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Attorneys for Plaintiff Veronica Topete

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SAN BERNARDINO

JOSHUA WOLFE, VERONICA TOPETE,
individually, and on behalf of other members of
the general public similarly situated and on
behalf of other aggrieved employees pursuant to
the California Private Attorneys General Act;

Plaintiffs,

vs.

SOUTH COAST BAKING, LLC, a California
limited liability company; SOUTH COAST
BAKING COMPANY, an unknown business
entity; RISE BAKING COMPANY, an
unknown business entity; RISE BAKING
COMPANY, LLC, a Delaware Limited
Liability Company; RISE BAKING ARTISAN
BREAD, LLC, a Delaware Limited Liability
Company; RISE BAKING SWEET GOODS,
LLC, a Delaware Limited Liability Company;
BRILL, INC., a Delaware Limited Liability
Company; and DOES 1 through 100, inclusive,

Defendants.

Case No. CIVSB2224856

Honorable Christian Towns
Department S26

CLASS ACTION

**DECLARATION OF PLAINTIFF
ZACHARY CROSNER IN SUPPORT OF
PLAINTIFFS' UNOPPOSED MOTION
FOR FINAL APPROVAL OF CLASS
ACTION SETTLEMENT**

Complaint Filed: October 27, 2022
FAC Filed: April 17, 2024
Jury Trial Date: None Set

I, Zachary Crosner, declare as follows:

2. Attached hereto as **Exhibit 1** is a true and correct copy of Crosner Legal, PC's ("Crosner Legal") Summary of Time and Costs.

3. I am unaware of any conflict of interest between myself or my law firm and any member of the proposed Class which should or would preclude me from representing the Class.

4. On or about January 4, 2023, Plaintiff Veronica Topete ("Plaintiff Topete") submitted a written Notice of Private Attorneys General Act Claim ("PAGA Notice") to the California Labor and Workforce Development Agency regarding specific provisions of the California Labor Code and Industrial Welfare Commission Orders that she alleges Defendants violated, and served this PAGA Notice on Defendants. On March 14, 2023, Plaintiff Topete filed an action in the Superior Court of California, County of Orange, Case No. 30-2023-01312362-CU-OE-CXC, on behalf of herself, all current and former hourly paid or non-exempt employees who worked for Defendants in California at any time from January 8, 2022 through the present ("Aggrieved Employees"), and the State of California, pursuant to the Private Attorneys' General Act, Cal. Labor Code Sections 2698 et seq. ("PAGA") for Defendants' alleged violations of California employment law ("Topete Action"). In her PAGA Complaint, Plaintiff Topete alleged the following violations of the California Labor Code: (1) failure to pay minimum and overtime wages, (2) failure to provide compliant meal periods, (3) failure to authorize and provide rest periods, (4) failure to provide accurate wage statements, (5) failure to produce employment records, (6) failure to keep accurate and complete payroll records, (7) failure to reimburse business expenses, (8) violation of the California WARN Act, (9) failure to provide proper sick leave, (10) failure to provide supplemental paid sick leave, (11) failure to provide suitable

1 seating, (12) failure to pay all vested, accrued time off, (13) failure to timely pay all wages upon
2 separation of employment, (14) unlawful criminal and/or financial checks, and (15) failure to
3 provide a safe and healthful workplace.

4 5. Prior to Plaintiff Topete filing the Topete Action, on or about October 27, 2022,
5 Plaintiff Joshua Wolfe filed the instant class action in the Superior Court for the County of San
6 Bernardino, Case No. CIVSB2224856 ("Wolfe Class Action"), alleging causes of action for: (1)
7 failure to pay overtime wages, (2) failure to provide meal period premiums, (3) failure to provide
8 rest break premiums, (4) failure to pay minimum wages, (5) failure to pay all wages due upon
9 separation of employment, (6) failure to pay wages timely during employment, (7) failure to
10 provide compliant wage statements, (8) failure to keep requisite payroll records, (9) failure to
11 reimburse for business expenses, and (10) violation of Cal. Bus. & Prof. Code Sections 17200 et
12 seq. As with Plaintiff Topete, Plaintiff Wolfe likewise submitted a PAGA notice to the California
13 Labor and Workforce Development Agency on or about September 14, 2023. Defendants have at
14 all times denied Plaintiff Topete's and Plaintiff Wolfe's allegations, and have maintained that
15 their policies and procedures comply with California law.

16 6. Upon researching the Wolfe Class Action and determining that the cases involved
17 many of the same parties and issues, Plaintiffs Topete and Wolfe and Defendants agreed to
18 pursue an early, global private mediation in the hope of resolving both the Topete Action and the
19 Wolfe Class Action. The Parties agreed to pursue private mediation with mediator Lynn Frank,
20 Esq. on December 12, 2023 and engaged in an exchange of substantial documents and
21 information to facilitate settlement discussions, including a sampling of employees' paystubs and
22 time records, applicable employee handbooks, meal and rest period policies, and personnel files.
23 At the mediation, the Parties engaged in arms-length negotiations that were hard-fought and
24 adversarial as the Parties exchanged extensive information on their legal and factual positions,
25 and made numerous countering demands and offers. Ultimately, with the mediator's assistance,
26 the Parties agreed to a reasonable settlement amount to resolve both the Topete Action as well as
27 the Wolfe Class Action and executed a Memorandum of Understanding. The Parties thereafter
28

collaborated for several months on the drafting of the Joint Stipulation of Class Action and PAGA Settlement and Release, which was fully executed on May 22, 2024.

7. On or about April 17, 2024, Plaintiff Wolfe filed a First Amended Class and Representative Action Complaint in the Wolfe Class Action which: (1) added Rise Baking Company, LLC, Rise Artisan Bread, LLC, Rise Baking Sweet Goods, LLC, and Brill, Inc. as defendants, (2) added Plaintiff Topete as a named plaintiff, and (3) added Plaintiff Topete's and Plaintiff Wolfe's PAGA claims, effectively consolidating the Topete Action and Wolfe Class Action together.

ATTORNEY'S FEES AND COSTS

8. Per the terms of the settlement, up to one-third of the initial gross amount is allocated to payment of reasonable attorney's fees, or \$400,000.00. Here, the parties did not negotiate the inclusion of attorney's fees until after extensive arms-length bargaining regarding relief to the Class was completed. The requested fee and cost award was a product of these arms-length negotiations and fairly reflects the marketplace value of the services rendered by Class Counsel in this case for the reasons addressed herein.

9. During this litigation, Crosner Legal's efforts have included: (1) extensive pre-lawsuit investigation of the claims of Plaintiffs and the putative class, including legal research, research into similar claims and claims against other employers in the same industry, and attempts to locate and contact other employees of the Defendants; (2) drafting a PAGA notice letter; (3) drafting the initial complaint and related documents; (4) case management, including communications with defense counsel, meeting and conferring/preparing case management statements, etc.; (5) lengthy discussions with defense counsel regarding settlement/mediation and informal discovery needed for meaningful settlement discussions; (6) engaging in substantial informal discovery, including propounding informal discovery "requests" and reviewing documents and other information produced; (7) working with a consulting expert on the analysis of Defendants' production; (8) drafting a mediation brief and accompanying damages model after review and analysis of defendant's formal and informal discovery production; (9) attending an all-day mediation; (10) negotiating and drafting the settlement agreement and related

documents; (11) reviewing the consolidated amended complaint to effectuate the settlement; (12) reviewing motion for preliminary approval, drafting supporting documents, and attending the hearing; (13) administration of the settlement, including communications with the Settlement Administrator and settlement class members; (14) reviewing final approval motion, drafting supporting documents, and attending the final approval hearing; and (15) extensive communications with the Plaintiffs regarding case status, case investigation and document review, mediation, and settlement terms. Additionally, Class Counsel will incur additional time following final approval to, inter alia, respond to class member inquiries, attend to distribution of settlement funds, and on the compliance hearing. Attached hereto as **Exhibit 1** is a summary of Crosner Legal's work performed and time expended on this matter.

10. I am a 2010 graduate of University San Diego School of Law and I have approximately thirteen years of experience as a practicing attorney. For nearly my entire career, my practice has focused on litigation of wage & hour, consumer, and privacy class action and representative action claims. Following graduation, I immediately began working for a nationally recognized plaintiff's complex litigation firm, CaseyGerry, where I worked directly with past presidents of the consumer attorneys and recipients of trial attorneys of the year awards. I also worked for other firms that included former CAALA and CLAY trial attorney of the year recipients. While with these firms, I advocated for the rights of consumers and employees in class action litigation, civil rights and employment litigation, catastrophic injuries, insurance bad faith and appellate litigation.

11. In 2013, I founded the law firm of Crosner Legal, P.C. which since its inception has focused almost exclusively on plaintiff-side class actions lawsuits representing employees, consumers and other victims. Currently, over ninety percent (95%) of my practice is dedicated exclusively to the prosecution of class actions and representative action lawsuits, and his law firm is currently responsible as lead counsel or co-lead counsel for prosecuting over one hundred (100) active wage and hour class actions and/or PAGA representative actions, as well as a multitude of consumer and privacy class actions, in both federal and state courts throughout

1 California. I have been a direct participant in over one hundred (100) class action and/or
2 representative action settlements where I have been approved as adequate lead counsel.

3 12. I have been selected by Super Lawyers as a “Southern California Rising Star” for
4 employment and labor law consecutively from 2018 through 2023. Super Lawyers have also
5 named me on their “Up-and-Coming 100” Southern California Rising Stars List for consecutive
6 years from 2021 through 2023. Only 2.5% of lawyers within California are named a Super
7 Lawyer Rising Star and even less are added to their Top Lists. Additionally, I have been selected
8 as a Top 40 Under 40 Civil Plaintiff Attorney by the National Trial Lawyers, invitation-only
9 organization composed of the premier trial lawyers, from 2019 through 2023. I am an active
10 participant in advocacy groups, including as an executive board member of the Wage and Hour
11 Committee and the Legislative Committee for the California Employment Lawyers Association;
12 a member of the Grassroots Advocacy Team for the National Employment Lawyers Association;
13 Wage and Hour Committee member and Class Action Committee member for the National Trial
14 Lawyers; a member of the American Association for Justice; and a member of the Pound Civil
15 Justice Institute.

16 13. Jamie Serb is a partner with Crosner Legal and head of the firms’ Wage & Hour
17 practice group. She graduated from the University of California, San Diego in 2004, graduated
18 from California Western School of Law in 2013, and has been a member of the California Bar
19 since 2013. She gained extensive experience in wage and hour litigation, beginning work as a
20 class action attorney in 2015 at the Mara Law Firm, PC (previously Turley & Mara Law Firm,
21 APLC; Turley Law Firm, APLC). She joined Crosner Legal on January 4, 2021 as an associate
22 attorney. She has handled wage and hour class actions and PAGA lawsuits for the past several
23 years and has assisted in obtaining millions of dollars for employees during her years of practice.

24 14. Nikki Trenner graduated from Trinity Law School in 2017 and joined Mara Law
25 Firm, PC (formerly The Turley and Mara Law Firm, APLC) that same year. She later joined
26 Crosner Legal in 2020 and is currently employed as a partner in the wage and hour department.
27 She has solely handled wage and hour class actions and PAGA lawsuits for six (6) years. Ms.
28 Trenner routinely write and oppose motions, draft complaints, appear before the Court at law and

1 motion and settlement hearings, engage in the discovery process, including drafting Belaire-West
2 notices and meet and confer letters.

3 15. Ms. Trenner has obtained class certification in the following matters: *Hernandez*
4 *v. Aviation Port Services, LLC*, Kern County Superior Court Case No. BCV-18-100141. She has
5 also assisted in obtaining millions of dollars for employees in the following court-approved class
6 action and/or representative PAGA settlements: *Michael Campbell, et al. v. Symons Emergency*
7 *Specialities, Inc.*, San Bernardino County Superior Court Case No. CIVDS1903158; *Amber*
8 *Collins v. Danbarb, Inc., et al.*, Los Angeles County Superior Court Case No. 20STCV44190;
9 *Michael Elridge v. LA Downtown Medical Center, LLC, et al.*, Los Angeles County Superior
10 Court Case No. 20STCV05951; *Anthony Leon, et al. v. Sierra Aluminum Company, et al.*, San
11 Bernardino County Superior Court Case No. CIVDS2010856; *Elaine Moyal v. Cabinets To Go,*
12 *LLC*, Los Angeles County Superior Court Case No. 20STCV32477; *Genevieve Rangel v. Bassett*
13 *Direct NC, LLC*, Orange County Superior Court Case No. 30-2018-01040101-CU-OE-CXC;
14 *Jacob Buys v. Sizewise Rentals, Inc., et al.*, Sacramento County Superior Court Case No. 34-
15 2018-00225848-CU-OE-GDS; *Alejandro Valencia v. VM Tree Service, Inc., et al.*, Riverside
16 County Superior Court Case No. RIC1819395; *Joshua Rael v. Intercontinental Hotels Group*
17 *Resources, Inc.*, Los Angeles County Superior Court Case No. 19STCV16010; *Angel Cervantez*
18 *v. Valley Pallet, Inc.*, Sacramento County Superior Court Case No. 34-2018-00234334-CU-OE-
19 GDS; *Tonja Edwards-Bloodsaw v. Sandburst Convalescent Group, LTD, et al.*, Los Angeles
20 Superior Court Case No. 19STCV15797; *Moriah Holtegaard, et al. v. Howroyd-Wright*
21 *Employment Agency, Inc. dba AppleOne Corporation Services, et al.*, Central District Court of
22 California, Eastern Division, Case No. 5:20-cv-00509 JGB (KKx); *Jade Findley, et al. v.*
23 *Avenue5 Residential, LLC, et al.*, Los Angeles County Superior Court Case No. 20STCV34633;
24 *Keivan Keyhanzad v. Ryan Cars, LLC dba Pomona Kia, et al.*, Riverside County Superior Court
25 Case No. RIC1905276; *Luis Bolanos v. FSC Corporation dba Il Pastaio Restaurant, et al.*, Los
26 Angeles County Superior Court Case No. BC722758; *Loretta Cannon v. Pasadena Hospital*
27 *Association, LTD dba Huntington Hospital*, Los Angeles County Superior Court Case No.
28 19STCV14554; *Nathan Kapusta v. Cardinale Motors SLO, Inc., et al.*, Kern County Superior

1 Court Case No. BCV-20-101593; and *Jesse McCauley v. Mullahey Ford, Inc., et al.*, San Luis
2 Obispo County Superior Court Case No. 21CV0001.

3 16. Michael Jones received his bachelor's degree from UC Santa Barbara in 2012 and
4 his J.D. from the USC Gould School of Law in 2016. Mr. Jones has practiced civil litigation for
5 over seven years and previously worked as a litigation attorney at Reisner & King, LLP and
6 Weston & McElvain LLP. During his tenure at Crosner Legal, PC, Mr. Jones focused
7 exclusively on representing employees in wage and hour class and PAGA actions.

8 17. Kiara Bramasco received her undergraduate degree, magna cum laude, from
9 Loyola Marymount University in Political Science, and then received her JD from Loyola Law
10 School in 2018. She then spent several years with well-known plaintiff's firm Moss Bollinger,
11 first as a law clerk and then as an associate, where her practice focused on employment law,
12 particularly wage and hour class action and PAGA litigation. She joined Crosner Legal in 2021.

13 18. Branden Hamilton obtained her undergraduate degree from UCLA in 2004, and
14 her law degree from George Washington University in 2007. She has been affiliated with my
15 firm since 2017 and became Of Counsel with Crosner Legal in 2019, and her practice focuses
16 almost exclusively on wage and hour class and representative actions. She has spent her entire
17 career representing plaintiffs in employment litigation, including several years as an associate at
18 well-known plaintiff's firm Carlin & Buchsbaum.

19 19. Crosner Legal, P.C. has obtained several multi-million dollar wage and hour class
20 action settlements while serving as lead class counsel in recent years, including but not limited to
21 a \$1.9 million wage and hour class action settlement in 2015 (*Smith v. Lux Retail North America,*
22 *Inc.*, Case No. 3:13-cv-01579-WHA (N.D. Cal.)); a \$4.1 million wage and hour class action
23 settlement in 2016 (*Aguirre v. Mariani Nut Company, Inc. et al.*, Case No. 34- 2016-00190252
24 (Sacramento Cty. Super Ct.)); a \$1.35 million wage and hour class action settlement in 2017
25 (*Montelone v. Ocean Cities Pizza, Inc.*, Case No. 56-2014-00458249 (Ventura Cty. Super. Ct.)),
26 a \$1.8 million wage and hour class action settlement in 2018 (*Latham v. K.W.P.H. Enterprises,*
27 *Inc. dba American Ambulance*, Case No. 17C-0162 (Kings Cty. Super Ct.)), a \$1.3 million wage
28 and hour class action settlement in 2019 (*Means, et al. v. AirGas USA, LLC*, Case No. 17-CV-

1 2160 JGB (C.D. Cal.)), a \$1.5 million wage and hour settlement in 2020 (*Babouchian, et al. v.*
2 *Wyndham Vacation Ownership, et al.*, Case No. CV18-14601 (San Diego Cty. Super. Ct.), a
3 \$1.15 million wage and hour class action settlement in 2020 (*Buford v. Medical Solutions LLC*,
4 Case No. 4:18-CV-04864-YGR (N.D.Cal.)); a \$7.25 million wage and hour class action
5 settlement in 2020 in *Avina, et al. v. First Alarm Security & Patrol, Inc.*, Case No. 18CV323753
6 (Santa Clara Cty. Super Ct.); a \$2.2 million wage and hour class action settlement in 2021
7 (*Ghorchian, et al. v. West Hills Hospital, et al.*, Case No. LS029737 (Los Angeles Cty. Super.
8 Ct.)); a \$2.85 million dollar wage and hour settlement in 2021 (*Valencia v. The Original*
9 *Mowbray's Tree Service, Inc.*, Case No. CIVDS1825518 (San Bernardino Cty. Super. Ct.)); a \$1
10 million wage and hour class action settlement in 2022 (*Duong v. Loan Factory, Inc.*, Case No.
11 21CV382467 (Santa Clara Cty. Super. Ct.)), a \$1.4 million wage and hour class action settlement
12 in 2023 in *Correa, et al. v. FedEx Supply Chain, Inc.*, Case No. CIVDS2023369 (San Bernardino
13 Cty. Super. Ct.), a \$2.38 million wage and hour class action settlement in 2023 in *Michel, et al.*
14 *v. Valley Thrift Store, Inc.*, Case No. 21STCV00925 (Los Angeles Cty. Super. Ct.); a \$2.5
15 million wage and hour class action settlement in 2023 in *Jajuga v. Pilot Travel Centers*, Case
16 No. CIVDS1931464 (San Bernardino Cty. Super. Ct.); \$1.015 million wage and hour class
17 action settlement in 2023 in *Gotishan v. Kyo Autism Therapy*, Case No. CGC-21-596378 (San
18 Francisco Cty. Super. Ct); and a \$1.15 million wage and hour PAGA settlement in 2023 in
19 *Vaughn v. Public Health Foundation Enters., Inc.*, Case No. 21STCV18512 (Los Angeles Cty.
20 Super. Ct.).

21 20. Based upon the qualifications and experience set forth above, the following
22 hourly rates are reasonable for attorneys practicing in this area of the law in California: Zachary
23 M. Crosner \$800/hour, Jamie Serb \$750/hour, Nikki Trenner, \$700/hour, Michael Jones,
24 \$600/hour, Kiara Bramasco \$650/hour, and Branden Hamilton \$600/hour.

25 21. Plaintiffs request the Court apply the above hourly billing rates in this case, as
26 these rates are reasonable in the California legal market for attorneys handling wage and hour
27 class actions. I have personal knowledge of the hourly rates charged by a number of plaintiff-side
28 wage and hour class action firms in the Bay Area, Los Angeles and San Diego markets, for

1 partner-level attorneys with experience comparable to mine and to that of my colleagues. These
2 rates have range from \$650 to \$850 per hour for calendar years 2017-2021. Some examples
3 include attorney Matthew Matern of Matern Law Group in Los Angeles, with approximately 26
4 years of experience \$850/hour (2018); Craig Ackermann of Ackermann & Tilajef, PC with
5 approximately 25 years of experience \$850/hour (2021), Michael Malk of Malk APC in Los
6 Angeles, with approximately 16 years of experience \$650/hour (2018), Michael Singer and Isam
7 Khoury of Cohelan Khoury & Singer in San Diego, 35 years and 45 years of experience
8 respectively, both \$825/hour (2018), Jason Ehrlich of McCormack & Ehrlich LLP in San
9 Francisco, with approximately 17 years of experience \$750/hour (2017), and James Kawahito of
10 Kawahito Law Group in Los Angeles, with approximately 16 years of experience \$750/hour
11 (2020).

12 22. The requested rates also comport with the adjusted Laffey Matrix, which provides
13 that reasonable hourly rates for attorneys with 20+ years of experience, such as Mr. Donnelly, is
14 around \$1000, and a reasonable rate for an attorney with 10+ years of experience, such as myself
15 Mr. Crosner, and Ms. Serb, is over \$800. The adjusted Laffey Matrix may be found at
16 <http://www.laffeymatrix.com/see.html>. Similarly, the December 8, 2008 article, “Billable Hours
17 Aren’t the Only Game in Town Anymore,” NATIONAL LAW JOURNAL, which set forth the
18 following hourly billing rates as reported by Sheppard, Mullin, Richter & Hampton, a leading
19 firm in the defense of wage-and-hour class actions that I have opposed when litigating wage-and-
20 hour class actions: Partners: \$475-\$795; Associates: 1st Year - \$275, 2nd Year - \$310, 3rd Year -
21 \$335, 4th Year - \$365, 5th Year - \$390, 6th Year - \$415, 7th Year - \$435, 8th Year - \$455.36

22 23. After the analysis above, Crosner Legal’s lodestar is \$134,185.00, based on
23 186.95 attorney hours spent litigating this case through the filing of this motion. Further, we will
24 almost certainly spend additional time addressing settlement administration matters, responding
25 to class member questions, etc. All tasks performed were reasonable and necessary to the
26 litigation of the case and the work performed was justified in light of the result achieved.

27 24. Class Counsel’s litigation costs and expenses are capped at \$35,000 under the
28 terms of Settlement Agreement. Crosner Legal’s total costs incurred to date are \$8,377.37. A true

1 and correct itemization of the costs and expenses incurred by my firm is set forth in **Exhibit 1**.
2 These costs were all reasonable and necessary to the litigation of this case and the results
3 achieved and are fair, reasonable, and unopposed by Defendants.

4 **SETTLEMENT ADMINISTRATION COSTS**

5 25. The settlement provides for a payment to Phoenix Settlement Administrators
6 (“Phoenix”) for its services as the Settlement Administrator. As set forth in the Declaration of
7 Jarrod Salinas, Phoenix has performed and will continue to perform its required duties through
8 final distribution of the settlement funds and incurred \$9,500 in fees and expenses. Plaintiffs
9 accordingly requests the Court approve payment of \$9,500 to Phoenix from the GSA.

10 **PLAINTIFFS’ ENHANCEMENT AWARDS**

11 26. Pursuant to the terms of the settlement, Plaintiffs seek modest incentive awards of
12 \$10,000 each for their service in bringing these claims on behalf of the Class. The requests are
13 reasonable given the risks they undertook on behalf of the Class Members, and by contacting and
14 retaining counsel to pursue these claims, Plaintiffs helped make this settlement possible for the
15 absent Class Members, while shouldering the risk of being liable for Defendant’s litigation costs.
16 Plaintiffs also exposed themselves to unwanted notoriety related to filing a public lawsuit
17 (discoverable even through a simple google search) for the benefit of other employees, placing
18 each at risk of discrimination by future prospective employers. As set forth in more detail in their
19 respective declarations, among taking many other actions assisting in the successful litigation of
20 this case, both Plaintiffs provided substantial factual information and documents to counsel,
21 attended numerous meetings/phone conferences with counsel to discuss the case, and kept
22 abreast of all significant developments.

23 I declare under penalty of perjury of the laws of the State of California that the foregoing
24 is true and correct. Executed this 28 day of March 2025, at Los Angeles, California.

25 

26 ZACHARY CROSNER
27
28

EXHIBIT “1”

Veronica Topete vs. South Coast Baking, LLC et al.
(San Bernardino County Superior court
Case No. CIVSB2224856)

Crosner Legal Time Report

Tasks	Zachary Crosner	Jamie Serb	Nikki Trenner	Kiara Bramasco	Michael Jones	Branden Hamilton
Pre-filing Case Investigation	8.6	0.0	0.0	6.2	0.0	8.6
Pleadings and Law and Motion	12.4	1.6	0.0	4.1	0.0	0.0
Discovery and Post-Filing Investigation	13.5	8.2	0.0	0.0	0.0	0.0
Court Appearances	0.0	0.0	0.0	0.0	0.0	0.0
Case Management; Litigation Strategy & Analysis	24.9	49.2	6.1	0.0	0.0	0.0
Mediation and Settlement	16.9	5.9	8.4	0.0	11.25	0.0
Total Hours	76.3	64.9	14.5	11.4	11.25	8.6
Hourly Rate	\$800	\$750	\$700	\$650	\$600	\$600
Lodestar	\$61,040	\$48,675	\$10,150	\$7,410	\$6,750	\$5,160

Requested Fees: \$400,000.00

Requested Costs: \$35,000.00

Total Hours: 186.95

Total Lodestar: \$134,185.00

D... >

Pr

Topete, Veronica (00584) v. South Coast Baking LLC, dba Rise Baking Company (...)

00584-Topete

Topete, Ver

Costs

Expense Detail

is

Select an option

Expense Date

is

exact date

>

Enter a date

For Attorney/...

has any of

+

...

Entered By

is

Select a user

Total Entries

16

Total Expense

\$8377.37

Expense Detail

Expense Amount

Expense Date

First Legal Fees

—

2/27/2025

First Legal Fees

\$14.20

8/12/2024

First Legal Fees

\$14.20

2/8/2024

Mediation Fee

\$5750.00

11/13/2023

Expense Detail	First Legal Fees
Expense Amount	–
Expense Date	2/27/2025
For Attorney/Paralegal	+
Name (from Attorney/Paralegal)	–
Type (from Attorney/Paralegal)	–
CLIO Matter	00584-Topete Costs Lodestar 126901360414880156611566215663
Matter Display (from CLIO Matter)	00584-Topete
Notes	First Legal Invoice ____ - Stipulation to continue CMC

Expense Detail	First Legal Fees
Expense Amount	\$14.20
Expense Date	8/12/2024
For Attorney/Paralegal	+
Name (from Attorney/Paralegal)	-
Type (from Attorney/Paralegal)	-
CLIO Matter	00584-Topete Costs Lodestar 126901360414880156611566215663
Matter Display (from CLIO Matter)	00584-Topete
Notes	FL Invoice 10842551- Joint Report Filing

14880

Expense Detail	First Legal Fees
Expense Amount	\$14.20
Expense Date	2/8/2024
For Attorney/Paralegal	Ashley Gutierrez +
Name (from Attorney/Paralegal)	Ashley Gutierrez
Type (from Attorney/Paralegal)	Paralegal Current
CLIO Matter	00584-Topete CostsLodestar12690 13604 14880 15661 15662 15663
Matter Display (from CLIO Matter)	00584-Topete
Notes	CMC STATEMENT - FL INV#10738436 2/08/24 5611379 DEF Crosner Legal PC Orange Civil Base Chg : 11.95 9440 Santa Monica Blvd. Electronic Filing Addt'Ichgs: 2.25 14.20 DIRECT eFILING BEVERLY HILLS CA 90210 DIRECT EFILING CA 00000 Caller: Mathew Adame 30-2023-01312362-CU-OE-CX Veronica Topete vs. South Coast Baking, LLC Status Conference Statement Env#: 9058701 Signed: Accepted Ref: 00584 - TOPETE

Expense Detail	Mediation Fee
Expense Amount	\$5750.00
Expense Date	11/13/2023
For Attorney/Paralegal	Ashley Gutierrez +
Name (from Attorney/Paralegal)	Ashley Gutierrez
Type (from Attorney/Paralegal)	Paralegal Current
CLIO Matter	00584-Topete Costs Lodestar 12690 13604 14880 15661 15662 15663
Matter Display (from CLIO Matter)	00584-Topete
Notes	MEDIATION - W/ FRANK & FEDER - FILE#4142 - 3961 - Check #VV1158 PAID ON 11/14/23 Mediation Services Scheduled for: Tuesday, December 12, 2023 \$5,750 (Total Fee: \$23,000) PAYMENT IS DUE ON OR BEFORE Wednesday, November 15, 2023. The mediation will not go forward until full payment is received from each party. Please make the check payable directly to Lynn Frank, a Sole Proprietor whose Federal Tax Identification Number is 94-3174862. Upon reserving a date the parties agree that they have read and are bound by the cancellation policy. Please put the file name, number and the party on whose behalf you are paying and send to: Lynn Frank c/o Frank & Feder 2173 Salk Avenue, Suite 250 Carlsbad, CA 92008

12690

Expense Detail	Copies (of Court Documents)
Expense Amount	\$7.50
Expense Date	10/5/2023
For Attorney/Paralegal	Maria Monterrey +
Name (from Attorney/Paralegal)	Maria Monterrey
Type (from Attorney/Paralegal)	ParalegalCurrent
CLIO Matter	00584-Topete CostsLodestar126901360414880156611566215663
Matter Display (from CLIO Matter)	00584-Topete
Notes	COURT COPY Order ID CIVIL57010939 Payment Confirmation Code01194G Payment Amount \$7.50 Payment Transaction Date 10/06/2023

Expense Detail	Copies (of Court Documents)
Expense Amount	\$7.50
Expense Date	4/24/2023
For Attorney/Paralegal	Maria Monterrey +
Name (from Attorney/Paralegal)	Maria Monterrey
Type (from Attorney/Paralegal)	ParalegalCurrent
CLIO Matter	00584-Topete CostsLodestar126901360414880156611566215663
Matter Display (from CLIO Matter)	00584-Topete
Notes	04/24/2023 M.O. dated 4/20.23 Order ID CIVIL53015767 Payment Confirmation Code 06245G Payment Amount \$7.50 Expiration Date 03/2027

Expense Detail	First Legal Fees
Expense Amount	\$38.00
Expense Date	3/23/2023
For Attorney/Paralegal	Ashley Gutierrez +
Name (from Attorney/Paralegal)	Ashley Gutierrez
Type (from Attorney/Paralegal)	ParalegalCurrent
CLIO Matter	00584-Topete CostsLodestar126901360414880156611566215663
Matter Display (from CLIO Matter)	00584-Topete
Notes	POS - FL INV#10603426 3/17/23 5261200 EFL Crosner Legal PC OCSC-SANTA ANA Base Chg : 35.75 9440 Santa Monica Blvd. 700 CIVIC CENTER DRIVE WEST Addt'l Chgs: 2.25 38.00 E-FILING BEVERLY HILLS CA 90210 SANTA ANA CA 92701 Caller: Manny Martinez 30-2023-01312362-CU-OE-CX Veronica Topete vs. South Coast Baking, LLC PROOF OF SERVICE SUMMONS;PROOF OF SERVICE SUMMONS;PROOF Env#: 7278979 Signed: Accepted Ref: TOPETE V SOUTH

23118

Expense Detail

First Legal Fees

Expense Amount

\$106.80

Expense Date

3/15/2023

For Attorney/Paralegal

Ashley Gutierrez +

Name (from Attorney/Paralegal)

Ashley Gutierrez

Type (from Attorney/Paralegal)

Paralegal Current

CLIO Matter

00584-Topete

Costs	Lodestar
12690 13604 14880 15661 15662 15663	

Matter Display (from CLIO Matter)

00584-Topete

Notes

SERVICE - FL INV#10600430
3/15/23 5259093 B3D Crosner Legal PC SOUTH COAST BAKING, LLC, a Californ Base Chg : 82.00
9440 Santa Monica Blvd. 2710 Gateway Oaks Dr PDF/Ship : 24.80 106.80
PROCESS-BRANCH 3 DAYS BEVERLY HILLS CA 90210 SACRAMENTO CA 95833
Caller: Manny Martinez
30-2023-01312362-CU-OE-CX
VERONICA TOPETE, on behalf of the State of Califor
Summons, Complaint, Civil Case Cover Sheet, Plaintiffs P
Env#: 8551352
Signed: KOY SAECHAO, PROCESS S Ref: TOPETE V. SOUTH COAST

Expense Detail	First Legal Fees
Expense Amount	\$38.00
Expense Date	3/15/2023
For Attorney/Paralegal	Ashley Gutierrez +
Name (from Attorney/Paralegal)	Ashley Gutierrez
Type (from Attorney/Paralegal)	Paralegal Current
CLIO Matter	00584-Topete CostsLodestar12690 13604 14880 15661 15662 15663
Matter Display (from CLIO Matter)	00584-Topete
Notes	PEREMPTORY CHALLENGE - FL INV#10600423 3/15/23 5258499 EFL Crosner Legal PC OCSC-COMPLEX LITIGATION Base Chg : 35.75 9440 Santa Monica Blvd. 751 W. SANTA ANA BLVD AddtlChgs: 2.25 38.00 E-FILING BEVERLY HILLS CA 90210 SANTA ANA CA 92701 Caller: Manny Martinez 30-2023-01312362-CU-OE-CX Veronica Topete vs. South Coast Baking, LLC PLAINTIFFS PEREMPTORY CHALLENGE OF THE HONORABLE WILLIAM FILE/CONFORM/RETURN Env#: 7265807 Signed: Accepted Ref: TOPETE V SOUTH COAST

Expense Detail	First Legal Fees
Expense Amount	\$1574.15
Expense Date	3/15/2023
For Attorney/Paralegal	Ashley Gutierrez +
Name (from Attorney/Paralegal)	Ashley Gutierrez
Type (from Attorney/Paralegal)	ParalegalCurrent
CLIO Matter	00584-Topete CostsLodestar126901360414880156611566215663
Matter Display (from CLIO Matter)	00584-Topete
Notes	SUMMONS & COMPLAINT - FL INV#10600422 3/14/23 5258116 EFR Crosner Legal PC OCSC-COMPLEX LITIGATION Base Chg : 79.50 9440 Santa Monica Blvd. 751 W. SANTA ANA BLVD Addt'l Chgs: 2.25 E-FILING RUSH BEVERLY HILLS CA 90210 SANTA ANA CA 92701 Adv/Wit Ck: 1435.00 Caller: Manny Martinez Check Chg : 57.40 1,574.15 30-2023-01312362-CU-OE-CX Veronica Topete vs. South Coast Baking, LLC Complaint;Civil Case Cover Sheet;Summons Issued and File EFILE COMPLEX CASE Env#: 7264291 Signed: Accepted Ref: TOPETE V S COAST BAKING Invoice Amount: 139.15 Fees Advanced: 1,435.00 : 1,574.15

Expense Detail	First Legal Fees
Expense Amount	\$149.43
Expense Date	3/15/2023
For Attorney/Paralegal	Ashley Gutierrez +
Name (from Attorney/Paralegal)	Ashley Gutierrez
Type (from Attorney/Paralegal)	ParalegalCurrent
CLIO Matter	00584-Topete CostsLodestar126901360414880156611566215663
Matter Display (from CLIO Matter)	00584-Topete
Notes	SERVICE - FL INV#10600431 3/15/23 5259095 FNP Crosner Legal PC RISE BAKING SWEET GOODS, LLC, a Del Base Chg : 124.63 9440 Santa Monica Blvd. 251 Little Falls Dr PDF/Ship : 24.80 149.43 PROCESS-FORWARD NEXT DAY BEVERLY HILLS CA 90210 WILMINGTON DE 19808 Caller: Manny Martinez Comment: RELATED PROCESS 30-2023-01312362-CU-OE-CX VERONICA TOPETE, on behalf of the State of Califor Summons, Complaint, Civil Case Cover Sheet, Plaintiffs P Env#: 8551365 Signed: Lynanne Gares, Litigat Ref: TOPETE V. SOUTH COAST

Expense Detail	First Legal Fees
Expense Amount	\$149.43
Expense Date	3/15/2023
For Attorney/Paralegal	Ashley Gutierrez +
Name (from Attorney/Paralegal)	Ashley Gutierrez
Type (from Attorney/Paralegal)	Paralegal Current
CLIO Matter	00584-Topete CostsLodestar12690 13604 14880 15661 15662 15663
Matter Display (from CLIO Matter)	00584-Topete
Notes	SERVICE - FL INV#10600432 3/15/23 5259096 FNP Crosner Legal PC RISE BAKING ARTISAN BREAD, LLC, a D Base Chg : 124.63 9440 Santa Monica Blvd. 251 Little Falls Dr PDF/Ship : 24.80 149.43 PROCESS-FORWARD NEXT DAY BEVERLY HILLS CA 90210 WILMINGTON DE 19808 Caller: Manny Martinez Comment: RELATED PROCESS 30-2023-01312362-CU-OE-CX VERONICA TOPETE, on behalf of the State of Califor Summons, Complaint, Civil Case Cover Sheet, Plaintiffs P Env#: 8551362 Signed: Lynanne Gares, Litigat Ref: TOPETE V. SOUTH COAST

Expense Detail	First Legal Fees
Expense Amount	\$274.05
Expense Date	3/15/2023
For Attorney/Paralegal	Ashley Gutierrez +
Name (from Attorney/Paralegal)	Ashley Gutierrez
Type (from Attorney/Paralegal)	Paralegal Current
CLIO Matter	00584-Topete CostsLodestar12690 13604 14880 15661 15662 15663
Matter Display (from CLIO Matter)	00584-Topete
Notes	SERVICE - FL INV#10600429 3/15/23 5259092 FNP Crosner Legal PC RISE BAKING COMPANY, LLC, a Delawar Base Chg : 249.25 9440 Santa Monica Blvd. 251 Little Falls Dr PDF/Ship : 24.80 274.05 PROCESS-FORWARD NEXT DAY BEVERLY HILLS CA 90210 WILMINGTON DE 19808 Caller: Manny Martinez 30-2023-01312362-CU-OE-CX VERONICA TOPETE, on behalf of the State of Califor Summons, Complaint, Civil Case Cover Sheet, Plaintiffs P Env#: 8551358 Signed: Lynanne Gares, Litigat Ref: TOPETE V. SOUTH COAST

23928

Expense Detail

PAGA Notice Filing Fee (LWDA)

Expense Amount

\$75.00

Expense Date

1/4/2023

For Attorney/Paralegal

Manny Martinez +

Name (from Attorney/Paralegal)

Manny Martinez

Type (from Attorney/Paralegal)

Paralegal

CLIO Matter

00584-Topete

Costs

Lodestar

12690 13604 14880 15661 15662 15663

Matter Display (from CLIO Matter)

00584-Topete

Notes

1/4/2023

LWDA Case No. LWDA-CM-927527-23

Law Firm : Crosner Legal, PC

Plaintiff Name : Veronica Topete

Employer: South Coast Baking, LLC

Filing Fee : \$75.00

IFP Claimed : No

Item submitted: Initial PAGA Notice

Expense Detail	Postage and Delivery Fees (Letterstream)
Expense Amount	\$148.61
Expense Date	1/4/2023
For Attorney/Paralegal	Manny Martinez +
Name (from Attorney/Paralegal)	Manny Martinez
Type (from Attorney/Paralegal)	Paralegal
CLIO Matter	00584-Topete Costs Lodestar 126901360414880156611566215663
Matter Display (from CLIO Matter)	00584-Topete
Notes	RECEIPT - PAGA Notice LetterStream, Inc. 8551 East Anderson Dr Suite 108 Scottsdale, AZ 85255-5451 480-473-3282 01/04/2023 17:53:04 MST --- S A L E --- Merchant ID Batch ID Tran ID4745617 Acct #* Auth Code Ref # Total: \$148.61

22263

Expense Detail	Postage and Delivery Fees (Letterstream)
Expense Amount	\$30.50
Expense Date	4/6/2022
For Attorney/Paralegal	Ashley Gutierrez +
Name (from Attorney/Paralegal)	Ashley Gutierrez
Type (from Attorney/Paralegal)	Paralegal Current
CLIO Matter	00584-Topete CostsLodestar126901360414880156611566215663
Matter Display (from CLIO Matter)	00584-Topete
Notes	Letterstream - Records Request