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Attorneys for Plaintiff Rigoberto Tecaliz and the Class

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN DIEGO

RIGOBERTO TECALIZ, individually and on
behalf of others similarly situated and on
behalf of other aggrieved employees,

Plaintiff,

vs.

NATIONAL RESTAURANT INC. DBA
BLACK BEAR DINER, a California
corporation; and DOES 1 through 25,
inclusive,

Defendants.

Case No. 37-2023-00046906-CU-OE-CTL

Honorable Matthew C. Braner
Department C-60

**DECLARATION OF MIRIAM L. SCHIMMEL
IN SUPPORT OF PLAINTIFF'S MOTION
FOR ATTORNEYS' FEES AND COSTS,
ENHANCEMENT PAYMENT, AND
SETTLEMENT ADMINISTRATION COSTS**

Date: August 15, 2025
Time: 9:00 a.m.
Dept.: C-60

Complaint Filed: October 27, 2023
FAC Filed: November 27, 2023
Trial Date: Not Set

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1. I am an attorney duly licensed to practice law in all Courts of the State of California. I am a Senior Attorney with the law firm of Blackstone Law, APC (“Blackstone”), attorneys of record for Plaintiff Rigoberto Tecaliz (“Plaintiff”). I have personal knowledge of the facts contained herein, and if called to testify, I could and would competently do so.

Attorneys' Fees and Costs

4. The effectiveness of Blackstone Law, APC's ("Blackstone") prosecution of this matter has translated into tangible monetary benefits for the Settlement Class Members, the State of California, and the PAGA Employees as follows: (1) Settlement Class Members, the State of California, and the PAGA Employees will obtain monetary recovery over a relatively short period of time, as opposed to waiting additional years for the same, or potentially worse, result; (2) a guaranteed result that compares favorably with other similar class action settlements of this type, given the strengths and weaknesses of the case; and (3) significant savings in Class Counsel's fees and/or costs that would have only increased significantly had the case progressed through trial and/or appeals.

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**DECLARATION OF MIRIAM L. SCHIMMEL IN SUPPORT OF PLAINTIFF’S MOTION FOR ATTORNEYS’
FEES AND COSTS, ENHANCEMENT PAYMENT, AND SETTLEMENT ADMINISTRATION COSTS**

1 5. In the present case, Class Counsel has borne all of the risks and costs of litigation and
2 will not receive any compensation until recovery is obtained. Class Counsel had to consider its
3 workload during this litigation when considering taking on additional work that was available, and
4 which Class Counsel had to forego in order to devote the time necessary to pursue this litigation. Class
5 Counsel is experienced in complex wage-and-hour litigation and used that experience to obtain a
6 favorable result for the Class, the State of California, and the PAGA Employees. Considering the
7 amount of fees requested, work performed, risks incurred, and experience of Class Counsel in handling
8 similar matters, Plaintiff maintains that the requested attorneys' fees of one-third (1/3) of the Gross
9 Settlement Amount (i.e., \$213,000.00) are reasonable and should be awarded.

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

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

1 thousands) of depositions; propounded and responded to all discovery; prepared and opposed all
2 motions and pleadings, including dispositive and certification motions; strategized on all cases;
3 attended all hearings; attended all mediations; coordinated with class action administrators; prepared
4 and worked with experts; first and second chaired multiple trials and arbitrations; and engaged in all
5 other intricate facets of litigation. During that time, he represented a wide range of clients from sole
6 proprietorships to Fortune 500 companies in state, federal, complex, and appellate courts. Many of
7 the cases he managed were highly publicized, with articles written about them in the Los Angeles
8 Times, Deadline, The Hollywood Reporter, Business Insider, Law360, and others. Super Lawyers has
9 regularly honored him as a Southern California Rising Star since 2012. His billable rate is \$1,150,
10 which is well within the prevailing rate for attorneys with his experience in this area of practice in
11 Southern California.

12 b. I am a 28-year litigator who joined Blackstone Law, APC in June 2022, following ten
13 years of working with two well-known plaintiff-side wage and hour law firms in Los Angeles. I
14 obtained my Bachelor of Arts degree in Political Science from the University of California at Los
15 Angeles in 1992. Thereafter, I received my law degree from Loyola Law School in 1996 and was
16 admitted to the California State Bar in December 1996. Since my admission to the Bar, I have devoted
17 my practice to a wide variety of litigation matters on both the plaintiff and defense side, including
18 general business, toxic tort, medical device, and pharmaceutical matters. Since 2010, my practice has
19 been devoted almost entirely to employment litigation consisting of wage and hour class actions and
20 representative actions pursuant to PAGA, as well as individual actions based on violations of the Fair
21 Employment and Housing Act ("FEHA"). Approximately 75% of my work in this regard has been on
22 behalf of employees (plaintiffs), while the remaining 25% was on behalf of employers/businesses. On
23 many of those cases, I was the senior lead attorney managing the litigation and overseeing other
24 attorneys. In that capacity, I obtained extensive experience analyzing potential wage and hour and
25 wrongful termination claims for viability; took and defended hundreds of depositions; propounded
26 and responded to discovery; prepared and opposed a wide variety of motions and pleadings, including
27 dispositive and certification motions, as well as settlement approval motions; strategized on all cases;
28 participated in and directed communication with class members; attended hearings; led and

1 participated in mediations; coordinated with class action administrators; prepared and worked with
2 experts; and engaged in all other related aspects of litigation in state, federal, complex, and appellate
3 courts. My billable rate is \$1,050, which is well within the prevailing rate for attorneys with my
4 experience in this area of practice in Southern California.

5 c. Joana Fang is a highly skilled eight-year lawyer who is part of the team at Blackstone
6 Law that litigated this matter. She is a 2015 graduate of Loyola Law School, and a 2011 graduate of
7 University of California, Berkeley where she was a double major in Legal Studies and Media Studies.
8 Since passing the Bar, Ms. Fang has exclusively represented plaintiffs in wage and hour litigation, as
9 well as catastrophic injury complex litigation. She is admitted to the State of California, all federal
10 district courts of California, and the U.S. Court of Appeals for the 9th Circuit. She was most recently
11 recognized as a 2025 Southern California Rising Star by Super Lawyers. Her hourly rate of \$750 is
12 reasonable based on her education and experience and is in line with the market rate.

13 d. Alexandra Rose joined Blackstone Law, APC from a highly reputable employment law
14 firm. She graduated from the University of California, Los Angeles with a Bachelor of Arts degree in
15 2016 and from New England Law | Boston with a Juris Doctor degree in 2019. She was admitted to
16 the State Bar of California in December of 2019 and the State Bars of New York and New Jersey in
17 2023. She is additionally licensed in all federal district courts of California. She has worked on many
18 wage and hour class action and PAGA representative matters, and her work has included, *inter alia*,
19 researching and drafting pleadings, administrative notice exhaustion, drafting, negotiating, and
20 finalizing stipulations and settlement agreements, engaging in motion practice, claims evaluation and
21 analysis, and making court appearances. Additionally, she manages the post-settlement department at
22 Blackstone. In that capacity, she oversees and handles over 100 wage-and-hour putative class actions
23 and/or representative actions under PAGA that are in settlement. Her hourly rate of \$750 is reasonable
24 based on her education and experience and is in line with the market rate.

25 e. Jared C. Osborne joined Blackstone also from a highly reputable employment law firm.
26 He graduated from New York University with a Bachelor of Arts degree in 2009 and from University
27 of Southern California Gould School of Law (USC) with a Juris Doctor degree in 2020. While at
28 USC, he was an Executive Senior Editor on the Southern California Law Review and graduated in the

1 top 10% of his class. He was admitted to the State Bar of California in February 2021. Since his
2 admittance, he has worked exclusively as a Plaintiff's side employment attorney handling both
3 individual and class action cases. He was most recently recognized as a 2025 Southern California
4 Rising Star by Super Lawyers. His hourly rate of \$650 is reasonable based on his education and
5 experience and is in line with the market rate.

6 f. James S. Winn Jr. recently joined Blackstone. He received his Bachelor's degree from
7 University of California, Santa Barbara in 2018 and Juris Doctor degree from University Pacific,
8 McGeorge School of Law in 2022. He was admitted to the State Bar of California in 2023. His hourly
9 rate of \$550 is reasonable based on his education and experience and is in line with the market rate.

10 7. Class Counsel has spent approximately 265.70 total hours litigating this matter. To
11 date, our total fees incurred amount to \$222,175. Each attorney who worked on this matter engaged
12 in a multitude of tasks, including communicating with the client and defense counsel; investigating
13 the facts and researching applicable legal issues; drafting pleadings, informal discovery requests, and
14 joint statements; reviewing documents; preparing for and attending mediation; and facilitating the
15 settlement by drafting the settlement documents and motion papers for obtaining settlement approval.
16 One difficulty in determining the hourly rate of attorneys of similar skill and experience in the relevant
17 community is the scarcity of hourly fee-paying clients in class action litigation. As a practical matter,
18 few if any employees or consumers pay attorneys' fees on an hourly basis for such extensive litigation,
19 and thus retainer agreements in such cases are based on a stepped-up contingency fee (with the
20 percentage increasing from one third to forty-five – and sometimes even fifty percent, which is on par
21 with personal injury contingency fee agreements – if the case goes to trial). Therefore, there is no
22 customary hourly billing rate for work that is routinely based on a contingent fee relationship, but the
23 nature of class action work should be strongly considered by the Court. Wage and hour work presents
24 a specialized and challenging area of law that is not within the knowledge of many lawyers. This kind
25 of class action work requires specialized learning and the willingness to take large risks. A summary
26 of Class Counsel's lodestar for each attorney who worked on this case is as follows:

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<u>Attorney</u>	<u>Position</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Jonathan M. Genish	Managing Partner	28.10	\$1,150	\$32,315
Miriam L. Schimmel	Senior Counsel	67.20	\$1,050	\$70,560
Joana Fang	Senior Associate	56.20	\$750	\$42,150
Alexandra Rose	Senior Associate	39.30	\$750	\$29,475
Jared C. Osborne	Associate Attorney	64.80	\$650	\$42,120
James S. Winn Jr.	Associate Attorney	10.10	\$550	\$5,555

8. We expect to spend an additional 10 hours (\$10,500) in connection with preparing for and attending the Final Approval Hearing and managing the Settlement through its conclusion, including anticipated communications with defense counsel, the Settlement Administrator, our client, and Class Members. Based thereon, the total amount of Class Counsel's fees through closure of this case are estimated to be approximately \$232,675.

9. The Settlement Agreement provides for reimbursement of litigation costs and expenses not to exceed Twenty Thousand Dollars and Zero Cents (\$20,000.00). Class Counsel seeks reimbursement of a total of Fifteen Thousand Four Hundred Ninety-Four Dollars and Six Cents (\$15,494.06) in litigation costs and expenses. 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.

10. The requested award of Attorneys' Fees and Costs was included and set forth clearly in the Class Notice provided to the Class Members.

Enhancement Payment

11. As part of the Settlement Agreement, Plaintiff is requesting a reasonable Enhancement Payment in the amount of Ten Thousand Dollars and Zero Cents (\$10,000.00) to Plaintiff. The requested Enhancement Payment is eminently reasonable given the time and effort Plaintiff spent on this matter, and the benefit to the other Class Members as a result of Plaintiff's 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 Rigoberto Tecaliz submitted herewith details his work and

1 efforts in bringing and litigating this matter through resolution and supports the requested
2 Enhancement Payment. The requested Enhancement Payment was also disclosed in the Class Notice
3 provided to the Class Members.

4 ***Settlement Administration Costs***

5 12. In Plaintiff's Motion for Preliminary Approval, Plaintiff requested, and the Court
6 approved, Settlement Administration Costs not to exceed Eight Thousand Five Hundred Dollars and
7 Zero Cents (\$8,500.00). ILYM Group, Inc., the approved Settlement Administrator, provided Class
8 Counsel with its quote stating that its cost to administer the Settlement is Seven Thousand Four
9 Hundred Fifty Dollars and Zero Cents (\$7,450.00).

10 ***Allocation to the LWDA***

11 13. As part of the Settlement, Defendant has agreed to pay Thirty Thousand Dollars and
12 Zero Cents (\$30,000.00) to settle the claims of the PAGA Employees brought pursuant to PAGA, of
13 which the payment of Twenty-Two Thousand Five Hundred Dollars and Zero Cents (\$22,500.00)
14 (75% of the PAGA Amount) will be paid to the LDWA for education and enforcement purposes.

15 14. It is extremely common in approved wage and hour class action cases that settle that
16 only a small portion of the total settlement is paid to PAGA penalties "in order to maximize payments
17 to class members." (*Magadia v. Wal-Mart Assocs.* (N.D. Cal. May 31, 2019, No. 17-CV-00062-LHK)
18 2019 U.S. Dist. LEXIS 91732, *90-91, citing as examples *Ceja-Corona v. CVS Pharm., Inc.* (E.D.
19 Cal. Jan. 14, 2015) 2015 U.S. Dist. LEXIS 5118, 2015 WL 222500, at *2-3 [preliminarily approving
20 \$10,000 in PAGA penalties out of a total settlement amount of \$900,000]; *Thio v. Genji, LLC* (N.D.
21 Cal. 2014) 14 F. Supp. 3d 1324, 1330 [preliminarily approving \$10,000 in PAGA penalties out of a
22 total settlement amount of \$1,250,000]; *Franco v. Ruiz Food Prods.* (E.D. Cal. Nov. 27, 2012) 2012
23 U.S. Dist. LEXIS 169057, 2012 WL 5941801, at *14 [granting final approval of \$10,000 in PAGA
24 penalties out of a total settlement amount of \$2,500,000]; *Garcia v. Gordon Trucking, Inc.* (E.D. Cal.
25 Oct. 31, 2012) 2012 U.S. Dist. LEXIS 160052, 2012 WL 5364575, at *3 [granting final approval of
26 \$10,000 in PAGA penalties out of a total settlement amount of \$3,700,000]; *Chu v. Wells Fargo Invs.,*
27 *LLC* (N.D. Cal. Feb. 16, 2011) 2011 U.S. Dist. LEXIS 15821, 2011 WL 672645, at *1 [granting final
28 approval of \$10,000 in PAGA penalties out of a total settlement amount of \$6,900,000].) Like here,

1 in these approved settlements, the parties generally maximized statutory penalties and minimized
2 PAGA penalties to focus on claims to the class members, the persons who actually suffered the
3 California Labor Code violations.

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

6 Executed on July 24, 2025, at Beverly Hills, California.

7 Miriam L. Schimmel
8 Miriam L. Schimmel
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EXHIBIT 1

- *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.
- *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.
- *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.
- *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

Date	Type of Expense	Description of Expense	Amount
Tecaliz v. National Restaurant, Inc. dba Black Bear Diner San Diego Superior Court Case No. 37-2023-00046906-CU-OE-CTL			
7/28/2023	Mailing	Records Request to National Restaurant, Inc.	\$8.53
7/28/2023	Mailing	Records Request to Agent for Service of National Restaurant, Inc.	\$8.53
9/11/2023	Mailing	Follow-up Records Request to National Restaurant, Inc.	\$8.53
9/11/2023	Mailing	Follow-up Records Request to Agent for Service of National Restaurant, Inc.	\$8.53
9/18/2023	Filing	LWDA: PAGA Notice	\$75.00
9/18/2023	Mailing	PAGA Notice to National Restaurant, Inc.	\$8.53
9/18/2023	Mailing	PAGA Notice to Agent for Service of National Restaurant, Inc.	\$8.53
10/16/2023	Mailing	Final Records Request to National Restaurant, Inc.	\$4.98
10/16/2023	Mailing	Final Records Request to Agent for Service of National Restaurant, Inc.	\$4.98
10/31/2023	Filing	Steno: Complaint & Initiating Documents	\$647.20
11/10/2023	Other	Steno: Personal Service of Complaint	\$219.95
11/27/2023	Mailing	Service of FAC on National Restaurant, Inc.	\$2.79
12/6/2023	Filing	Steno: First Amended Complaint	\$59.95
4/11/2024	Filing	Steno: Notice and Acknowledgment of Receipt	\$59.95
4/30/2024	Filing	Steno: Case Management Statement	\$59.95
6/5/2024	Mailing	Mailing Payment to JAMS	\$0.64
9/12/2024	Mediation	JAMS - Admin Fee	\$9,500.00
9/12/2024	Mailing	Mailing Payment to JAMS	\$0.69
10/31/2024	Filing	Steno: Case Management Statement	\$99.95
12/12/2024	Other	Berger Consulting Group	\$4,365.00
3/26/2025	Filing	Steno: Motion for Preliminary Approval and Supporting Documents	\$140.95
	Filing	Estimated Cost - Steno: Motion for Final Approval and Supporting Documents	\$140.95
	Filing	Estimated Cost - Notice of Entry of Judgment or Order	\$59.95
Total:			\$15,494.06