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Attorneys for Plaintiffs Wallace Carter,
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SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES – SPRING STREET COURTHOUSE

WALLACE CARTER; SHADDI MACHARIA;
and ALFREDO CASTANEDA, individually
and on behalf of all other others similarly
situated,

Plaintiffs,

vs.

READY PAC FOODS INCORPORATED;
BONDUELLE INCORPORATED;
BONDUELLE USA INC; BONDUELLE US
HOLDING INC.; BONDUELLE FRESH
AMERICAS; OTS SOLUTIONS, LLC;
SALAD TIME, LLC; MISSA BAY, LLC;
READY PAC FLORENCE PARTNERSHIP;
and DOES 2 through 50, inclusive,

Defendants.

Case No.: 24PSCV00259

CLASS ACTION

Assigned for All Purposes To:

Hon. Carolyn B. Kuhl
Dept. 12

**DECLARATION OF DAVID
ARAKELIAN IN SUPPORT OF
MOTION FOR FINAL APPROVAL OF
CLASS ACTION AND PAGA
SETTLEMENT, ATTORNEYS' FEES
AND EXPENSES, AND ENHANCEMENT
AWARDS**

Date: July 17, 2026
Time: 11:00am
Dept.: 7

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I, David Arakelyan, declare as follows:

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 have personal knowledge of the facts herein, and if called as a witness I could and would competently testify to them.

2. I am an associate attorney at D.Law, Inc., and attorney of record for counsel for Plaintiffs Wallace Carter, Shaddi Macharia, and Alfredo Castaneda (“Plaintiffs” or “Class Representative”) on behalf of similarly situated employees of Defendants Ready Pac Foods Incorporated, Bonduella Incorporated, Bonduelle USA Inc., Bonduelle US Holding Inc., Bonduelle Fresh Americas, OTS Solutions, LLC, Salad Time, LLC, Missa Bay, LLC, and Ready Pac Floresce Partnership (hereinafter “Defendants”).

3. I am an Associate Attorney at D.Law, focusing exclusively on class action and PAGA cases. I was admitted to the California Bar in May of 2021. I received both my B.A. and J.D. from University of California, Los Angeles (UCLA). Since graduating from law school, I have practiced exclusively in the area of employment law, including both defense side and Plaintiff side positions. During my career, I have represented employees in wage-and-hour class action lawsuits as counsel, and I have worked to obtain six and seven figure settlements against a range of defendants. These cases have involved the gamut of wage-and-hour claims, including claims for failure to pay minimum wages, unpaid wages and overtime, failure to provide meal breaks, inaccurate pay statements, and failure to pay timely wages - similar to claims at issue in the present matter.

4. This Declaration is offered in support of Plaintiffs' motion for final approval of a settlement agreement negotiated and entered into at arm's length by the parties herein.

CASE HISTORY

5. On September 6, 2023, Plaintiff CASTANEDA filed a class action in Monterey County Superior Court complaint against Defendants READY PAC FOODS, INC., READY PAC

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1 PRODUCE, INC., SALAD TIME, LLC, MISSA BAY, LLC, BONDUELLE FRESH
2 AMERICAS, and READY PAC FLORENCE PARTNERSHIP, alleging several causes of action
3 and assigned Case No. 23CV002901. Plaintiff submitted a PAGA Notice to the Labor and
4 Workforce Development Agency (“LWDA”) on the same day. Subsequently, on December 7,
5 2023, Plaintiff CASTANEDA filed his First Amended Complaint, adding a single cause of action
6 under the Private Attorneys General Act (“PAGA”). Pursuant to a joint stipulation of the Parties,
7 Plaintiff Castaneda filed his Second Amended Complaint in Monterey County to add additional
8 Defendant, OTS SOLUTIONS, LLC, on July 10, 2024.

9 6. On January 25, 2024, Plaintiff CARTER filed a PAGA lawsuit in the Los Angeles
10 County Superior Court against Defendants, Case No. 24PSCV00259. On June 23, 2025, Plaintiff
11 CARTER filed a First Amended Complaint (“FAC”) in Case No. 24PSCV00259, adding an
12 additional named Plaintiff, SHADDI MACHARIA, as a named Plaintiff to the Carter Complaint.

13 7. As part of the settlement, Plaintiff CARTER agreed to amend his Complaint to add
14 Plaintiffs MACHARIA and CASTANEDA as plaintiffs to his lawsuit. In amending the
15 Complaint, Plaintiff CARTER added the claims and theories encompassed by the settlement,
16 including class action claims, which were not pled in the original Carter complaint. Plaintiff
17 CARTER’s First Amended Complaint filed on June 23, 2025, for purposes of this settlement is the
18 Operative Complaint. The First Amended class and representative action Complaint filed in this
19 matter alleges that Defendants have failed to (1) provide meal periods; (2) provide rest periods; (3)
20 pay hourly wages and overtime; (4) provide accurate written wage statements; (5) timely pay all
21 final wages; (6) pay wages due, negotiable, and payable in cash on demand; (7) indemnify; (8)
22 engaged in unfair competition and are liable for (9) civil penalties.

23 8. Plaintiffs have entered into a joint prosecution agreement in this case and have
24 consented to the agreement in writing.

25 9. On January 15, 2026, this court issued its Order Granting Preliminary Approval,
26 approving the notice of settlement and setting a hearing for final approval.

27 10. Class Counsel has engaged in substantial factual and legal investigation to reach
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1 this point. Before filing the lawsuit, Class Counsel investigated and researched the facts and
2 circumstances underlying the pertinent issues and the law applicable thereto. This required
3 thorough discussions and interviews between Class Counsel and Plaintiffs, as well as preliminary
4 research into the various legal issues involved in the case. After conducting their initial
5 investigation, Class Counsel determined that Plaintiffs' claims were well-suited for class and
6 representative action adjudication owing to what appeared to be a common course of conduct
7 affecting a similarly situated group of employees.

8 11. Class Counsel conducted a thorough investigation of the facts and claims giving
9 rise to the action, including: (1) conducting informal discovery, and meeting and conferring with
10 defense counsel about same; (2) reviewing and analyzing timekeeping and payroll records as well
11 as employment handbooks, Plaintiffs' personnel files, relevant policies and other documentation;
12 (3) researching the applicable law and potential defenses; (4) constructing damage models based
13 on interpretations of California law; and (5) reviewing information provided by Defendants at the
14 mediation.

15 12. The Settlement is the product of extensive arm's length negotiations between the
16 parties. The Parties are represented by experienced class action attorneys. In order to reach the
17 Settlement, the Parties debated, discussed, and resolved many difficult legal and factual issues.
18 Moreover, during the process the Parties were required to make reasonable compromises in light
19 of the facts, issues, and risks presented in this action. Class Counsel considered the uncertainty
20 and risks of further litigation, and the difficulties inherent in such litigation. Class Counsel also
21 considered the burdens of proof necessary to establish liability against Defendant and Defendant's
22 defenses, the length and complexity of the trial itself, and the risks of further delays and expenses
23 arising from possible appeals. Assessment of all of these factors indicated that the best interests of
24 Class Members would be served by a settlement of this action in the manner and upon the terms
25 set forth in the Parties' Class Action and PAGA Settlement Agreement ("Settlement Agreement"
26 or "Settlement").

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1 in attorneys' fees, plus up to \$35,000.00 of Class Counsel's costs (Class Counsel's actual costs in
2 this matter are less as detailed below and attached as **Exhibit A** to Declaration of David Arakelyan
3 and **Exhibit 3** to the Declaration of Haig B. Kazandjian). This request is fair, reasonable, and
4 adequate to compensate Class Counsel for the substantial work they have put into this case and the
5 risk they assumed by taking it in the first place. The attorneys' fees award is intended to reimburse
6 Class Counsel for all uncompensated work that they have already done and for all the work they
7 will continue to do in carrying out and overseeing the administration of the settlement. To provide
8 the Court with an overview of the work done by Class Counsel in this case, I provide a detailed
9 summary of the hours Class Counsel from D.Law, Inc. invested in this action as **Exhibit B** to this
10 Declaration. This detailed summary is intended to provide the Court with sufficient detail of the
11 tasks performed in connection with specific motions or events or phases that track the progress of
12 the litigation from our initial investigation through settlement.

13 **The Lodestar Method**

14 20. Class Counsel's lodestar calculation supports the requested attorneys' fees. The
15 lodestar calculation typically proceeds in three steps. First, a trial court must determine a baseline
16 guide or "lodestar" figure based on the time spent and reasonable hourly compensation for each
17 attorney involved in the case. *Serrano v. Priest* (1975) 20 Cal.3d 25, 48. The court then sets a
18 reasonable hourly fee to apply to the time expended, with reference to the prevailing rates in the
19 geographical area in which the action is pending. *Bihun v. AT&T Information System* (1993) 13
20 Cal.App.4th 976, 997. Finally, a "multiplier" is selected with reference to the following factors:
21 (1) the novelty and difficulty of issues involved, (2) the skill displayed in presenting them, (3) the
22 extent to which the nature of the litigation precluded other employment by the attorneys, and (4)
23 the contingent nature of the fee award, based on the uncertainty of prevailing on the merits and of
24 establishing eligibility for the award. *Serrano, supra*, 20 Cal.App.3d at 49.

25 21. Class Counsel charges rates commensurate with the prevailing market rates in the
26 Los Angeles area for attorneys of comparable experience and skill handling complex litigation.

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1 Aside from being warranted by our skill, experience and ability, Class Counsel rates that were
2 used in application of the lodestar cross check in this case, are supported by the Laffey Matrix
3 attached hereto as **Exhibit C**.

4 22. As for the *Serrano* factors, all militate in favor of the requested fee award. This
5 case raised a number of complex and contested issues, and Class Counsel exhibited skill and
6 creativity in prosecuting and presenting them.

7 23. This case was not straightforward. Class Counsel had to spend time researching and
8 analyzing each of these claims and issues in order to adequately assess the liability of Defendant.
9 Class Counsel then had to develop the evidence necessary through both formal and informal
10 discovery to establish Defendant's liability. This was done through carefully sifting through
11 hundreds of pages of documents.

12 24. In sum, Class Counsel had to come up with creative approaches to these issues in
13 litigating the case and, ultimately, negotiating and crafting the settlement. To this end, Class
14 Counsel has devoted a tremendous amount of time and energy. As shown in the table above, Class
15 Counsel have spent a substantial number of hours working on this case. This time commitment
16 was necessary in order to research, construct and prosecute viable legal claims in the face of stiff
17 opposition, but it has come at a cost. In particular, the time Class Counsel have devoted to this
18 case has prevented them from taking on many other cases, including hourly work for which
19 compensation for work done would have been more certain. They have also had to forgo a number
20 of other potential employment matters that might have settled during the pendency of this
21 litigation and yielded significant attorneys' fees. Despite these considerations Class Counsel
22 zealously represented Plaintiffs and the class and have obtained a favorable result.

23 25. Such is not always the case. Indeed, Class Counsel has invested time and money
24 into numerous other cases, including class actions, that have fizzled for one reason or another,
25 leaving Class Counsel completely without any compensation for their effort. Here Class Counsel
26 has achieved a beneficial settlement for the class, but this was by no means a foregone conclusion;
27 indeed, their efforts might well have been frustrated by any number of obstacles with which they

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1 were presented along the way. Nor could class certification be guaranteed. In addition, Defendants
2 could have exerted pressure on Plaintiffs to dismiss his claims by offering him an individual
3 settlement, an experience with which Class Counsel are not unfamiliar. However, Class Counsel
4 was able to navigate the shoals of unpredictability to achieve a desirable result, and they have
5 done so without receiving any compensation to speak of thus far because they took this case on a
6 contingency-fee basis.

7 26. From the foregoing analysis, Class Counsel's requested attorneys' fees are fair and
8 reasonable. Class Counsel conservatively estimate that they have invested over 400 hours of
9 attorney time in this matter. My billing rate is \$625.00 per hour (6 years out of law school), and I
10 spent 117.7 hours on this matter. *See Exhibit B* (Time Summaries for D.Law Attorneys, *Exhibit*
11 *C* attached hereto (Laffey Matrix)). Managing Attorney David Yeremian's billing rate is
12 \$1,375.00 (23 years out of law school), and he spent 3.8 hours on this matter. (*See Exhibit B.*)
13 Senior Counsel David Keledjian's billing rate is \$1,045 (10 years out of law school), and he spent
14 34.1 hours on this matter. *See Exhibit B* attached hereto. Former D.Law, Inc. Attorney Kevin
15 Burns' billing rate was \$475.00 per hour (3 years out of law school), and he spent 2.7 hours on
16 this matter. Attorney Norayr Zakaryan's billing rate is \$475.00 per hour (2 years out of law
17 school), and he spent 2.1 hours on this matter. The lodestar for Plaintiff's counsel at D.Law, Inc. is
18 \$116,702 (\$73,562.50 for my time, \$5,225.00 for David Yeremian's time, \$35,634.50 for David
19 Keledjian's time, \$1,282.50 for Kevin Burns' time; \$997.50 for Norayr Zakaryan's time.)
20 Additionally, pursuant to the Declaration of Haig B. Kazandjian, co-counsel's (HBK Lawyers)
21 lodestar is \$204,947 (see Kazandjian Decl., ¶ 19.) **The total combined lodestar for the two firms**
22 **is \$321,649.** Class Multipliers routinely range from 3 to 5, and it is not uncommon that multipliers
23 of between 5 and 10, or higher, are applied. *See, e.g., Wilson v. Bank of Am. Natl. Trust & Savs.*
24 *Assn.*, No. 643872 (Cal. Sup. Ct., Aug. 16, 1982) (multiplier of 10); *Glendora Comm. Redev.*
25 *Agency v. Demeter* (1984) 155 Cal.App.3d 456, 465 (affirming multiplier of 12 and expressly
26 rejecting argument that fee was either exorbitant or unconscionable). The fee request of
27 \$250,250.00 results in a multiplier of approximately **0.78** which further evidences the

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1 reasonableness of the request.

2 **The Percentage-of-the-Benefit Comparison**

3 27. In settlements where a definite monetized fund is created, it is appropriate for
4 courts to evaluate the lodestar amount as a percentage of the recovery and adjust it accordingly if
5 the lodestar differs from the range of percentage fees freely negotiated in comparable litigation.
6 *See Lealao v. Beneficial Calif., Inc.* (2000) 82 Cal.App.4th 19, 49-50.

7 28. Class Counsel took this case on a contingent-fee basis against a corporation
8 represented by a reputable defense firm. When we take contingent cases, we must pay careful
9 attention to the economics involved or one bad case can destroy years of work. Accordingly, in
10 such cases, we anticipate that we shall, if successful, receive a fee that exceeds our normal hourly
11 rate; otherwise the risk is often too great to bear. Even when we work long hours, the number of
12 hours in a day is limited. Because of this, when we take on one particular matter, we are unable to
13 take on other matters. When my firm became involved in this case, we realized the time
14 commitment it would entail and were forced to turn down other matters that we otherwise should
15 have been able to handle.

16 29. Contingent-fee cases present the very real risk of working hundreds if not
17 thousands of hours that may never be entirely compensated. Moreover, while the case is being
18 litigated, counsel must pay overhead (salaries, rent, etc.), provide for their own expenses, and in
19 most cases pay the out-of-pocket expenses incurred on the plaintiff's behalf. And the prospect of a
20 court-awarded fee does not greatly reduce the risk posed by these cases. In many cases, the
21 prospect is nothing more than a potential that never materializes. First, you must win the case to
22 get a court-awarded fee; even those cases that seem strongest at the onset can be lost and
23 sometimes are lost. Second, there are always the pitfalls and unforeseen obstacles that arise along
24 the way, such as settlement offers that the client may accept without ensuring that we receive a
25 reasonable fee or changes in the law that substantially affect the merits of the case, or other
26 uncertainties involving the client. Finally, there is the great risk inherent in advancing tens if not
27 hundreds of thousands of dollars in out-of-pocket expenses. If that money were to be invested in

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1 some sort of financial investment, one would expect a reasonable rate of return on that investment.
2 Here, however, the best we can hope to recover is our money, and then only if we are substantially
3 successful; if we are not, all or part of this “investment” can be lost.

4 30. Class Counsel is well acquainted with the contingent-fee market throughout
5 California, particularly as it pertains to wage-and-hour and class-action litigation. Class Counsel
6 has negotiated numerous contingency-fee agreements with plaintiffs, both as individuals and as
7 representatives in class-action suits. Many of those agreements required that counsel receive a fee
8 under certain scenarios that exceeds thirty-five percent of the recovery. Plaintiff here signed a
9 retainer agreement indicating that Class Counsel could receive a fee under certain scenarios that
10 exceeds thirty-five percent of the recovery. Class counsel in contingency-fee cases typically
11 receive attorneys’ fees equal to or greater than a third of the gross settlement amount. *See, e.g.,*
12 *Evans et al. v. Coca-Cola* (Los Angeles County Sup.Ct. 2001 Case No. BC 220525 (Hon. Richard
13 C. Hubbell)) (approving an award of attorney’s fees of at least 33-1/3% of the settlement); *Moreno*
14 *v. Miller Brewing* (Los Angeles County Sup. Ct. April 2004 BC 278170 (Hon. David M.
15 Minning)) (same); and *Josiah Eaton, et al. v. Adolph Coors Company* (Orange County Sup. Ct.
16 2003 Case No. 01CC00140 (Hon. Stephen J. Sundvold)) (at least same award); *Daum v. Claim*
17 *Jumper Restaurants* (Orange County Sup. Ct. 2006 Case No. 02CC10201 (Hon. Ronald L.
18 Bauer)) (final approval of same); *Moore v. IKEA* (Los Angeles County Sup. Ct. 2006 Case No.
19 BC 263646 (Hon. Peter Lichtman)) (final approval of same); *Big Lots Overtime Cases* (San
20 Bernardino County Sup. Ct. February 2004, JCCP Proceeding No. 4283 (Hon. Walter L.
21 Blackwell, III)) (same); and *Fitzpatrick v. Baja Fresh* (Los Angeles Super. Ct. Case No. BC
22 265578 (Hon. Anthony J. Mohr)) (same). Thus, the fees requested in this case are in line with, if
23 not less than, the fees routinely awarded in class action wage-and-hour cases.

24 31. Indeed, California courts have approved attorney’s-fee awards in excess of the
25 benchmark of one-third of the settlement fund. *See Crandall v. U-Haul* (Los Angeles County Sup.
26 Ct., Case No. BC178775), the Honorable Steven Czuleger awarded a 40% attorney fee request in
27 an overtime-exemption class action; in *Bushnell v. Cremar, Inc.* (Orange County Sup. Ct., Case

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No. 657778), the Honorable Donald E. Smallwood awarded attorneys' fees in the amount of 38%; in *Abzug v. Kerkorian* CA000981 (Los Angeles County Sup. Ct., November 1990), the Honorable R. William Schoettler awarded a 45% fee; in *Haitz v. Meyer, et al.*, Alameda County Sup. Ct., 8-20-1990 No. 572968-3, the court awarded a 40% fee; in *Elliott v. Clothestime* (Orange County Sup. Ct., Case No. 01-CC00333) the Honorable Jonathan Cannon awarded a 40% fee in a wage-and-hour class action which had not yet proceeded to the class certification stage; in both *Rippee v. Boston Market Corporation*, Case No.: 05 CV 1359 BTM (JMA) and *Barile v. Boston Market Corporation*, Case No.: 05 CV 1360 BTM (JMA), the Honorable Judge Barry T. Moskowitz awarded a 40% fee to plaintiff's counsel in wage-and-hour class actions that had not proceeded to the class-certification stage.

32. In light of the foregoing, the fee request in an amount equal to one-third of the Gross Settlement Amount is well within the bounds that have been established by the above-cited authority. Defendant has no objection to an award of fees in the amount requested. Moreover, the Class Notice mailed to Class Members stated the amount of fees requested by Class Counsel; however, not a single Class Member has objected to an award of fees in the amount requested.

Costs

33. The preliminarily approved settlement calls for the payment of up to \$35,000.00 of Class Counsel's costs. The total costs for Plaintiffs' counsel are \$25,842.93 (with \$17,331.20 incurred by D.Law, Inc. and \$8,511.73 incurred by HBK Lawyers). (see Exhibit 3 to the Kazandjian Decl.) Class Counsel incurred costs including, but not limited to, filing fees (e.g. complaints, stipulations, motions), service of process, mediation fees, expert analysis fees, and attorney-service costs for court filings. The Settlement provides for reimbursement to Counsel of up to \$35,000.00 and Counsel hereby requests \$25,842.93 which were all reasonably incurred in the prosecution of this action.

ENHANCEMENT AWARD TO NAMED PLAINTIFFS IS REASONABLE

34. Plaintiffs are entitled to a reasonable service payment for his efforts and initiative in bringing and helping to prosecute this action. Plaintiffs assumed great risk by challenging

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1 Defendants' wage-and-hour policies and bringing suit against Defendant. Plaintiffs spent time
2 better apprising themselves of their rights, deciding whether remedial action should be taken, how
3 it should be taken, searching for attorneys, and finally contacting their attorneys, who spent many
4 hours with him discussing his case and the law. In the end, Plaintiffs decided to vindicate not only
5 their own rights but also those of his fellow employees by filing a class action lawsuit.

6 35. By suing their former employer, Plaintiffs increased the risk of retaliation by
7 prospective employers to which he may apply in the future. This risk is particularly real in the
8 information age, where employers can, more easily than ever, perform background checks of
9 prospective employees, sometimes with the stroke of a key.

10 36. But Plaintiffs did not allow this fear of the potential repercussions of being class
11 representatives deter them from acting for the benefit of Class Members. Quite the contrary,
12 Plaintiffs were intimately involved from the start. They have devoted a substantial amount of time
13 to helping Class Counsel effectively develop and prosecute this action at every stage of the
14 litigation. Plaintiffs conferred with Class Counsel on numerous occasions to discuss every aspect
15 of this case; provided information about Defendants; reviewed documents; produced documents;
16 identified witnesses; monitored the progress of the litigation; took the time to apprise themselves
17 of the facts, issues and law regarding the claims at issue, spent time with Class Counsel discussing
18 the terms of the settlement and reviewed and executed the settlement agreement. In all, Plaintiffs
19 estimates that they have devoted numerous hours in preparing the Action and seeing it through to
20 settlement.

21 37. Plaintiffs spent a significant amount of time with Class Counsel detailing their
22 knowledge of Defendants' practices and assisting in the prosecution of this action. They have
23 diligently, adequately, and fairly represented Class Members and have not placed their interests
24 above any member of the putative class. Class Counsel believe that Plaintiffs are entitled to an
25 enhancement award for the time and effort he has devoted to this case. Defendants have agreed not
26 to oppose the requested awards. Such payments to class representatives are a common feature of
27 settlements negotiated by Class Counsel, and trial courts routinely approve them. In light of the

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1 foregoing, Class Counsel believes the enhancement awards in the amount of \$10,000.00 to each
2 Plaintiff (totaling \$30,000.00 for the three Plaintiffs) is fair and reasonable.

3 38. California trial courts routinely approve enhancement payments to class
4 representatives in wage-and-hour class-action settlements. *See, e.g., Bennett v. Countrywide*
5 *Financial Corporation* (2005) San Diego Sup. Ct. Case No. GIC840981 (\$35,000); *Hogue v. WH*
6 *Smith of Nevada, Inc.* (2004) San Diego Sup. Ct. Case No. GIC830653 (\$20,000); *Fiez v. Brown*
7 *Group Retail Inc., d.b.a. Famous Footwear* (2003) Orange County Sup. Ct. Case No. 01CC00381
8 (\$35,000 to current employee of defendant and \$20,000 to former employee); *Barry v. Cost Plus,*
9 *Inc.* (2003) OCSC No. 01CC00380 (\$35,000 for each named plaintiff); *Lajoie v. The Picture*
10 *People, Inc.* (2003) Orange County Sup. Ct. Case No. 01CC00324 (\$25,000 each for two named
11 plaintiffs); *Franco v. Vans, Inc.* (2002) Orange County Sup. Ct. Case No. 01CC03995 (\$35,000
12 for each named plaintiff); *Crandall v. U-Haul Corporation* (2001) Los Angeles Sup. Ct. Case No.
13 BC 178775 (\$20,000 for each named plaintiff); *Joel v. Athlete's Foot Group* (2001) Los Angeles
14 Sup. Ct. Case No. BC 234231 (\$25,000). Plaintiffs' enhancement requests are substantially less
15 than the enhancements approved in these cases; therefore, it is reasonable.

16 **Qualifications and Adequacy of Class Counsel**

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

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

27 41. D.Law has litigated and successfully resolved many wage and hour class action

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1 cases involving failure to pay wages and derivative Labor Code claims and penalties. See e.g. *De*
2 *La Rosa v. The Coca Cola Company et al.* (Superior Court of California in Napa, 17CV000787),
3 *Harvey v. Bed Bath & Beyond of California Limited Liability Company* (Superior Court of
4 California in Alameda, RG17885153), *Paredes v. Bottling Group LLC et. al.* (Superior Court of
5 California in Kern), *Ramirez v. Harris Ranch Beef Company* (Superior Court of California in
6 Fresno, 16CECG04103), *Gates v. Gate Gourmet, Inc. et. al.* (Southern District of California, 16-
7 cv-01084-L-AGS), *Hargrave v. Antelope Valley Hospital* (Superior Court of California in Los
8 Angeles, BC663252), *Ramirez v. Milton Roy et. al.* (Superior Court of California in Los Angeles,
9 BC 632 276), *Hawkins v. AvalonBay Communities* (Superior Court of California in Santa Clara,
10 17CV316492), *Jones Tharpe et al. v. Sprint Corporation et al.* (Superior Court of California in
11 Los Angeles, BC644645), *Ortega et al. v. Nestle Waters North America, Inc. et al.* (Superior
12 Court of California in Los Angeles, BC623610), *Schultz v. Jimbo's Natural Family, Inc.* (Superior
13 Court of California in San Diego, 37-2017-00022348-CUE-OE-CTL), *Ambrose v. Victor Valley*
14 *Global et al.* (Superior Court of California in San Bernardino, CIVDS1709289), *Puerta-Gildardo*
15 *v. Real Time Staffing Services LLC et. al.* (Superior Court of California in Los Angeles,
16 BC565445), *Vargo v. Pregis Innovative Packaging LLC* (Superior Court of California in Tulare,
17 270836), *Conlin v. Aegis Senior Communities LLC* (Northern District of California, 17-cv-05534-
18 LHK), *Galarza v. Kloeckner Metals Corporation* (Central District of California, 2:17-cv-04910-
19 FMO), *Estes v. L3 Technologies, Inc. et al.* (Southern District of California, 3:17-cv-02356-H-
20 JMA), *Rowser v. Trunk Club, Inc.* (Central District of California, 2:17-cv-05064-DSF-RAO),
21 *Leach v. The Claremont Colleges, Inc.* (Superior Court of California in Los Angeles, BC686451),
22 *Vaesau v. PCT Enterprises, Inc. dba Precision Cabinets* (Superior Court of California, County of
23 Contra Costa MSC18-02404), *Terry v. TF Louderback, Inc. dba Bay Area Beverage Company*
24 (Superior Court of the State of California, County of Contra Costa, MSC18-00859), *Roach v.*
25 *Westcare California, Inc.* (Superior Court of California in Kern County, BCV-17-102367-SDS),
26 *Patton v. Church & Dwight Co., Inc.* (Central District of California, EDCV 18-903-MWF (KKx)),
27 *Juarez v. ISL Employees, Inc.* (Superior Court of California in Madera, MCV074787), *Ferraro v.*

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1 *USC Verdugo Hill s Hospital, et al.* (Superior Court of California in Los Angeles,
2 18STCV09463), *Ford v. Account Control Technology, Inc., et al.* (Superior Court of California in
3 Los Angeles, 19STCV09369), *Ornelas v. iStorage, et al.* (Superior Court of California in San
4 Francisco, CGC-18-571421), *Martinez v. Ronpak, Inc.* (Superior Court of California in Riverside,
5 RIC1901307), *Barrera et al. v. Exclusive Wireless, Inc.* (Superior Court of California in
6 Stanislaus, 9000687), *Barajas v. Mancha Development Company LLC* (Superior Court of
7 California in Orange County, 30-2018-00974707-CU-OE-CXC), *Prado v. IMAX Corporation dba*
8 *IMAC Worldwide Home* (Superior Court of California in San Bernardino, CIVDS1820265),
9 *Rodriguez v. ND Industries, Inc.* (Superior Court of California in Los Angeles, 19STCV38096),
10 *Singletary v. Motel 6 Operating LP, et al.* (Southern District of California, 3:20-cv-0270-LAB-
11 AHG), *Quizon v. CF Watsonville East, LLC, et al.* (Superior Court of California in Santa Cruz,
12 20CV01868), *Stephenson v. Bakersfield Dodge, Inc.* (Superior Court of California in Kern, BCV-
13 20-102693), *Bacerra v. Hugo Boss Retail, Inc.* (Superior Court of California in San Diego, 37-
14 2021-00002933-CU-OE-CTL), *Walker v. Ariat International, Inc.* (Superior Court of California in
15 Alameda, HG19026439), *Orr v. Petvet Care Centers (California) Inc.* (Superior Court of
16 California in Santa Clara, 19CV354063), *Jimenez v. OEC Distribution Services, Inc.* (Superior
17 Court of California in San Bernardino, CIVDS1915743), *Virdi v. Absolute Security International*
18 (Superior Court of California in San Bernardino, CIVDS 1909589), *Raj v. First Transit, Inc*
19 (Superior Court of California in Sacramento, 34-2021-00295895-CU-OE-GDS), *Marchbanks v.*
20 *Torrid Administration, Inc.* (Superior Court of California in San Diego, 37-2020-00008179-CU-
21 OE-NC), among others.

22 42. I am an Associate Attorney at D.Law, focusing exclusively on class action and
23 PAGA cases. I was admitted to the California Bar in May of 2021. I received both my B.A. and
24 J.D. from University of California, Los Angeles (UCLA). Since graduating from law school, I
25 have practiced exclusively in the area of employment law, including both defense side and
26 Plaintiff side positions.

27 43. During my career, I have represented employees in wage-and-hour class action
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1 lawsuits as counsel, and I have worked to obtain six and seven figure settlements against a range
2 of defendants. These cases have involved the gamut of wage-and-hour claims, including claims for
3 failure to pay minimum wages, unpaid wages and overtime, failure to provide meal breaks,
4 inaccurate pay statements, and failure to pay timely wages - similar to claims at issue in the
5 present matter.

6 44. I am experienced in prosecuting employment matters, particularly class actions. In
7 addition to the present case, I am also class counsel for dozens of other putative wage-and-hour
8 class-action lawsuits pending in various state and federal jurisdictions throughout California.

9 45. Attorney David Keledjian is a Senior Counsel at D.Law where he manages a
10 significant number of class action and PAGA cases. Mr. Keledjian was admitted to the California
11 Bar in December 2008. He received his J.D. from Trinity Law School in May of 2015. Since
12 graduating from law school, Mr. Keledjian dedicated virtually his entire career on the practice of
13 employment law. He has significant experience specifically working on wage and hour class
14 actions from the plaintiff's side as well as the defense side, with the majority of his experience
15 coming from the plaintiff's side.

16 46. Mr. Keledjian's experience in litigating employment wage and hour matters has
17 been integral in identifying legal issues, evaluating the strengths and weaknesses of a case, and
18 generally negotiating fair and reasonable class action settlements. Practice in the narrow field of
19 wage and hour litigation requires skill and knowledge concerning the constantly evolving
20 substantive law (state and federal), as well as the procedural law of class action litigation. In this
21 action, Mr. Keledjian is fully equipped to use the skills and knowledge he has developed.
22 Therefore, on the account of his resources, experience, and knowledge, Mr. Keledjian is well
23 qualified to act as Class Counsel and represent Plaintiff and the putative Class Members in this
24 action.

25 47. Attorney David Yeremian is Managing Attorney at D.Law and counsel of record
26 for Plaintiff. Mr. Yeremian graduated from UC Berkeley in 1997 and received his law degree and
27 MBA from UCLA in 2001. Mr. Yeremian has been honored as a Super Lawyers Rising Star in

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1 2009, 2010, 2012-2015 and has been named and honored as a Super Lawyer. Since 2007, Mr.
2 Yeremian has focused exclusively on representing employees, including in wage-and-hour class
3 actions. During his career, Mr. Yeremian has represented employees in hundreds of wage-and-
4 hour class action lawsuits as lead or co-lead counsel (including in the Central, Southern, Eastern,
5 and Northern Districts of California), and has obtained six and seven-figure settlements against a
6 range of defendants, including Fortune 500 companies.

7 48. The collective experience of the D.Law attorneys in litigating employment wage
8 and hour matters has been integral in identifying legal issues, evaluating the strengths and
9 weaknesses of a case, and generally negotiating fair and reasonable class and representative action
10 settlements. Practice in the narrow field of wage and hour litigation requires skill and knowledge
11 concerning the constantly evolving substantive law (state and federal), as well as the procedural
12 law of class and representative action litigation. In this action, the attorneys at D.Law are fully
13 equipped to use the skills and knowledge developed over decades of prosecuting and defending
14 wage and hour class actions to fairly and adequately represent the interests of the Class Members
15 and aggrieved employees. Therefore, based on our resources, experience, and knowledge, the
16 attorneys at D.Law are well-qualified to act as class counsel and represent the Plaintiff and the
17 putative Class Members and aggrieved employees in this action.

18 49. We understand the responsibilities owed as counsel to the Settlement Class
19 Members and aggrieved employees we represent. The attorneys at D.Law thoroughly investigated
20 the claims asserted in this action, and have remained committed to dedicating the resources
21 necessary to represent the Settlement Class and vigorously pursue their claims. Based upon my
22 experience and understanding of the claims and defenses in this action, I believe the settlement is
23 fair, adequate, and reasonable for the Class Members and Aggrieved Employees and all involved,
24 and that the Settlement is well within the range of reasonableness that would permit it to be finally
25 approved. I am not aware of any conflict of interest with Plaintiff or any other Class Member that
26 would interfere with the duties as Class Counsel.

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

Executed this 24th day of June 2026 at Pasadena, California.

David Arakelyan

EXHIBIT A

EXHIBIT A

Castaneda v. Ready Pac Foods, Inc.					
Litigation Costs					
Service Date	Details	Provider	Amount		
9/6/23	PAGA Letter	LWDA	\$ 75.00		
9/7/23	Summons & Complaint	Rapid Legal	\$ 1,495.30		
9/12/23	Process of Service - Ready Pac Foods, Inc.	Rapid Legal	\$ 77.25		
9/12/23	Process of Service - Ready Pac Produce, Inc.	Rapid Legal	\$ 77.25		
9/18/23	Process of Summons - Salad Time, LLC	Rapid Legal	\$ 77.25		
9/25/23	Peremptory Challenge	Rapid Legal	\$ 17.10		
9/26/23	Process of Service - Bonduelle Fresh Americas	Rapid Legal	\$ 77.25		
9/26/23	Process of Service - Missa Bay, LLC	Rapid Legal	\$ 77.25		
9/26/23	Process of Service - Ready Pac Florence Partnership	Rapid Legal	\$ 77.25		
9/27/23	POS of Summons - For All Defendants	Rapid Legal	\$ 17.10		
10/6/23	Notice of Case Assignment & CMC	Rapid Legal	\$ 17.10		
11/22/23	First Amended Complaint (Rejected)	Rapid Legal	\$ 13.39		
11/22/23	Joint Stip; [P] Order for Leave to File FAC (Rejected)	Rapid Legal	\$ 17.10		
11/22/23	Joint Stip for Leave to File First Amended Complaint	Rapid Legal	\$ 38.26		
12/9/23	First Amended Complaint	Rapid Legal	\$ 17.10		
12/21/23	Case Management Statement	Rapid Legal	\$ 17.10		
12/27/23	Notice of Unavailability	Rapid Legal	\$ 17.10		
4/10/24	Process of Service On Time Management & Staffing Amended FAC	Rapid Legal	\$ 87.55		
4/25/24	Amendement to Complaint Naming Doe One (Rejected)	Rapid Legal	\$ 11.33		
5/1/24	Process of Service - On Time Management & Staffing - FAC	Rapid Legal	\$ 11.33		
5/8/24	Amended First Amended Complaint	Rapid Legal	\$ 15.19		
5/30/24	Process of Service - On Time Management & Staffing - SAC	Rapid Legal	\$ 15.19		
6/17/24	Case Management Statement	Rapid Legal	\$ 15.19		
6/21/24	Amended First Amended Complaint (Rejected)	Rapid Legal	\$ 11.33		
7/2/24	Stip;[P] Order; POS for Leave to File FAC	Rapid Legal	\$ 35.79		
7/24/24	Second Amended Complaint	Rapid Legal	\$ 15.19		
8/5/24	Notice of Further Case Management Conference	Rapid Legal	\$ 15.19		
8/5/24	Process of Summons - OTS Solutions LLC - SAC, Ntc of CMC	Rapid Legal	\$ 169.95		
8/19/24	Process of Service - OTS Solutions, LLC - SAC; Ntc of CMC	Rapid Legal	\$ 15.19		
9/19/24	Notice of Change of Address	Rapid Legal	\$ 15.19		
10/8/24	Req. for Partial Dismissal;Decl; [P] Order	Rapid Legal	\$ 15.19		
12/2/24	Mediation Fee	McKelvey, Brandon	\$ 6,250.00		
1/5/25	Notice of Unavailability	Rapid Legal	\$ 15.19		
2/19/25	Case Management Statement	Rapid Legal	\$ 15.19		
3/4/25	Document Retrieval from Related Case	Los Angeles Superior Court	\$ 19.60		
3/5/25	Notice of Remote Appearance	Rapid Legal	\$ 15.19		
4/4/25	Expert Mediation Analysis	Berger Consulting Group	\$ 8,145.00		
4/8/25	Case Management Statement	Rapid Legal	\$ 15.19		
4/18/25	Joint Stip; [P] Order; POS to Continue CMC	Rapid Legal	\$ 35.79		
6/25/25	Joint Case Managemnet Statement	Rapid Legal	\$ 15.27		
9/9/25	Joint Case Managemnet Statement	Rapid Legal	\$ 15.27		
10/30/25	Request for Dismissal	Rapid Legal	\$ 15.27		
11/26/25	Joint Case Managemnet Statement	Proceed	\$ 15.27		
5/15/26	Joint Case Managemnet Statement	Proceed	\$ 15.01		
TBD	Motion for Final Approval	Proceed	\$ 75.00		
TBD	Request for Dismissal	Proceed	\$ 15.01		
Total			\$17,331.20		

EXHIBIT B

EXHIBIT B

Castaneda v. Ready Pac Foods, Inc., et al.				
Time Report				
Staff ↓	Entry Date	Duration (in decimals)	Duration	Task Note
Norayr Zakaryan	6/2/2026	0.7	0 H 42M	court hearing CMC - NZ attended
	6/2/2026	0.1	0 H 06M	checked the docket for CMC hearing
	6/2/2026	0.1	0 H 06M	pre-hearing preparation
	6/2/2026	0.4	0 H 24M	pre-hearing preparation
	6/1/2026	0.1	0 H 06M	calling clerk's office
	6/1/2026	0.2	0 H 12M	conferred with lead attorney on the case
	6/1/2026	0.5	0 H 30M	reviewed the procedural history of the case, preparing for CMC hearing
Subtotal	Sum	2.1		
Kevin Burns	4/22/2025	0.5	0 H 30M	Prepped appearance for colleague.
	7/2/2024	0.8	0 H 48M	Prep and appearance for CMC.
	10/24/2023	1.4	1 H 24M	Drafted Discovery for Defendant Ready Pac Foods, Inc.
Subtotal	Sum	2.7		
David Yeremian	5/6/2026	0.1	0 H 06M	Review status report.
	7/14/2025	0.1	0 H 06M	Confer with staff re new overlapping case.
	3/4/2025	0.1	0 H 06M	Review email re: mediation analysis.
	1/22/2025	0.1	0 H 06M	Review email from staff re arbitration.
	10/2/2024	0.1	0 H 06M	Email staff re mediation.
	5/10/2024	0.1	0 H 06M	Email staff re JPA.
	10/2/2024	0.1	0 H 06M	Review email from staff re mediation.
	4/15/2024	0.1	0 H 06M	Review email re JPA.
	3/18/2024	0.1	0 H 06M	Review email re overlapping case.
	2/22/2024	0.1	0 H 06M	Review email re overlapping case.
	3/1/2025	0.2	0 H 12M	Review status report.
	7/11/2023	0.2	0 H 12M	Review completed retainer and related documents.
	6/29/2023	1.5	1 H 30M	Review summary and client docs and prior lawsuits; approve for sign up.
	1/31/2024	0.4	0 H 24M	Confer with staff re overlapping cases; review comparison chart.
	2/21/2024	0.1	0 H 06M	Review email re overlapping case.
	8/29/2023	0.1	0 H 06M	Assign to attorney.
	1/28/2025	0.1	0 H 06M	Review email from staff re mediation production.
	4/1/2024	0.1	0 H 06M	Review email re case status.
	1/30/2024	0.1	0 H 06M	Review email from staff re overlapping case.
Subtotal	Sum	3.8		
David Keledjian	10/3/2025	0.9	0 H 54M	Review and Revise Prelim Papers.
	8/20/2025	0.4	0 H 24M	Discuss D's Changes to Long Form Agreement w/ DA.
	7/14/2025	0.6	0 H 36M	Call with all counsel Re: Related Matters.
	6/4/2025	1.1	1 H 06M	Review and Revise Long Form Agreement.
	4/26/2025	0.5	0 H 30M	Review and Revise Consolidated complaint.
	3/4/2025	7.4	7 H 24M	Attend and Appear for Mediation
	3/3/2025	3.7	3 H 42M	Prepare for Mediation including review and analysis of Expert Report.
	2/27/2025	3.2	3 H 12M	Review and Revise Mediation Brief
	2/26/2025	4.3	4 H 18M	Cont Review all pre-mediation records for Brief (over 400 pages)
	12/18/2024	0.3	0 H 18M	Call with co-counsel Re: Mediation.
	11/14/2024	0.5	0 H 30M	TC w/ OC Re: Mediation data.
	9/19/2024	0.5	0 H 30M	Review and Revise Request for Dismissal of Defendant
	9/5/2023	3.1	3 H 06M	Draft Complaint and PAGA Letter
	9/5/2023	2.3	2 H 18M	Review file for claims and theories of liability.

	1/30/2024	0.3	0 H 18M	Meeting with DA Re: Related Case Issues
	1/30/2024	0.4	0 H 24M	Meeting with DA and DY Re: Related Case and Potential Fee Split.
	1/30/2024	0.4	0 H 24M	Call w/ Co-counsel Re: Related case.
	11/17/2023	0.6	0 H 36M	Meet and Confer Call with OC
	11/16/2023	0.4	0 H 24M	Review of Arbitration Agreement and Memo Re: Issues
	11/9/2023	0.2	0 H 12M	Review and Revise FAC Adding PAGA
	10/30/2023	0.3	0 H 18M	Review written discovery.
	9/20/2023	0.2	0 H 12M	Review and Revise Preemptory Challenge.
	6/7/2024	0.4	0 H 24M	TC w/ OC Re: Mediation and case status.
	5/7/2024	0.4	0 H 24M	Review and Revise Proposed JPA.
	3/6/2024	0.3	0 H 18M	TC with OC Re: Mediation
	7/22/2025	0.7	0 H 42M	Review and Revise Long Form with Defendant's edits.
	2/6/2025	0.7	0 H 42M	Review/analyze Mediation production for Defendant
Subtotal	Sum	34.1		
David Arakelyan	6/24/2026	0.1	0 H 06M	Email to co-counsel re: filing issues
	6/24/2026	0.1	0 H 06M	Follow up with DY re: motion filing issues
	6/24/2026	0.5	0 H 30M	Review and revise FA motion based on co-counsel's changes
	6/22/2026	9	9 H 00M	Draft final approval motion, including declarations, review of all relevant paperwork; draft proposed order and judgment; review settlement agreement; reach out to client; follow up with team re: time entries; etc.
	6/18/2026	0.1	0 H 06M	Follow up with co-counsel re: motion and costs information
	6/4/2026	0.2	0 H 12M	Retrieve and review the declaration from settlement admin
	6/2/2026	0.3	0 H 18M	Update case sheet and CMC sheet; create follow up tasks re: calendaring items
	6/2/2026	0.1	0 H 06M	Respond to OC re: CMC appearance
	6/1/2026	0.5	0 H 30M	Review and revise the settlement admin declaration
	6/1/2026	0.1	0 H 06M	Email settlement admin re: updated declaration
	6/1/2026	0.2	0 H 12M	Discussion with Noro re: CMC tomorrow; look up tentative; confirm registration
	6/1/2026	0.1	0 H 06M	Follow up with Jordan re: calendaring CMC for tomorrow
	6/1/2026	0.2	0 H 12M	Follow up with Norayr and Lana re: hearing coverage tomorrow
	5/19/2026	0.2	0 H 12M	Review outstanding case items and deadlines; confirm the filing of a joint report; note to DK
	5/14/2026	0.2	0 H 12M	Finalize the joint statement; send Word and PDF versions to OC and ask re: filing
	5/12/2026	0.1	0 H 06M	Email OC with updated joint CMS
	5/12/2026	0.3	0 H 18M	Draft updated joint CMS
	5/7/2026	0.2	0 H 12M	Email co-counsel regarding the FA motion, declarations, judge's rules, etc.
	5/6/2026	0.2	0 H 12M	Follow up re: case issues; reach out to settlement admin re: decl; update case sheet; update for DK and DY
	4/27/2026	0.1	0 H 06M	Retrieve documents related to settlement admin
	4/16/2026	0.1	0 H 06M	Update case sheet and note to DK re: deadlines
	4/16/2026	0.2	0 H 12M	Review court docket and timeline from admin; email re: incorrect due date; review report re: opt outs
	3/27/2026	0.1	0 H 06M	Retrieve and review the weekly report; send to Jordan for filing
	3/14/2026	0.1	0 H 06M	Follow up with settlement admin re: large number of undeliverable notices
	3/14/2026	0.1	0 H 06M	Retrieve the notice re: settlement admin and send to Jordan for filing
	2/27/2026	0.1	0 H 06M	Retrieve and review the settlement admin report; send to Jordan for filing
	2/25/2026	0.1	0 H 06M	Follow up with co-counsel re: status of notice administration
	2/11/2026	0.1	0 H 06M	Email settlement admin re: website
	2/9/2026	0.1	0 H 06M	Respond to settlement admin
	2/6/2026	0.2	0 H 12M	Retrieve prelim approval order; send to Jordan for filing
	2/5/2026	0.2	0 H 12M	Review changes to notice by co-counsel; compare to my notes from hearing; send response to co-counsel re: declaration and finalization
	2/5/2026	0.1	0 H 06M	Follow up with co-counsel re: status of revised order, etc.
	2/2/2026	0.1	0 H 06M	Email co-counsel re: status of changes that had to be made to the notice
	1/30/2026	0.1	0 H 06M	Review settlement terms; update the tracker
	1/29/2026	0.2	0 H 12M	Review and respond to email re: number of notices and different Defendants
	1/26/2026	0.2	0 H 12M	Email settlement admin with agreement and other related information re: settlement
	1/26/2026	0.2	0 H 12M	Call with and follow up email to client re: case status, amounts to be received, timeline, his plans
	1/23/2026	0.2	0 H 12M	Retrieve prelim order (signed); send to Jordan; follow up re: tasks and update case sheet
	1/15/2026	0.2	0 H 12M	Call with client re: case status, his pending move to Mexico

	1/15/2026	0.1	0 H 06M	Call and voicemail for client
	1/15/2026	0.7	0 H 42M	Appearance at prelim approval hearing; review case and motion before the appearance
	1/14/2026	0.3	0 H 18M	Follow up re: prelim approval motion
	1/14/2026	0.3	0 H 18M	Follow up re: tentative in Carter case: calls to Court, email co-counsel, online search
	12/2/2025	0.1	0 H 06M	Email exchanges with OC re: CMC
	12/2/2025	0.3	0 H 18M	CMC appearance and follow up
	12/1/2025	0.1	0 H 06M	Review court docket; confirm CMC on calendar
	11/26/2025	0.1	0 H 06M	Confirm CMC is on court docket; confirm submission of joint report
	11/26/2025	0.1	0 H 06M	Retrieve court order re: department change; update case notes; send to Jordan for filing
	11/20/2025	0.1	0 H 06M	Follow up email to OC re: submitting the joint report
	11/20/2025	0.2	0 H 12M	Update and finalize joint report; send to Jordan for filing
	11/20/2025	0.2	0 H 12M	Follow up re: status of joint report ahead of CMC: email OC with draft
	11/6/2025	0.1	0 H 06M	Retrieve and send fully executed agreement to Gregg L.
	11/6/2025	0.1	0 H 06M	Email OC re: dismissal of Defendants
	11/6/2025	0.1	0 H 06M	Email OC re: upcoming CMC, dismissal and submission of joint report
	11/6/2025	0.4	0 H 24M	Draft joint report ahead of December CMC
	11/4/2025	0.1	0 H 06M	Respond to OC re: declaration, dismissal, etc.
	10/30/2025	0.1	0 H 06M	Respond to OC re: dismissals
	10/27/2025	0.1	0 H 06M	Send dismissal forms for Defendants to co-counsel for review
	10/27/2025	0.2	0 H 12M	Finalize the declaration from Defendant for filing purposes
	10/27/2025	0.6	0 H 36M	Draft dismissal papers based on settlement agreement
	10/27/2025	0.1	0 H 06M	Review the prelim motion papers and deadlines/send to Jordan for calendaring
	10/16/2025	0.1	0 H 06M	Follow up with co-counsel re: missing signature on SA
	10/16/2025	0.1	0 H 06M	Retrieve and review the settlement agreement signed by Haig's client; send to Jordan for filing
	10/3/2025	0.2	0 H 12M	Call with co-counsel re: approval issues
	10/3/2025	1	1 H 00M	Review MPA
	10/3/2025	0.2	0 H 12M	Email co-counsel re: declaration and motion submission
	10/3/2025	0.8	0 H 48M	Draft MPA declaration
	10/2/2025	0.1	0 H 06M	Update case notes; note to DK re: status of case and pending agreement
	9/26/2025	0.1	0 H 06M	Send settlement agreement executed by client to co-counsel
	9/26/2025	0.1	0 H 06M	Call, voicemail and email to client re: signing of settlement agreement
	9/24/2025	0.2	0 H 12M	Call with co-counsel re: prelim motion, hearing date, and OC email
	9/24/2025	0.2	0 H 12M	Call with and follow up email to client re: settlement agreement
	9/24/2025	0.1	0 H 06M	Email OC re: settlement agreement
	9/24/2025	0.1	0 H 06M	Finalize settlement agreement with add'l language re: escalator clause
	9/24/2025	0.2	0 H 12M	Discussion with DK re: escalator clause
	9/24/2025	0.1	0 H 06M	Email OC re: settlement agreement and changes
	9/24/2025	0.3	0 H 18M	Make additional revisions to the settlement agreement re: escalator and dismissal
	9/23/2025	0.1	0 H 06M	Note to DK re: OC's concerns re: escalator clause
	9/23/2025	0.1	0 H 06M	Follow up with co-counsel re: settlement agreement
	9/23/2025	0.2	0 H 12M	CMC Follow up; create calendaring items and tasks; update CMC and case sheets
	9/23/2025	1	1 H 00M	CMC appearance
	9/23/2025	0.2	0 H 12M	Review joint statement ahead of CMC; check hearing time
	9/11/2025	0.1	0 H 06M	Retrieve DOE Amendment filed by co-counsel; send to Jordan for filing
	9/10/2025	0.1	0 H 06M	Retrieve the declaration; send to Jordan for filing
	9/8/2025	0.1	0 H 06M	Finalize joint report and send to Jordan for filing
	9/8/2025	0.2	0 H 12M	Review OC email and respond re: settlement agreement, DOE Amendments, new complaints filed, etc.
	9/5/2025	0.1	0 H 06M	Note to DK re: case status and pending issues
	9/4/2025	0.1	0 H 06M	Email OC re: joint report, dismissal decl and settlement agreement draft
	9/4/2025	0.3	0 H 18M	Draft joint report
	9/2/2025	0.1	0 H 06M	Respond to OC re: CMS deadline; look up dates and past filings
	8/28/2025	0.1	0 H 06M	Send settlement agreement changes to OC
	8/22/2025	0.2	0 H 12M	Review changes to SA by co-counsel; send to DK for approval with note

	8/22/2025	0.3	0 H 18M	Call with co-counsel re; settlement agreement issues and escalator clause
	8/21/2025	0.1	0 H 06M	Retrieve the joint stip in related case re: arb motion; send to Jordan for filing
	8/20/2025	0.3	0 H 18M	Call with and follow up email to client re: status of the case, his updated contact info, settlement approval process, etc.
	8/20/2025	0.2	0 H 12M	Draft response to OC and send to co-counsel with copy of settlement agreement
	8/20/2025	0.4	0 H 24M	Review and discuss settlement agreement with DK; figure out the section that need to be accepted and the ones that need to be revised; notes re: what to say to OC/co-counsel
	8/19/2025	0.1	0 H 06M	Call, voicemail and email to client re: checking in/following up
	8/19/2025	0.2	0 H 12M	Call with co-counsel re: settlement agreement
	8/19/2025	0.2	0 H 12M	Call with OC and co-counsel re: declaration language for dismissal
	8/18/2025	0.1	0 H 06M	Email OC re: tomorrow's meeting/send Teams invitation
	8/18/2025	0.1	0 H 06M	Respond to OC re: declaration language issues
	8/18/2025	0.2	0 H 12M	Review the settlement agreement changes by OC and send a note to DK
	8/18/2025	0.2	0 H 12M	Respond to OC re: language; review and revise declaration re: dismissal of Defendants
	8/14/2025	0.1	0 H 06M	Retrieve related case notice and send to Janet for filing
	8/14/2025	0.1	0 H 06M	Respond to OC re: DOE Amendments and settlement issues
	8/13/2025	0.1	0 H 06M	Follow up with OC re: status of settlement agreement
	8/11/2025	0.2	0 H 12M	Review case status and pending items; note to DK re: outstanding issues
	8/11/2025	0.1	0 H 06M	Follow up email to OC re: status of SA and draft declarations dismissing Defendants
	8/7/2025	0.1	0 H 06M	Email co-counsel re: settlement agreement language
	8/6/2025	0.3	0 H 18M	Call with co-counsel (Christina Mirzaei) re: meet and confer efforts with Defendant, dismissals of entities from complaint, settlement agreement, etc.
	7/31/2025	0.1	0 H 06M	Review joint report and send comments to co-counsel
	7/31/2025	0.2	0 H 12M	Respond to OC re: dismissal of Defendant entities; review email with details from her
	7/31/2025	0.1	0 H 06M	Respond to co-counsel re: settlement agreement and joint report
	7/30/2025	0.2	0 H 12M	Correspond with co-counsel re: finalizing settlement agreement and sending to OC
	7/29/2025	0.1	0 H 06M	Respond to co-counsel re: escalator clause
	7/26/2025	0.1	0 H 06M	Email co-counsel re: changes to the settlement agreement and add'l feedback
	7/26/2025	0.2	0 H 12M	Review status of the changes made to the settlement agreement; add additional edits and changes
	7/21/2025	0.2	0 H 12M	Review the SA from OC and comments for DK
	7/17/2025	0.1	0 H 06M	Follow up email to OC re: settlement agreement status
	7/16/2025	0.1	0 H 06M	Discuss the settlement process and call with OC/co-counsel with David K.
	7/14/2025	0.1	0 H 06M	Discussion with DY re: newly filed cases and call with OC/co-counsel
	7/14/2025	0.6	0 H 36M	Call with OC and co-counsel re: newly filed cases
	7/12/2025	0.1	0 H 06M	Review emails with OC and co-counsel; add Monday's call to calendar
	7/11/2025	0.2	0 H 12M	Review related case info from OC; update case sheet; send email re: meet/confer call next week
	7/9/2025	0.1	0 H 06M	Check court docket re: CMC; update case sheet and CMC sheet ; create follow up task for Jordan
	7/8/2025	0.1	0 H 06M	CMC follow up and email to OC
	7/8/2025	0.1	0 H 06M	Follow up email to OC re: status of settlement agreement
	7/8/2025	0.3	0 H 18M	Review OC emails re: related cases; add them to the case list; update information
	7/1/2025	0.1	0 H 06M	Respond to OC re: related cases, the changes to the settlement agreement, etc.
	6/28/2025	0.2	0 H 12M	Update case notes re: settlement, consolidated complaint, etc.
	6/28/2025	0.1	0 H 06M	Follow up with co-counsel re: status of the SA
	6/28/2025	0.2	0 H 12M	Review outstanding case items; follow up re: FAC filing; retrieve copies and send to Jordan for filing; update case notes; follow up re CMC (still on calendar)
	6/23/2025	0.2	0 H 12M	Draft the CMS and send to OC
	6/23/2025	0.2	0 H 12M	Review FAC and respond to co-counsel re: filing
	6/18/2025	0.1	0 H 06M	Respond to co-counsel re: FAC; review edits
	6/17/2025	0.1	0 H 06M	Email OC re: amended complaint and scope of the expense reimb class
	6/5/2025	0.1	0 H 06M	Send the revisions to FAC and class agreement revisions to co-counsel
	6/4/2025	0.1	0 H 06M	Email co-counsel re: status of FAC/SA and ETA
	6/4/2025	1.4	1 H 24M	Review and revise the settlement agreement and the consolidated complaint
	5/20/2025	0.1	0 H 06M	Email co-counsel re: OC revisions to the complaint and feedback re: changes
	5/20/2025	0.2	0 H 12M	Review OC changes to the consolidated complaint; propose revisions
	5/19/2025	0.1	0 H 06M	Review status of the case and outstanding items; note to DK
	5/19/2025	0.2	0 H 12M	Review draft complaint; respond to co-counsel re: PAGA allegations
	5/13/2025	0.1	0 H 06M	Call from client re: emails received from another law firm (requested copy of email)

	5/8/2025	0.1	0 H 06M	Review settlement admin bids and send to staff for filing
	5/6/2025	0.3	0 H 18M	Review mediation data and costs; send email to co-counsel re: findings
	5/6/2025	0.1	0 H 06M	Follow up with staff re: cost report requested by co-counsel
	5/6/2025	0.1	0 H 06M	Email co-counsel with approval of the joint stip and amended complaint
	5/6/2025	0.2	0 H 12M	Review the changes to the amended complaint by co-counsel; review the joint stipulation
	5/5/2025	0.1	0 H 06M	Create a case checklist and update case/mediation status
	4/29/2025	0.1	0 H 06M	Email co-counsel re: settlement agreement draft and prelim approval
	4/29/2025	0.2	0 H 12M	Discuss/review SAC with DK; discuss course of action re: allocation of work for settlement approval
	4/29/2025	0.1	0 H 06M	Email response to OC re: status of complaint/motion for approval
	4/28/2025	0.1	0 H 06M	Note to DK re: conversation with co-counsel
	4/28/2025	0.2	0 H 12M	Call with co-counsel re: work distribution
	4/26/2025	0.8	0 H 48M	Finalize the consolidated complaint
	4/25/2025	0.1	0 H 06M	Discuss consolidated complaint with DK
	4/25/2025	1.2	1 H 12M	Start drafting the consolidated complaint
	4/23/2025	0.1	0 H 06M	Retrieve and review court order re: CMC continuance; forward to staff for filing
	4/22/2025	0.1	0 H 06M	Email Berger re: invoice status
	4/22/2025	0.2	0 H 12M	CMC Follow up: update case sheet and CMC sheet; create follow up task
	4/22/2025	0.7	0 H 42M	CMC appearance
	4/22/2025	0.1	0 H 06M	Correspond with Kevin B. re: CMC
	4/18/2025	0.2	0 H 12M	Confer with Roman re: filing consolidated complaint in PAGA-only actions
	4/17/2025	0.4	0 H 24M	Review complaint draft form co-counsel; questions to DK re: consolidation; start working on consolidated complaint
	4/16/2025	0.1	0 H 06M	Finalize CMS and send to Jordan for filing
	4/16/2025	0.2	0 H 12M	Make revisions to the joint stip/order and send to OC for review
	4/15/2025	0.2	0 H 12M	Call with and follow up email to client re: settlement and the process going forward
	4/15/2025	0.1	0 H 06M	Call and email for client to get back to us
	4/14/2025	0.1	0 H 06M	Call, voicemail and email to client re: status of the case
	4/14/2025	0.1	0 H 06M	Retrieve mediator's proposal and retrieve/PDF file and send to staff for filing
	4/14/2025	0.1	0 H 06M	Review mediator's email re: settlement
	4/14/2025	0.1	0 H 06M	Email co-counsel re: filing the approval motion in LASC
	4/14/2025	0.1	0 H 06M	Email OC re: joint stip and approval motion
	4/14/2025	0.3	0 H 18M	Draft joint stip re: CMC and hearing date
	4/14/2025	0.1	0 H 06M	Respond to OC re: settlement and CMC
	4/9/2025	0.1	0 H 06M	Discuss settlement status with DK
	4/8/2025	0.1	0 H 06M	Finalize CMS and send for filing
	4/8/2025	0.1	0 H 06M	Review and revise the CMS; send to OC
	4/8/2025	0.1	0 H 06M	Follow up email to OC re: CMS and her comments
	4/7/2025	0.1	0 H 06M	Email OC re: joint CMS
	4/7/2025	0.3	0 H 18M	Draft joint CMS
	4/1/2025	0.1	0 H 06M	Email client re: update and case situation
	4/1/2025	0.1	0 H 06M	Email co-counsel re: mediation and settlement
	3/20/2025	0.2	0 H 12M	Review case docket and status of post-mediation talks; note to DK re: status of conversations with McKelvey, upcoming CMC and things to do
	3/11/2025	0.2	0 H 12M	CMC follow up: create tasks re: calendaring; update CMC sheet and case sheet
	3/11/2025	0.6	0 H 36M	CMC appearance
	3/11/2025	0.2	0 H 12M	CMC prep
	3/6/2025	0.1	0 H 06M	Respond to expert's office re: invoice
	3/6/2025	0.1	0 H 06M	Review case deadlines and upcoming hearings; note to DK ahead of our meeting
	3/4/2025	7.4	7 H 24M	Mediation attendance
	3/4/2025	0.4	0 H 24M	mediation prep
	3/4/2025	0.1	0 H 06M	Review updated damage analysis; send to DK/DY with note re: updated figures
	3/3/2025	0.3	0 H 18M	Call with expert re: mediation data
	3/3/2025	0.2	0 H 12M	Review mediation analysis with DK; reach out to mediator
	3/3/2025	0.1	0 H 06M	Review mediation damage analysis and send note to DK/DY
	3/3/2025	0.1	0 H 06M	Review and sign confidentiality agreement

	3/1/2025	0.1	0 H 06M	Call, voicemail and email to client re: Tuesday mediation and need to get in touch with me
	3/1/2025	0.5	0 H 30M	Follow up re: mediation: draft a summary for DY/DK and send with documents; follow up with Jordan re: attaching docs on calendar event;
	2/28/2025	0.3	0 H 18M	Finalize the mediation brief and send to mediator
	2/28/2025	0.1	0 H 06M	Follow up with co-counsel re: status of mediation brief
	2/28/2025	0.1	0 H 06M	Email updated data to expert
	2/28/2025	0.1	0 H 06M	Email OC re: updated demographic data
	2/26/2025	5	5 H 00M	Continue working on mediation brief
	2/26/2025	3	3 H 00M	Continue working on mediation brief; review records and analyze forms for rounding and meal period issues; discussion with DK
	2/26/2025	0.2	0 H 12M	Follow up with expert re: additional information from OC and email re: rounded time records
	2/26/2025	0.1	0 H 06M	Call with co-counsel re: factual basis for Plaintiff's claims
	2/26/2025	0.2	0 H 12M	Email expert re: OC's timeline on producing remaining data
	2/25/2025	3.7	3 H 42M	Continue drafting mediation brief; review facts and complaints re: related case;
	2/25/2025	0.6	0 H 36M	Continue drafting mediation brief; review related case information; call to co-counsel's office
	2/25/2025	1.7	1 H 42M	Review Defendant's document production; extract exhibits
	2/24/2025	0.1	0 H 06M	Email co-counsel re: information for mediation brief
	2/24/2025	0.3	0 H 18M	Retrieve and send info to Berger for analysis; respond to email with specific requests
	2/18/2025	0.1	0 H 06M	Review OC add'l comments re: CMC; finalize CMS after OC comments; send to JF for filing
	2/18/2025	0.2	0 H 12M	Finalize CMS and prepare for filing; send to the other side
	2/18/2025	0.1	0 H 06M	Respond to OC re: CMC and continuing hearing
	2/14/2025	0.1	0 H 06M	Email OC with copy of joint CMS; ask for revisions; inform of changes
	2/14/2025	0.5	0 H 30M	Draft joint CMS, including additional information on events since last summer
	2/14/2025	0.1	0 H 06M	Confirm that On Time Management and Staffing was dismissed from case
	2/14/2025	0.1	0 H 06M	Email co-counsel re: sending documents to work on re: mediation brief
	2/11/2025	0.1	0 H 06M	Email OC re: paycards and confirming mediation info
	2/11/2025	0.1	0 H 06M	Convert images of pay cards to PDF
	2/10/2025	0.1	0 H 06M	Email OC re: pre-mediation data requests
	2/10/2025	0.3	0 H 18M	Review co-counsel's email; supplement responses to the pre-mediation data by OC
	2/10/2025	0.1	0 H 06M	Respond to co-counsel re: data sharing with OC
	2/7/2025	0.2	0 H 12M	Review the prompt to OC re: responses to items with DK; make edits and revisions; discussion re: sharing with OC
	2/6/2025	0.1	0 H 06M	Review pending case items; notes to DK re: follow up issues
	2/7/2025	0.1	0 H 06M	Email co-counsel re: responses to OC, add'l information from their Plaintiffs
	2/7/2025	0.1	0 H 06M	Update narrative in response to Defendant's request for mediation info
	2/5/2025	0.1	0 H 06M	Email client re: response to OC and documents to be shared
	2/5/2025	0.4	0 H 24M	Review the additional mediation production; compare Excel spreadsheets re: OTS data; access the link for additional production; locate and PDF emails re: class data and OC responses to mediation data issues; respond to OC re: outstanding items
	2/5/2025	0.4	0 H 24M	Draft a response to OC re: pay cards, wage statements, Workforce application, etc.; send for review by David K.
	2/4/2025	0.1	0 H 06M	Inform DK re: Castaneda mediation invoice payment confirmation
	2/3/2025	0.1	0 H 06M	Email Berger with data re OTS and the note from OC re: data outstanding
	2/3/2025	0.1	0 H 06M	Retrieve the additional data (OTS) received from D and add to file
	2/3/2025	0.1	0 H 06M	Follow up email to client re: status of doc search/information re: pre-mediation
	1/31/2025	0.1	0 H 06M	Follow up email to client re: status of documents, etc.
	1/30/2025	0.1	0 H 06M	Retrieve order vacating OSC and send to Jordan for filing
	1/29/2025	0.1	0 H 06M	Review OC email re: mediation; respond to her request for information
	1/29/2025	0.1	0 H 06M	Confirm with Sasha and court docket that OSC was vacated
	1/29/2025	0.1	0 H 06M	Call and voicemail for calendaring department re; OSC
	1/29/2025	0.1	0 H 06M	Respond to expert's questions re: class period and add'l docs
	1/29/2025	0.1	0 H 06M	Email OC re: missing mediation items
	1/29/2025	0.1	0 H 06M	Email co-counsel re: wage statements and email to OC
	1/29/2025	0.2	0 H 12M	Review mediation production for wage statements and identify bates numbers
	1/28/2025	0.1	0 H 06M	Email co-counsel re: missing mediation data/questions for OC
	1/28/2025	0.8	0 H 48M	Review mediation data/docs produced by Defendant
	1/28/2025	0.1	0 H 06M	Respond to DY re: mediation data status
	1/28/2025	1	1 H 00M	Pre-mediation call with client; follow up email
	1/28/2025	0.1	0 H 06M	Call to court; conversation with clerk; voicemail for calendaring re: OSC issue

	1/28/2025	0.1	0 H 06M	Emailed OC re: cancellation charges for mediation per DK instructions
	1/28/2025	0.2	0 H 12M	Attempt to call court re: OSC (no response)
	1/28/2025	0.1	0 H 06M	Email exchanges with client; send Teams invitation and schedule call
	1/28/2025	0.1	0 H 06M	Correspond with OC re: production issues
	1/28/2025	0.1	0 H 06M	Note to DK/DY re: OC email re: production issues
	1/28/2025	0.1	0 H 06M	Call, email and voicemail for the client re: call scheduling
	1/28/2025	0.1	0 H 06M	Review OSC and CMC status and deadlines
	1/28/2025	0.1	0 H 06M	Follow up email to OC re: status of production
	1/27/2025	0.1	0 H 06M	Update DK re: status of mediation and production
	1/24/2025	0.2	0 H 12M	Attempted calls to client re: today's pre-mediation appt
	1/24/2025	0.2	0 H 12M	Prepare for call with client
	1/23/2025	0.3	0 H 18M	Send data to expert's office; include co-counsel
	1/23/2025	0.1	0 H 06M	Review case status; send update to DK
	1/23/2025	0.3	0 H 18M	Call and follow up email with client
	1/23/2025	0.1	0 H 06M	Call, voicemail and email for client re: pre-mediation call
	1/22/2025	0.1	0 H 06M	Respond to DY re: arbitration; send AA signed by client
	1/22/2025	0.1	0 H 06M	Follow up with OC re: remaining production status
	1/22/2025	0.1	0 H 06M	Inform Berger re: co-counsel
	1/16/2025	0.1	0 H 06M	Confirm invoice payment for mediation; retrieve and send to JF; update case notes
	1/16/2025	0.8	0 H 48M	Call with OC re: mediation
	1/16/2025	0.1	0 H 06M	Note to DK re: mediation call today
	1/15/2025	0.1	0 H 06M	Email mediation data to co-counsel
	1/15/2025	0.1	0 H 06M	Retrieve the mediation data; add to shared folder; send to JF to add to Neos
	1/13/2025	0.1	0 H 06M	Respond to OC re: time to speak this week
	1/9/2025	0.3	0 H 18M	Follow up re: OSC and SAC service; retrieve POSS and SAC; research the circumstances; create a follow up task for JF
	1/6/2025	0.1	0 H 06M	Respond to Emmalee re: missing mediation confirmation paperwork
	1/6/2025	0.1	0 H 06M	Review Emmalee's emails; update case notes
	1/6/2025	0.2	0 H 12M	Email to Accounting re: invoice payment; retrieve and attach W-9
	1/6/2025	0.1	0 H 06M	Email OC re: status of mediation production
	1/6/2025	0.1	0 H 06M	Email mediator's office re: invoice and cancellation
	1/6/2025	0.1	0 H 06M	Check status of CMC and relevant dates
	1/6/2025	0.1	0 H 06M	Reply to OC re: CMC
	12/19/2024	0.1	0 H 06M	Respond to co-counsel re: work allocation
	12/18/2024	0.3	0 H 18M	Call with co-counsel re: mediation
	12/15/2024	0.1	0 H 06M	Review case status; note to DK re: pending items
	12/6/2024	0.2	0 H 12M	Respond to OC re: sample size and sampling issues
	12/6/2024	0.1	0 H 06M	Respond to co-counsel re: meeting; send Teams link
	11/22/2024	0.3	0 H 18M	Draft/send email to OC re: mediation call and follow up items discussed
	11/22/2024	0.2	0 H 12M	Review case notes; note to DK: re convo with OC
	11/14/2024	0.5	0 H 30M	Call with OC re: mediation, data, etc.
	11/14/2024	0.1	0 H 06M	Note to DK re: case status and pending call with OC
	11/12/2024	0.1	0 H 06M	Respond to OC re: call next week
	11/11/2024	0.1	0 H 06M	Email OC re: call tomorrow
	11/6/2024	0.1	0 H 06M	Update co-counsel e-service list
	11/1/2024	0.1	0 H 06M	Email OC re: splitting mediation costs/fees
	10/31/2024	0.1	0 H 06M	Review email draft re: mediation to OC; send reminder to DK
	10/31/2024	0.2	0 H 12M	Follow up re: CMC and OSC: update case sheet and CMC sheet
	10/11/2024	0.1	0 H 06M	Follow up with DK re: mediation
	10/4/2024	0.3	0 H 18M	Draft response email to OC re: mediation fees
	10/2/2024	0.1	0 H 06M	Follow up re: status of dismissal and OSC: create task for JF
	10/2/2024	0.2	0 H 12M	Do calculations re: settlement and mediation fees; email DY about the numbers
	10/2/2024	0.1	0 H 06M	Review OC response and DY's email regarding the mediation issue
	10/2/2024	0.1	0 H 06M	Email follow up to OC re: mediation cost split

	9/30/2024	0.1	0 H 06M	Email OC re: mediation fees
	9/27/2024	0.1	0 H 06M	Email OC re: fee split issue
	9/20/2024	0.1	0 H 06M	Finalize dismissal request for On Time Mgmt and Staffing and send to JF for filing
	9/20/2024	0.3	0 H 18M	Call and follow up email to client re: mediation, dismissal of On Time Management and Staffing, approval process, etc.
	9/19/2024	0.1	0 H 06M	Call and voicemail for client re: returning call and reviewing email sent
	9/19/2024	0.7	0 H 42M	Draft dismissal request for wrong Defendant
	9/19/2024	0.2	0 H 12M	Email client re: mediation
	9/19/2024	0.2	0 H 12M	Email OC re: mediation production deadline and OTS consent to mediation
	9/13/2024	0.1	0 H 06M	Email OC re: mediation data to OTS
	9/13/2024	0.2	0 H 12M	Follow up re: mediation: send requested information to McKelvey's office; create follow up tasks
	9/9/2024	0.1	0 H 06M	Email counsel re: mediation confirmation
	9/4/2024	0.1	0 H 06M	Email OC re: mediation data request and OTS
	9/4/2024	0.2	0 H 12M	Review case status; update case notes and notes to DK re: pending items
	9/4/2024	0.1	0 H 06M	Respond to OC re: mediation status
	9/4/2024	0.1	0 H 06M	Email mediator's office re: potential early date release for March
	9/4/2024	0.1	0 H 06M	Email to OC and mediator re: dates in March
	8/26/2024	0.1	0 H 06M	Email response to OC re: responsive pleading deadline
	8/26/2024	0.3	0 H 18M	Follow up with JF re: service of OTS; attempts to locate POSS
	8/20/2024	0.2	0 H 12M	Review case status, pending and outstanding items; notes to DK; update case notes; create tasks
	8/6/2024	0.1	0 H 06M	Email OC re: mediation; attempted call to Medina/McKelvey
	8/3/2024	0.2	0 H 12M	Draft/send mediation data request email to OC (joint with HBK)
	8/3/2024	0.1	0 H 06M	Finalize the joint mediation data request with Haig's office
	8/2/2024	0.1	0 H 06M	Follow up email to Emmalee re: pre-holding February mediation dates
	8/2/2024	0.2	0 H 12M	Follow up on service to OTS and the judge's order re OSC
	8/1/2024	0.1	0 H 06M	Email OC re: mediation data/dates
	8/1/2024	0.2	0 H 12M	Send mediation data request to co-counsel
	8/1/2024	0.2	0 H 12M	Draft mediation data request
	8/1/2024	0.1	0 H 06M	Email OC re: discovery stay
	7/29/2024	0.1	0 H 06M	Email McKelvey re: mediation reservation
	7/24/2024	0.2	0 H 12M	Respond to OC re: mediation and OTS Defendant service
	7/24/2024	0.1	0 H 06M	Email McKelvey's office re: mediation availability
	7/17/2024	0.1	0 H 06M	Email OC re: mediation and dates available for Haig and DLaw
	7/17/2024	0.1	0 H 06M	Email Haig re: mediation with McKelvey and availability
	7/17/2024	0.1	0 H 06M	Draft email to OC re: McKelvey's availability
	7/15/2024	0.2	0 H 12M	Locate fully-executed JPA; add to both Neos and Sharepoint file
	7/15/2024	0.2	0 H 12M	Review case status and SAC status; update case notes
	7/9/2024	0.2	0 H 12M	Email OC re: CMC and orders
	7/9/2024	0.3	0 H 18M	Retrieve court orders re: OSC and CMC; create tasks; follow up on SAC filing
	7/9/2024	0.5	0 H 30M	Follow up on SAC; work with JF; make changes and updates
	7/9/2024	0.1	0 H 06M	Follow up on the status of stip/order re: SAC
	7/9/2024	0.1	0 H 06M	Follow up on CMO and OSC; create tasks for JF and DK; update case sheet
	7/2/2024	0.1	0 H 06M	Follow up email to OC re: CMC and order re: stip
	7/2/2024	0.1	0 H 06M	Check status of stip/order
	7/2/2024	0.2	0 H 12M	Review CMC-related issues; follow up on calendaring; update CMS sheet and case list
	7/1/2024	0.2	0 H 12M	Finalize the stip and prepare for filing; create task for JF
	7/1/2024	0.1	0 H 06M	Follow up with OC re: stipulation
	6/27/2024	0.1	0 H 06M	Follow up email to OC re: stipulation
	6/22/2024	0.1	0 H 06M	Email OC re: joint stip and complaint amendment
	6/22/2024	0.5	0 H 30M	Draft joint stip/complaint amendment to add new Defendant
	6/22/2024	0.1	0 H 06M	Retrieve final JPA; forward to JF for filing
	6/17/2024	0.1	0 H 06M	Check status of DOE 2 Amendment
	6/17/2024	0.1	0 H 06M	Respond to OC email
	6/17/2024	0.2	0 H 12M	Finalize CMS and prepare for filing; create task for JF

	6/14/2024	0.1	0 H 06M	Email co-counsel re: JPA status
	6/13/2024	0.1	0 H 06M	Email OC re: CMS
	6/13/2024	0.5	0 H 30M	Draft new joint CMS
	6/11/2024	0.2	0 H 12M	Update Amendment to Complaint; follow up with JF re: filing and service
	6/11/2024	0.1	0 H 06M	Retrieve SOI for proper new Defendant (OTS Solutions)
	6/11/2024	0.1	0 H 06M	Check status of CMC; create task; follow up on JPA and create new task
	6/7/2024	0.4	0 H 24M	Call with OC re: mediation and CMS
	6/7/2024	0.1	0 H 06M	Grant extension to OC re: discovery to 7/8
	6/7/2024	0.1	0 H 06M	Discuss case-related matters with DK
	6/7/2024	0.1	0 H 06M	Email co-counsel with JPA
	6/7/2024	0.1	0 H 06M	Update case notes and check RapidLegal
	6/7/2024	0.2	0 H 12M	Review status of the case, including service on OnTime Staffing JPA issue, communications with OC and co-counsel
	6/7/2024	0.1	0 H 06M	Email OC re: CMC, mediation and scheduling a call
	5/28/2024	0.1	0 H 06M	Discuss course of action with DK once JPA is signed
	5/28/2024	0.1	0 H 06M	Respond to client re: JPA
	5/28/2024	0.1	0 H 06M	Call, voicemail and email to client re: JPA signing
	5/24/2024	0.1	0 H 06M	Email OC re: On Time Staffing
	5/24/2024	0.1	0 H 06M	Case review: docket check; confirm Amended filing; update case notes re: client communications and other ongoing issues
	5/24/2024	0.2	0 H 12M	Follow up on the status of service re: On Time Staffing; review Rapid Legal records, emails and tasks; follow up with JF
	5/24/2024	0.1	0 H 06M	Respond to client re: JPA link sent
	5/23/2024	0.1	0 H 06M	Respond to client re: spelling of his name
	5/21/2024	0.1	0 H 06M	Call/voicemail and email to client re: JPA signing and questions
	5/20/2024	0.1	0 H 06M	Accept changes on JPA; convert to PDF; send to JF for signatures
	5/20/2024	0.1	0 H 06M	Follow up email to OC re: JPA
	5/14/2024	0.1	0 H 06M	Email Haig's office re: status of JPA
	5/10/2024	0.1	0 H 06M	Respond to DY email re: JPA
	5/10/2024	0.1	0 H 06M	Follow up with JF re: confirming the service of FAC and tasks re: follow up on responsive pleading
	5/8/2024	0.1	0 H 06M	Follow up on the amendment
	5/7/2024	0.1	0 H 06M	Email co-counsel with proposed JPA
	5/7/2024	0.3	0 H 18M	Draft JPA
	5/3/2024	0.1	0 H 06M	Email co-counsel re: status of fee split issue
	5/3/2024	0.1	0 H 06M	Update case notes with info re: mediation and MTC deadline
	5/3/2024	0.2	0 H 12M	Respond to OC email re: discovery extension and new Defendant issue
	5/3/2024	0.1	0 H 06M	Discuss JPA and OC extension request with DK
	5/2/2024	0.2	0 H 12M	Review case status and update notes; follow up on the DOE amendment
	4/26/2024	0.1	0 H 06M	Update top filed cases sheet with info re: case
	4/26/2024	0.1	0 H 06M	Email/send Teams invite to PAGA counsel
	4/25/2024	0.1	0 H 06M	Update DOE Amendment per Court rejection; send to JF for filing
	4/25/2024	0.1	0 H 06M	Email co-counsel re: telephone meet/confer scheduling
	4/22/2024	0.1	0 H 06M	Discuss call from PAGA counsel with DK and Janet
	4/18/2024	0.3	0 H 18M	Follow up on service; retrieve POSS; update case notes and create task for JF
	4/15/2024	0.1	0 H 06M	Note to DY re: mediation and fee split
	4/12/2024	0.1	0 H 06M	Discuss fee split and mediation issues with DK
	4/12/2024	0.1	0 H 06M	Review case status and outstanding items; note to DK re: JPA and mediation
	4/10/2024	0.1	0 H 06M	Email co-counsel and OC with the list of mediators
	4/3/2024	0.1	0 H 06M	Review outstanding issues re: case; email DK with pending items
	4/2/2024	0.1	0 H 06M	Follow up with JF re: filing and serving DOE Amendment/Complaint; provide SOS info
	4/2/2024	0.4	0 H 24M	Draft DOE Amendment
	4/1/2024	0.1	0 H 06M	Reply to OC re: mediators
	4/1/2024	0.1	0 H 06M	Respond to OC re: mediation
	4/1/2024	0.1	0 H 06M	Email DY re: case status and talks with PAGA counsel
	3/18/2024	0.1	0 H 06M	Note to DY re: related case and reaching out to OC
	3/15/2024	0.1	0 H 06M	Verify discovery response deadlines; update case notes

	3/6/2024	0.3	0 H 18M	Phone call with OC re: mediation, arb motion, etc.
	3/5/2024	0.2	0 H 12M	Draft/send email to OC re: settlement and call
	3/5/2024	0.2	0 H 12M	Update case notes with related case and prior settlement info
	3/5/2024	0.1	0 H 06M	Follow up with JF re: discovery service
	3/5/2024	0.2	0 H 12M	Discussion with DA and DK re: case strategy
	2/29/2024	0.7	0 H 42M	Update discovery and letter
	2/28/2024	0.1	0 H 06M	Discuss status of JPA and case with DK
	2/27/2024	0.1	0 H 06M	Note to DK re: mediation
	2/22/2024	0.1	0 H 06M	Respond to DY re: case questions
	2/21/2024	0.1	0 H 06M	Email DY re: conversation with related case counsel and fee split issue
	2/14/2024	0.1	0 H 06M	Reviewed case status and pending items; note to DK
	2/13/2024	0.1	0 H 06M	Check record of client contacts per DK request
	2/12/2024	0.1	0 H 06M	Send invitation to Haig re: call at 2PM
	2/9/2024	0.1	0 H 06M	Respond to PAGA case counsel re: call next week
	2/8/2024	0.1	0 H 06M	Follow up email with OC re: arbitration agreement for PAGA Plaintiff
	2/7/2024	0.1	0 H 06M	Email OC re: call follow up and info re: related case Plaintiff
	1/30/2024	0.4	0 H 24M	Discussion with DK and DY re: case, split fee, relations with counsel
	1/30/2024	0.2	0 H 12M	Correspond with OC re: meet and confer call; Teams invitation
	1/30/2024	0.2	0 H 12M	Email report to DY re: conversation with Haig K. and findings re: related case/arb agreement
	1/30/2024	0.2	0 H 12M	Discussion with DK re: arbitration issues and joint agreement with co-counsel
	1/30/2024	0.4	0 H 24M	Call with Haig Kazandjian re: related case
	1/30/2024	0.1	0 H 06M	Update case sheet with information re: related case, etc.
	1/30/2024	0.3	0 H 18M	Review related PAGA complaint; draft related case comparison for DY
	1/29/2024	0.3	0 H 18M	Phone conversation/email follow up with client re: arbitration matters
	1/29/2024	0.1	0 H 06M	Reply to Brand office email re: communications with client
	1/29/2024	0.1	0 H 06M	Call/voicemail for client
	1/29/2024	0.3	0 H 18M	Review PAGA website and related case info; start drafting Related Case comparison
	1/24/2024	0.1	0 H 06M	Email FAC to related case counsel; requested copy of his PAGA complaint
	1/24/2024	0.1	0 H 06M	Respond to PAGA counsel email
	1/24/2024	0.1	0 H 06M	Email Haig Kazandjian re: call/working together on cases
	1/24/2024	0.2	0 H 12M	Search for PAGA case filed against Ready Pac Foods on LWDA (not successful)
	1/23/2024	0.1	0 H 06M	Email Brand office re: contacting client
	1/23/2024	0.1	0 H 06M	Call/voicemail for client re: arbitration
	1/22/2024	0.1	0 H 06M	Call/voicemail for client re: arbitration/call back
	1/18/2024	0.2	0 H 12M	Review case status and pending tasks; note to DK re: arbitration
	1/18/2024	0.1	0 H 06M	Email client re: connecting to discuss arbitration
	1/4/2024	0.1	0 H 06M	Update case notes regarding case status and pending items
	1/4/2024	0.1	0 H 06M	Review court docket and emails re: pending items; review CMS for upcoming 1/9 hearing
	1/4/2024	0.1	0 H 06M	Follow up email to client re: getting in touch with our office
	12/19/2023	0.1	0 H 06M	Call, voicemail and email to client re: arbitration agreement and call
	12/12/2023	0.2	0 H 12M	Phone call/email with client re: arbitration agreement
	12/12/2023	0.2	0 H 12M	Review case status, outstanding items, status of contact with client. Update case list; create tasks for DA
	12/12/2023	0.1	0 H 06M	Respond to OC email re: CMS
	12/8/2023	0.1	0 H 06M	Call/voicemail and follow up email to the client
	12/8/2023	0.1	0 H 06M	Email OC re: CMS
	12/8/2023	0.7	0 H 42M	Draft joint CMS
	12/8/2023	0.2	0 H 12M	Search for complex case instructions in Monterey
	12/7/2023	0.1	0 H 06M	Add previous PAGA filing info to Neos
	12/7/2023	0.2	0 H 12M	Search for related PAGA case
	12/7/2023	0.2	0 H 12M	Call with OC re: CMC
	12/6/2023	0.2	0 H 12M	Review outstanding items for the case; draft note to DK; update case list
	12/6/2023	0.1	0 H 06M	Follow up on status of order re: FAC; task JF to call court
	12/4/2023	0.1	0 H 06M	Review/analyze CMC rules

	12/1/2023	0.1	0 H 06M	Confirm meeting time; send Teams invite to OC
	12/1/2023	0.1	0 H 06M	Email to OC re: meeting and conferring re CMC
	11/30/2023	0.1	0 H 06M	Follow up on status of stip/order submission, signing; no update
	11/30/2023	0.1	0 H 06M	Call to client (no response)
	11/29/2023	0.2	0 H 12M	Call, voicemail and email to client re: getting in touch
	11/27/2023	0.2	0 H 12M	Review court docket re: proposed order; f/up with JF; update case list; email DK
	11/21/2023	0.1	0 H 06M	Call/voicemail for client
	11/17/2023	0.6	0 H 36M	Meet and confer call with OC
	11/17/2023	0.1	0 H 06M	Review status of FAC; note to DK
	11/16/2023	0.3	0 H 18M	Review arbitration agreement and draft report to DK
	11/14/2023	0.2	0 H 12M	Review case status and emails; update notes on case list
	11/13/2023	0.1	0 H 06M	Respond to OC email; look into arbitration agreement
	11/9/2023	0.1	0 H 06M	Email OC with FAC and stip/order
	11/9/2023	0.3	0 H 18M	Draft FAC to add PAGA
	11/9/2023	0.4	0 H 24M	Draft FAC and stipulation re: FAC
	11/7/2023	0.1	0 H 06M	Review status of answers and discovery; follow up with JF re; service
	11/1/2023	0.1	0 H 06M	Check court docket, pending items and status of discovery
	10/30/2023	0.4	0 H 24M	Review discovery
	10/25/2023	0.2	0 H 12M	Review discovery with KB
	10/23/2023	0.1	0 H 06M	Discuss status of answer and discovery with DK
	10/17/2023	0.1	0 H 06M	Confirm all POSS filed and no stay on case
	10/11/2023	0.4	0 H 24M	Review Notice of Assignment, local rules and CRC re: CMC/CMS
	10/5/2023	0.3	0 H 18M	Email OC re: extensions and dates
	10/5/2023	0.1	0 H 06M	Review rules re: extensions; calculate new dates for responsive pleading
	10/5/2023	0.3	0 H 18M	Draft/send a response to OC with POSS re: responsive pleading deadline
	10/4/2023	0.1	0 H 06M	Follow up on CMC/CMO (none on file)
	9/27/2023	0.4	0 H 24M	Research re: addresses for service in CA/NJ; email to Natalie
	9/20/2023	0.4	0 H 24M	Draft peremptory challenge
	9/7/2023	0.2	0 H 12M	Revise PAGA letter
Subtotal	Sum	117.7		

EXHIBIT C

EXHIBIT C

LAFFEY MATRIX

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			Years Out of Law School *				
Year	Adjustmt Factor**	Paralegal/ Law Clerk	1-3	4-7	8-10	11-19	20 +
6/01/25- 5/31/26	1.075336	\$277	\$508	\$625	\$902	\$1,019	\$1,227
6/01/24- 5/31/25	1.080182	\$258	\$473	\$581	\$839	\$948	\$1,141
6/01/23- 5/31/24	1.059295	\$239	\$437	\$538	\$777	\$878	\$1,057
6/01/22- 5/31/23	1.085091	\$225	\$413	\$508	\$733	\$829	\$997
6/01/21- 5/31/22	1.006053	\$208	\$381	\$468	\$676	\$764	\$919
6/01/20- 5/31/21	1.015894	\$206	\$378	\$465	\$672	\$759	\$914
6/01/19- 5/31/20	1.0049	\$203	\$372	\$458	\$661	\$747	\$899
6/01/18- 5/31/19	1.0350	\$202	\$371	\$455	\$658	\$742	\$894
6/01/17- 5/31/18	1.0463	\$196	\$359	\$440	\$636	\$717	\$864
6/01/16- 5/31/17	1.0369	\$187	\$343	\$421	\$608	\$685	\$826
6/01/15- 5/31/16	1.0089	\$180	\$331	\$406	\$586	\$661	\$796
6/01/14- 5/31/15	1.0235	\$179	\$328	\$402	\$581	\$655	\$789
6/01/13- 5/31/14	1.0244	\$175	\$320	\$393	\$567	\$640	\$771
6/01/12- 5/31/13	1.0258	\$170	\$312	\$383	\$554	\$625	\$753
6/01/11- 5/31/12	1.0352	\$166	\$305	\$374	\$540	\$609	\$734
6/01/10- 5/31/11	1.0337	\$161	\$294	\$361	\$522	\$589	\$709
6/01/09- 5/31/10	1.0220	\$155	\$285	\$349	\$505	\$569	\$686
6/01/08- 5/31/09	1.0399	\$152	\$279	\$342	\$494	\$557	\$671
6/01/07-5/31/08	1.0516	\$146	\$268	\$329	\$475	\$536	\$645
6/01/06-5/31/07	1.0256	\$139	\$255	\$313	\$452	\$509	\$614
6/1/05-5/31/06	1.0427	\$136	\$249	\$305	\$441	\$497	\$598
6/1/04-5/31/05	1.0455	\$130	\$239	\$293	\$423	\$476	\$574
6/1/03-6/1/04	1.0507	\$124	\$228	\$280	\$405	\$456	\$549
6/1/02-5/31/03	1.0727	\$118	\$217	\$267	\$385	\$434	\$522
6/1/01-5/31/02	1.0407	\$110	\$203	\$249	\$359	\$404	\$487
6/1/00-5/31/01	1.0529	\$106	\$195	\$239	\$345	\$388	\$468
6/1/99-5/31/00	1.0491	\$101	\$185	\$227	\$328	\$369	\$444
6/1/98-5/31/99	1.0439	\$96	\$176	\$216	\$312	\$352	\$424
6/1/97-5/31/98	1.0419	\$92	\$169	\$207	\$299	\$337	\$406

6/1/96-5/31/97	1.0396	\$88	\$162	\$198	\$287	\$323	\$389
6/1/95-5/31/96	1.032	\$85	\$155	\$191	\$276	\$311	\$375
6/1/94-5/31/95	1.0237	\$82	\$151	\$185	\$267	\$301	\$363

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

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

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

EXHIBIT D

EXHIBIT D