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Attorneys for Plaintiffs

**SUPERIOR COURT OF THE STATE OF CALIFORNIA**

**COUNTY OF SAN DIEGO**

FRANK TOWNS and STEVEN QUIRINO,  
individually, on behalf of themselves and on  
behalf of all persons similarly situated,  
  
Plaintiffs,

vs.

CORE & MAIN LP, a limited partnership; and  
DOES 1 through 50, inclusive,  
  
Defendants.

CASE NO.: **37-2024-00006393-CU-OE-CTL**

**DECLARATION OF MANNY STARR IN  
SUPPORT OF PLAINTIFF'S MOTION  
FOR APPROVAL OF SETTLEMENT**

Hearing Date: April 3, 2026  
Hearing Time: 1:30 p.m.

Judge: Hon. Katherine Bacal  
Dept.: 63

Date Action Filed: February 13, 2024  
Trial Date: Not set

**DECLARATION OF MANNY STARR**

I, Manny Starr, declare as follows:

1. I am an attorney duly admitted to practice before all courts in the State of California and am the managing partner of Frontier Law Center. I am one of the attorneys of record for Plaintiffs

1 Frank Towns and Steven Quirino ("Plaintiffs"), on behalf of themselves and all other similarly  
2 situated and aggrieved employees, in the above-entitled action. I have personal knowledge of the  
3 matters set forth herein, and if called upon as a witness to testify thereto, I could and would  
4 competently do so.

5 **THE SETTLEMENT IS FAIR, REASONABLE, AND ADEQUATE**

6 2. I have substantial experience in class action litigation, particularly in the area of  
7 employment law. Over the course of my legal career, I have represented thousands of plaintiffs in  
8 employment law litigation, both on an individual and class action basis.

9 3. Based on my experience, I believe that the settlement reached in this matter is fair,  
10 reasonable, and adequate.

11 4. This case settled for a Gross Settlement Amount of \$500,000.00, which is an excellent result  
12 given the inherent risks of litigation and in light of the facts of this case.

13 5. Our firm has invested substantial time and resources in this litigation. Our current lodestar is  
14 approximately \$40,950.00. Our firm's lodestar spreadsheet is attached hereto as **Exhibit A**.

15 6. We have incurred costs of \$951.44 in prosecuting this action. Our firm's costs spreadsheet is  
16 attached hereto as **Exhibit B**.

17 7. The settlement for each Class Member is fair, reasonable, and adequate, given the inherent  
18 risks of litigation, including the substantial risks relative to class certification and the costs of  
19 pursuing such litigation, as discussed further below.

20 **BACKGROUND OF THE LITIGATION**

21 8. On February 13, 2024, Plaintiff Frank Towns filed a class action complaint against Core &  
22 Main LP in the Superior Court of California, County of San Diego (Case No. 37-2024-00006393-  
23 CU-OE-CTL), and a companion PAGA action in the Superior Court of California, County of  
24 Monterey (Case No. 24CV000549). Plaintiff Steven Quirino subsequently filed a PAGA notice with  
25 the LWDA on March 19, 2024 (LWDA-CM-1017425-24), attached hereto as **Exhibit C**. On July 8,  
26 2024, Plaintiff Steven Quirino filed a related class action in the Superior Court of California,  
27 County of Riverside (Case No. CVR12403855). The three actions were consolidated under a First  
28

1 Amended Complaint filed in the San Diego action, which is the Operative Complaint in the Actions.  
2 The Quirino Action and the Towns PAGA Action have been dismissed without prejudice.

3 9. The Actions allege that Defendant, as employer of non-exempt California employees, failed  
4 to: (1) pay overtime wages; (2) pay all wages and minimum wages; (3) provide compliant meal  
5 periods; (4) provide compliant rest periods; (5) timely furnish accurate itemized wage statements;  
6 (6) pay all wages due at separation; (7) provide proper and accurate sick pay; and (8) reimburse  
7 business expenses, in violation of the California Labor Code, applicable IWC Wage Orders, and  
8 Business and Professions Code section 17200, et seq. Plaintiffs also sought PAGA civil penalties  
9 under Labor Code section 2699, et seq.

#### 10 INVESTIGATION AND INFORMAL DISCOVERY

11 10. I have spent significant time researching and pursuing the claims alleged in this action. Prior  
12 to mediation, Plaintiffs obtained sufficient documents and information to thoroughly investigate the  
13 claims. The Parties engaged in a significant amount of informal discovery, and the Parties' pre-  
14 mediation investigation was sufficient to satisfy the criteria for court approval set forth in *Dunk v.*  
15 *Foot Locker Retail, Inc.* (1996) 48 Cal.App.4th 1794, 1801 and *Kullar v. Foot Locker Retail, Inc.*  
16 (2008) 168 Cal.App.4th 116, 129–130.

17 11. The Parties participated in an all-day mediation on September 22, 2025, presided over by  
18 Tripper Ortman, a respected and experienced mediator of wage and hour class and representative  
19 actions.

#### 20 ATTORNEY'S EXPERIENCE

21 12. Based on my review of all documents and information obtained, and based on my  
22 experience in complex class and representative employment litigation, I believe this settlement to be  
23 fair, adequate, and reasonable.

24 13. I was retained on a contingency fee basis, pursuant to which Plaintiffs' counsel agreed to  
25 advance all costs and receive no fee unless a recovery was accomplished. Had Plaintiffs failed to  
26 prevail in this case, counsel for Plaintiffs would have expended a significant amount of time,  
27 money, and resources without any benefit or return. In addition, had Plaintiffs failed to prevail,  
28 Defendant would have been entitled to seek costs in connection with its defense.

1 14. In terms of my experience in this field, I have been named as Class Counsel in several class  
2 actions and have been lead counsel in numerous representative PAGA settlements that have been  
3 granted approval, including the following:

4 a. Joshua Albright, et al. v. Loma Linda Shared Services, Case No. CIVDS1818361: Class  
5 action and PAGA case involving failure to pay wages, meal and rest break violations, and  
6 failure to indemnify work related expenses; \$600,000.00 settlement; final approval granted;

7 b. Tri Nguyen v First Alarm Security & Patrol, Inc., Case No. 18CV332369: class action and  
8 PAGA case on behalf of security guards involving various wage and hour issues; \$7,250,000  
9 settlement; final approval granted;

10 c. Ronnie McNeal v. Platinum Security, Inc., Case No. 19STCV05709: PAGA action on  
11 behalf of security guards involving meal and rest break violations and failure to pay wages in a  
12 timely manner; \$300,000 settlement; PAGA settlement approved;

13 d. Mervyn Cole v. Saucey, Inc. Case No. BC707895: class action and PAGA case involving  
14 misclassification of employees and other wage and hour issues; \$590,000 settlement; final  
15 approval granted;

16 e. James Rushing v. Security Intelligence Specialist Corporation, Case No. 18-civ-1808, class  
17 action and PAGA case on behalf of security guards for breaks and wage statement violations;  
18 \$480,000 settlement; final approval granted;

19 f. Anthony Gaines, et al. v. Triple Canopy, Inc., Case No. 9CV345169, class action and  
20 PAGA case on behalf of approximately 550 security guards relating to meal and rest break  
21 violations and other wage and hour issues; \$2,300,000 settlement; final approval granted;

22 g. Veronica Espinoza v. Sharp HealthCare, Case No. 37-2018-00034031-CU-OECTL, class  
23 action and PAGA case on behalf of hospital employees relating to meal and rest break  
24 violations, among other things; \$2,125,000 settlement; final approval granted;

25 h. Wendy Navarro Garcia v. Widdicombe Enterprises, Inc., Case No. 30-2021-  
26 01235358-CU-OE-CXC: Class action and PAGA case involving failure to provide compliant  
27 meal and rest breaks, failure to pay overtime at the correct regular rate, failure to provide  
28

1 accurate itemized wage statements, and failure to pay all wages due at time of termination;  
2 \$1,200,000 settlement; final approval granted;

3 i. Samuel Nudelman v. Heartland Steel Products West LLC, Case No. STK-CVUOE-2022-  
4 0003348: Class action and PAGA case involving failure to pay overtime at the correct regular  
5 rate, unpaid meal and rest period premiums, failure to provide compliant off-premises meal and  
6 rest periods, and failure to provide compliant wage statements; \$1,032,500 settlement; final  
7 approval granted;

8 j. Renee Bullock v. Atria Management Company, LLC, et al., Case No. CU22-086285: PAGA  
9 case involving failure to provide compliant meal and rest breaks, failure to properly account for  
10 non-discretionary bonuses in the regular rate of pay for calculating overtime, failure to provide  
11 accurate itemized wage statements, and failure to pay all wages due at time of termination;  
12 \$1,695,000 settlement; PAGA approval granted;

13 k. Robert Anthony Gonzalez v. Golden Gate Bell, LLC, Case No. MSC21-00956: Class action  
14 and PAGA case involving off-the-clock work, failure to reimburse expenses, failure to provide  
15 reporting time pay, meal and rest break violations, and various wage statement and penalty  
16 claims; \$4,500,000 settlement; final approval granted; and

17 l. Raul Antonio Castro v. Clay Lacy Aviation, Inc., Case No. 21VECV00304: PAGA case  
18 involving various wage and hour violations; \$760,000 settlement; PAGA approval granted.  
19

20 I declare under penalty of perjury under the laws of the State of California that the foregoing  
21 is true and correct. I submit this Declaration in support of Plaintiff's Motion for Preliminary  
22 Approval and respectfully request that the Court grant the motion.  
23

24 Executed on August 18, 2026, in Woodland Hills, California.

25  
26 /s/ Manny Starr

27 MANNY STARR

28 Attorney for Plaintiff Steven Quirino

# EXHIBIT A

## Time and Fees

for Steven Quirino - Employment Claim - Core & Main, LP - Charge No.: LWDA-CM-1017425-24 Superior Court Case No.: CVRI2403855

### Time and Fee entries

| Date      | Activity | Description                                                                                            | Staff                | Duration | Rate     | Billable? | Write Off? | Status | Total    |
|-----------|----------|--------------------------------------------------------------------------------------------------------|----------------------|----------|----------|-----------|------------|--------|----------|
| 8/7/2026  |          | 2 emails sent/reviewed regarding Towns v. Core and Main (CA3146) - Report                              | Taylor McCarthy      | 0.10     | \$225.00 | True      | No         | -      | \$22.50  |
| 7/29/2026 |          | 1 email sent/reviewed regarding Towns v. Core and Main (CA3146) - Report                               | Taylor McCarthy      | 0.10     | \$225.00 | True      | No         | -      | \$22.50  |
| 7/15/2026 |          | 1 email sent/reviewed regarding Towns v. Core and Main (CA3146) - Report                               | Taylor McCarthy      | 0.10     | \$225.00 | True      | No         | -      | \$22.50  |
| 7/1/2026  |          | 1 email sent/reviewed regarding Towns v. Core and Main (CA3146) - Report                               | Taylor McCarthy      | 0.10     | \$225.00 | True      | No         | -      | \$22.50  |
| 7/1/2026  |          | Email attachment reviewed - Core and Main LP - Settlement Report - 07.01.26                            | Taylor McCarthy      | 0.10     | \$225.00 | True      | No         | -      | \$22.50  |
| 6/16/2026 |          | 1 email sent/reviewed regarding Towns v. Core and Main (CA3146) - Report                               | Taylor McCarthy      | 0.10     | \$225.00 | True      | No         | -      | \$22.50  |
| 5/11/2026 |          | 1 email sent/reviewed regarding Towns v. Core and Main (CA3146) - Settlement Administration Bid Needed | Taylor McCarthy      | 0.10     | \$225.00 | True      | No         | -      | \$22.50  |
| 5/8/2026  |          | 1 email sent/reviewed regarding Towns v. Core and Main (CA3146) - Settlement Administration Bid Needed | Taylor McCarthy      | 0.10     | \$225.00 | True      | No         | -      | \$22.50  |
| 4/24/2026 |          | MOU - Signed by CNM_Quirino reviewed                                                                   | Rebecca Harteker     | 0.10     | \$450.00 | True      | No         | -      | \$45.00  |
| 4/16/2026 |          | 3_6_26 - STARR Decl - Quirino reviewed                                                                 | Collette Navasartian | 0.10     | \$225.00 | True      | No         | -      | \$22.50  |
| 4/16/2026 |          | Request for Dismissal created                                                                          | Collette Navasartian | 0.10     | \$225.00 | True      | No         | -      | \$22.50  |
| 4/14/2026 |          | 4 emails sent/reviewed regarding Steven Quirino v. Core & Main, LP                                     | Collette Navasartian | 0.30     | \$225.00 | True      | No         | -      | \$67.50  |
| 4/14/2026 |          | Decl Manny Starr ISO MFPA reviewed                                                                     | Collette Navasartian | 0.10     | \$225.00 | True      | No         | -      | \$22.50  |
| 4/14/2026 |          | 1 email sent/reviewed regarding Towns v. Core & Main - CA3146 - draft Motion for Preliminary Approval  | Taylor McCarthy      | 0.10     | \$225.00 | True      | No         | -      | \$22.50  |
| 4/14/2026 |          | Matter admin                                                                                           | Gabriela Dominguez   | 0.10     | \$225.00 | True      | No         | -      | \$22.50  |
| 4/14/2026 |          | Memo edited and reviewed - Service List - some emails missing                                          | Gabriela Dominguez   | 0.10     | \$225.00 | True      | No         | -      | \$22.50  |
| 4/14/2026 |          | S. Quirino - CMS and POES created, then edited                                                         | Gabriela Dominguez   | 0.10     | \$225.00 | True      | No         | -      | \$22.50  |
| 4/14/2026 |          | Case Management Statement edited and reviewed                                                          | Gabriela Dominguez   | 0.10     | \$225.00 | True      | No         | -      | \$22.50  |
| 4/14/2026 |          | 5 emails sent/reviewed regarding Steven Quirino v. Core & Main, LP                                     | Gabriela Dominguez   | 0.10     | \$225.00 | True      | No         | -      | \$22.50  |
| 4/14/2026 |          | Proof of Electronic Service pos050 edited and reviewed                                                 | Gabriela Dominguez   | 0.10     | \$225.00 | True      | No         | -      | \$22.50  |
| 4/6/2026  |          | Matter admin                                                                                           | Cynthia Rodriguez    | 0.10     | \$225.00 | True      | No         | -      | \$22.50  |
| 4/6/2026  |          | Memo created - HRNG - MX for Preliminary Approval                                                      | Cynthia Rodriguez    | 0.10     | \$225.00 | True      | No         | -      | \$22.50  |
| 4/3/2026  |          | HRNG - TOWNS vs CORE & MAIN LP (37 -2024-00006393-CU-OE-CTL & Department: C-63) attended               | Daniel Ginzburg      | 0.50     | \$650.00 | True      | No         | -      | \$325.00 |
| 4/2/2026  |          | 1 email sent/reviewed regarding Towns v. Core & Main (CA3146)                                          | Cynthia Rodriguez    | 0.10     | \$225.00 | True      | No         | -      | \$22.50  |
| 4/1/2026  |          | 2026-3-4-Towns -- Settlement Agreement - FINAL - All Plaintiffs Signed reviewed                        | Taylor McCarthy      | 0.10     | \$225.00 | True      | No         | -      | \$22.50  |
| 4/1/2026  |          | 1 email sent/reviewed regarding Towns v. Core & Main                                                   | Taylor McCarthy      | 0.10     | \$225.00 | True      | No         | -      | \$22.50  |
| 4/1/2026  |          | 2 emails sent/reviewed regarding Towns v. Core & Main                                                  | Cynthia Rodriguez    | 0.50     | \$225.00 | True      | No         | -      | \$112.50 |
| 3/31/2026 |          | 1 email sent/reviewed regarding Towns v. Core & Main                                                   | Cynthia Rodriguez    | 0.10     | \$225.00 | True      | No         | -      | \$22.50  |
| 3/25/2026 |          | 2 emails sent/reviewed regarding Towns v. Core & Main                                                  | Taylor McCarthy      | 0.20     | \$225.00 | True      | No         | -      | \$45.00  |
| 3/19/2026 |          | 1 email sent/reviewed regarding Towns v. Core & Main - CA3146 - draft Motion for Preliminary Approval  | Taylor McCarthy      | 0.10     | \$225.00 | True      | No         | -      | \$22.50  |
| 3/9/2026  |          | 1 email sent/reviewed regarding Towns v. Core & Main - CA3146 - Exhibits                               | Taylor McCarthy      | 0.30     | \$225.00 | True      | No         | -      | \$67.50  |
| 3/9/2026  |          | Memo reviewed - HRNG - CMC                                                                             | Taylor McCarthy      | 0.10     | \$225.00 | True      | No         | -      | \$22.50  |
| 3/6/2026  |          | Email attachment reviewed - Decl Manny Starr ISO MFPA                                                  | Taylor McCarthy      | 0.10     | \$225.00 | True      | No         | -      | \$22.50  |
| 3/6/2026  |          | Decl Manny Starr ISO MFPA edited                                                                       | Taylor McCarthy      | 0.20     | \$225.00 | True      | No         | -      | \$45.00  |
| 3/6/2026  |          | 3_6_26 - STARR Decl - Quirino created                                                                  | Taylor McCarthy      | 0.10     | \$225.00 | True      | No         | -      | \$22.50  |

|            |  |                                                                                                                                               |                    |      |          |      |    |   |          |
|------------|--|-----------------------------------------------------------------------------------------------------------------------------------------------|--------------------|------|----------|------|----|---|----------|
| 3/6/2026   |  | 3 emails sent/reviewed regarding Towns v. Core & Main - CA3146 - draft Motion for Preliminary Approval                                        | Taylor McCarthy    | 0.20 | \$225.00 | True | No | - | \$45.00  |
| 3/5/2026   |  | Memo reviewed - Mediation notes                                                                                                               | Manny Starr        | 0.10 | \$750.00 | True | No | - | \$75.00  |
| 3/5/2026   |  | MOU - Signed by CNM_Quirino reviewed                                                                                                          | Taylor McCarthy    | 0.10 | \$225.00 | True | No | - | \$22.50  |
| 3/5/2026   |  | 6 emails sent/reviewed regarding Towns v. Core & Main - CA3146 - draft Motion for Preliminary Approval                                        | Taylor McCarthy    | 0.30 | \$225.00 | True | No | - | \$67.50  |
| 3/5/2026   |  | Decl Manny Starr ISO MFPA edited                                                                                                              | Taylor McCarthy    | 0.10 | \$225.00 | True | No | - | \$22.50  |
| 3/5/2026   |  | Memo reviewed - HRNG - CMC                                                                                                                    | Taylor McCarthy    | 0.10 | \$225.00 | True | No | - | \$22.50  |
| 3/5/2026   |  | Decl Steven Quirino ISO MFPA edited and reviewed                                                                                              | Taylor McCarthy    | 0.10 | \$225.00 | True | No | - | \$22.50  |
| 3/5/2026   |  | 6 messages sent/reviewed                                                                                                                      | Taylor McCarthy    | 0.10 | \$225.00 | True | No | - | \$22.50  |
| 3/4/2026   |  | Email attachment reviewed - 2026-3-4-Towns -- Settlement Agreement - FINAL and Unsigned                                                       | Taylor McCarthy    | 0.10 | \$225.00 | True | No | - | \$22.50  |
| 3/4/2026   |  | 15 emails sent/reviewed regarding Towns v. Core & Main - CA3146 - draft Motion for Preliminary Approval                                       | Taylor McCarthy    | 0.80 | \$225.00 | True | No | - | \$180.00 |
| 3/4/2026   |  | Decl Steven Quirino ISO MFPA created, then edited                                                                                             | Taylor McCarthy    | 0.30 | \$225.00 | True | No | - | \$67.50  |
| 3/4/2026   |  | 6 emails sent/reviewed regarding Towns v. Core & Main - CA3146 -                                                                              | Taylor McCarthy    | 0.50 | \$225.00 | True | No | - | \$112.50 |
| 3/4/2026   |  | Email attachment reviewed - pleading form                                                                                                     | Taylor McCarthy    | 0.10 | \$225.00 | True | No | - | \$22.50  |
| 3/4/2026   |  | Complaint - 2024-08-14T125302.922 reviewed                                                                                                    | Taylor McCarthy    | 0.10 | \$225.00 | True | No | - | \$22.50  |
| 3/4/2026   |  | Decl Manny Starr ISO MFPA created, then edited and reviewed                                                                                   | Taylor McCarthy    | 0.90 | \$225.00 | True | No | - | \$202.50 |
| 3/2/2026   |  | 1 email sent/reviewed regarding Towns v. Core & Main - CA3146 - draft Exhibits                                                                | Taylor McCarthy    | 0.10 | \$225.00 | True | No | - | \$22.50  |
| 2/27/2026  |  | 1 email sent/reviewed regarding Towns v. Core & Main - CA3146 -                                                                               | Taylor McCarthy    | 0.10 | \$225.00 | True | No | - | \$22.50  |
| 2/26/2026  |  | 1 email sent/reviewed regarding Transaction Notification for order #27328906 (Steven Quirino) : Customer 0106752                              | Kaylie Urango      | 0.10 | \$225.00 | True | No | - | \$22.50  |
| 2/9/2026   |  | 1 email sent/reviewed regarding Towns v. Core & Main - CA3146 -                                                                               | Taylor McCarthy    | 0.10 | \$225.00 | True | No | - | \$22.50  |
| 2/6/2026   |  | Notice of Change of Address or Other Contract Information reviewed                                                                            | Kaylie Urango      | 0.10 | \$225.00 | True | No | - | \$22.50  |
| 2/6/2026   |  | Memo reviewed - HRNG - CMC                                                                                                                    | Kaylie Urango      | 0.10 | \$225.00 | True | No | - | \$22.50  |
| 2/3/2026   |  | 1 email sent/reviewed regarding Towns v. Core & Main - CA3146 -                                                                               | Taylor McCarthy    | 0.10 | \$225.00 | True | No | - | \$22.50  |
| 1/30/2026  |  | 1 email sent/reviewed regarding Towns v. Core & Main - CA3146 -                                                                               | Taylor McCarthy    | 0.10 | \$225.00 | True | No | - | \$22.50  |
| 1/29/2026  |  | Notice of Change of Address or Other Contract Information reviewed                                                                            | Kaylie Urango      | 0.10 | \$225.00 | True | No | - | \$22.50  |
| 1/28/2026  |  | Notice of Change of Address or Other Contract Information created, then reviewed                                                              | Gabriela Dominguez | 0.10 | \$225.00 | True | No | - | \$22.50  |
| 1/9/2026   |  | 1 email sent/reviewed regarding Towns v. Core & Main - CA3146 -                                                                               | Taylor McCarthy    | 0.10 | \$225.00 | True | No | - | \$22.50  |
| 1/9/2026   |  | 2 emails sent/reviewed regarding Towns v. Core & Main - CA3146 - Draft Settlement Agreement                                                   | Taylor McCarthy    | 0.20 | \$225.00 | True | No | - | \$45.00  |
| 12/16/2025 |  | 1 email sent/reviewed regarding Towns v. Core & Main - CA3146 - Draft Settlement Agreement                                                    | Taylor McCarthy    | 0.10 | \$225.00 | True | No | - | \$22.50  |
| 12/15/2025 |  | 2 emails sent/reviewed regarding Towns v. Core & Main - CA3146 -                                                                              | Taylor McCarthy    | 0.10 | \$225.00 | True | No | - | \$22.50  |
| 12/11/2025 |  | 1 email sent/reviewed regarding Towns v. Core & Main - CA3146 -                                                                               | Taylor McCarthy    | 0.10 | \$75.00  | True | No | - | \$7.50   |
| 12/5/2025  |  | 1 email sent/reviewed regarding Towns v. Core & Main - CA3146 - Draft Settlement Agreement                                                    | Taylor McCarthy    | 0.10 | \$75.00  | True | No | - | \$7.50   |
| 11/25/2025 |  | 2 emails sent/reviewed regarding Towns v. Core & Main - CA3146 -                                                                              | Taylor McCarthy    | 0.10 | \$75.00  | True | No | - | \$7.50   |
| 11/21/2025 |  | 1 email sent/reviewed regarding Riverside County Superior Court - Minute Order: on CVRI2403855                                                | Cynthia Rodriguez  | 0.10 | \$225.00 | True | No | - | \$22.50  |
| 11/12/2025 |  | 3 messages sent/reviewed                                                                                                                      | Taylor McCarthy    | 0.30 | \$75.00  | True | No | - | \$22.50  |
| 11/12/2025 |  | MOU - Signed by CNM_Quirino created                                                                                                           | Taylor McCarthy    | 0.10 | \$75.00  | True | No | - | \$7.50   |
| 11/12/2025 |  | 1 email sent/reviewed regarding Towns v. Core & Main - Please Confirm This MOU Can w/ Signature Blocks for Clients Go Out for Sigs - CA3146 - | Taylor McCarthy    | 0.10 | \$75.00  | True | No | - | \$7.50   |
| 11/5/2025  |  | Matter admin                                                                                                                                  | Cynthia Rodriguez  | 0.10 | \$225.00 | True | No | - | \$22.50  |

|            |  |                                                                                                 |                      |       |          |      |    |   |            |
|------------|--|-------------------------------------------------------------------------------------------------|----------------------|-------|----------|------|----|---|------------|
| 11/4/2025  |  | Memo created - HRNG - CMC                                                                       | Cynthia Rodriguez    | 0.10  | \$225.00 | True | No | - | \$22.50    |
| 11/4/2025  |  | Matter admin                                                                                    | Cynthia Rodriguez    | 0.10  | \$225.00 | True | No | - | \$22.50    |
| 11/3/2025  |  | 10-24-25 Joint NTC of PAGA Action Settlement created                                            | Cynthia Rodriguez    | 0.10  | \$225.00 | True | No | - | \$22.50    |
| 10/31/2025 |  | Status Hearing re Case Stay attended                                                            | Daniel Ginzburg      | 0.50  | \$650.00 | True | No | - | \$325.00   |
| 10/27/2025 |  | 1 email sent/reviewed regarding Steven Quirino v. Core & Main, LP                               | Collette Navasartian | 0.10  | \$225.00 | True | No | - | \$22.50    |
| 10/24/2025 |  | 2 emails sent/reviewed regarding Steven Quirino v. Core & Main, LP                              | Collette Navasartian | 0.10  | \$225.00 | True | No | - | \$22.50    |
| 10/24/2025 |  | 2024-02-13 (PAGA) Plaintiff's Complaint - Towns reviewed                                        | Taylor McCarthy      | 0.10  | \$75.00  | True | No | - | \$7.50     |
| 10/24/2025 |  | Memo created, then edited - Service List - some emails missing                                  | Gabriela Dominguez   | 0.10  | \$225.00 | True | No | - | \$22.50    |
| 10/24/2025 |  | Joint Status Report created, then edited                                                        | Gabriela Dominguez   | 1.10  | \$225.00 | True | No | - | \$247.50   |
| 10/24/2025 |  | Notice of Department Assignment (10) reviewed                                                   | Gabriela Dominguez   | 0.10  | \$225.00 | True | No | - | \$22.50    |
| 10/24/2025 |  | 2024-09-18 Defendant's Answer to Plaintiff's PAGA Complaint reviewed                            | Gabriela Dominguez   | 0.10  | \$225.00 | True | No | - | \$22.50    |
| 10/23/2025 |  | 3 emails sent/reviewed regarding Steven Quirino v. Core & Main, LP                              | Collette Navasartian | 0.10  | \$225.00 | True | No | - | \$22.50    |
| 10/23/2025 |  | 1-30-25 Joint Stipulation to Stay Proceedings reviewed                                          | Collette Navasartian | 0.10  | \$225.00 | True | No | - | \$22.50    |
| 10/23/2025 |  | 5 emails sent/reviewed regarding Steven Quirino v. Core & Main, LP                              | Cynthia Rodriguez    | 0.10  | \$225.00 | True | No | - | \$22.50    |
| 10/10/2025 |  | 1 email sent/reviewed regarding Invoice - Statement BCG10945-2 from Berger Consulting Group     | Taylor McCarthy      | 0.10  | \$75.00  | True | No | - | \$7.50     |
| 9/26/2025  |  | reviewing responses to informal discovery                                                       | Daniel Ginzburg      | 6.00  | \$650.00 | True | No | - | \$3,900.00 |
| 9/26/2025  |  | preparation for mediation                                                                       | Daniel Ginzburg      | 10.00 | \$650.00 | True | No | - | \$6,500.00 |
| 9/26/2025  |  | mediation                                                                                       | Daniel Ginzburg      | 8.00  | \$650.00 | True | No | - | \$5,200.00 |
| 9/25/2025  |  | Memo reviewed - Mediation notes                                                                 | Manny Starr          | 0.60  | \$750.00 | True | No | - | \$450.00   |
| 9/23/2025  |  | Phone Call To: Steven Quirino                                                                   | Daniel Ginzburg      | 0.10  | \$650.00 | True | No | - | \$65.00    |
| 9/22/2025  |  | MEDIATION attended                                                                              | Daniel Ginzburg      | 8.00  | \$650.00 | True | No | - | \$5,200.00 |
| 9/22/2025  |  | 2025-9-15-mediation brief - final created                                                       | Daniel Ginzburg      | 0.10  | \$650.00 | True | No | - | \$65.00    |
| 9/22/2025  |  | Prep for and attend mediation                                                                   | Manny Starr          | 11.00 | \$750.00 | True | No | - | \$8,250.00 |
| 9/22/2025  |  | Memo reviewed - Email from Emily Mertes                                                         | Manny Starr          | 0.20  | \$750.00 | True | No | - | \$150.00   |
| 9/22/2025  |  | Memo created - Mediation notes                                                                  | Manny Starr          | 0.10  | \$750.00 | True | No | - | \$75.00    |
| 9/19/2025  |  | Review mediation brief                                                                          | Manny Starr          | 1.70  | \$750.00 | True | No | - | \$1,275.00 |
| 9/19/2025  |  | 90283668_09_11_2025_Notice_of_Case_Reassignment__Department_2__created                          | Cynthia Rodriguez    | 0.10  | \$225.00 | True | No | - | \$22.50    |
| 9/15/2025  |  | Quirino - Stip for Protective Order created                                                     | Cynthia Rodriguez    | 0.10  | \$225.00 | True | No | - | \$22.50    |
| 9/9/2025   |  | 5 emails sent/reviewed regarding Towns v. Core & Main                                           | Kaylie Urango        | 0.30  | \$75.00  | True | No | - | \$22.50    |
| 9/9/2025   |  | Memo created, then reviewed - Email from Emily Mertes                                           | Kaylie Urango        | 0.10  | \$75.00  | True | No | - | \$7.50     |
| 7/24/2025  |  | 2 emails sent/reviewed regarding Steven Quirino v. Core & Main, LP                              | Gabriela Dominguez   | 0.20  | \$225.00 | True | No | - | \$45.00    |
| 6/25/2025  |  | 1 email sent/reviewed regarding Steven Quirino v. Core & Main, LP                               | Gabriela Dominguez   | 0.10  | \$225.00 | True | No | - | \$22.50    |
| 6/25/2025  |  | 1 message sent/reviewed                                                                         | Gabriela Dominguez   | 0.10  | \$225.00 | True | No | - | \$22.50    |
| 6/24/2025  |  | 1 email sent/reviewed regarding Steven Quirino v. Core & Main, LP                               | Gabriela Dominguez   | 0.20  | \$225.00 | True | No | - | \$45.00    |
| 5/30/2025  |  | Matter admin                                                                                    | Gabriela Dominguez   | 0.10  | \$225.00 | True | No | - | \$22.50    |
| 5/19/2025  |  | Wage and Hour Complaint reviewed                                                                | Daniel Ginzburg      | 0.20  | \$650.00 | True | No | - | \$130.00   |
| 5/13/2025  |  | Phone Call To: Steven Quirino                                                                   | Daniel Ginzburg      | 0.10  | \$650.00 | True | No | - | \$65.00    |
| 5/6/2025   |  | 2 emails sent/reviewed regarding Steven Quirino v. Core & Main, LP - Rescheduled Mediation Date | Cynthia Rodriguez    | 0.10  | \$225.00 | True | No | - | \$22.50    |
| 4/23/2025  |  | 1 email sent/reviewed regarding Steven Quirino v. Core & Main, LP                               | Manny Starr          | 0.10  | \$750.00 | True | No | - | \$75.00    |
| 4/21/2025  |  | 1 email sent/reviewed regarding Steven Quirino v. Core & Main, LP - Rescheduled Mediation Date  | Cynthia Rodriguez    | 0.10  | \$225.00 | True | No | - | \$22.50    |
| 3/18/2025  |  | 1 email sent/reviewed regarding Steven Quirino v. Core & Main, LP-CA3146                        | Manny Starr          | 0.10  | \$750.00 | True | No | - | \$75.00    |

|            |  |                                                                                                         |                      |      |          |      |    |   |          |
|------------|--|---------------------------------------------------------------------------------------------------------|----------------------|------|----------|------|----|---|----------|
| 3/12/2025  |  | 2 emails sent/reviewed regarding Steven Quirino v. Core & Main, LP-CA3146                               | Manny Starr          | 0.10 | \$750.00 | True | No | - | \$75.00  |
| 2/10/2025  |  | 1 email sent/reviewed regarding Steven Quirino v. Core & Main, LP                                       | Cynthia Rodriguez    | 0.10 | \$225.00 | True | No | - | \$22.50  |
| 2/6/2025   |  | Steven Q - Defs CMS reviewed                                                                            | Cynthia Rodriguez    | 0.10 | \$225.00 | True | No | - | \$22.50  |
| 2/3/2025   |  | 1 email sent/reviewed regarding Steven Quirino v. Core & Main, LP                                       | Taylor McCarthy      | 0.10 | \$75.00  | True | No | - | \$7.50   |
| 2/3/2025   |  | CMS Steven Quirino created                                                                              | Taylor McCarthy      | 0.10 | \$75.00  | True | No | - | \$7.50   |
| 2/3/2025   |  | Proof of Electronic Service pos050 edited and reviewed                                                  | Taylor McCarthy      | 0.10 | \$75.00  | True | No | - | \$7.50   |
| 2/3/2025   |  | Case Management Statement edited and reviewed                                                           | Taylor McCarthy      | 0.40 | \$75.00  | True | No | - | \$30.00  |
| 1/29/2025  |  | 4 emails sent/reviewed regarding Steven Quirino v. Core & Main, LP                                      | Manny Starr          | 0.10 | \$750.00 | True | No | - | \$75.00  |
| 1/29/2025  |  | 3 emails sent/reviewed regarding Steven Quirino v. Core & Main, LP                                      | Collette Navasartian | 0.30 | \$225.00 | True | No | - | \$67.50  |
| 1/29/2025  |  | 5 emails sent/reviewed regarding Steven Quirino v. Core & Main, LP                                      | Cynthia Rodriguez    | 0.20 | \$225.00 | True | No | - | \$45.00  |
| 1/29/2025  |  | 1 email sent/reviewed regarding Quirino v. Core & Main, LP, et al.: Defendant's Motion to Stay          | Cynthia Rodriguez    | 0.10 | \$225.00 | True | No | - | \$22.50  |
| 1/29/2025  |  | 1 email sent/reviewed regarding Steven Quirino v. Core & Main, LP - Service                             | Cynthia Rodriguez    | 0.10 | \$225.00 | True | No | - | \$22.50  |
| 1/21/2025  |  | 1 email sent/reviewed regarding Quirino v. Core & Main, LP, et al.: Defendant's Motion to Stay          | Cynthia Rodriguez    | 0.10 | \$225.00 | True | No | - | \$22.50  |
| 1/15/2025  |  | CMC (DEPT 3) attended                                                                                   | Daniel Ginzburg      | 0.50 | \$650.00 | True | No | - | \$325.00 |
| 1/15/2025  |  | 1-15-25 MO re CMC created                                                                               | Cynthia Rodriguez    | 0.10 | \$225.00 | True | No | - | \$22.50  |
| 1/15/2025  |  | 2 emails sent/reviewed regarding Quirino v. Core & Main, LP, et al.: Defendant's Motion to Stay         | Cynthia Rodriguez    | 0.10 | \$225.00 | True | No | - | \$22.50  |
| 1/15/2025  |  | Memo created, then reviewed - HRNG - CMC                                                                | Cynthia Rodriguez    | 0.20 | \$225.00 | True | No | - | \$45.00  |
| 1/15/2025  |  | Matter admin                                                                                            | Cynthia Rodriguez    | 0.10 | \$225.00 | True | No | - | \$22.50  |
| 1/9/2025   |  | 1 email sent/reviewed regarding Quirino v. Core & Main, LP, et al.: Defendant's Motion to Stay          | Cynthia Rodriguez    | 0.10 | \$225.00 | True | No | - | \$22.50  |
| 12/30/2024 |  | 1 email sent/reviewed regarding Steven Quirino v. Core & Main, LP                                       | Taylor McCarthy      | 0.10 | \$75.00  | True | No | - | \$7.50   |
| 12/30/2024 |  | 1 email sent/reviewed regarding Transaction Notification for order #24401098 : Customer 0106752         | Taylor McCarthy      | 0.10 | \$75.00  | True | No | - | \$7.50   |
| 12/28/2024 |  | Memo edited - there is a related cases filed on 2/13/24 we have to see if it overlaps entirely.         | Daniel Ginzburg      | 0.10 | \$650.00 | True | No | - | \$65.00  |
| 12/27/2024 |  | PLT CMS - Steven Quirino created                                                                        | Taylor McCarthy      | 0.10 | \$75.00  | True | No | - | \$7.50   |
| 12/27/2024 |  | Proof of Electronic Service pos050 created                                                              | Taylor McCarthy      | 0.10 | \$75.00  | True | No | - | \$7.50   |
| 12/27/2024 |  | Case Management Statement edited and reviewed                                                           | Taylor McCarthy      | 0.10 | \$75.00  | True | No | - | \$7.50   |
| 12/27/2024 |  | 2024.12.20 CORE AND MAIN_ Quirino - Mittal Decl. in support of motion to stay 4935-0443-1113 1 reviewed | Taylor McCarthy      | 0.10 | \$75.00  | True | No | - | \$7.50   |
| 12/27/2024 |  | 1 email sent/reviewed regarding Steven Quirino v. Core & Main, LP                                       | Taylor McCarthy      | 0.10 | \$75.00  | True | No | - | \$7.50   |
| 12/26/2024 |  | 4 internal messages sent/reviewed                                                                       | Daniel Ginzburg      | 0.40 | \$650.00 | True | No | - | \$260.00 |
| 12/26/2024 |  | Case Management Statement created                                                                       | Taylor McCarthy      | 0.20 | \$75.00  | True | No | - | \$15.00  |
| 12/26/2024 |  | Complaint - 2024-08-14T125302.922 reviewed                                                              | Taylor McCarthy      | 0.10 | \$75.00  | True | No | - | \$7.50   |
| 12/26/2024 |  | Notice of Case Management Conference Complaint for Other Employment (Over \$35,000) (2) reviewed        | Taylor McCarthy      | 0.10 | \$75.00  | True | No | - | \$7.50   |
| 12/26/2024 |  | 1 email sent/reviewed regarding Steven Quirino v. Core & Main, LP - Incoming Mail                       | Cynthia Rodriguez    | 0.10 | \$225.00 | True | No | - | \$22.50  |
| 12/26/2024 |  | 2 emails sent/reviewed regarding Quirino v. Core & Main, LP, et al.: Defendant's Motion to Stay         | Cynthia Rodriguez    | 0.10 | \$225.00 | True | No | - | \$22.50  |
| 12/26/2024 |  | 2 emails sent/reviewed regarding Steven Quirino v. Core & Main, LP                                      | Cynthia Rodriguez    | 0.10 | \$225.00 | True | No | - | \$22.50  |
| 12/24/2024 |  | 1 internal message sent/reviewed                                                                        | Manny Starr          | 0.10 | \$750.00 | True | No | - | \$75.00  |
| 12/24/2024 |  | 5 internal messages sent/reviewed                                                                       | Taylor McCarthy      | 0.20 | \$75.00  | True | No | - | \$15.00  |
| 12/20/2024 |  | Core & Main - JPA reviewed                                                                              | Adam Rose            | 0.10 | \$850.00 | True | No | - | \$85.00  |
| 12/20/2024 |  | 1 email sent/reviewed regarding Steven Quirino v. Core & Main, LP                                       | Manny Starr          | 0.10 | \$750.00 | True | No | - | \$75.00  |
| 12/20/2024 |  | 1 message sent/reviewed                                                                                 | Taylor McCarthy      | 0.10 | \$75.00  | True | No | - | \$7.50   |

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|------------|--|---------------------------------------------------------------------------------------------------------------------|-------------------|------|----------|------|----|---|----------|
| 12/20/2024 |  | 2024.12.20 CORE AND MAIN_Quirino - MPA in support of motion to stay 4919-9133-5945 1 created                        | Cynthia Rodriguez | 0.10 | \$225.00 | True | No | - | \$22.50  |
| 12/20/2024 |  | Email attachment reviewed - 2024.12.20 CORE AND MAIN_Quirino - Notice of motion and motion to stay 4918-6393-4217 1 | Cynthia Rodriguez | 0.10 | \$225.00 | True | No | - | \$22.50  |
| 12/20/2024 |  | 1 email sent/reviewed regarding Quirino v. Core & Main, LP, et al.: Defendant's Motion to Stay                      | Cynthia Rodriguez | 0.10 | \$225.00 | True | No | - | \$22.50  |
| 12/20/2024 |  | Matter admin                                                                                                        | Cynthia Rodriguez | 0.10 | \$225.00 | True | No | - | \$22.50  |
| 11/12/2024 |  | 2 emails sent/reviewed regarding Steven Quirino v. Core & Main, LP                                                  | Manny Starr       | 0.10 | \$750.00 | True | No | - | \$75.00  |
| 11/12/2024 |  | Matter admin                                                                                                        | Cynthia Rodriguez | 0.10 | \$225.00 | True | No | - | \$22.50  |
| 11/11/2024 |  | Matter admin                                                                                                        | Manny Starr       | 0.10 | \$750.00 | True | No | - | \$75.00  |
| 11/11/2024 |  | 5 emails sent/reviewed regarding Steven Quirino v. Core & Main, LP                                                  | Manny Starr       | 0.10 | \$750.00 | True | No | - | \$75.00  |
| 11/6/2024  |  | DECLARATION OF ROBERT SOSA edited                                                                                   | Taylor McCarthy   | 1.20 | \$75.00  | True | No | - | \$90.00  |
| 10/30/2024 |  | 2 emails sent/reviewed regarding Steven Quirino v. Core & Main, LP                                                  | Taylor McCarthy   | 0.10 | \$75.00  | True | No | - | \$7.50   |
| 10/29/2024 |  | 1 message sent/reviewed                                                                                             | Taylor McCarthy   | 0.10 | \$75.00  | True | No | - | \$7.50   |
| 10/28/2024 |  | 1 email sent/reviewed regarding Steven Quirino v. Core & Main, LP                                                   | Taylor McCarthy   | 0.10 | \$75.00  | True | No | - | \$7.50   |
| 10/28/2024 |  | 1 message sent/reviewed                                                                                             | Taylor McCarthy   | 0.10 | \$75.00  | True | No | - | \$7.50   |
| 10/28/2024 |  | 1 email sent/reviewed regarding Steven Quirino v. Core & Main, LP - Incoming Mail                                   | Cynthia Rodriguez | 0.10 | \$225.00 | True | No | - | \$22.50  |
| 10/25/2024 |  | 2 emails sent/reviewed regarding Steven Quirino v. Core & Main, LP                                                  | Manny Starr       | 0.10 | \$750.00 | True | No | - | \$75.00  |
| 10/25/2024 |  | 4 messages sent/reviewed                                                                                            | Taylor McCarthy   | 0.20 | \$75.00  | True | No | - | \$15.00  |
| 10/25/2024 |  | 5 emails sent/reviewed regarding Steven Quirino v. Core & Main, LP                                                  | Taylor McCarthy   | 0.20 | \$75.00  | True | No | - | \$15.00  |
| 10/14/2024 |  | 2 emails sent/reviewed regarding Steven Quirino v. Core & Main, LP                                                  | Manny Starr       | 0.10 | \$750.00 | True | No | - | \$75.00  |
| 10/10/2024 |  | 4 emails sent/reviewed regarding Steven Quirino v. Core & Main, LP                                                  | Taylor McCarthy   | 0.20 | \$75.00  | True | No | - | \$15.00  |
| 10/4/2024  |  | 1 email sent/reviewed regarding Steven Quirino v. Core & Main, LP                                                   | Manny Starr       | 0.10 | \$800.00 | True | No | - | \$80.00  |
| 10/3/2024  |  | 3 emails sent/reviewed regarding Steven Quirino v. Core & Main, LP                                                  | Taylor McCarthy   | 0.10 | \$75.00  | True | No | - | \$7.50   |
| 10/2/2024  |  | Special Rogs - Individual edited and reviewed                                                                       | Taylor McCarthy   | 0.40 | \$75.00  | True | No | - | \$30.00  |
| 10/1/2024  |  | 1 email sent/reviewed regarding Steven Quirino v. Core & Main, LP                                                   | Manny Starr       | 0.10 | \$800.00 | True | No | - | \$80.00  |
| 9/30/2024  |  | 1 email sent/reviewed regarding Steven Quirino v. Core & Main, LP                                                   | Manny Starr       | 0.10 | \$800.00 | True | No | - | \$80.00  |
| 9/30/2024  |  | 2 emails sent/reviewed regarding Steven Quirino v. Core & Main, LP                                                  | Taylor McCarthy   | 0.20 | \$75.00  | True | No | - | \$15.00  |
| 9/30/2024  |  | 2 emails sent/reviewed regarding Steven Quirino v. Core & Main, LP                                                  | Cynthia Rodriguez | 0.20 | \$225.00 | True | No | - | \$45.00  |
| 9/30/2024  |  | Memo created, then reviewed - eService List                                                                         | Cynthia Rodriguez | 0.10 | \$225.00 | True | No | - | \$22.50  |
| 9/27/2024  |  | 2 emails sent/reviewed regarding Steven Quirino v. Core & Main, LP                                                  | Manny Starr       | 0.10 | \$650.00 | True | No | - | \$65.00  |
| 9/26/2024  |  | 2 emails sent/reviewed regarding Steven Quirino v. Core & Main, LP                                                  | Taylor McCarthy   | 0.10 | \$75.00  | True | No | - | \$7.50   |
| 9/26/2024  |  | DECLARATION OF JORGE COVARRUBIAS edited and reviewed                                                                | Taylor McCarthy   | 0.10 | \$75.00  | True | No | - | \$7.50   |
| 9/26/2024  |  | DECLARATION OF ROBERT SOSA edited and reviewed                                                                      | Taylor McCarthy   | 0.20 | \$75.00  | True | No | - | \$15.00  |
| 9/26/2024  |  | Matter admin                                                                                                        | Cynthia Rodriguez | 0.10 | \$225.00 | True | No | - | \$22.50  |
| 9/25/2024  |  | DECLARATION OF ROBERT SOSA edited                                                                                   | Taylor McCarthy   | 0.10 | \$75.00  | True | No | - | \$7.50   |
| 9/25/2024  |  | Form Rogs - General reviewed                                                                                        | Taylor McCarthy   | 0.10 | \$75.00  | True | No | - | \$7.50   |
| 9/25/2024  |  | DECLARATION OF JORGE COVARRUBIAS created, then edited                                                               | Taylor McCarthy   | 0.10 | \$75.00  | True | No | - | \$7.50   |
| 9/25/2024  |  | Form Rogs - Employment - No termination reviewed                                                                    | Taylor McCarthy   | 0.10 | \$75.00  | True | No | - | \$7.50   |
| 9/25/2024  |  | Special Rogs - Individual created, then edited and reviewed                                                         | Taylor McCarthy   | 2.70 | \$75.00  | True | No | - | \$202.50 |
| 9/25/2024  |  | 2024-09-18 Defendant's Answer to Plaintiff's PAGA Complaint reviewed                                                | Taylor McCarthy   | 0.70 | \$75.00  | True | No | - | \$52.50  |
| 9/25/2024  |  | Complaint - 2024-08-14T125302.922 reviewed                                                                          | Taylor McCarthy   | 0.10 | \$75.00  | True | No | - | \$7.50   |
| 9/25/2024  |  | 1 email sent/reviewed regarding Steven Quirino v. Core & Main, LP                                                   | Taylor McCarthy   | 0.10 | \$75.00  | True | No | - | \$7.50   |
| 9/24/2024  |  | 2024-03-27 - Steven Quirino - Letter to Daniel Ginzburg with Document Production and Documents reviewed             | Taylor McCarthy   | 0.20 | \$75.00  | True | No | - | \$15.00  |

|                           |     |                                                                                                           |                      |      |          |      |    |   |          |
|---------------------------|-----|-----------------------------------------------------------------------------------------------------------|----------------------|------|----------|------|----|---|----------|
| 9/24/2024                 |     | Complaint - 2024-08-14T125302.922 reviewed                                                                | Taylor McCarthy      | 0.10 | \$75.00  | True | No | - | \$7.50   |
| 9/24/2024                 |     | RFPD - Individual created, then edited                                                                    | Taylor McCarthy      | 0.20 | \$75.00  | True | No | - | \$15.00  |
| 9/23/2024                 |     | 1 email sent/reviewed regarding Quirino v. Core & Main, LP, et al.: Defendant's Answer to PAGA Complaint  | Cynthia Rodriguez    | 0.20 | \$225.00 | True | No | - | \$45.00  |
| 9/20/2024                 |     | Form Rogs - General created                                                                               | Taylor McCarthy      | 0.10 | \$75.00  | True | No | - | \$7.50   |
| 9/20/2024                 |     | Form Rogs - Employment - No termination created                                                           | Taylor McCarthy      | 0.10 | \$75.00  | True | No | - | \$7.50   |
| 9/20/2024                 |     | Complaint - 2024-08-14T125302.922 reviewed                                                                | Taylor McCarthy      | 1.80 | \$75.00  | True | No | - | \$135.00 |
| 9/20/2024                 |     | 2024-09-18 Defendant's Answer to Plaintiff's PAGA Complaint created                                       | Cynthia Rodriguez    | 0.10 | \$225.00 | True | No | - | \$22.50  |
| 9/20/2024                 |     | 2024-09-18 Civil Case Cover Sheet created                                                                 | Cynthia Rodriguez    | 0.10 | \$225.00 | True | No | - | \$22.50  |
| 9/20/2024                 |     | 2 emails sent/reviewed regarding Quirino v. Core & Main, LP, et al.: Defendant's Answer to PAGA Complaint | Cynthia Rodriguez    | 0.10 | \$225.00 | True | No | - | \$22.50  |
| 9/20/2024                 |     | 1 email sent/reviewed regarding Quirino v. Core & Main, LP, et al.: Defendant's Answer to PAGA Complaint  | Dane Huntsman        | 0.10 | \$75.00  | True | No | - | \$7.50   |
| 9/20/2024                 |     | Matter admin                                                                                              | Dane Huntsman        | 0.10 | \$75.00  | True | No | - | \$7.50   |
| 9/12/2024                 |     | Memo created - there is a related cases filed on 2/13/24 we have to see if it overlaps entirely.          | Daniel Ginzburg      | 0.20 | \$425.00 | True | No | - | \$85.00  |
| 9/12/2024                 |     | 1 email sent/reviewed regarding Steven Quirino v. Core & Main, LP - Service                               | Dane Huntsman        | 0.10 | \$75.00  | True | No | - | \$7.50   |
| 9/11/2024                 |     | 1 email sent/reviewed regarding Steven Quirino v. Core & Main, LP - Service                               | Dane Huntsman        | 0.10 | \$75.00  | True | No | - | \$7.50   |
| 9/5/2024                  |     | 1 email sent/reviewed regarding Steven Quirino v. Core & Main, LP - Service                               | Dane Huntsman        | 0.10 | \$75.00  | True | No | - | \$7.50   |
| 8/29/2024                 |     | 1 email sent/reviewed regarding Steven Quirino v. Core & Main, LP - Service                               | Dane Huntsman        | 0.10 | \$75.00  | True | No | - | \$7.50   |
| 8/26/2024                 |     | 2 emails sent/reviewed regarding Steven Quirino v. Core & Main, LP - Service                              | Dane Huntsman        | 0.10 | \$75.00  | True | No | - | \$7.50   |
| 8/19/2024                 |     | 1 email sent/reviewed regarding Steven Quirino v. Core & Main, LP - Service                               | Dane Huntsman        | 0.10 | \$75.00  | True | No | - | \$7.50   |
| 8/16/2024                 |     | Matter admin                                                                                              | Cynthia Rodriguez    | 0.10 | \$225.00 | True | No | - | \$22.50  |
| 8/14/2024                 |     | Matter admin                                                                                              | Dane Huntsman        | 0.10 | \$75.00  | True | No | - | \$7.50   |
| 8/14/2024                 |     | 1 email sent/reviewed regarding Steven Quirino v. Core & Main, LP - Service                               | Dane Huntsman        | 0.10 | \$75.00  | True | No | - | \$7.50   |
| 8/9/2024                  |     | Phone Call From: Steven Quirino                                                                           | Daniel Ginzburg      | 0.10 | \$425.00 | True | No | - | \$42.50  |
| 8/9/2024                  |     | Civil Case Cover Sheet reviewed                                                                           | Dane Huntsman        | 0.10 | \$75.00  | True | No | - | \$7.50   |
| 7/31/2024                 |     | 1 internal message sent/reviewed                                                                          | Daniel Ginzburg      | 0.10 | \$425.00 | True | No | - | \$42.50  |
| 7/31/2024                 |     | 2 internal messages sent/reviewed                                                                         | Manny Starr          | 0.10 | \$650.00 | True | No | - | \$65.00  |
| 7/8/2024                  |     | Wage and Hour Complaint edited                                                                            | Collette Navasartian | 0.40 | \$225.00 | True | No | - | \$90.00  |
| 7/8/2024                  |     | Matter admin                                                                                              | Collette Navasartian | 0.10 | \$225.00 | True | No | - | \$22.50  |
| 7/8/2024                  |     | Summons created, then edited                                                                              | Collette Navasartian | 0.10 | \$225.00 | True | No | - | \$22.50  |
| 7/8/2024                  |     | Civil Case Cover Sheet created, then edited                                                               | Collette Navasartian | 0.10 | \$225.00 | True | No | - | \$22.50  |
| 5/29/2024                 |     | Damage Calculation reviewed                                                                               | Daniel Ginzburg      | 0.10 | \$425.00 | True | No | - | \$42.50  |
| 5/29/2024                 |     | Memo reviewed - Manny's Notes:                                                                            | Daniel Ginzburg      | 0.20 | \$425.00 | True | No | - | \$85.00  |
| 5/29/2024                 |     | Wage and Hour Complaint created, then reviewed                                                            | Daniel Ginzburg      | 0.40 | \$425.00 | True | No | - | \$170.00 |
| 5/29/2024                 |     | PAGA Letter Template reviewed                                                                             | Daniel Ginzburg      | 0.30 | \$425.00 | True | No | - | \$127.50 |
| 3/18/2024                 |     | Phone Call From: Steven Quirino                                                                           | Daniel Ginzburg      | 0.10 | \$425.00 | True | No | - | \$42.50  |
| 3/15/2024                 |     | Phone Call To: Steven Quirino                                                                             | Daniel Ginzburg      | 0.20 | \$425.00 | True | No | - | \$85.00  |
| 3/15/2024                 |     | Matter admin                                                                                              | Daniel Ginzburg      | 0.10 | \$425.00 | True | No | - | \$42.50  |
| 3/15/2024                 |     | PAGA Letter Template created, then reviewed                                                               | Daniel Ginzburg      | 0.20 | \$425.00 | True | No | - | \$85.00  |
| 3/15/2024                 |     | Analysis - Steven Quirino v. Core & Main, Lp edited and reviewed                                          | Daniel Ginzburg      | 0.30 | \$425.00 | True | No | - | \$127.50 |
| 2/27/2024                 | 001 | Initial case review and evaluation                                                                        | Manny Starr          | 0.00 | \$975.00 | True | No | - | \$975.00 |
| <b>Total - Write offs</b> |     |                                                                                                           |                      | 0.00 |          |      |    |   | \$0.00   |
| <b>Total - Unbillable</b> |     |                                                                                                           |                      | 0.00 |          |      |    |   | \$0.00   |

|                  |       |             |
|------------------|-------|-------------|
| Total - Billable | 84.00 | \$40,950.00 |
| Total            | 84.00 | \$40,950.00 |

## EXHIBIT B

Expenses

for Steven Quirino - Employment Claim - Core & Main, LP - Charge No.: LWDA-CM-1017425-24 Superior Court Case No.: CVRI2403855

Expense entries

| Date               | Activity | Description                         | Staff           | Quantity | Price    | Billable? | Write Off? | Status | Total    |
|--------------------|----------|-------------------------------------|-----------------|----------|----------|-----------|------------|--------|----------|
| 4/21/2026          |          | One Legal Credit Card Sale_08283821 | Kelly Pineda    | 1        | \$24.12  | True      | No         | -      | \$24.12  |
| 2/26/2026          |          | One Legal Credit Card Sale_08083810 | Kaylie Urango   | 1        | \$24.12  | True      | No         | -      | \$24.12  |
| 12/30/2024         |          | One Legal Credit Card Sale_06671626 | Taylor McCarthy | 1        | \$23.02  | True      | No         | -      | \$23.02  |
| 9/20/2024          |          | One Legal Credit Card Sale_06391118 | Dane Huntsman   | 1        | \$19.36  | True      | No         | -      | \$19.36  |
| 8/26/2024          |          | Service of process                  | Adam Rose       | 1        | \$68.00  | True      | No         | -      | \$68.00  |
| 8/7/2024           |          | One Legal Credit Card Sale_06214810 | Dane Huntsman   | 1        | \$482.58 | True      | No         | -      | \$482.58 |
| 3/19/2024          |          | ORD-000275633                       | Taylor McCarthy | 1        | \$75.00  | True      | No         | -      | \$75.00  |
| 3/19/2024          |          | PAGA MAIL FEE                       | Taylor McCarthy | 2        | \$8.93   | True      | No         | -      | \$17.86  |
| 2/28/2024          |          | RR MAIL FEE                         | Taylor McCarthy | 2        | \$8.69   | True      | No         | -      | \$17.38  |
| 2/27/2024          |          | Eve AI Services Fee                 | Taylor McCarthy | 1        | \$200.00 | True      | No         | -      | \$200.00 |
| Total - Write offs |          |                                     |                 |          |          |           |            |        | \$0.00   |
| Total - Unbillable |          |                                     |                 |          |          |           |            |        | \$0.00   |
| Total - Billable   |          |                                     |                 |          |          |           |            |        | \$951.44 |
| Total              |          |                                     |                 |          |          |           |            |        | \$951.44 |

## EXHIBIT C



Daniel Ginzburg | Attorney

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March 19, 2024

**Via Online Filing**

<http://www.dir.ca.gov/Private-Attorneys-General-Act/Private-Attorneys-General-Act.html>

**Via Certified Mail**

Core & Main, LP  
3155 Indian Avenue  
Perris, CA 92571

Core & Main, LP  
1830 Craig Park Ct  
St. Louis, MO 63146

Subject: *Steven Quirino v. Core & Main, LP*

Dear Representative:

This office represents Steven Quirino (“Plaintiff”) in connection with Labor Code violation claims related to their employment with Core & Main, LP (“Employer”). Employer can be contacted at:

Core & Main, LP  
3155 Indian Avenue  
Perris, CA 92571

Core & Main, LP  
1830 Craig Park Ct  
St. Louis, MO 63146

Plaintiff was subjected to at least one of the Labor Code violations alleged in this letter while employed by Employer. As such, Plaintiff intends to seek PAGA penalties on behalf of himself and all other non-exempt employees of Employer employed in California and who were subjected to any or all of the Labor Code violations referenced herein during the PAGA Period (“Aggrieved Employees”). The PAGA Period begins one year prior to the date of this letter and, because the violations alleged herein are ongoing, the PAGA Period extends beyond the date of this letter.

This letter is sent pursuant to the requirements of Labor Code section 2699.3. The Labor Code violations being alleged are as follows:

**Meal Break Violations**

Labor Code section 512 and the applicable Wage Order provides that an employer shall not employ an employee for a work period of more than five hours per day without providing the

employee with a meal period of not less than 30 minutes, or more than 10 hours per day without providing the employee with a second meal period of not less than 30 minutes. Meal periods must be uninterrupted, and the employee must be relieved of all duty.

Labor Code section 226.7 further provides that an employee is entitled to one hour of pay at their regular rate of pay for each day that a compliant meal period was not provided.

The Aggrieved Employees' meal breaks were regularly missed, late or short because of understaffing.

### **Civil Penalties Applicable to Meal Break Violations**

As a result of the above meal break violations, Employer is subject to the civil penalties listed in Labor Code sections 558 and 2699.

### **Derivative Wage Statement Penalties**

Labor Code section 226 requires an employer to provide wage statements to its employees which include, among other things, gross and net wages earned. As a result of Employers failure to pay all premium pay for missed meal breaks as set forth above, Employer failed to provide the Aggrieved Employees with wage statements which accurately listed all wages earned. Employer is therefore subject to the civil penalties listed in Labor Code sections 226.3 and 2699.

### **Derivative Waiting Time Penalties**

Labor Code sections 201 and 202 require that an employer provide an employee with all wages due and payable either: (a) immediately upon termination, or (b) within 3 days of the employee's resignation. When an employer fails to comply with the above, the employee is entitled to the equivalent of a day's wage at their regular rate of pay for each day the employer is late, for up to 30 days. (Labor Code section 203).

Because Employer did not pay the Aggrieved Employees all premium pay owed during their employment, it follows that the Aggrieved Employees were also never paid these wages after the conclusion of their employment. Thus, Employer had an obligation to pay waiting time penalties, but intentionally failed to do so, and is therefore subject to the civil penalties listed in Labor Code section 2699.

### **Rest Break Violations**

Labor Code section 226.7 and the applicable Wage Order requires employers to authorize and permit its employees to take rest periods based on the total hours worked daily at the rate of 10 minutes net per four hours or major fraction thereof. Employees must be relieved of all duties during their rest breaks.

Labor Code section 226.7 further provides that an employee is entitled to one hour of pay at their regular rate of pay for each day that a compliant rest break was not provided.

The Aggrieved Employees' rest breaks were regularly missed because employees were not allowed to take it until January 8, 2024.

The Aggrieved Employees were required to remain on call and generally on duty during their rest breaks. Courts have repeatedly held that employers may not impose any limits on rest breaks. (*Augustus v. ABM Sec. Servs., Inc.*, 2 Cal. 5th 257, 269 (2016) (an employer cannot "satisfy its obligation to relieve employees from duties and employer control during rest periods when the employer [] requires its employees to remain on call")). Thus, Employer violated the Labor Code by requiring the Aggrieved Employees to remain on call and on duty during their rest breaks.

An employer generally may not place restrictions on its employees during their rest breaks, such as requiring its employees to remain on the premises and subject to the employer's control. In fact, the California Division of Labor Standards and Enforcement has provided the following guidance on its website:

Q. Can my employer require that I stay on the work premises during my rest period?

A. No, your employer cannot impose any restraints not inherent in the rest period requirement itself. In *Augustus v. ABM Security Services, Inc.*, (2016) 5 Cal.5th 257, 269, the California Supreme Court held that the rest period requirement "obligates employers to permit-and authorizes employees to take-off-duty rest periods. That is, during rest periods employers must relieve employees of all duties and relinquish control over how employees spend their time." (citation omitted) As a practical matter, however, if an employee is provided a ten minute rest period, the employee can only travel five minutes from a work post before heading back to return in time.

Here, since the Aggrieved Employees were not allowed to leave the work premises during their rest breaks, they were subject to Employer's control during the rest breaks. Thus, the Aggrieved Employees were not provided with compliant rest breaks.

### **Civil Penalties Applicable to Rest Break Violations**

As a result of the above rest break violations, Employer is subject to the civil penalties listed in Labor Code section 2699.

### **Derivative Wage Statement Penalties**

Labor Code section 226 requires an employer to provide wage statements to its employees which include, among other things, gross and net wages earned. As a result of

Employers failure to pay all premium pay for missed rest breaks as set forth above, Employer failed to provide the Aggrieved Employees with wage statements which accurately listed all wages earned. Employer is therefore subject to the civil penalties listed in Labor Code sections 226.3 and 2699.

### **Derivative Waiting Time Penalties**

Labor Code sections 201 and 202 require that an employer provide an employee with all wages due and payable either: (a) immediately upon termination, or (b) within 3 days of the employee's resignation. When an employer fails to comply with the above, the employee is entitled to the equivalent of a day's wage at their regular rate of pay for each day the employer is late, for up to 30 days. (Labor Code section 203).

Because Employer did not pay the Aggrieved Employees all premium pay owed during their employment, it follows that the Aggrieved Employees were also never paid these wages after the conclusion of their employment. Thus, Employer had an obligation to pay waiting time penalties, but intentionally failed to do so, and is therefore subject to the civil penalties listed in Labor Code section 2699.

### **Wage Statement Violations**

Labor Code section 226 requires an employer to provide wage statements to its employees which include, among other things, gross and net wages earned / total hours worked. Employer failed to provide wage statements which accurately reflected this information.

### **Civil Penalties Applicable to Wage Statement Violations**

As a result of the wage statement violations detailed above, Employer is subject to the civil penalties listed in Labor Code sections 226.3 and 2699.

### **Waiting Time Penalties**

Labor Code sections 201 and 202 require that an employer provide an employee with all wages due and payable either: (a) immediately upon termination, or (b) within 3 days of the employee's resignation. When an employer fails to comply with the above, the employee is entitled to the equivalent of a day's wage at their regular rate of pay for each day the employer is late, for up to 30 days. (Labor Code section 203).

Because Employer did not pay the Aggrieved Employees all wages owed during their employment, it follows that the Aggrieved Employees were also never paid these wages after the conclusion of their employment. Thus, Employer had an obligation to pay waiting time penalties, but intentionally failed to do so.

The Aggrieved Employees were provided vacation time pay by Employer pursuant to Employer's Vacation Time Pay Policy. The Aggrieved Employees were entitled to receive all vested but unpaid vacation time pay upon the conclusion of their employment with Employer. (Labor Code section 227.3). However, Employer failed to pay out this vested vacation time pay, and similarly failed to pay waiting time penalties based thereon.

### **Civil Penalties Applicable to Waiting Time Penalties**

Because of Employer's failure to pay all wages at the conclusion of employment and to pay the resulting waiting time penalties, Employer is subject to the civil penalties listed in Labor Code section 2699.

### **Reservation of Rights**

The facts and claims contained herein are based on the information available at the time of this writing. Therefore, if through discovery and/or expert review, Plaintiff becomes aware of additional facts or theories of liability, they expressly reserve the right to revise these facts and/or add any new claims by amending and/or supplementing this letter or by adding applicable causes of action to the complaint which will relate back to the date of this letter.

Sincerely,

*/s/ Daniel Ginzburg*

Daniel Ginzburg