Fawn F. Bekam (SBN 307312)
fawn@abramsonlaw.com
Lisa B. Iturriaga (SBN 339678)
Lisa.i@abramsonlaw.com
ABRAMSON LAW GROUP
1700 W. Burbank Blvd.
Burbank, California 91506
Tel: (213) 493-6300
Fax: (213) 723-2522

David Keledjian, Esq. (SBN 309135)
David Arakelyan, Esq. (SBN 337076)
D.LAW, INC.
250 N Madison Avenue. 2nd Floor
Pasadena, CA 91101-1639
Tel: (818) 962-6465 / Fax: (818) 962-6469
Emails: D.Keledjian@d,law, D.Arakelyan@d.law

Attorneys for Plaintiffs LISA CHILDRESS and JUSTIN AARON HEARD, on behalf of themselves and all others similarly situated,

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SAN BERNARDINO

LISA CHILDRESS and JUSTIN AARON HEARD, on behalf of themselves and all others similarly situated, Plaintiffs, vs. FORD MOTOR COMPANY; and DOES 1 through 100, Inclusive, Defendants.	**CLASS ACTION** Case No. CIVSB2324555 *Assigned for All Purposes to Hon. Thomas S. Garza, Dept. S27* **DECLARATION OF DAVID ARAKELYAN IN SUPPORT OF PLAINTIFFS' MOTION FOR FINAL APPROVAL OF CLASS ACTION AND PAGA SETTLEMENT AND REQUEST FOR ATTORNEYS' FEES, COSTS, AND CLASS REPRESENTATIVES' ENHANCEMENT AWARDS** Date: November 18, 2026 Time: 8:30 a.m. Dept.: S27 Complaint filed: October 3, 2023 Trial Date: None set.

DECLARATION OF DAVID ARAKELYAN IN SUPPORT OF PLAINTIFFS' MOTION FOR FINAL APPROVAL OF CLASS ACTION AND PAGA SETTLEMENT AND REQUEST FOR ATTORNEYS' FEES, COSTS, AND CLASS REPRESENTATIVES' ENHANCEMENT AWARDS

I, David Arakelyan, declare:

1. I am an attorney licensed and admitted to practice before all courts of the State of California and the United States District Courts for the Central, Southern, Eastern and Northern Districts of California. I am an Associate Attorney at D.Law, Inc. ("D.Law"), and attorney of record for Plaintiffs Lisa Childress and Justin Heard ("Plaintiffs" or "Class Representatives") on behalf of similarly situated employees of Defendant Ford Motor Company ("Defendants").

2. On July 20, 2023, Plaintiff Childress filed her Class Action Complaint in San Bernardino Superior Court, Case No. CIVSB2316694 ("Childress Class Action"), alleging claims for: (1) failure to pay all minimum wages; (2) failure to provide meal periods, (3) failure to provide rest periods; (4) failure to issue accurate wage statements; (5) failure to pay all final wages; (6) failure to reimburse business expenses; and (7) unfair business practices. On September 22, 2023, Defendant removed the Childress Class Action to the United States District Court for the Central District of California.

3. On July 21, 2023, Plaintiff Childress provided written notice to the Labor & Workforce Development Agency (LWDA) and Defendant of her intent to pursue PAGA civil penalties for alleged violations of the California Labor Code, as required by Labor Code § 2699.3, predicated on underlying violations of Labor Code sections § 201- 204, 210, 221, 226, 226.7, 512, 516, 558, 1174, 1182.12, 1194, 1194.2, 1197, 1198, 2802, and 2804, et. seq., and the applicable Wage Orders of the Industrial Welfare Commission.

4. On October 3, 2023, Plaintiff Childress filed a Representative Action Complaint in the San Bernardino Superior Court, Case No. CIVSB2324555 ("Childress PAGA Action"), against Defendant for civil penalties for violations of Labor Code section 2698, et seq., the California Private Attorneys General Act ("PAGA"). On October 6, 2023, Plaintiff Childress submitted a conformed copy of the Childress PAGA Action to the LWDA, pursuant to Labor

Code § 2699(l).

5. On September 19, 2023, Plaintiff Heard filed a Class Action Complaint in the San Joaquin Superior Court, Case No. STK-CV-VOE-2023-9958 ("Heard Action"), alleging claims for: (1) failure to pay all minimum wages; (2) failure to pay overtime wages; (3) failure to provide meal periods or pay premium pay in lieth thereof; (4) failure to provide rest periods or pay premium pay in lieth thereof; (5) failure to issue accurate wage statements; (6) failure to pay final wages, (7) failure to maintain records; (8) failure to reimburse business expenses, and (9) unfair business practices.

6. On September 22, 2023, Defendant removed the Childress Class Action to the United States District Court for the Central District of California. On October 20, 2023, Defendant removed the Heard Class Action to the United States District Court for the Central District of California.

7. On September 18, 2023, Plaintiff Heard, provided written notice to the Labor & Workforce Development Agency (LWDA) and Ford of his intent to pursue PAGA civil penalties for alleged violations of the California Labor Code, as required by Labor Code § 2699.3. On December 21, 2023, Heard filed a First Amended Complaint, which added a claim for PAGA civil penalties. On February 7, 2024, Plaintiff Heard submitted a conformed copy of his First Amended Complaint to the LWDA, pursuant to Labor Code § 2699(l).

8. On November 22, 2024, the Court stayed the Childress Class Action, so that the Parties may seek preliminary approval of the Class Action and PAGA Action Settlement in the Childress PAGA Action pending before this Court.

9. The Parties agreed to participate in mediation and informally exchanged information and documents, including timekeeping and corresponding payroll records for Plaintiffs and all the Class Members along with applicable policy documents. In preparation for mediation, Plaintiffs hired Berger Consulting Group, an expert data analysis group to prepare damage calculations and an exposure analysis for the mediation.

10. On October 18, 2024, the Parties attended mediation with the Hon. Daniel J. Buckley (Ret.), a respected and highly experienced mediator in wage and hour class actions.

After further discussions and negotiations, the Parties were able to reach a class wide settlement.

11. On July 9, 2025, Plaintiff Childress filed the operative First Amended Complaint ("FAC) to add Plaintiff Heard as a named plaintiff and class representative and to add additional allegations and causes of action pled in the Heard Action, which allegations and causes of action were valued and negotiated at the mediation, and to add plaintiff's counsel in the Heard Action as proposed counsel in this Action. On November 18, 2025, Plaintiffs' counsel submitted a conformed copy of the Childress PAGA Action to the LWDA.

12. The mediation resulted in a Gross Settlement Amount of $3,300,000.00 ("Gross Settlement Amount"), on a class wide and PAGA representative basis. The Settlement Period is defined in the Settlement Agreement as July 19, 2019, through October 21, 2025. PAGA Members means all current and former hourly-paid, non-exempt employees of Defendants who were employed in the State of California at any time during the PAGA Period (i.e., the period from July 21, 2022, through October 21, 2025).

13. The Settlement Class consists of all current and former non-exempt, hourly employees of Defendants in California at any time between July 20, 2019, through October 21, 2025 (the "Settlement Period"). There is no claim form requirement, and no residual will revert to Defendants. It is an opt-out class.

14. As the escalator clause was triggered and Defendant chose to shorten the release period. As a result, the Class Period is now from July 20, 2019, through December 22, 2024 (see Declaration of Laura Hodson, ["Hodson Decl.], ¶ 6.)

15. The *highest* estimated Individual Class Payment is approximately $14,209.27, the *average* Individual Class Payment is currently estimated to be approximately $5,886.90, and the *lowest* Individual Class Payment is currently estimated to be approximately $50.21. (see Hodson Decl., ¶ 19.) Additional proposed disbursements are as follows:

1) Class Counsel Fees: $1,100,000.00

2) Class Counsel Litigation Expenses Payment: $24,324.57

3) Administration Costs: $7,000

4) Class Representative Enhancement Awards: $10,000 to each Plaintiff

(total of $20,000)

5) PAGA Penalties: $165,000 (LWDA Share: $123,750)

16. After the above deductions from the Gross Settlement Amount of $3,300,000.00, the Net Settlement Amount to be distributed to Participating Class Members is estimated to be $1,983,675.43.[1]

17. On April 8, 2026, the Court granted Preliminary Approval of this settlement, approved the Notice of Class Action and related forms, appointed Plaintiffs Lisa Childress and Justin Aaron Heard as the Class Representatives, appointed Class Counsel, approved Simpluris ("Simpluris") as the Administrator, and set timelines for the settlement administration process, pursuant to the Settlement Agreement. Simpluris completed the notice procedure per the Settlement terms, including mailing the Court-approved Notice of Class Action Settlement (the "Class Notice") to 336 eligible Class Members. (Hodson Decl., ¶ 8.)

18. On July 28, 2026, Simpluris mailed the Class Notices via First Class U.S. Mail to 336 Class Members. (*Id*.) The Class Notice advised Class Members of their right to opt out of the settlement, object to the settlement, dispute the quantity of Workweeks, or do nothing, and the implications of each such action. The Class Notice also advised Class Members of applicable deadlines and other events, including the date of the Final Approval Hearing, and how Class Members could obtain additional information. The Class Notice advised Class Members that they could submit an exclusion, objection and/or dispute postmarked by September 28, 2026 and extended deadline for remailed Class Notices of October 12, 2026. (*Id*., ¶ 13.)

19. Simpluris performed twenty-two (22) address skip traces on Class Notices returned as undeliverable. The address trace utilizes the Class Member's name, previous address and Social Security Number for locating a current address. Of the 22 traces performed, seventeen (17) more current addresses were obtained, and Class Notices were promptly re-mailed to those Class Members via First Class mail. Of the 22 traces performed, Simpluris did

[1] This amount is different from what is stated in the Administrator's Declaration ($1,978,000) as it reflects the deduction of actual litigation costs rather than the amount mentioned in the settlement agreement.

not obtain updated addresses for five (5) undeliverable Class Notices. Of the 17 Class Notices mailed to a more current address identified from trace, five (5) Class Notice was returned to Simpluris as undeliverable a second time. As of this date, five (5) Class Notices were returned to Simpluris as undeliverable. (See Hodson Decl., ¶ 9.)

20. Re-mailed Class Notices were provided with an extended deadline of October 12, 2026. (*Id*., ¶ 13.) As of this date, Simpluris has received zero (0) requests for exclusion, zero (0) objections, and zero (0) disputes regarding employment information from Class Members. (*Id*., ¶¶ 14 – 16.)

21. Class Counsel remain convinced the Settlement is in the best interest of the Class based on a detailed knowledge of the issues, risks of loss, and the negotiations. Nothing has changed since the Court granted Preliminary Approval of the Settlement to negate the presumption of fairness. The affirmative defenses asserted by Defendants, the uncertainty of achieving certification, the prospect of a potential adverse summary judgment ruling, the difficulties of complex litigation, the lengthy process of establishing specific damages, and the perils of litigation affecting the value of the claims, as well as the risks of loss at trial and the various possible delays and appeals were carefully considered by Class Counsel in arriving at the proposed Settlement.

22. The Class Members' response to the settlement is outstanding - 100% of the money will be paid out as there is no reversion to Defendants and 100% of the Class Members who received the Class Notice are participating in the settlement, since there are no requests for exclusion, to date. There are also no objections to the Settlement, to date.

23. Individual Class Payments will be allocated: 40% wages for which an IRS Form W-2 will be issued, and 60% will be allocated to the settlement of interest and allocated to penalties for which IRS 1099 Forms will be issued.

CLASS REPRESENTATIVES' ENHANCEMENT AWARDS

24. I believe that the requested Class Representatives' Enhancement Awards for Plaintiffs of $10,000 each (total $20,000) are fair and reasonable. This is based on the information set forth in the Motion for Preliminary Approval and the Declarations of the Class

Representatives (see Declaration of Class Representative Justin A. Heard in Support of Plaintiffs' Motion for Preliminary Approval ["Heard Decl."]; Declaration of Class Representative Lisa Childress in Support of Plaintiff's Motion for Preliminary Approval ["Childress Decl."]).

LWDA – SUBMISSION OF MOTION

25. As required by PAGA, Plaintiffs' Motion for Final Approval of Class Action and PAGA Settlement was submitted (uploaded) to the Labor and Workforce Development Agency's ("LWDA") online system on the same day as filing the Motion. Attached hereto as **Exhibit A** is a true and correct copy of proof of submission from the LWDA confirming receipt.

ATTORNEYS' COSTS AND ADMINISTRATION EXPENSES

26. The parties' Settlement Agreement provides for reimbursement of costs for up to $30,000.00. Class Counsels' litigations costs to date are $24,324.57 ($14,642.20 – D.Law and $9,682.37 Abramson). Class Counsel requests reimbursement of litigation costs for a total of $24,324.57. These are costs include the mediator's fee, expert fees, and filing fees. Class Counsel's litigation costs include anticipated filing costs of $97.16 for filing this Motion, the Administrator's declaration regarding final distribution, and the notice of entry of final order and judgment. Attached hereto as **Exhibit B** are the itemized Litigation Costs for D.Law to date; attached as **Exhibit 1** to the Declaration of Fawn F. Bekam are the itemized Litigation Costs for Abramson Law Group.

27. The Parties requested several settlement administration quotes, and selected Simpluris as the settlement administrator. Based on a quote obtained from Simpluris, the Administration Costs are $7,000.00. (See Hodson Decl., ¶ 22.)

ATTORNEYS' FEES

28. The Class Notice mailed to Class Members stated the amount of fees being requested by Class Counsel. Not a single Class Member objected to an award of fees in the amount requested to date.

29. Class Counsel are experienced and qualified to evaluate the class claims and viability of the defenses. The recovery for each Class Member in the present is fair and

reasonable based on all risk factors.

30. Class Counsel seeks a fee award calculated as a percentage of the common fund for the successful prosecution and resolution of this action. For Class Counsel, the fees here were wholly contingent in nature, and this complex action involved specialized issues. There was the prospect of the enormous cost inherent in class action litigation, as well as a long battle with corporate Defendants. Class Counsel risked not only their time but also money to ensure the successful litigation of this action on behalf of all Class Members. Accordingly, the requested percentage of the common fund is appropriate, and Class Counsel respectfully requests that the Court enter an Order to that effect.

31. I believe that an attorneys' fee of 1/3 of the total value of this case is fair and reasonable. This amount was negotiated by the parties in good faith with the assistance of the mediator, and Defendants have no objection to the fees request. I am very familiar with the contingent fee market throughout California particularly as it pertains to complex employment, wage and hour, and class action litigation. Contingency fee agreements with plaintiffs, both as individuals and as representatives in class action suits, commonly provide that counsel will receive a fee that is between 33% to 40% of any recovery that is obtained, and, in addition, that counsel be reimbursed for the costs they incurred out of a recovery amount. These are typical and standard percentages in employment related contingency agreements throughout California. Indeed, in my opinion, Plaintiff in this complex wage and hour case could not have retained competent counsel in California, particularly with the considerable skill and expertise of my firm for any amount significantly less than the contingency fee percentage provided in these retainer agreements. As the Court is aware, Plaintiff's Counsel has not received any payment for attorneys' fee to date in this case and has advanced all costs during the multi-year litigation.

32. In the present case, Class Counsel will have worked a total of 587.25 hours (356.7 Abramson + 230.55 D.Law) on this case, with a lodestar of approximately $464,604.80 ($226,435.00 Abramson + $238,169.80 D.Law). Attached hereto as **Exhibit C** are true and correct copies of itemized Time Records to date for D.Law. All these hours were reasonable and necessary and related to this litigation. Class Counsel requests a fee of $1,100,000.00, which

requires a multiplier of approximately 2.37 excluding paralegal support ($1,100,000 divided by $464,604.80). (see also Declaration of Fawn F. Bekam on file herein.)

33. Class Counsel's rates consistent with surveys relied on by other courts. (*Martinez v. Helzberg's Diamond Shops* (C.D. Cal., Sept. 24, 2021, No. EDCV201085PSGSHKX) 2021 WL 9181893, at *10 [relying on "The Real Rate Report"]; *Gutierrez v. Chopard USA Ltd.* (2022) 82 Cal.App.5th 383, 387 [Unruh Act case affirming award based on Laffey Matrix, available at http://www.laffeymatrix.com/see.html].)

ATTORNEYS' EXPERIENCE

34. D.Law (formerly known as Davtyan Law Firm) prosecutes wage and hour cases, including class actions and PAGA actions on behalf of employees and others who have had their rights violated. D.Law, either on its own or with co-counsel, is currently serving as plaintiffs' counsel of record in numerous wage and hour and employment class action and PAGA action cases pending in both state and federal court.

35. D.Law is well-qualified and has ample experience, knowledge, and resources to act as counsel and represent Plaintiffs and the putative Class and aggrieved employees in this action. Our practice is exclusively focused on employment matters and representing plaintiffs in wage and hour actions with the same or similar causes of actions brought forth in the matter pending before this Court.

36. D.Law has litigated and successfully resolved many wage and hour class action cases involving failure to pay wages and derivative Labor Code claims and penalties. See e.g. *De La Rosa v. The Coca Cola Company et al.* (Superior Court of California in Napa, 17CV000787), *Harvey v. Bed Bath & Beyond of California Limited Liability Company* (Superior Court of California in Alameda, RG17885153), *Paredes v. Bottling Group LLC et. al.* (Superior Court of California in Kern), *Ramirez v. Harris Ranch Beef Company* (Superior Court of California in Fresno, 16CECG04103), *Gates v. Gate Gourmet, Inc. et. al.* (Southern District of California, 16-cv-01084-L-AGS), *Hargrave v. Antelope Valley Hospital* (Superior Court of California in Los Angeles, BC663252), *Ramirez v. Milton Roy et. al.* (Superior Court of California in Los Angeles, BC 632 276), *Hawkins v. AvalonBay Communities* (Superior Court of California in Santa Clara,

17CV316492), *Jones Tharpe et al. v. Sprint Corporation et al*. (Superior Court of California in Los Angeles, BC644645), *Ortega et al. v. Nestle Waters North America, Inc. et al.* (Superior Court of California in Los Angeles, BC623610), *Schultz v. Jimbo's Natural Family, Inc.* (Superior Court of California in San Diego, 37-2017-00022348-CUE-OE-CTL), *Ambrose v. Victor Valley Global et al.* (Superior Court of California in San Bernardino, CIVDS1709289), *Puerta-Gildardo v. Real Time Staffing Services LLC et. al.* (Superior Court of California in Los Angeles, BC565445), *Vargo v. Pregis Innovative Packaging LLC* (Superior Court of California in Tulare, 270836), *Conlin v. Aegis Senior Communities LLC* (Northern District of California, 17-cv-05534-LHK), *Galarza v. Kloeckner Metals Corporation* (Central District of California, 2:17-cv-04910-FMO), *Estes v. L3 Technologies, Inc. et al.* (Southern District of California, 3:17-cv-02356-H-JMA), *Rowser v. Trunk Club, Inc.* (Central District of California, 2:17-cv-05064-DSF-RAO), *Leach v. The Claremont Colleges, Inc.* (Superior Court of California in Los Angeles, BC686451), *Vaesau v. PCT Enterprises, Inc. dba Precision Cabinets* (Superior Court of California, County of Contra Costa MSC18-02404), *Terry v. TF Louderback, Inc. dba Bay Area Beverage Company* (Superior Court of the State of California, County of Contra Costa, MSC18-00859), *Roach v. Westcare California, Inc.* (Superior Court of California in Kern County, BCV-17-102367-SDS), *Patton v. Church & Dwight Co., Inc.* (Central District of California, EDCV 18-903-MWF (KKx)), *Juarez v. ISL Employees, Inc.* (Superior Court of California in Madera, MCV074787), *Ferraro v. USC Verdugo Hill s Hospital, et al.* (Superior Court of California in Los Angeles, 18STCV09463), *Ford v. Account Control Technology, Inc., et al.* (Superior Court of California in Los Angeles, 19STCV09369), *Ornelas v. iStorage, et al.* (Superior Court of California in San Francisco, CGC-18-571421), *Martinez v. Ronpak, Inc.* (Superior Court of California in Riverside, RIC1901307), *Barrera et al. v. Exclusive Wireless, Inc.* (Superior Court of California in Stanislaus, 9000687), *Barajas v. Mancha Development Company LLC* (Superior Court of California in Orange County, 30-2018-00974707-CU-OE-CXC), *Prado v. IMAX Corporation dba IMAC Worldwide Home* (Superior Court of California in San Bernardino, CIVDS1820265), *Rodriguez v. ND Industries, Inc.* (Superior Court of California in Los Angeles, 19STCV38096), *Singletary v. Motel 6 Operating LP, et al.* (Southern District of

California, 3:20-cv-0270-LAB-AHG), *Quizon v. CF Watsonville East, LLC, et al.* (Superior Court of California in Santa Cruz, 20CV01868), *Stephenson v. Bakersfield Dodge, Inc.* (Superior Court of California in Kern, BCV-20-102693), *Bacerra v. Hugo Boss Retail, Inc.* (Superior Court of California in San Diego, 37-2021-00002933-CU-OE-CTL), *Walker v. Ariat International, Inc.* (Superior Court of California in Alameda, HG19026439), *Orr v. Petvet Care Centers (California) Inc.* (Superior Court of California in Santa Clara, 19CV354063), *Jimenez v. OEC Distribution Services, Inc.* (Superior Court of California in San Bernardino, CIVDS1915743), *Virdi v. Absolute Security International* (Superior Court of California in San Bernardino, CIVDS 1909589), *Raj v. First Transit, Inc* (Superior Court of California in Sacramento, 34-2021-00295895-CU-OE-GDS), *Marchbanks v. Torrid Administration, Inc.* (Superior Court of California in San Diego, 37-2020-00008179-CU-OE-NC), among others.

37. As an associate attorney at D.Law, Inc., I received my Bachelor of Arts in political science from the University of California, Los Angeles, in 2009. I then earned my Juris Doctorate from the University of California, Los Angeles in May of 2020. Upon graduating from law school, I have primarily focused my practice on representing employees in wage-and-hour class actions. I have worked on multiple cases that have resulted in favorable settlements for the employee Class Members and Aggrieved Employees I have represented. Throughout the course of this litigation, I spent at least 102.65 hours litigating this matter. Accordingly, my unadjusted lodestar in this matter is $76,987.50 (102.65 x $750.00 = $76,987.50). If I were to charge a rate for this type of work by the hour, given his experience and the focus of his practice, my current hourly rate would be $750.00 per hour, which is in line with the Laffey Matrix.

38. As Senior Counsel at D.Law, Inc. David Keledjian manages his own complex litigation team. He was admitted to the California Bar in December 2016. Mr. Keledjian received his J.D. from Trinity Law School and B.A. from California State University of Fullerton. Since graduating from law school, he has dedicated virtually his entire career to the practice of employment law. Mr. Keledjian practiced employment law from both the plaintiff's side and defense side.

39. Consistent with hourly billing rates for attorneys with his experience, Mr. Keledjian's hourly billing rate is $1,177.00 per hour. Mr. Keledjian spent approximately 54.7 hours on this case to date. Accordingly, his lodestar in this matter is $64,381.90 (54.7 x $1,177.00 = $64,381.90).

40. I have also reviewed the files and billable records for former Associate Attorney Kevin Burns. Mr. Burns received his dual bachelor's degree in economics and public policy from University of North Carolina, Chapel Hill in 2018 and his Juris Doctor degree from Loyola Law School, Los Angeles in 2023. During law school, he served as staff editor for the *Loyola of Los Angeles Law Review*, President of the Loyola Sports Law Association, and Vice President during Loyola's first year of partnership with Parents, Educators/Teachers, and Students in Action (PESA). Since law school he has devoted most of his practice to wage and hour employment matters, including class actions and PAGA actions. Mr. Burns was admitted to the California State Bar in December 2023. Throughout the course of this litigation, Kevin Burns estimated he spent at least 0.3 hours litigating this matter. Accordingly, Mr. Burns' unadjusted lodestar in this matter is $183.00 (0.3 x $610.00 = $183.00). If Mr. Burns were to charge a rate for this type of work by the hour, given his experience and the focus of his practice, his current hourly rate would be $610.00. A $610.00 rate is warranted based on Mr. Burns' experience in a highly specialized area of law and is in line with the Laffey Matrix.

41. I have also reviewed the files and billable records for Svetlana Hovhannisyan. Svetlana Hovhannisyan is an Associate Attorney at D.Law, Inc. Ms. Hovhannisyan received her Bachelor of Arts in Political Science from the University of California, Berkeley in 2020, and then earned her Juris Doctorate from LMU Loyola Law School in 2024. She has been licensed to practice law in the State of California since December of 2024 and has practiced primarily in employment law wage and hour and wrongful termination litigation since her admission to the California Bar.

42. Consistent with hourly billing rates for attorneys with Ms. Hovhannisyan's experience, her hourly billing rate is $559.00 per hour. Throughout the course of this litigation, Ms. Hovhannisyan estimates she has spent at least 5.8 hours litigating this matter. Accordingly,

Ms. Hovhannisyan's lodestar in this matter is $3,242.20 (5.8 hours x $559.00 = $3,242.20).

43. Additionally, I have reviewed the files for Founder and Managing Attorney Emil Davtyan Emil Davtyan. Emil Davtyan graduated from Woodbury University in 2008 with a bachelor's degree in Business Finance with the highest honors, as the top student in his class. He graduated Southwester Law School in 2014 in the top 10% of his class. He is the founder of and currently the managing attorney at D.Law, Inc. (formerly known as Davtyan Law Firm) based out of Pasadena, California. He is an attorney duly licensed to practice law in the State of California and is a member in good standing with the State Bar of California.

44. Mr. Davtyan's legal experience since becoming a member of the California State Bar has been exclusively devoted to the practice of California and federal employment law. D.Law, Inc. exclusively represents plaintiffs in wage and hour actions (and other labor and employment lawsuits) with the same or similar causes of actions brought forth in the matter pending before this Court.

45. Mr. Davtyan has been actively participating in the prosecution and successful settlement of multiple wage and hour class action lawsuits, helping to recover wages and penalties on behalf of tens of thousands of class members.

46. Mr. Davtyan has been appointed as Class/PAGA Counsel in numerous Class/PAGA actions, including, *Moriana v. Viking River Cruises* (Superior Court of California in Los Angeles, BC 687325), *De La Rosa v. The Coca Cola Company et al.* (Superior Court of California in Napa, 17CV000787), *Harvey v. Bed Bath & Beyond of California Limited Liability Company* (Superior Court of California in Alameda, RG17885153), *Ramirez v. Harris Ranch Beef Company* (Superior Court of California in Fresno, 16CECG04103), *Gates v. Gate Gourmet, Inc. et al*. (Southern District of California, 16-cv-01084-L-AGS), *Hargrave v. Antelope Valley Hospital* (Superior Court of California in Los Angeles, BC663252), *Ramirez v. Milton Roy et al.* (Superior Court of California in Los Angeles, BC 632276), *Hawkins v. AvalonBay Communities* (Superior Court of California in Santa Clara, 17CV316492), *Jones Tharpe et al. v. Sprint Corporation et al.* (Superior Court of California in Los Angeles, BC644645), *Ortega et al. v. Nestle Waters North America, Inc. et al.* (Superior Court of

California in Los Angeles, BC623610), *Schultz v. Jimbo's Natural Family, Inc.* (Superior Court of California in San Diego, 37-2017-00022348-CUE-OE-CTL), *Ambrose v. Victor Valley Global et al.* (Superior Court of California in San Bernardino, CIVDS1709289), *Puerta-Gildardo v. Real Time Staffing Services LLC et al*. (Superior Court of California in Los Angeles, BC565445), *Vargo v. Pregis Innovative Packaging LLC* (Superior Court of California in Tulare, 270836), *Conlin v. Aegis Senior Communities LLC* (Northern District of California, 17-cv-05534-LHK), *Galarza v. Kloeckner Metals Corporation* (Central District of California, 2:17-cv-04910- FMO), *Estes v. L3 Technologies, Inc. et al.* (Southern District of California, 3:17-cv-02356-H-JMA), *Rowser v. Trunk Club, Inc.* (Central District of California, 2:17-cv-05064-DSF-RAO), *Leach v. The Claremont Colleges, Inc.* (Superior Court of California in Los Angeles, BC686451), *Vaesau v. PCT Enterprises, Inc. dba Precision Cabinets* (Superior Court of California, County of Contra Costa MSC18-02404), *Terry v. TF Louderback, Inc. dba Bay Area Beverage Company* (Superior Court of the State of California, County of Contra Costa, MSC18-00859), *Roach v. Westcare California, Inc.* (Superior Court of California in Kern County, BCV-17-102367-SDS), *Patton v. Church & Dwight Co., Inc.* (Central District of California, EDCV 18-903-MWF (KKx)), *Juarez v. ISL Employees, Inc.* (Superior Court of California in Madera, MCV074787), *Ferraro v. USC Verdugo Hills Hospital, et al.* (Superior Court of California in Los Angeles, 18STCV09463), *Ford v. Account Control Technology, Inc., et al.* (Superior Court of California in Los Angeles, 19STCV09369), *Ornelas v. iStorage, et al.* (Superior Court of California in San Francisco, CGC-18-571421), *Martinez v. Ronpak, Inc.* (Superior Court of California in Riverside, RIC1901307), *Barrera et al. v. Exclusive Wireless, Inc*. (Superior Court of California in Stanislaus, 9000687), *Barajas v. Mancha Development Company LLC* (Superior Court of California in Orange County, 30-2018-00974707-CU-OE-CXC), *Prado v. IMAX Corporation dba IMAC Worldwide Home* (Superior Court of California in San Bernardino, CIVDS1820265), *Rodriguez v. ND Industries, Inc.* (Superior Court of California in Los Angeles, 19STCV38096), *Singletary v. Motel 6 Operating LP, et al.* (Southern District of California, 3:20-cv-0270-LAB-AHG), *Quizon v. CF Watsonville East, LLC, et al.* (Superior Court of California in Santa Cruz, 20CV01868), *Stephenson v. Bakersfield Dodge,*

Inc. (Superior Court of California in Kern, BCV-20-102693), *Bacerra v. Hugo Boss Retail, Inc.* (Superior Court of California in San Diego, 37-2021-00002933-CU-OE-CTL), *Walker v. Ariat International, Inc.* (Superior Court of California in Alameda, HG19026439), *Orr v. Petvet Care Centers* (California) Inc. (Superior Court of California in Santa Clara, 19CV354063), *Jimenez v. OEC Distribution Services, Inc.* (Superior Court of California in San Bernardino, CIVDS1915743), *Virdi v. Absolute Security International* (Superior Court of California in San Bernardino, CIVDS 1909589), *Raj v. First Transit, Inc.* (Superior Court of California in Sacramento, 34-2021- 00295895-CU-OE-GDS), *Marchbanks v. Torrid Administration, Inc.* (Superior Court of California in San Diego, 37-2020-00008179-CU-OE-NC), *Taylor v. Populus Group, LLC* (Southern District of California, 3:20-cv-00473-BAS-BLM), *Wilkerson v. Intuit, Inc.* (Superior Court of California in San Diego, 37-2020-00030371-CU-OE-CTL, among others.

47. Throughout the course of this litigation, attorney Emil Davtyan estimates he has spent at least 52.00 hours litigating this matter. Accordingly, Mr. Davtyan's lodestar in this matter is $69,940.00 (52.00 x $1,345.00 = $69,940.00). If Mr. Davtyan were to charge a rate for this type of work by the hour, given his experience and the focus of his practice, his current hourly rate would be $1,345.00 per hour. A $1,345.00 rate is warranted based on Mr. Davtyan's years of experience in a highly specialized area of law and his position as the founder and managing partner and is in line with rates suggested by the Laffey Matrix.

48. Additionally, I have reviewed the files for David Yeremian. Managing Partner David Yeremian graduated from UC Berkeley in 1997 and received his law degree and MBA from UCLA in 2001. He is a member of the Los Angeles County Bar Association and the California Employment Lawyers Association. He has been honored as a Super Lawyers Rising Star in 2009, 2010, 2012-2015. He has been named and honored as a Super Lawyer since 2016. In addition to the present case, he is also class or PAGA counsel for other wage-and-hour class-action lawsuits pending in various counties throughout California (including in federal courts). The following is a list of some of his class-action settlements that have received preliminary or final approval: *Galavis v. Patina Restaurant Group, LLC* (LASC BC375225; class size approx.

10,000; co-counsel); *Milford v. ADT Security Services, Inc.* (CACD CV08-2236; class size approx. 2,000; lead counsel); *Carreon v. Wolfgang Puck Catering and Events, LLC* (LASC BC398569; class size approx. 1,400; lead counsel); *Fluke v. RFG Oil, Inc.* (LASC BC403354; class size approx. 1,400; lead counsel); *Urena v. Camachos Restaurant* (LASC BC365913; class size approx. 887; lead counsel); *Smith v. Rio Rancho Pontiac GMC Buick Inc.* (LASC BC391187; class size approx. 860; lead counsel); *Callela v. Dolce Group* (LASC BC364711; class size approx. 600; lead counsel); *Vasquez v. The Hollywood Pig n Whistle LP* (LASC BC335075; class size approx. 600; lead counsel); *Goldman v. Aorta Restaurant Operating LP* (LASC BC379688; class size approx. 300; lead counsel); *Sink-Crilly v. Centex Homes* (CACD CV09-2476; class size approx. 250; lead counsel); *Utley v. Cranbrook Partners Inc.* (LASC BC392813; class size approx. 200; lead counsel); *Garcia v. California Credits Group* (LASC BC353213; class size approx. 160; lead counsel); *Afanasyev v. Miller Infiniti, Inc.* (LASC BC350788; class size approx. 160; lead counsel); *Morris v. Gymboree, Inc.* (LASC BC393270; class size approx. 150; lead counsel); *Ortega v. AJC Sandblasting, Inc.* (LASC BC378806; class size approx. 140; lead counsel); *Lulejyan v. Jim Falk Motors of Beverly Hills, Inc.* (LASC BC398459; class size approx. 72; lead counsel); *Rylko v. The Griddle Café, Inc.* (LASC BC386126; class size approx. 70; lead counsel); *Healy v. Siemens IT Solutions and Services, Inc.* (Santa Clara Superior Court 108CV113479; class size approx. 60; lead counsel). Throughout the course of this litigation, attorney David Yeremian estimates he has spent at least 15.1 hours litigating this matter. Accordingly, Mr. Yeremian's lodestar in this matter is $23,435.20 (15.1 x $1,552.00 = $23,435.20). If Mr. Yeremian were to charge a rate for this type of work by the hour, given his experience and the focus of his practice, his current hourly rate would be $1,552.00 per hour. A $1,552.00 rate is warranted based on Mr. Yeremian's years of experience in a highly specialized area of law and his position as managing partner and is in line with rates suggested by the Laffey Matrix.

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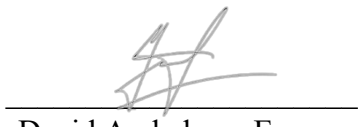
49. The below table summarizes Class Counsel's total hours, billables, and costs:

Attorney	Total Hours	Total Billables	Costs
Emil Davtyan	52	$69,940.00	
David Yeremian	15.1	$23,435.20	
David Keledjian	54.7	$64,381.90	
David Arakelyan	102.65	$76,987.50	
Svetlana Hovhannisyan	5.8	$3,242.20	
Kevin Burns	0.3	$183.00	
Totals:	**230.55**	$238,169.80	$24,324.57

I declare under penalty of perjury under the laws of the State of California and the United States of America that the foregoing is true and correct.

Executed on October 26, 2026, in Yerevan, Republic of Armenia.



David Arakelyan, Esq.

EXHIBIT A

EXHIBIT A

EXHIBIT B

EXHIBIT B

Heard v. Ford Motor Company

Litigation Costs

Service Date	Details	Provider	Amount
9/18/23	LWDA Submission	LWDA	$75.00
9/20/23	Summons and Complaint	Proceed	$1,812.80
9/22/23	Process Service - Agent for Service of Process C.T. Corp.	Proceed	$82.40
9/28/23	Process Serving - Ford Motor Company	Proceed	$123.60
9/29/23	Process Serving - Agent for Service of Process Kathy Hunter	Proceed	$211.15
2/10/23	Proof of Service of Summons (Ford Motor Company - CT Corporation and Kathy Hunter)	Proceed	$128.75
2/10/23	Notice of Case Management Conference	Proceed	$128.75
1/24/24	Federal Document Retrieval	Pacer	$5.50
3/5/24	Mediation Fee	Signature Resolution	$4,975.00
10/24/24	Expert Analysis Fee	Berger Consulting Group	$6,705.00
11/15/24	Skip Trace Order	Express Network	$295.00
4/15/26	Document Retrieval - Order Granting Preliminary Approval Motion	San Bernardino Superior Court	$2.09
10/26/26	Motion for Final Approval	Proceed	$79.63
TBD	Notice of Entry of Order	Proceed	$17.53

Total: $14,642.20

EXHIBIT 1

EXHIBIT 1

Fawn F. Bekam (SBN 307312)
fawn@abramsonlabor.com
Lisa B. Iturriaga (SBN 339678)
lisa.i@abramsonlabor.com
ABRAMSON LABOR GROUP
1700 W Burbank Blvd
Burbank, CA 91506
Telephone: (213) 493-6300
Facsimile: (213) 336-3704

David Keledjian, Esq. (SBN 309135)
David Arakelyan, Esq. (SBN 337076)
D.LAW, INC.
250 N Madison Avenue. 2nd Floor
Pasadena, CA 91101-1639
Tel: (818) 962-6465 / Fax: (818) 962-6469
Emails: D.Keledjian@d,law, D.Arakelyan@d.law

Attorneys for Plaintiffs Lisa Childress and Justin Aaron Heard

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SAN BERNARDINO

LISA CHILDRESS and JUSTIN AARON HEARD, on behalf of themselves, the State of California, and other aggrieved employees, Plaintiffs, vs. FORD MOTOR COMPANY; and DOES 1 through 100, inclusive, Defendants.	Case No. Case No. CIVSB2324555 *Assigned for all purposes to:* *Hon. Thomas S. Garza, Dept. S27* **DECLARATION OF FAWN F. BEKAM IN SUPPORT OF PLAINTIFFS' MOTION FOR FINAL APPROVAL OF CLASS ACTION AND PAGA SETTLEMENT** Date: November 18, 2026 Time: 8:30 a.m. Dept.: S27

I, Fawn F. Bekam, hereby state and declare as follows:

1. I am an attorney at law, duly licensed and entitled to practice in the State of California. I am a Partner at Abramson Labor Group ("ALG"), attorneys of record for Plaintiffs Justin Aaron Heard and Lisa Childress ("Plaintiffs") along with co-counsel D.Law, Inc. ("D.Law"). As such, I have personal knowledge of the matters set forth herein and, if called as a witness, could and would competently testify thereto under oath.

2. I submit this Declaration in support of Plaintiffs' Motion for Final Approval of Class Action and PAGA Settlement.

3. ALG has litigated and successfully resolved many class and representative action cases involving Labor Code claims and penalties. *See, e.g., Tamez v. Heyday Wellness, LLC*, Los Angeles Superior Court Case No. 23STCV07302, *Negus v. Kashaco, Inc.*, Los Angeles Superior Court Case No. 25STCV17151, *Bryan v. Orange Coast Title Company of Northern California*, Santa Clara Superior Court Case No. 22STCV405756, *Cheung v. C2 Educational Systems, Inc.*, Santa Clara Superior Court Case No. 23CV417697, *Medina v. Kindness General Contractors, LLC*, Orange Superior Court Case No. 30-2023-01300740-CU-OE-CXC, *Sadat v. Island Auto Towing, Inc.*, Alameda Superior Court Case No. 23CV036438, *Johnson v. 24HR Homecare, LLC*, Ventura Superior Court Case No. 2023CUOE006965, *Vinson v. National Security Industries and Services, Inc.*, Santa Clara Superior Court Case No. 23CV416392, *Caston v. Exel Inc.*, Santa Clara Superior Court Case No. 22CV409265, *Aguillar v. Burgeson's Heating and Air Conditioning, Inc.*, San Bernardino Superior Court Case No. CIVSB2303316, *Russel v. Sweetwater Care Resource LLC*, San Diego Superior Court Case No. 37-2023-00020793-CU-OE-CTL, *Rivera v. Aarmark Beer Gardens*, Santa Barbara Superior Court Case No. 22CV04059, *Perez v. EDPO, LLC*, San Benito Superior Court Case No. CU-22-00156, *Rabelas v. Aram Logistics, Inc.*, San Diego Superior Court Case No. 37-2023-00003165-CU-OE-CTL, *Alexander v. Impossible Foods, Inc.*, San Mateo Superior Court Case No. 230CIV-05278, *Bueno v. Zollner Electronics, Inc.*, Santa Clara Superior Court Case No. 23CV401939, *Martinez v. TRC Investments LLC dba Servpro*, Los Angeles Superior Court Case No. 23STCV03176, *Bing v. Miramar Health, LLC*, Orange Superior Court Case No. 30-2022-01274896-CU-OE-CXC, *Frazier v. JustFoodForDogs, LLC*, Los Angeles Superior Court Case No.

23STCV23085, *Morales v. Cornerstone Certified Vineyard*, Sonoma Superior Court Case No. 23CV00791, *Llewellyn v. Betz & Sons, Inc.*, San Francisco Superior Court Case No. CGC-23-606077, *Heredia v. Stowasser Buick-GMC, Inc.*, Santa Barbara Superior Court Case No. 23CV02511, *Velez v. Down Dog Lodge, LLC*, Los Angeles Superior Court Case No. 23STCV17285, *Abarca v. Circosta Iron & Metal Company Inc.*, San Francisco Superior Court Case No. CGC-22-602245, *Blackburn v. Actriv Healthcare, Inc.*, Riverside Superior Court Case No. CVRI2205649, *Chiang v. Zipfizz Corporation*, Los Angeles Superior Court Case No. 23STCV17431, *Mendez v. Ramsey Lath & Plaster, Inc.*, Santa Cruz Superior Court Case No. 22CV01808, *Arce v. Bezsam, Inc.*, San Diego Superior Court Case No. 32-2023-00018538-CU-OE-CTL, *Huerta v. FPK Security, Inc.*, Los Angeles Superior Court Case No. 23STCV21172, *Fields v. Irvine Eurocars, LLC dba Irvine BMW*, Orange Superior Court Case No. 30-2023-01319978-CU-OE-CXC, *Walters v. UFP Thornton LLC*, San Joaquin Superior Court Case No. STK-CV-UOE-2022-0012249, *Jimenez v. Delta View Farms LLC*, Tulare Superior Court Case No. VCU293548, *Green v. Union Rescue Mission*, Los Angeles Superior Court Case No. 22STCV30872, *Cardenas v. G I Security, Inc.*, Ventura Superior Court Case No. 56-2022-00570355-CU-OE-VTA, *Waters v. Hawx Services, LLC*, Los Angeles Superior Court Case No. 23STCV12811, *Tavera v. BLVD Residential Inc.*, San Benito Superior Court Case No. 34-2022-00327501, *Lamping v. Vincent G. Harris Insurance Agency*, Sacramento Superior Court Case No. 34-2021-00297056.

4. I am a partner at ALG. I am a graduate of University of California, Irvine School of Law, where I received my J.D. in 2015. I received my B.A. from University of California, Los Angeles in 2012. I have been selected to Super Lawyers Rising Stars every year since 2020, as well as Best Lawyers: Ones to Watch. I have litigated hundreds of class and representative matters and have been appointed as class counsel by state and federal courts through both contested motions for class certification and uncontested settlement motions. My current hourly billing rate is $850.

5. Lisa B. Iturriaga is an associate attorney at ALG. She is a graduate of Chapman University Dale E. Fowler School of Law, where she received her J.D. in 2020. Ms. Iturriaga received her B.S. in Finance and B.A. in Marketing from University of South Florida in 2016. Ms. Iturriaga's experience includes insurance defense and employment law. Since 2023, she has exclusively

practiced Plaintiff's-side wage and hour class and representative actions. Ms. Iturriaga's hourly billing rate is $650.

6. Tuvia Korobkin was senior counsel at ALG. He is a graduate of University of California, Los Angeles School of Law, where he received his J.D. in 2009. Mr. Korobkin was admitted to the California State Bar in December 2009. Mr. Korobkin has litigated numerous class and representative actions in both state and federal court. Mr. Korobkin's hourly rate while at ALG was $725.

7. Neil M. Larsen was senior counsel at ALG. He is a graduate of Santa Clara University School of Law, where he received his J.D. in 2010. Mr. Larsen was admitted to the California State Bar in June 2011. Mr. Larsen has litigated numerous class and representative actions in both state and federal court. Mr. Larsen's hourly rate while at ALG was $700.

8. Jennifer S. Rivera was an associate attorney at ALG. She is a graduate of Southwestern University School of Law, where she received her J.D. in 2023. Ms. Rivera was admitted to the California State Bar in November 2023. Ms. Rivera's hourly rate while at ALG was $400.

9. ALG's hourly rates are comparable to those charged by other employment, class, and/or representative counsel. The total hours expended on this action were reasonable and in line with comparable cases.

10. ALG has performed significant work and incurred litigation costs in prosecuting this matter with no guarantee of any payments. ALG's efforts have included conducting extensive pre- and post-filing investigation, drafting pleadings, correspondence, joint statements, stipulations, discovery requests, and extensive review and analysis of informal discovery, preparation for and attendance at mediation, negotiation of the settlement and terms thereof, and assisting with preparing the preliminary approval motion and this motion.

11. ALG's current lodestar reflects 356.7 hours of work resulting in $226,435.00 in fees. The chart below shows the calculation of hours spent by each of ALG's attorneys on this case:

Attorney	**Hours**	**Hourly Rate**	**Total**

Fawn F. Bekam	27.8	$850	$23,630.00
Tuvia Korobkin	94.6	$725	$68,585.00
Neil M. Larsen	129.0	$700	$90,300.00
Jennifer Rivera	98.1	$400	$39,240.00
Lisa B. Iturriaga	7.2	$650	$4,680.00
TOTALS	356.7		$226,435.00

12. This amount also does not include the time ALG will spend at the hearing in this matter and obtaining a declaration for the final accounting hearing. ALG dedicated significant resources to this case by dividing the tasks required according to skill level, and the hours spent by each attorney are reasonable and not duplicative. ALG's lodestar reflects the efficiencies achieved by attorneys experienced in this field.

13. In litigation costs, ALG has spent $9,682.37 on items such as filing fees, service fees, and mediation fees. A true and correct copy of ALG's cost report in this matter is attached hereto as **Exhibit 1**. All of the costs incurred were reasonable and necessary for the prosecution of this case.

14. The attorneys at ALG and D.Law have negotiated a settlement here that they believe is fair, reasonable, and adequate based on their prior experience litigating these types of cases.

15. To date, the LWDA has not responded to or objected to the Settlement.

I declare under penalty of perjury of the laws of the State of California that the foregoing is true and correct. Executed in Irvine, California.



Fawn F. Bekam

EXHIBIT 1

Date	Description	Bill amount
24-Jul-23	LWDA Filing Fee	$75.00
3-Aug-23	Complaint Filing Fee Filed by FAX	$1,457.00
29-Sep-23	Complaint Filing Fee Zachs Filing ID 8851073	$1,496.61
3-Oct-23	Zachs Filing ID 8867802 Filing NAR on original complaing	$11.30
6-Oct-23	Complaint Filing Fee - PAGA Only Case Zachs Filing ID 8867657	$1,485.76
6-Nov-23	Mediation Fees Signature Resolution Invoice #56554	$4,975.00
14-Mar-24	Zachs Filing ID 9778513/9778540 Notices of Change of Address in original and PAGA only Actions	$22.60
26-Mar-24	Zachs Filing ID: 9850182 CMC Statement and Request for Continuance	$11.30
11-Apr-24	Zachs Filing ID: 9945746	$11.30
6-Feb-25	Zachs Filing ID: 11592608 Joint Case Management Statement	$13.95
9-Jul-25	Zachs Filing ID: 12471861 Joint Stip and Order for Leave to File Amended Complaint	$33.86
28-Oct-25	Zachs Filing ID: 13159592 Joint Status Conference Statement	$13.95
18-Nov-25	Zachs Filing ID: 13297891 Preliminary Approval Motion	$74.74
	Total	**$9,682.37**

EXHIBIT C

EXHIBIT C

Attorney Time Report

Staff ↓		Entry Date	Duration (in decimals)	Duration	Court Billing Description
Lana Hovhannisyan		1/15/2025	0.8	0 H 48M	draft long form settlement agreement
		1/22/2025	0.9	0 H 54M	Continue drafting long form settlement agreement
		2/18/2025	0.3	0 H 18M	Revise long form settlement agreement
		2/19/2025	1.1	1 H 06M	Revise long form settlement agreement
		2/20/2025	1.4	1 H 24M	Review long form settlement agreement with David A.
		2/20/2025	0.2	0 H 12M	Revise long form settlement agreement
		2/25/2025	0.9	0 H 54M	Revise settlement agreement
		2/28/2025	0.1	0 H 06M	Other
		3/27/2025	0.1	0 H 06M	Revise settlement agreement
Subtotal	Sum		5.8		
Kevin Burns		3/21/2024	0.3	0 H 18M	Emailed client case update, referred communications to DA.
Subtotal	Sum		0.3		
Emil Davtyan		11/10/2022	3.2	3 H 12M	Review and analyze client intake
		11/17/2022	7.4	7 H 24M	Review and analyze documents provided by client
		11/18/2022	6.3	6 H 18M	Review and analyze additional documents provided by client
		2/2/2023	1.2	1 H 12M	Draft records request to employer
		3/13/2023	4.6	4 H 36M	Review and analyze records produced by defendant
		3/30/2023	2.9	2 H 54M	Review and analyze additional records produced by defendant
		4/5/2023	2.4	2 H 24M	Review documents provided by client
		4/28/2023	2.4	2 H 24M	Review additional documents provided by client
		6/1/2023	2.3	2 H 18M	Review and analyze additional documents provided by client
		6/8/2023	3.4	3 H 24M	Research defendant
		6/13/2023	1.8	1 H 48M	Review and analyze additional documents provided by client
		7/11/2023	2.6	2 H 36M	Review and analyze additional documents provided by client
		7/24/2023	6.2	6 H 12M	Research prior lawsuits against defendant
		7/27/2023	5.3	5 H 18M	Draft legal memo for litigation
Subtotal	Sum		52		
David Yeremian		7/27/2023	1.5	1 H 30M	Review memo; review client docs; request retainer.
		8/1/2023	0.2	0 H 12M	Review file opening docs; assign to lit team.
		2/12/2024	0.1	0 H 06M	Status update with staff.
		4/16/2024	0.1	0 H 06M	Discuss mediation scheduling.
		10/17/2024	5.5	5 H 30M	Review mediation brief; review damage model; confer with staff and expert; review case file.
		10/18/2024	7	7 H 00M	Attend mediation.
		12/16/2024	0.2	0 H 12M	Correspondence from staff re status.
		1/22/2025	0.1	0 H 06M	Correspondence from staff re settlement.
		10/7/2025	0.2	0 H 12M	Correspondence from staff re status.
		5/7/2026	0.1	0 H 06M	Message from staff re: status.
		10/20/2026	0.1	0 H 06M	Message from staff re status.
Subtotal	Sum		15.1		
David Keledjian		9/7/2023	3.2	3 H 12M	review of case file and client docs for claims and theories of liability and review of draft complaint
		9/13/2023	1.3	1 H 18M	review and revise Draft PAGA Letter to the LWDA
		9/13/2023	2.1	2 H 06M	Review and revise draft complaint
		12/20/2023	1.2	1 H 12M	review and revise Stip for leave to amend and FAC
		2/14/2024	0.5	0 H 30M	review and revise pre-mediation records request
		10/14/2024	5.4	5 H 24M	Review of all pre-mediation documents and records for brief (over 260 pages including spreadsheets of time logs and pay data)
		10/15/2024	1.6	1 H 36M	Start drafting mediation brief
		10/16/2024	4.7	4 H 42M	continue drafting mediation brief and extract and organize supporting exhibits and exemplars
		10/17/2024	2.4	2 H 24M	finalize mediation brief, including exhibits, and send to mediator
		10/17/2024	3.3	3 H 18M	prepare for mediation, including review and analysis of expert report, and plan negotiation strategy
		10/18/2024	8.1	8 H 06M	attend and participate in mediation
		12/5/2024	1.2	1 H 12M	review of and revisions to MOU for discussion with DA
		3/26/2025	7.4	7 H 24M	Review and Revise Long Form Settlement Agreement and Related Papers
		6/24/2025	6.1	6 H 06M	Further Review and Revise Long Form Settlement Agreement and Proposed Notice to Settlement Class
		10/23/2025	6.2	6 H 12M	Review of Motion to Preliminary Approval and Supporting Papers
Subtotal	Sum		54.7		
David Arakelyan		9/6/2023	1.5	1 H 30M	Draft complaint
		9/14/2023	1	1 H 00M	Draft/finalize PAGA letter
		9/20/2023	0.2	0 H 12M	Review case management order and case assignment paperwork; add info to case list
		9/28/2023	0.1	0 H 06M	Email OC with e-service list
		10/2/2023	0.1	0 H 06M	Email Rapid Legal re: addresses for service
		10/2/2023	0.1	0 H 06M	Review proofs of service of summons/complaints
		10/4/2023	0.5	0 H 30M	Review client file for WT claims and create intake sheet with document references, etc.
		10/4/2023	0.8	0 H 48M	WT intake call with client
		10/11/2023	0.2	0 H 12M	Verify details re: case management statement and CMO
		10/13/2023	0.1	0 H 06M	Follow up on POSS and submission to court

10/23/2023	5	5 H 00M	Draft Motion for Remand - research, drafting, review of declarations and factual background
10/23/2023	0.3	0 H 18M	Magistrate judge declination form - retrieve, fill out and prepare for submission
10/23/2023	0.5	0 H 30M	Review Defendant's removal papers and exhibits
10/23/2023	0.4	0 H 24M	Research central district rules re: removal
10/24/2023	0.1	0 H 06M	Check status of Answer and POSS on website
10/26/2023	0.1	0 H 06M	Review Notice of Related case; update case sheet with information
10/27/2023	0.1	0 H 06M	Confirm declination form is on court docket
10/27/2023	0.2	0 H 12M	Review case history, emails and docket; update case sheet with relevant information re: OC, removal, answer status, etc.
10/27/2023	0.1	0 H 06M	Discuss ECF filing with Jordan
10/30/2023	0.1	0 H 06M	Review case docs; add PAGA date to case list
11/2/2023	0.1	0 H 06M	Email OC re: remand stip.
11/2/2023	0.3	0 H 18M	Draft separate evidentiary objections and insert required meet/confer language into the motion
11/2/2023	0.2	0 H 12M	Follow up on the standing order; review the relevant portions applicable to remand motion
11/2/2023	0.2	0 H 12M	Draft response to OC email
11/7/2023	0.2	0 H 12M	Review both state and federal court docket; retrieve OC magistrate judge acceptance form; update notes on case list
11/8/2023	0.3	0 H 18M	Review Heard remand and make additions/corrections
11/17/2023	0.1	0 H 06M	Review status of FAC; note to DK
11/21/2023	0.1	0 H 06M	Email OC re: amending complaint to add PAGA claim
11/21/2023	0.1	0 H 06M	Review related case information and court dockets (Fed and state); update case list;
11/27/2023	0.1	0 H 06M	Follow up on status of FAC; create a task to f/up with Defendant
11/28/2023	0.1	0 H 06M	Follow up email to OC re: stipulation to file PAGA
11/28/2023	0.1	0 H 06M	Confirmation email to client re: phone call today
11/28/2023	0.3	0 H 18M	Call with client re: JPA, PAGA, class action, termination claims, etc.
11/28/2023	0.1	0 H 06M	Review JPA from Abramson Law
11/30/2023	0.1	0 H 06M	Review list of outstanding items re: case; note to DK
12/5/2023	0.1	0 H 06M	Send note to DK re: shift premium and warehouse quotas issue
12/5/2023	0.4	0 H 24M	Draft FAC
12/5/2023	0.3	0 H 18M	Draft stip and order re: FAC
12/7/2023	0.1	0 H 06M	Email OC re: stip/order and FAC
12/8/2023	0.1	0 H 06M	Confirm judge assignment; no need for report in 60 days after removal
12/14/2023	0.1	0 H 06M	Email OC with LWDA letter and info
12/18/2023	0.1	0 H 06M	Email OC re: stipulation and admin motion
12/20/2023	0.1	0 H 06M	Review status of JPA and mediation; note to DK re: next steps
12/21/2023	0.3	0 H 18M	Revise, finalize and prepare stip, order and FAC for filing; task JF
12/21/2023	0.1	0 H 06M	Confirm all attorneys are on the e-service list for federal court
12/21/2023	0.1	0 H 06M	Confirm joint mediation date; update case list; task JF with calendaring
12/21/2023	0.1	0 H 06M	Review stipulation revisions submitted by OC
1/4/2024	0.2	0 H 12M	Review court docket, status of reply from OC re: mediation; note to DK re: pending items
1/8/2024	0.1	0 H 06M	Follow up email to co-counsel re: mediation docs
1/10/2024	0.2	0 H 12M	Review mediation documents; update case list; note to DK re: potential tasks;
1/16/2024	0.1	0 H 06M	Email co-counsel re: mediation
1/18/2024	0.1	0 H 06M	Review outstanding case issues and items
1/18/2024	0.1	0 H 06M	Review court docket (federal) for hearings and updates (none)
1/23/2024	0.1	0 H 06M	Confirm all mediation dates and deadlines; update the board with information
1/29/2024	0.5	0 H 30M	Draft related case comparison; review all case docs and dockets
2/6/2024	0.2	0 H 12M	Email co-counsel re: mediation call
2/12/2024	0.1	0 H 06M	Respond to related case counsel email and send Teams invitations for a call
2/12/2024	0.1	0 H 06M	Follow up with DY re: Wednesday call
2/12/2024	0.1	0 H 06M	Follow up with JF and Natalia re: calendaring deadline to pay mediation invoice
2/12/2024	0.1	0 H 06M	Respond to co-counsel re: call availability
2/14/2024	0.1	0 H 06M	Update mediation data request per DK suggestions
2/14/2024	0.1	0 H 06M	Email DK re: questions re: mediation data request
2/14/2024	0.7	0 H 42M	Draft joint mediation data request
2/14/2024	0.1	0 H 06M	Discuss mediation issues with DK
2/14/2024	0.5	0 H 30M	Call with related case counsel/follow up email re: mediation
2/14/2024	0.4	0 H 24M	Prepare for meeting with co-counsel
2/14/2024	0.1	0 H 06M	Email related case counsel re: moving the call forward
2/14/2024	0.3	0 H 18M	Review pending case issues; CMC topics; send note to DK; update case sheet
2/14/2024	0.1	0 H 06M	Email mediator's office re: updating service list
2/15/2024	0.2	0 H 12M	Discuss case with DK: mediation data, convo with client, upcoming CMC
2/15/2024	0.2	0 H 12M	Phone call with client re: mediation and case update
2/15/2024	0.1	0 H 06M	Discuss call with Neil Larsen with DK
2/15/2024	0.1	0 H 06M	Call from co-counsel re: mediation data
2/15/2024	0.2	0 H 12M	Email co-counsel with mediation data request
2/15/2024	0.2	0 H 12M	Email Team David re: conversation with co-counsel re: mediation; create follow up tasks
2/15/2024	0.2	0 H 12M	Update Related Case sheet with info re: PAGA claims; review PAGA complaint docket
2/16/2024	0.1	0 H 06M	Respond to OC re: state case CMC; complying with CMO
2/16/2024	0.1	0 H 06M	Email meet/confer re: CMC to OC
2/16/2024	0.2	0 H 12M	Review California rules of court; attempts to find prior meet/confer emails ahead of CMC
2/16/2024	0.6	0 H 36M	Draft meet and confer email to OC
2/20/2024	0.1	0 H 06M	Email JF re: calendaring mediation data due date; confirm other calendaring items
2/21/2024	0.1	0 H 06M	Discuss FAC and CMC issues with DK

	2/27/2024	0.1	0 H 06M	Update case sheet with relevant information; review Fed docket re: hearings, etc.
	2/27/2024	0.1	0 H 06M	Respond to OC re: meet/confer call on mediation
	2/27/2024	0.2	0 H 12M	Check DK calendar for call with OC; verify with Hrag and KB
	3/5/2024	0.1	0 H 06M	Review case-related issues
	3/5/2024	0.1	0 H 06M	Follow up on CMC: review docket, D's submissions, update case sheet, inform JF of calendaring
	3/21/2024	0.1	0 H 06M	Follow up email to co-counsel re: status of mediation data
	3/21/2024	0.2	0 H 12M	Call/email to client re: mediation
	3/29/2024	0.1	0 H 06M	Update case notes with new info re: mediation; note to DK
	3/29/2024	0.1	0 H 06M	Review Fed and state (inaccessible) court dockets for updates
	4/3/2024	0.1	0 H 06M	Discuss case-related and mediation issues with DK
	4/3/2024	0.1	0 H 06M	Email OC re: phone consultation re: mediation
	4/9/2024	0.1	0 H 06M	Correspond with co-counsel re: mediation data and call with OC
	4/10/2024	0.1	0 H 06M	Respond to OC and co-counsel re: call
	4/11/2024	0.1	0 H 06M	Follow up with DK re: call with co-counsel and fee split
	4/11/2024	0.1	0 H 06M	Email OC re: meet/confer call on mediation
	4/12/2024	0.1	0 H 06M	Respond to co-counsel re: mediation rescheduling
	4/15/2024	0.1	0 H 06M	Respond to mediator re: new date/old date unavailability
	4/15/2024	0.2	0 H 12M	Compose email to mediator's office requesting postponement
	4/15/2024	0.1	0 H 06M	Review and locate mediator/assistant information
	4/16/2024	0.1	0 H 06M	Respond to mediator re: October mediation date
	4/16/2024	0.1	0 H 06M	Follow up with DK and DY re: July/Oct mediation rescheduling
	4/18/2024	0.2	0 H 12M	Update case notes; note to DK re: mediation postponement and new deadlines; task re: follow up on items pending
	4/25/2024	0.1	0 H 06M	Follow up on mediation: update notes; calculate new deadlines; message to DK re: deadlines, etc.
	4/25/2024	0.1	0 H 06M	Respond to Emil re: mediation
	4/25/2024	0.1	0 H 06M	Create mediation-related tasks for JF
	4/25/2024	0.1	0 H 06M	Email mediator's office re: correcting email addresses for our office
	4/26/2024	0.1	0 H 06M	Update top filed cases sheet with info re: case
	5/2/2024	0.1	0 H 06M	Review state and Fed court dockets (no updates)
	5/2/2024	0.1	0 H 06M	Email mediator's office re: paperwork and notice
	5/2/2024	0.1	0 H 06M	Review case issues and update case
	5/3/2024	0.1	0 H 06M	Discuss case with DK: mediation, working with co-counsel
	5/3/2024	0.1	0 H 06M	Follow up with Natalia re: invoice payment
	5/3/2024	0.2	0 H 12M	Review new mediation notice; update case sheet; ask JF to calendar dates and deadlines
	5/15/2024	0.1	0 H 06M	Discuss tasks and deadlines ahead of mediation
	5/24/2024	0.2	0 H 12M	Follow up re: mediation issues; create tasks; review notes
	6/5/2024	0.1	0 H 06M	Reply to OC email re: stipulation; ask about mediation data production
	6/5/2024	0.1	0 H 06M	Email co-counsel re: reminding OC re: data
	7/15/2024	0.2	0 H 12M	Case follow up: check deadlines re; mediation; update notes; check court docket re: answer status; create tasks
	7/25/2024	0.1	0 H 06M	Follow up with OC re: mediation data
	8/13/2024	0.1	0 H 06M	Email co-counsel re: convenient times to do a call with OC
	8/15/2024	0.1	0 H 06M	Reply to OC re: call availability next week; calendar check
	8/15/2024	0.1	0 H 06M	Email OC re: conversation on mediation data
	8/21/2024	0.3	0 H 18M	Draft email follow up to OC based on conversation with DK re: expanded class definition
	8/21/2024	0.1	0 H 06M	Calls/email to client re: his call
	8/21/2024	0.2	0 H 12M	Follow up email to OC re: conversation today
	8/21/2024	0.3	0 H 18M	Call with OC and co-counsel re: mediation
	8/21/2024	0.2	0 H 12M	Prepare for call re: mediation
	8/22/2024	0.2	0 H 12M	Call with and email to client re: mediation, case status, etc.
	9/4/2024	0.1	0 H 06M	Review mediation communications with co-counsel; note to DK re: allocation of work
	9/4/2024	0.2	0 H 12M	Review case status, mediation production, and draft note to DK
	9/4/2024	0.1	0 H 06M	Email OC re: mediation docs and data
	9/4/2024	0.2	0 H 12M	Retrieve mediation documents
	9/6/2024	0.2	0 H 12M	Update/send email to co-counsel re: wage statement issue
	9/6/2024	0.1	0 H 06M	Review wage statement issue with DK
	9/6/2024	0.2	0 H 12M	Research re: wage statement issue and staffing agency; note to DK re: findings
	9/12/2024	0.2	0 H 12M	Discuss course of action re: email to OC/co-counsel re: 226 claims
	9/12/2024	0.1	0 H 06M	Discussion with DK re: wage statement issue
	9/12/2024	0.1	0 H 06M	Email OC re: wage statement class/including all EE's
	9/12/2024	0.1	0 H 06M	Email to co-counsel re: wage statements and emailing OC
	9/12/2024	0.1	0 H 06M	Follow up email to co-counsel re: message to OC
	9/19/2024	0.2	0 H 12M	Start new thread with co-counsel re: mediation data
	9/19/2024	0.2	0 H 12M	Emails to co-counsel and expert re: data/working together
	9/19/2024	0.1	0 H 06M	Email expert re: data
	9/19/2024	0.1	0 H 06M	Email co-counsel re: mediation data and analysis
	9/19/2024	0.3	0 H 18M	Conversation with DK re: mediation and call with counsel
	9/19/2024	0.1	0 H 06M	Respond to co-counsel re: data and analysis costs
	9/19/2024	0.1	0 H 06M	Note to DK re: mediaition, call with OC, status of data
	9/19/2024	0.2	0 H 12M	Retrieve documents produced ahead of mediation; add to folder; share with JF for filing
	9/30/2024	0.1	0 H 06M	Email OC re: missing data
	9/30/2024	0.2	0 H 12M	Email exchanges with expert re: missing data
	9/30/2024	0.1	0 H 06M	Email expert re: mediation data questions
	9/30/2024	0.2	0 H 12M	Review mediation data
	10/3/2024	0.1	0 H 06M	Review case status and note to DK re: mediation and brief

10/7/2024	3	3 H 00M	Legal research re: various aspects of the case (wage statement issue, conditions of employment)
10/7/2024	1.8	1 H 48M	Pre-mediation call with the client
10/7/2024	0.1	0 H 06M	Email Jarrett re: production of records
10/10/2024	0.1	0 H 06M	Retrieve mediation analysis and the email chain; add to file
10/10/2024	0.1	0 H 06M	Retrieve add'l mediation doc production
10/10/2024	0.1	0 H 06M	Email OC re: problems retrieving docs
10/10/2024	0.2	0 H 12M	Attempts to retrieve docs in mediation production; look up password
10/10/2024	0.2	0 H 12M	Call with co-counsel re: mediation brief
10/18/2024	8	8 H 00M	Mediation Attendance (remote)
10/31/2024	0.1	0 H 06M	Follow up re: 10/28 court order and create task; update case sheet;
11/17/2024	0.1	0 H 06M	Email client re: his questions re: settlement agreement
11/17/2024	0.1	0 H 06M	Review OC email re: MOU and assign tasks re: review
11/20/2024	1.5	1 H 30M	Review and revise the MOU
12/2/2024	0.1	0 H 06M	Respond to client email
12/6/2024	0.1	0 H 06M	Email OC re: status of MOU and call next week
12/6/2024	0.2	0 H 12M	Discuss changes to MOU and case status with DK
12/13/2024	0.1	0 H 06M	Follow up email to OC re: call next week
12/16/2024	0.1	0 H 06M	Respond to client re: lack of relevancy in the cases he cited
12/16/2024	0.2	0 H 12M	Review cases cited by client
12/16/2024	0.3	0 H 18M	Start drafting email to DK and DY re: Plaintiff and his issues
12/16/2024	0.3	0 H 18M	Draft/send email to client re: call and his duties
12/16/2024	0.7	0 H 42M	Call with client Heard re: settlement issues, breakdown of settlement and various numbers, discussion re: fairness and court approval process
12/16/2024	0.1	0 H 06M	Review SA terms and conditions to discuss with client
12/17/2024	0.1	0 H 06M	Email OC re: dispositional documents
12/17/2024	0.3	0 H 18M	Draft joint report to Court re: dispositional docs
12/18/2024	0.1	0 H 06M	Finalize joint report and forward to JF for filing
12/18/2024	0.2	0 H 12M	Email exchanges with OC re: joint report
1/6/2025	0.1	0 H 06M	Respond to client email re: court-imposed deadline
1/6/2025	0.1	0 H 06M	Email OC re: MOU status
1/6/2025	0.1	0 H 06M	Review court order re: dispositional docs; update task
1/10/2025	0.1	0 H 06M	Follow up email to OC re: status of MOU
1/13/2025	0.1	0 H 06M	Discuss the issues pertaining to case with DK
1/15/2025	0.1	0 H 06M	Respond to client email re: status of dismissal papers
1/15/2025	0.2	0 H 12M	Review case details and prepare for drafting of long form with Lana
1/22/2025	0.1	0 H 06M	Conversation with Lana re: settlement agreement draft
1/22/2025	0.1	0 H 06M	Response message to DY re: settlement status
1/23/2025	0.1	0 H 06M	Review court order re: extending deadline to file dispositional papers; update board; create task for JF
1/24/2025	0.2	0 H 12M	Search for the mediator's proposal; communicate with JF; create task for DK
1/28/2025	0.2	0 H 12M	Draft response to lending company; send to DK for review
1/28/2025	0.2	0 H 12M	Call with High Rise Financial re: client's request for cash
1/30/2025	0.1	0 H 06M	Respond to funding company re: their questions and requests
1/30/2025	0.3	0 H 18M	Call with client re: funding issue; follow up email confirming advice re: reviewing terms/conditions for fees/costs
1/30/2025	0.1	0 H 06M	Email client re: getting in touch re: settlement loan
1/30/2025	0.1	0 H 06M	Email OC re: status of MOU
2/4/2025	0.1	0 H 06M	Email co-counsel with proposed final MOU to get final approval to sign
2/4/2025	0.3	0 H 18M	Review MOU drafts sent by OC; compare with our draft to ensure no add'l changes; discuss escalation clause with DK
2/5/2025	0.1	0 H 06M	Send MOU executed by Plaintiff Heard to OC
2/5/2025	0.1	0 H 06M	Send MOU to Jordan to send to client; email client re: MOU
2/5/2025	0.1	0 H 06M	Review rules re: MOU signatures; note to DK re: no client signature on MOU
2/5/2025	0.1	0 H 06M	Respond to co-counsel re: MOU
2/6/2025	0.2	0 H 12M	Discuss MOU terms re: settlement with DK; review pending case items and issues to address with OC, including postponing the dismissal deadline
2/7/2025	0.1	0 H 06M	Review pending case items; notes to DK re: follow up issues
2/11/2025	0.1	0 H 06M	Reach out to OC re: stipulation to continue the dispositive motion deadline
2/13/2025	0.2	0 H 12M	Finalize the joint stipulation/order to federal court; send to JF for filing
2/13/2025	0.1	0 H 06M	Respond to OC re: stipulation and authorization to file
2/13/2025	0.1	0 H 06M	Email client re: status of MOU and next steps
2/13/2025	0.1	0 H 06M	Retrieve and review finalized MOU; send to Jordan for filing; add to sharepoint
2/19/2025	0.1	0 H 06M	Correspond with Lana re: case complaint
2/20/2025	0.2	0 H 12M	Email to Simpluris re: quote for settlement admin
2/20/2025	0.1	0 H 06M	Follow up with firm attorneys re: Simpluris contact information
2/20/2025	1.5	1 H 30M	Review and revise the settlement agreement with Lana
2/24/2025	0.2	0 H 12M	Retrieve quotes from settlement admins; confirm no response from Phoenix; add to sharepoint; send to Jordan F to add to file
3/6/2025	1.2	1 H 12M	Review Settlement Agreement; note to DK
3/7/2025	0.1	0 H 06M	Email co-counsel re: reserving a hearing date in San Bernardino
3/21/2025	0.1	0 H 06M	Review case status and pending items; draft note for DK re: follow up tasks
3/25/2025	0.1	0 H 06M	Review co-counsel email re: reservation for hearings; respond re: MPA
3/25/2025	0.1	0 H 06M	Email co-counsel re: hearing reservation in their case for prelim approval
3/25/2025	0.1	0 H 06M	Check court docket for related case re: hearing reservation (none)
4/1/2025	0.1	0 H 06M	Respond to client re: status of settlement agreement
4/1/2025	0.1	0 H 06M	Email settlement agreement to co-counsel for review
4/1/2025	1.4	1 H 24M	Review and revise the settlement agreement and notice
4/8/2025	0.1	0 H 06M	Follow up with DK re: case status and pending settlement issues
4/8/2025	0.1	0 H 06M	Follow up email to co-counsel re: status of settlement agreement

4/11/2025	0.3	0 H 18M	Review changes to settlement agreement by co-counsel; send note to DK re: things to approve/review
4/18/2025	0.1	0 H 06M	Correspond with OC re: dispositional docs and settlement agreement
4/18/2025	0.5	0 H 30M	Draft joint stipulation re: extension of time to file dispositional paperwork
4/22/2025	0.2	0 H 12M	Review and accept all changes to settlement agreement by co-counsel and DK; create final document
4/23/2025	0.1	0 H 06M	Email response to client re: status of settlement agreement
4/23/2025	0.2	0 H 12M	Send draft settlement agreement to Defense counsel for review
4/23/2025	0.1	0 H 06M	Email co-counsel confirming acceptance of all changes and finalizing the costs
4/29/2025	0.1	0 H 06M	Respond to client re: status of settlement
4/29/2025	0.1	0 H 06M	Note to DK re: status of the case, consolidated complaint, and settlement agreement
5/7/2025	0.1	0 H 06M	Email OC re: status of settlement agreement
5/8/2025	0.1	0 H 06M	Email co-counsel re: consolidated complaint drafting
5/8/2025	0.1	0 H 06M	Reply to client re: settlement agreement
5/12/2025	0.1	0 H 06M	Update mediation/settlement info and checklists
5/14/2025	0.1	0 H 06M	Email client with copy of the settlement agreement draft
5/19/2025	0.1	0 H 06M	Email OC re: status of settlement agreement
5/23/2025	0.1	0 H 06M	Email response to client re: status of settlement agreement
5/23/2025	0.1	0 H 06M	Follow up email to co-counsel re: status of consolidated complaint
5/23/2025	0.1	0 H 06M	Follow up email to OC re: status of settlement agreement
5/29/2025	0.1	0 H 06M	Respond to client email re: rewriting the settlement agreement terms, etc.
6/2/2025	0.5	0 H 30M	Review and revise the proposed amended complaint from co-counsel
6/6/2025	0.1	0 H 06M	Respond to Heard re: settlement agreement remaining funds
6/6/2025	0.1	0 H 06M	Respond to client re: status of the case/settlement
6/6/2025	0.1	0 H 06M	Email to co-counsel re: status of complaint
6/6/2025	0.1	0 H 06M	Follow up email to OC re: status of settlement agreement
6/17/2025	0.2	0 H 12M	Discuss SA with DK; point to issues to address
6/17/2025	0.3	0 H 18M	Review SA and OC's changes; send to DK with notes
6/17/2025	0.1	0 H 06M	Respond to client re: payment deadline/questions
6/17/2025	0.1	0 H 06M	Respond to client re: status of settlement agreement
6/23/2025	0.1	0 H 06M	Prepare the stip and order for filing
6/23/2025	0.1	0 H 06M	Follow up email to OC re: joint stip and complaint
6/23/2025	0.1	0 H 06M	Call, voicemail and email to OC re: joint stipulation
6/23/2025	0.6	0 H 36M	Draft new joint stipulation re: extension
6/23/2025	0.2	0 H 12M	Call, convo with assistant, email to co-counsel re: status of the complaint filing
6/23/2025	0.2	0 H 12M	Review status of case, emails and pending items
6/24/2025	0.2	0 H 12M	Review relevant related case information; send message to DK with responses to his questions
6/26/2025	0.1	0 H 06M	Review emails from client
6/27/2025	0.3	0 H 18M	Call with and follow up email to client re: status of the settlement and pending items
6/28/2025	0.1	0 H 06M	Follow up email to co-counsel re: status of complaint and SA
7/1/2025	0.1	0 H 06M	Respond to client re; federal court docket and status conference
7/1/2025	0.2	0 H 12M	Call to, voicemail and follow up email to co-counsel re: status of settlement agreement
7/9/2025	0.1	0 H 06M	Email OC and co-counsel re: status of SA and joint stip to file amended complaint
7/11/2025	0.1	0 H 06M	Email co-counsel re: status of settlement agreement
7/16/2025	0.1	0 H 06M	Send email update to client re: status of settlement agreement
7/16/2025	0.1	0 H 06M	Follow up email to co-counsel re: SA
7/21/2025	0.1	0 H 06M	Email settlement agreement draft to OC
7/25/2025	0.1	0 H 06M	Respond to client re: status of settlement agreement
8/5/2025	0.1	0 H 06M	Email OC re: status of settlement agreement
8/11/2025	0.1	0 H 06M	Follow up email to OC re: status of settlement agreement
8/15/2025	0.1	0 H 06M	Follow up email to OC re: settlement agreement
8/18/2025	0.1	0 H 06M	Email exchanges with the client re: status of settlement
8/18/2025	0.2	0 H 12M	Call to and follow up email to OC re: status of settlement agreement
8/20/2025	0.1	0 H 06M	Review OC changes to the stipulation; send to DK for final review/approval
8/20/2025	0.1	0 H 06M	Email OC re: joint stip and dispositional deadline/settlement agreement signature
8/20/2025	0.4	0 H 24M	Draft joint stipulation re: stay, not dismissing and alternatively, remanding the case
8/20/2025	0.1	0 H 06M	Retrieve settlement agreements signed by both P's and put in sharepoint; review for accuracy
8/20/2025	0.2	0 H 12M	Discuss the issue of dispositional papers with David K; discuss language re: joint stipulation
8/20/2025	0.1	0 H 06M	Follow up email to OC re: status of settlement agreement
8/20/2025	0.1	0 H 06M	Email settlement agreement to client for signature
8/21/2025	0.1	0 H 06M	Email OC re: filing the joint stipulation and issues related to the settlement agreement
8/21/2025	0.1	0 H 06M	Review OC changes to the joint stipulation and accept them; create final doc
8/22/2025	0.1	0 H 06M	Respond to client email re: doing an intake on WT case
8/22/2025	0.1	0 H 06M	Follow up re: joint stip filing
8/22/2025	0.1	0 H 06M	Email OC re: settlement agreement and joint stip
8/22/2025	0.2	0 H 12M	Combine all signature pages; put together final settlement agreement; update joint stipulation and create a final version; send SA to Jordan for filing
8/25/2025	0.3	0 H 18M	Review federal court order re: joint reports; follow up re: calendaring; calculate deadlines; create tasks for each deadlines; update case notes
8/26/2025	0.1	0 H 06M	Draft/send email to co-counsel re: approval motion and process
8/29/2025	0.1	0 H 06M	Email CST re: potential new case
8/29/2025	0.2	0 H 12M	Call with and follow up email to client re: case status and another potential case
8/29/2025	0.1	0 H 06M	Review and retrieve emails from client re: new potential case
9/3/2025	0.1	0 H 06M	Email co-counsel re: status of the prelim approval motion papers
9/10/2025	0.1	0 H 06M	Follow up email to co-counsel re: prelim motion status

	9/16/2025	0.1	0 H 06M	Respond to client re: status of approval motion
	9/17/2025	0.1	0 H 06M	Respond to client re: advance
	10/4/2025	0.1	0 H 06M	Draft/send response to OC re: preliminary approval papers
	10/4/2025	0.8	0 H 48M	Review and revise the motion for preliminary approval
	10/4/2025	1.8	1 H 48M	Draft counsel declaration re: motion for preliminary approval
	10/4/2025	0.1	0 H 06M	Email to client re: declaration for preliminary approval of settlement
	10/4/2025	0.8	0 H 48M	Draft Plaintiff's declaration ISO preliminary approval of settlement
	10/6/2025	0.1	0 H 06M	Follow up with David K and David Y re: preliminary approval and supporting documentation
	10/6/2025	0.1	0 H 06M	Email response to client re: declaration
	10/6/2025	0.1	0 H 06M	Discuss client declaration with DK
	10/6/2025	0.1	0 H 06M	Respond to client re: declaration and hours worked
	10/7/2025	0.4	0 H 24M	Correspond with DK and DY re: approval hearing, case status, pending motion; assign tasks
	10/7/2025	0.3	0 H 18M	Call with client re: hours devoted to the case and the current situation
	10/7/2025	0.1	0 H 06M	Email client re: declaration
	11/4/2025	0.1	0 H 06M	Respond to client inquiry re: status of prelim motion
	11/6/2025	0.1	0 H 06M	Respond to OC and co-counsel re: prelim hearing date; check calendar
	11/6/2025	0.1	0 H 06M	Review case status and status of prelim hearing; update case sheet
	11/10/2025	0.1	0 H 06M	Respond to client re: settlement admin status
	11/12/2025	0.1	0 H 06M	Confirm the preliminary approval date and ask Jordan to calendar
	11/16/2025	0.1	0 H 06M	Respond to client email re: status of FA filing
	11/18/2025	0.1	0 H 06M	Retrieve motion docs in related case; send to Jordan for filing
	11/18/2025	0.1	0 H 06M	Email motion documents to client
	11/18/2025	0.2	0 H 12M	Follow up re: declaration for me and client; send to Jordan for signature; sign mine; create final docs;
	11/18/2025	0.1	0 H 06M	Email co-counsel re: declaration
	11/20/2025	0.1	0 H 06M	Email OC re: submission of joint report and deadline
	11/20/2025	0.2	0 H 12M	Draft joint report for Fed Court submission
	11/21/2025	0.2	0 H 12M	Finalize the joint report and send to Jordan for filing
	11/26/2025	0.2	0 H 12M	Review the court order re: dates; create follow up tasks for Jordan re: calendaring and me for filing reports
	12/3/2025	0.1	0 H 06M	Update case sheet re: prelim; note to DK re: dates
	12/10/2025	0.2	0 H 12M	Review the emails from the client; respond re: contacting intake team
	12/15/2025	0.1	0 H 06M	Follow up with Jordan re: emails from client
	2/17/2026	0.2	0 H 12M	Check case status; update case sheet; note to DK; check docket for federal court
	3/4/2026	0.1	0 H 06M	Respond to client email re: case update
	4/9/2026	0.1	0 H 06M	Create follow up tasks re: admin of notice
	4/9/2026	0.1	0 H 06M	Respond to client re: status of case and FA hearing
	4/14/2026	0.1	0 H 06M	Draft/send email to OC re: settlement approval
	4/14/2026	0.4	0 H 24M	Review court's order from November re: joint report; review OC email; draft joint report for OC review
	4/15/2026	0.6	0 H 36M	Draft/update class notice as a separate Word document; email Simpluris re: notice administration
	4/15/2026	0.1	0 H 06M	Email OC re: status of joint report
	4/15/2026	0.1	0 H 06M	Finalize joint report and send to staff for filing
	4/16/2026	0.3	0 H 18M	Update case sheet with hearing dates and deadlines; note to DK re: FA motion and notice administration
	5/7/2026	0.1	0 H 06M	Review case status; update to DK/DY
	5/8/2026	0.1	0 H 06M	Reach out to co-counsel re: timesheets and FA submission
	5/8/2026	0.1	0 H 06M	Email OC and settlement admin re: status of data
	5/13/2026	0.1	0 H 06M	Respond to Simpluris re: class notice and ask re: receipt of class data
	5/13/2026	0.3	0 H 18M	Review class notice
	5/19/2026	0.2	0 H 12M	Review email from settlement admin re: settlement end date; note to DK re: necessary feedback
	5/29/2026	0.1	0 H 06M	Discuss case and settlement issues with DK
	5/29/2026	0.1	0 H 06M	Respond to settlement admin and OC re: escalator
	6/2/2026	0.25	0 H 15M	Draft/send email to High Rise re: client settlement details for a loan
	6/4/2026	0.1	0 H 06M	Respond to client email
	6/18/2026	0.1	0 H 06M	Respond to OC call re: court filing
	6/18/2026	0.1	0 H 06M	Follow up with DK re: case status
	6/25/2026	0.1	0 H 06M	Email OC re: call tomorrow
	6/25/2026	0.1	0 H 06M	Respond to client email re: case status
	6/26/2026	0.2	0 H 12M	Email to client with update re: workweeks issue
	6/26/2026	0.2	0 H 12M	Call with OC re: escalator issues
	6/29/2026	0.2	0 H 12M	Draft/send email to settlement admin re: timing of notice mailer
	6/30/2026	0.1	0 H 06M	Email OC re: follow up call in mid-July
	6/30/2026	0.1	0 H 06M	Respond to settlement admin re: notice administration
	6/30/2026	0.2	0 H 12M	Draft/send email to co-counsel re: recent talk with OC and plan ahead
	7/1/2026	0.1	0 H 06M	Respond to co-counsel re: escalator clause
	7/9/2026	0.1	0 H 06M	Email OC re: call follow up from last week
	7/9/2026	0.1	0 H 06M	Respond to client re: case status
	7/9/2026	0.2	0 H 12M	Review updated notice and dates from settlement admin
	7/10/2026	0.2	0 H 12M	Follow up with DK and settlement admin re: call
	7/10/2026	0.1	0 H 06M	Discussion with DK re: escalator
	7/10/2026	0.1	0 H 06M	Email settlement admin re: call this week
	7/11/2026	0.2	0 H 12M	Draft joint report for federal court
	7/11/2026	0.1	0 H 06M	Email OC re: joint report due date
	7/13/2026	0.1	0 H 06M	Respond to OC re: joint report
	7/13/2026	0.2	0 H 12M	Finalize joint report for filing; send to Jordan with instructions

		7/16/2026	0.1	0 H 06M	Discuss escalator and notice with DK
		7/23/2026	0.2	0 H 12M	Review the timeline for notice mailer and provide approval to settlement admin
		7/23/2026	0.2	0 H 12M	Call with settlement admin re: truncated class period
		7/23/2026	0.1	0 H 06M	Review email from OC re: escalator
		7/23/2026	0.1	0 H 06M	Email co-counsel re: escalator and D's position
		7/23/2026	0.1	0 H 06M	Call/voicemail for settlement admin re: escalator and call back
		7/28/2026	0.1	0 H 06M	Follow up with settlement admin re: notice admin
		7/28/2026	0.1	0 H 06M	Note to DK re: settlement deadlines
		7/29/2026	0.1	0 H 06M	Email client with update re: notice administration
		7/31/2026	0.1	0 H 06M	Retrieve weekly report and send to Jordan for filing
		8/3/2026	0.2	0 H 12M	Call with class member Termaine Adams
		8/7/2026	0.1	0 H 06M	Retrieve and review admin report; send to Jordan for filing
		8/13/2026	0.1	0 H 06M	Update settlement tracker
		8/13/2026	0.1	0 H 06M	Respond to client re: settlement date
		8/25/2026	0.1	0 H 06M	Retrieve weekly report; send to Jordan to add to file
		8/31/2026	0.1	0 H 06M	Retrieve weekly report; send to Jordan for filing
		9/4/2026	0.1	0 H 06M	Retrieve weekly report and send to Jordan for filing
		9/11/2026	0.1	0 H 06M	Retrieve and review the weekly report; send to Jordan for filing
		9/22/2026	0.1	0 H 06M	Follow up with settlement admin re: declaration
		9/30/2026	0.1	0 H 06M	Retrieve the weekly report; send to Jordan for filing
		10/5/2026	0.1	0 H 06M	Retrieve and review the weekly report; send to Jordan to add to file
		10/13/2026	0.1	0 H 06M	Respond to admin re: declaration
		10/13/2026	0.2	0 H 12M	Draft/send email to co-counsel re: FA motion
		10/13/2026	0.3	0 H 18M	Review and revise admin declaration
		10/13/2026	0.1	0 H 06M	Retrieve and review weekly report; add to file
		10/13/2026	0.1	0 H 06M	Respond to client email re: case status
		10/14/2026	1.4	1 H 24M	Continue working on the FA motion
		10/14/2026	3.8	3 H 48M	Continue working on FA motion; draft declaration; follow up with settlement admin, costs and reports
		10/14/2026	0.2	0 H 12M	Follow up with Simpluris re: declaration and admin quote
		10/14/2026	1.2	1 H 12M	Start working on FA motion
		10/16/2026	4.5	4 H 30M	Draft final approval motion
		10/20/2026	0.2	0 H 12M	Retrieve and review weekly report; send to jordan for filing
		10/20/2026	0.1	0 H 06M	Follow up with DY re: FA motion
		10/22/2026	0.1	0 H 06M	Follow up with co-counsel re: MFA
		10/23/2026	0.3	0 H 18M	Review co-counsel's submissions re: FA motion
		10/26/2026	3	3 H 00M	Finalize FA motion and prepare for submission
Subtotal	Sum		102.65		