the other Class Members as a result of Plaintiffs' actions. Enhancement awards in wage and hour cases typically range from \$5,000.00 to \$20,000.00, although some awards are higher. The Declaration of Plaintiff Ramirez submitted herewith details his work and efforts in bringing and litigating this matter through resolution and supports the requested Class Representative Service Payment.

19. Plaintiff Ramirez's Individual Class Payment is estimated to be Five Hundred Twenty Three Dollars and Seventy-Five Cents (\$523.75) and his Individual PAGA Payment is estimated to be Zero Dollars and Zero Cents (\$0.00).

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on July 20, 2026, at Jersey City, New Jersey.



Alexandra Rose

EXHIBIT 1

- *Daniel Pereira, et al. v. L.N. Curtis and Sons*, Alameda County Superior Court, Case No. 24CV101859, approved as counsel, in association with other counsel, in final settlement of wage and hour class and PAGA action.
- *Dillan Burghart, et al. v. Watermark Services, IV, LLC*, Alameda County Superior Court, Case No. 23CV035212, approved as counsel, in association with other counsel, in final settlement of wage and hour class and PAGA action.
- *Kasim Hakimi v. Catalent Pharma Solutions, LLC*, Alameda County Superior Court, Case No. 24CV087209, approved as counsel in final settlement of wage and hour class and PAGA action.
- *Cesar Ibarra v. Leuen, Inc. dba The Original Pantry Café*, Los Angeles County Superior Court, Case No. 23STCV017182, approved as counsel in final settlement of wage and hour class and PAGA action.
- *Sharon Baker v. OPARC*, Los Angeles County Superior Court, Case No. 24STCV11229, approved as counsel in final settlement of wage and hour class and PAGA action.
- *Basilía Villa Magaña v. CJKANTRG PA, LLC*, Los Angeles County Superior Court, Case No. 23STCV25886, approved as counsel in final settlement of wage and hour class and PAGA action.
- *Alexis Stuart-Drinnen v. DiCarlo's Italian Cafe, LLC, et al.*, San Bernardino County Superior Court, Case No. CIVSB2313579, approved as counsel in final settlement of wage and hour class and PAGA action.
- *Monique Duong v. Boardwalk IG Management, LLC*, Orange County Superior Court, Case No. 30-2023-01334565-CU-OE-CXC, approved as counsel in final settlement of wage and hour class action.
- *Peter J. Gutierrez v. Univar Solutions USA Inc., et al.*, Los Angeles County Superior Court, Case No. 23STCV26851, approved as counsel, in association with other counsel, in final settlement of wage and hour class and PAGA action.

- *Steve Robles v. Avery Products Corporation*, Orange County Superior Court, Case No. 30-2024-01390483-CU-OE-CXC, approved as counsel in settlement of representative wage and hour action pursuant to PAGA.
- *Dianna Flores v. Capitol Distribution Company LLC dba Capitol Food Company*, Los Angeles County Superior Court, Case No. 24STCV20477, approved as counsel in final settlement of wage and hour class and PAGA action.
- *Mark Trahan v. Celebrity Casinos, Inc. dba Crystal Casino*, Los Angeles County Superior Court, Case No. 25STCV30655, approved as counsel in settlement of representative wage and hour action pursuant to PAGA.
- *Jamie Ramires, et al. v. Bright Star Schools*, Los Angeles Superior Court, Case No. 23STCV15490, approved as counsel in final settlement of wage and hour class and PAGA action.
- *Alesia Williams v. Altamed Health Services Corp.*, Los Angeles Superior Court, Case No. 23STCV15413, approved as counsel in final settlement of wage and hour class and PAGA action.
- *Jose Moreno v. Kern Regional Center*, Kern County Superior Court, Case No. BCV-24-103353, approved as counsel in final settlement of wage and hour class and PAGA action.
- *Jonathan Cruz-Pulido v. Central Valley Meat Co., Inc., et al.*, Los Angeles County Superior Court, Case No. 24STCV13660, approved as counsel in settlement of representative wage and hour action pursuant to PAGA.
- *Gregorio Pineda, et al. v. Orthopaedic Hospital dba Orthopaedic Institute for Children and Luskin Orthopaedic Institute for Children, et al.*, Los Angeles County Superior Court, Case No. 24STCV01618, approved as counsel, in association with other counsel, in final settlement of wage and hour class and PAGA action.
- *John Price v. Fort Point Beer Company*, San Francisco County Superior Court, Case No. CGC-23-610592, approved as counsel in final settlement of wage and hour class

and PAGA action.

- *David Jason Quiñones, et al. v. J-M Manufacturing Company Inc. dba JM Eagle*, Los Angeles County Superior Court, Case No. 23STCV16439, approved as counsel, in association with other counsel, in final settlement of wage and hour class and PAGA action.
- *Laila Droubi, et al. v. GSF Properties, Inc.*, Kern County Superior Court, Case No. BCV-24-100950, approved as counsel, in association with other counsel, in final settlement of wage and hour class and PAGA action.
- *Rowena Ray v. Sierra Central Credit Union*, Butte County Superior Court, Case No. 24CV02890, approved as counsel in final settlement of wage and hour class and PAGA action.
- *Hamid Kondori, et al. v. Mission Imports, et al.*, Orange County Superior Court, Case No. 30-2022-01295280-CU-OE-CXC, approved as counsel in settlement of representative wage and hour action pursuant to PAGA.
- *Johnny Rivas v. Buckingham Property Management*, Kings County Superior Court, Case No. 23CU0355, approved as counsel in final settlement of wage and hour class and PAGA action.
- *Manuel Hernandez v. DHC PS Holdings LLC, et al.*, Alameda County Superior Court, Case No. 24CV079333, approved as counsel in final settlement of wage and hour class and PAGA action.
- *Daniel He, et al. v. Bay Photo Lab Inc., et al.*, Los Angeles County Superior Court, Case No. 24STCV05682, approved as counsel in final settlement of wage and hour class and PAGA action.
- *Leonard Moore v. Truepill, Inc.*, Alameda County Superior Court, Case No. 23CV047001, approved as counsel in final settlement of wage and hour class and PAGA action.
- *Colton Ray v. Papé Machinery, Inc., et al.*, Humboldt County Superior Court, Case No.

CV2402126, approved as counsel in settlement of representative wage and hour action pursuant to PAGA.

- *Elba Garcia v. South Central Los Angeles Regional Center for Developmentally Disabled Persons, Inc.*, Los Angeles County Superior Court, Case No. 24STCV04382, approved as counsel in final settlement of wage and hour class and PAGA action.
- *Miguel Avila v. Weber Metals, Inc.*, Los Angeles County Superior Court, Case No. 24STCV04071, approved as counsel in final settlement of wage and hour class action.
- *Hector Cornejo v. Renovo Solutions, LLC*, Los Angeles County Superior Court, Case No. 23STCV27376, approved as counsel in final settlement of wage and hour class and PAGA action.
- *Juan Campos-Ledezma, et al. v. Institute for Environmental Health, Inc.*, Stanislaus County Superior Court, Case No. CV-23-006693, approved as counsel in final settlement of wage and hour class and PAGA action.
- *Jeanne Boudreau v. Intelliswift Software, Inc.*, San Francisco County Superior Court, Case No. CGC-23-611128, approved as counsel in final settlement of wage and hour class and PAGA action.
- *Daniel Munguia v. Moog Inc.*, Los Angeles County Superior Court, Case No. 24STCV11688, approved as counsel in final settlement of wage and hour class and PAGA action.
- *Francisco Javier Sanchez, Jr. v. Jim Crawford Construction Company, Inc.*, Fresno County Superior Court, Case No. 24CECG01421, approved as counsel in final settlement of wage and hour class action.
- *Jose Ramirez v. A.J. Kirkwood & Associates, Inc.*, San Diego County Superior Court, Case No. 24CU012580C, approved as counsel in settlement of representative wage and hour action pursuant to PAGA.

- *Kirstie Deveaux, et al. v. Motorola Solutions, Inc.*, Santa Clara County Superior Court, Case No. 23CV427798, approved as counsel, in association with other counsel, in final settlement of wage and hour class and PAGA action.
- *Geri Gates, et al. v. SD & A Teleservices, Inc.*, Los Angeles County Superior Court, Case No. 23STCV29390, approved as counsel, in association with other counsel, in final settlement of wage and hour class and PAGA action.
- *Bryan Zuniga v. Inova Diagnostics, Inc., et al.*, San Diego County Superior Court, Case No. 37-2023-00055201-CU-OE-CTL, approved as counsel in final settlement of wage and hour class and PAGA action.
- *Ivorya Geneve v. Mikuni Restaurant Group, Inc.*, Contra Costa County Superior Court, Case No. C23-02732, approved as counsel in final settlement of wage and hour class and PAGA action.
- *Amira Fakira, et al. v. CSL Plasma, Inc.*, Alameda County Superior Court, Case No. 23CV057131, approved as counsel in final settlement of wage and hour class and PAGA action.
- *Vadim Savin, et al. v. Fleetlogix Inc.*, San Diego County Superior Court, Case No. 37-2023-00051984-CU-OE-CTL, approved as counsel in final settlement of wage and hour class and PAGA action.
- *Grace Weissmuller, et al. v. Astrix Technology, LLC*, Los Angeles County Superior Court, Case No. 21STCV45436, approved as counsel, in association with other counsel, in final settlement of wage and hour class and PAGA action.
- *Gabriel Perez, et al. v. Kimberlite Corporation, et al.*, Alameda County Superior Court, Case No. 24CV073959, approved as counsel in final settlement of wage and hour class and PAGA action.
- *Armida Marquez v. The Nielsen Company (US), LLC*, Los Angeles County Superior Court, Case No. 23STCV06394, approved as counsel in final settlement of wage and hour class and PAGA action.

- *Sergio Valdez v. Ampere Computing, LLC, et al.*, Santa Clara County Superior Court, Case No. 24CV438808, approved as counsel in final settlement of wage and hour class and PAGA action.
- *Mario Mendoza v. Mingei International, Inc.*, San Diego County Superior Court, Case No. 37-2024-00015385-CU-OE-CTL, approved as counsel in final settlement of wage and hour class action.
- *Vivian Huynh v. Technical Safety Services, LLC*, Alameda County Superior Court, Case No. 23CV053505, approved as counsel in final settlement of wage and hour class and PAGA action.
- *Connor Brown v. Bi-Rite Management Services LLC, et al.*, San Francisco County Superior Court, Case No. CGC-24-611385, approved as counsel in final settlement of wage and hour class and PAGA action.
- *Joshua Gilmore v. Golden Bolt, LLC*, Los Angeles County Superior Court, Case No. 24STCV11281, approved as counsel in settlement of representative wage and hour action pursuant to PAGA.
- *Tony Jones v. Saddle Creek Corporation dba Saddle Creek Logistics Services*, Orange County Superior Court Case No. 30-2024-01379065-CU-OE-CXC, approved as counsel in final settlement of wage and hour class and PAGA action.
- *Armida Burton v. Mercury Mission Systems, LLC*, Los Angeles County Superior Court, Case No. 24STCV02628, approved as counsel in final settlement of wage and hour class and PAGA action.
- *Triada Pallidou v. TJB Geary's, LLC dba Geary's Beverly Hills*, Los Angeles County Superior Court, Case No. 24STCV15627, approved as counsel in settlement of representative wage and hour action pursuant to PAGA.
- *Joey Ruiz, et al. v. Southern Tire Mart, LLC*, Los Angeles County Superior Court, Case No. 24STCV12037, approved as counsel, in association with other counsel, in final settlement of wage and hour class and PAGA action.

- *Salomon Garcia, et al. v. Atlas Freight Forwarding, Inc.*, San Diego County Superior Court, Case No. 37-2022-00039724-CU-OE-CTL, approved as counsel in final settlement of wage and hour class and PAGA action.
- *Chardriana Jean v. Woodruff-Sawyer & Co.*, Alameda County Superior Court, Case No. 24CV102594, approved as counsel in final settlement of wage and hour class and PAGA action.
- *Stephanie Leon v. Fulgent Therapeutics, LLC, et al.*, Los Angeles County Superior Court, Case No. 24STCV14168, approved as counsel in settlement of representative wage and hour action pursuant to PAGA.
- *Emma Romero v. Charles Abbott Associates, Inc.*, San Bernardino County Superior Court, Case No. CIVSB2322374, approved as counsel in final settlement of wage and hour class and PAGA action.
- *Karen Hartstein v. Hyatt Corporation*, Los Angeles County Superior Court, Case No. 20STCV15895, approved as counsel in final settlement of wage and hour class and PAGA action.
- *Michael Casas, et al. v. Encorr Sheets, LLC*, San Bernardino County Superior Court, Case No. CIVSB2319925, approved as counsel, in association with other counsel, in final settlement of wage and hour class and PAGA action.
- *Quincy O'Neal v. Included Health, Inc., formerly known as Grand Rounds Health, Inc.*, San Francisco County Superior Court, Case No. CGC-23-608391, approved as counsel in final settlement of wage and hour class and PAGA action.
- *Javario Datrail Luna v. A-Check America, Inc., et al.*, Riverside County Superior Court, Case No. CVRI2306180, approved as counsel in settlement of representative wage and hour action pursuant to PAGA.
- *Kevin Werner, et al. v. Greystar Management Services, LP, et al.*, Los Angeles County Superior Court, Case No. 23STCV08498, approved as counsel, in association with other counsel, in settlement of representative wage and hour action

pursuant to PAGA.

- *Jully Mullings v. Antelope Ambulance Service*, Los Angeles County Superior Court, Case No. 23STCV30241, approved as counsel in final settlement of wage and hour class and PAGA action.
- *Maria Martina Aleman v. Holding Hands OPCO LLC dba Holding Hands, Inc.*, Los Angeles County Superior Court, Case No. 24STCV25240, approved as counsel in settlement of representative wage and hour action pursuant to PAGA.
- *Jesus Herrera v. Reeve Store Equipment Company*, Los Angeles County Superior Court, Case No. 22STCV04239, approved as counsel in settlement of representative wage and hour action pursuant to PAGA.
- *Vanessa Vazquez v. Cliffs Resort LLC*, San Luis Obispo County Superior Court, Case No. 24CV-0025, approved as counsel in settlement of representative wage and hour action pursuant to PAGA.
- *Javier Hernandez, Jr. v. DGDG I, LLC, et al.*, Santa Clara County Superior Court, Case No. 23CV416770, approved as counsel, in association with other counsel, in settlement of representative wage and hour action pursuant to PAGA.
- *Juan Manuel Munoz v. MGA Entertainment, Inc.*, Los Angeles County Superior Court, Case No. 23STCV06386, approved as counsel in final settlement of wage and hour class and PAGA action.
- *Mayra Campos Molina, et al. v. Harbor Hotels, LLC*, Los Angeles County Superior Court, Case No. 23STCV10683, approved as counsel in final settlement of wage and hour class and PAGA action.
- *William Sykes, IV, et al. v. Wente Bros.*, Alameda County Superior Court, Case No. 23CV048758, approved as counsel in final settlement of wage and hour class and PAGA action.
- *Jose Padilla, et al. v. WEHO Hospitality Sunset, LLC*, Los Angeles County Superior Court, Case No. 23STCV01072, approved as counsel, in association with other

counsel, in final settlement of wage and hour class and PAGA action.

- *Marvin Morales v. Skurka Aerospace, Inc.*, Los Angeles County Superior Court, Case No. 24STCV12893, approved as counsel in settlement of representative wage and hour action pursuant to PAGA.
- *Tyler Krug, et al. v. EKC Enterprises, Inc.*, Kern County Superior Court, Case No. BCV-23-103975, approved as counsel, in association with other counsel, in final settlement of wage and hour class and PAGA action.
- *Joseph Amyot v. Silverthorn Resort, Inc.*, Shasta County Superior Court, Case No. 23CV-0203487, approved as counsel in final settlement of wage and hour class and PAGA action.
- *Marissa Hartman v. Napa LP Hospitality Corporation*, Napa County Superior Court, Case No. 23CV00116, approved as counsel in final settlement of wage and hour class and PAGA action.
- *Lesly Arreguin, et al. v. Intercare Therapy, Inc.*, Los Angeles County Superior Court, Case No. 23STCV27972, approved as counsel in settlement of representative wage and hour action pursuant to PAGA.
- *Alma Lopez, et al. v. Advanced Manufacturing and Development, Inc.*, Mendocino County Superior, Case No. 23CV000673, approved as counsel, in association with other counsel, in final settlement of wage and hour class and PAGA action.
- *Brittni Aghedo, et al. v. Villa Esperanza Services*, Los Angeles County Superior Court, Case No. 23STCV27362, approved as counsel in final settlement of wage and hour class and PAGA action.
- *Robin Jennings v. Mizuho Orthopedic Systems, Inc. dba Mizuho OSI*, Alameda County Superior Court, Case No. 24CV070891, approved as counsel in settlement of representative wage and hour action pursuant to PAGA.
- *Jonathan Martin v. Atlas Digital, LLC*, Los Angeles County Superior Court, Case No. 23STCV30498, approved as counsel in final settlement of wage and hour class

and PAGA action.

- *Cynthia Molt v. Los Angeles Film School, LLC*, Los Angeles County Superior Court, Case No. 23STCV30757, approved as counsel in final settlement of wage and hour class and PAGA action.
- *William Ramirez v. Employer Solutions Staffing Group LLC*, Los Angeles County Superior Court, Case No. 23STCV24735, approved as counsel in final settlement of wage and hour class and PAGA action.
- *Anu Verma v. SingerLewak LLC*, Los Angeles County Superior Court, Case No. 24STCV11344, approved as counsel in settlement of representative wage and hour action pursuant to PAGA.
- *Toby Lanzarin, et al. v. Building Material Distributors, Inc.*, Sacramento County Superior Court, Case No. 34-2022-00330343-CU-OE-GDS, approved as counsel in final settlement of wage and hour class and PAGA action.
- *Kassandra Herndon, et al. v. Agreeya Solutions, Inc.*, San Joaquin County Superior Court, Case No. STK-CV-UOE-2023-0002783, approved as counsel, in association with other counsel, in final settlement of wage and hour class and PAGA action.
- *Damon Siler, et al. v. Call-The-Car dba Call the Car*, Los Angeles County Superior Court, Case No. 24STCV07514, approved as counsel in settlement of representative wage and hour action pursuant to PAGA.
- *Daniel Ochoa-Lopez v. CorTech West Staffing, LLC, et al.*, Los Angeles County Superior Court, Case No. 23STCV19480, approved as counsel in settlement of representative wage and hour action pursuant to PAGA
- *Juan Escobedo v. Block Tops, Inc.*, Orange County Superior Court, Case No. 30-2023-01356309-CU-OE-CXC, approved as counsel in settlement of representative wage and hour action pursuant to PAGA.
- *Antonio Quintero v. Weyerhaeuser NR Company*, Los Angeles County Superior Court, Case No. 23STCV02624, approved as counsel in final settlement of wage and

hour class and PAGA action.

- *Cristo Hernandez v. Eldorado National (California), Inc.*, Riverside County Superior Court, Case No. CVRI2201056, approved as counsel, in association with other counsel, in final settlement of wage and hour class and PAGA action.
- *Rigoberto Tecaliz v. National Restaurant Inc. dba Black Bear Diner*, San Diego County Superior Court, Case No. 37-2023-00046906-CU-OE-CTL, approved as counsel in final settlement of wage and hour class and PAGA action.
- *Cecilia Estrada v. The Roman Catholic Archbishop of Los Angeles*, Los Angeles County Superior Court, Case No. 24STCV07184, approved as counsel in final settlement of wage and hour class and PAGA action.
- *Alexander Davis v. JAJ Roofing dba Citadel Roofing and Solar*, Sacramento County Superior Court, Case No. 23CV011004, approved as counsel in settlement of representative wage and hour action pursuant to PAGA.
- *Aurelio Aguilar v. Supreme Car Wash, Inc.*, Los Angeles County Superior Court, Case No. 21STCV29696, approved as counsel in final settlement of wage and hour class and PAGA action.
- *Aaron Coffey v. Catalina Channel Express, Inc.*, Los Angeles County Superior Court, Case No. 21STCV41396, approved as counsel in final settlement of wage and hour class and PAGA action.
- *Djuana Shanella Hale, et al. v. Welbe Health, LLC, et al.*, San Joaquin County Superior Court, Case No. STK-CV-UOE-2023-0006866, approved as counsel in final settlement of wage and hour class and PAGA action.
- *Mario Fosados v. Drew Chain Security Corp.*, Los Angeles County Superior Court, Case No. 24STCV00519, approved as counsel in in settlement of representative wage and hour action pursuant to PAGA.
- *Jose Manuel Amaro Bernal v. Joseph Holt Plastering, Inc.*, Los Angeles County Superior Court, Case No. 24STCV15637, approved as counsel in in settlement of

representative wage and hour action pursuant to PAGA.

- *Brandon Geston v. FRTO LLC, et al.*, Fresno County Superior Court, Case No. 24CECG01292, approved as counsel in in settlement of representative wage and hour action pursuant to PAGA.
- *Alfonso Herrera v. W.L. Butler Construction, Inc., et al.*, Orange County Superior Court, Case No. 30-2023-01335445-CU-OE-CXC, approved as counsel in final settlement of wage and hour class and PAGA action.
- *Marcos Ojendiz, et al. v. Jonathan Louis International*, Los Angeles County Superior Court, Case No. 21STCV35253, approved as counsel in in settlement of representative wage and hour action pursuant to PAGA.
- *Emmanuel Caldera v. Zeb's World Famous Boathouse Inc. dba Goat Hill Tavern*, Orange County Superior Court, Case No. 30-2023-01310801-CU-OE-CXC, approved as counsel in final settlement of wage and hour class and PAGA action.
- *Alex Javier Nakamoto v. Skydio, Inc.*, Alameda County Superior Court, Case No. 24CV062913, approved as counsel in in settlement of representative wage and hour action pursuant to PAGA.
- *Jason McEntee v. Roche Molecular Systems, Inc.*, Alameda County Superior Court, Case No. 23CV041360, approved as counsel in final settlement of wage and hour class and PAGA action.
- *Alexzander Roberts, et al. v. Lemonade Restaurant Group*, Los Angeles County Superior Court, Case No. 22STCV38302, approved as counsel, in association with other counsel, in final settlement of wage and hour class and PAGA action.
- *Halla Knotts v. Launch Technical Workforce Solutions, LLC*, San Bernardino County Superior Court, Case No. CIVSB2332568, approved as counsel, in association with other counsel, in settlement of representative wage and hour action pursuant to PAGA.
- *Armando Gastelum v. Premier Trailer Manufacturing, Inc.*, Tulare County Superior

Court, Case No. VCU300333, approved as counsel in final settlement of wage and hour class and PAGA action.

- *Tiffany Patterson v. Black Mountain Healthcare, LLC., d/b/a Seaport Home Health & Hospice*, San Diego County Superior Court, Case No. 37-2023-00037563-CU-OE-CTL, approved as counsel in settlement of representative wage and hour action pursuant to PAGA.
- *Angel Rodriguez v. American Textile Maintenance*, Los Angeles County Superior Court, Case No. 22STCV17855, approved as counsel, in association with other counsel, in final settlement of wage and hour class and PAGA action.
- *Rita Ray v. Families Together of Orange County*, Orange County Superior Court, Case No. 30-2023-01324555-CU-OE-CXC, approved as counsel in final settlement of wage and hour class and PAGA action.
- *Ly Hai v. Sunroad HS Auto, Inc.*, San Diego County Superior Court, Case No. 37-2022-00025788-CU-OE-CTL, approved as counsel, in association with other counsel, in settlement of representative wage and hour action pursuant to PAGA.
- *Anabel Perez v. Eureka Specialties, Inc.*, Los Angeles County Superior Court, Case No. 22STCV35940, approved as counsel in final settlement of wage and hour class and PAGA action.
- *Jose Luis Galicia v. Virco, Inc., et al.*, Los Angeles County Superior Court, Case No. 23STCV29425, approved as counsel in settlement of representative wage and hour action pursuant to PAGA.
- *Rene Umana v. Columbus Technologies*, Los Angeles County Superior Court, Case No. 22STCV16432, approved as counsel in settlement of representative wage and hour action pursuant to PAGA.
- *Sitara Nayabkhil v. San Francisco SPCA (dba SFSPCA), a California 501(c)(3) non-profit organization*, San Francisco County Superior Court, Case No. CGC-23-609950, approved as counsel in final settlement of wage and hour class and PAGA

action.

- *Fernando Solis v. Tuff Shed, Inc.*, Los Angeles County Superior Court, Case No. 24VECV00368, approved as counsel in settlement of representative wage and hour action pursuant to PAGA.
- *Tyler Emery v. Santa Cruz Bicycles, LLC*, Santa Cruz Superior Court, Case No. 24CV00244, approved as counsel in final settlement of wage and hour class and PAGA action.
- *Odalys Montejo v. Team Nissan LLC*, Ventura County Superior Court, Case No. 2023CUOE017853, approved as counsel in settlement of representative wage and hour action pursuant to PAGA
- *Vanessa Cortes v. Giti Tire (USA) LTD*, San Bernardino County Superior Court, Case No. CIVSB2332578, approved as counsel in settlement of representative wage and hour action pursuant to PAGA.
- *Travis Sanford v. Santa Cruz Seaside Company*, Santa Cruz County Superior Court, Case No. 23CV01762, approved as counsel in final settlement of wage and hour class and PAGA action.
- *Jered Ortega v. YMCA of San Diego County*, San Diego County Superior Court, Case No. 37-2023-00043645-CU-OE-CTL, approved as counsel in settlement of representative wage and hour action pursuant to PAGA.
- *Corina Martinez v. Stagnaro Bros. Seafood, Inc.*, Santa Cruz County Superior Court, Case No. 24CV00082, approved as counsel in settlement of representative wage and hour action pursuant to PAGA.
- *Alejandra Jimenez v. ClearFreight, Inc.*, Los Angeles County Superior Court, Case No. 23STCV28938, approved as counsel, in association with other counsel, in settlement of representative wage and hour action pursuant to PAGA.
- *Jazzmin Cortez v. Millard Mall Services, Inc.*, Riverside County Superior Court, Case No. CVRI2104010, approved as counsel in settlement of representative wage

and hour action pursuant to PAGA.

- *Christa Morton, et al. v. PSI Services, LLC*, Fresno County Superior Court, Case No. 24CECG00039, approved as counsel in settlement of representative wage and hour action pursuant to PAGA.
- *Michael Bravo v. Michels Pacific Energy, Inc.*, Santa Clara County Superior Court, Case No. 22CV403427, approved as class counsel in final settlement of wage and hour class and PAGA action.
- *Daniel Rodriguez v. Republique, LLC*, Los Angeles County Superior Court, Case No. 23STCV14521, approved as counsel in settlement of representative wage and hour action pursuant to PAGA.
- *Theresa Bendorf, et al. v. Sea World LLC, et al.*, San Diego County Superior Court, Case No. 37-2021-00034922-CU-OE-CTL, approved as class counsel, in association with other counsel, in final settlement of wage and hour class and PAGA action.
- *Victor De La Cruz v. Northwest Pipe Company*, San Bernardino County Superior Court, Case No. CIVSB2211140, approved as class counsel in final settlement of wage and hour class and PAGA action.
- *Bobby Birdi v. Lucid USA, Inc.*, Alameda County Superior Court, Case No. 21CV003541, approved as class counsel in final settlement of wage and hour class and PAGA action.
- *Jose Trujillo, et al. v. Producers Dairy Foods, Inc.*, Sacramento County Superior Court, Case No. 34-2022-00313753, approved as counsel in settlement of representative wage and hour action pursuant to PAGA.
- *David Williams v. Rancho Nicasio, LLC*, Marin County Superior Court, Case No. CIV2203067, approved as class counsel in final settlement of wage and hour class and PAGA action.
- *Alexander Jackson v. Lifecare Assurance Company*, Los Angeles County Superior

Court, Case No. 23STCV26579, approved as counsel in settlement of representative wage and hour action pursuant to PAGA.

- *Alexis Cardoza v. BHFC Operating LLC*, Los Angeles County Superior Court, Case No. 21STCV34040, approved as counsel in settlement of representative wage and hour action pursuant to PAGA.
- *Maria Ayala, et al. v. SDH Services West, LLC*, Kern County Superior Court, Case No. BCV-21-101933, approved as class counsel in final settlement of wage and hour class action.
- *Alfredo Sanchez v. Greenworld, Inc.*, Riverside County Superior Court, Case No. CVRI2105756, approved as class counsel in final settlement of wage and hour class and PAGA action.
- *Oscar Bryant v. Midwest Construction Services, Inc. dba Trillium*, San Bernardino County Superior Court, Case No. CIVSB2121529, approved as class counsel in final settlement of wage and hour class action.
- *Matthew Savattieri v. AMI Expeditionary Healthcare, LLC, et al.*, Los Angeles County Superior Court, Case No. 21STCV33372, approved as class counsel in final settlement of wage and hour class and PAGA action.
- *Lexy Barajas, et al. v. H. W. Hunter, Inc.*, Los Angeles County Superior Court, Case No. 22STCV01892, approved as counsel in settlement of representative wage and hour action pursuant to PAGA.
- *Alejandro Valdez v. C.H.I. Automart, Inc.*, Los Angeles County Superior Court, Case No. 21STCV40168, approved as class counsel in final settlement of wage and hour class and PAGA action.
- *Sheizan Bawa v. Meathead Movers, Inc.*, Orange County Superior Court, Case No. 30-2021-01211895-CU-OE-CXC, approved as counsel in settlement of representative wage and hour action pursuant to PAGA.
- *Tanisha Lopez, et al. v. Restorix Health, Inc.*, Los Angeles County Superior Court,

Case No. 21STCV33067, approved as class counsel, in association with other counsel, in final settlement of wage and hour class and PAGA action.

- *Perla Soto, et al. v. Nippon Express U.S.A., Inc.*, Los Angeles County Superior Court, Case No. 21STCV24902, approved as class counsel in final settlement of wage and hour class and PAGA action.
- *Angel Garcia, et al. v. J&B Investments, Inc., et al.*, San Bernardino County Superior Court, Case No. CIVSB2208601, approved as class counsel, in association with other counsel, in final settlement of wage and hour class and PAGA action.
- *Sindy Aviles, et al. v. Freeway Insurance Services America, LLC*, Los Angeles County Superior Court, Case No. 21STCV34864, approved as counsel, in association with other counsel, in settlement of representative wage and hour action pursuant to PAGA.
- *Alexander Gnaedig, et al. v. Favorite Healthcare Staffing, Inc.*, Los Angeles County Superior Court, Case No. 21STCV20904, approved as class counsel, in association with other counsel, in final settlement of wage and hour class and PAGA action.
- *Richard Evans v. My Paint Stop, LLC, et al.*, Contra Costa County Superior Court, Case No. MSC21-01812, approved as class counsel in final settlement of wage and hour class and PAGA action.
- *Jose Luis Parada George v. Main Electric Supply Company, LLC, et al.*, Orange County Superior Court, Case No. 30-2021-01220136-CU-OE-CXC, approved as counsel in settlement of representative wage and hour action pursuant to PAGA.
- *Samia Salazar Yunis v. Sharif Jewelers*, Sacramento County Superior Court, Case No. 34-2020-00290080, approved as class counsel in final settlement of wage and hour class and PAGA action.
- *Daniel Analco v. Felix Chevrolet, LP, et al.*, Los Angeles County Superior Court, Case No. 21STCV36654, approved as class counsel in final settlement of wage and hour class and PAGA action.

- *Sasha Aiono v. Benefit Cosmetics*, Los Angeles County Superior Court, Case No. 21STCV33719, approved as counsel in settlement of representative wage and hour action pursuant to PAGA.

EXHIBIT 2

Matter: Ramirez v. TMI Automotive Products

Date	Type of Expense	Title	Amount
9/18/2023	Mailing	Welcome PKG	\$ 1.59
9/20/2023	Filing	Steno - Complaint Packet	\$ 2,057.45
9/28/2023	Mailing	Mailing to TMI Automotive Products, Inc.	\$ 8.53
10/12/2023	Service	Steno - Personal Service to Kamran Staffing, Inc.	\$ 232.95
10/25/2023	Service	Steno - Personal Service to TMI Automotive Products, Inc.	\$ 232.95
11/28/2023	Mailing	Service: Request to Entry of Default to Kamran Staffing Inc.	\$ 1.59
11/30/2023	Filing	Steno - Request for Entry of Default	\$ 59.95
11/30/2023	Filing	First Legal Network, LLC - Case Management Statement	\$ 83.30
2/27/2024	Other	Riverside County Court - Documents Purchase	\$ 14.00
4/5/2024	Filing	Steno - Joint Statement re Upcoming Mediation and Request to Continue Status Conference	\$ 59.95
4/24/2024	Filing	Steno - Opposition to Motion to Compel Arbitration and Dismiss Class Claims	\$ 99.95
4/26/2024	Mailing	Service: Opposition to Motion to Compel Arbitration to Kamran Staffing, Inc.	\$ 2.11
5/1/2024	Filing	Steno - Proof of Service	\$ 59.95
5/1/2024	Filing	Steno - Objection and Request to Strike	\$ 99.95
5/9/2024	Filing	Steno - Supplemental Briefing	\$ 99.95
9/24/2024	Filing	Steno - Joint Stipulation and Proposed Order	\$ 86.95
2/24/2025	Mediation Fee	Payment to Barnes Dispute Resolution re Mediation Services	\$ 5,333.00
2/24/2025	Mailing	Mailing of Check to Barnes Dispute Resolution, Inc.	\$ 0.69
4/18/2025	Mediation Fee	Payment to Berger Consulting Group	\$ 1,826.00
4/18/2025	Mailing	Mailing of Check to Berger Consulting Group, LLC	\$ 8.40
4/25/2025	Filing	Notice of Remote Appearance	\$ 59.95
5/2/2025	Filing	Steno - Case Management Statement	\$ 59.95
8/25/2025	Filing	Steno - Joint Stipulation and Proposed Order	\$ 59.95
8/27/2025	Filing	Steno - Joint Stipulation and Proposed Order	\$ 126.95
10/13/2025	Filing	Steno - Joint Stipulation and Proposed Order	\$ 86.95
11/5/2025	Filing	Steno - Case Management Statement	\$ 59.95
12/15/2025	Service	Steno - Settlement Agreement to Jose Luis Ramirez	\$ 208.50
4/28/2026	Filing	Steno - Case Management Statement	\$ 59.95
4/29/2026	Filing	Steno - Notice of Entry of Order	\$ 59.95
	Filing	Estimated Cost: Steno - Request for Dismissal of Ramirez Action	\$ 99.95
		Total:	\$ 11,251.26