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SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF LOS ANGELES

MONET L. STERLING, on behalf of herself
and current and former aggrieved employees

Plaintiff,

vs.

DOTHAN SECURITY, INC.; and DOES
1 to 100, inclusive,

Defendants.

Case No.: 23STCV08293

Assigned for All Purposes to:
Hon. Bruce G. Iwasaki
Dept. 58

**DECLARATION OF JUSTIN F. MARQUEZ IN
SUPPORT OF PLAINTIFFS' MOTION FOR
APPROVAL OF SETTLEMENT UNDER
PRIVATE ATTORNEY'S GENERAL ACT**

Date: January 22, 2025
Time: 9:00 am
Dept.: 58

Reservation ID: 142991704662

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Attorneys for Plaintiffs CARLTON McGEE and

RICARDO WENDELL

1. I am admitted, in good standing, to practice as an attorney in the State of California, the Ninth Circuit Court of Appeals, and the United States District Courts for the Central, Southern, Eastern, and Northern Districts of California. I am a Senior Attorney at Wilshire Law Firm, PLC, counsel of record for Plaintiffs Carlton McGee and Ricardo Wendell. I have personal knowledge of the facts set forth in this declaration and could and would competently testify to them under oath if called as a witness. This Declaration is submitted in support of Plaintiffs' Motion for Approval of Settlement.

THE PROPOSED SETTLEMENT IS FAIR AND REASONABLE

2. I have reviewed the Declaration of Sepideh Ardestani and agree with her analysis of Defendant's potential liability. I also agree with Sepideh Ardestani that a proposed settlement is fair and reasonable.

COSTS AND EXPENSES

3. The Settlement provides for a payment of attorneys' fees in the amount of \$276,666.67 and up to \$32,000.00 in costs to Plaintiffs' counsel. As of the filing date, Wilshire Law Firm's total lodestar is \$19,730.00, which is based upon 18.1 hours of attorney time at customary hourly rates. In addition, Wilshire Law Firm has incurred \$3,385.71 in litigation costs. Wilshire Law Firm was required to expend the funds prosecuting this case to a successful resolution on, among other things, court filing fees, document service, postage, and copying. Because these costs are reasonable, Wilshire Law Firm respectfully requests that the Court approve the payment.

4. The efforts expended by Wilshire Law Firm to achieve this excellent result include, but are not limited to, the following: interviews with Plaintiffs and review of documents provided by Plaintiffs and Defendant; preparing and revising the Complaint; filing of the PAGA complaint; investigating and researching the claims; reviewing and editing a mediation brief; participating in mediation; drafting and revising the Settlement Agreement; and supporting documents for this Motion.

5. The regular and customary practice at Wilshire Law Firm, PLC is for all attorneys to maintain contemporaneous time records setting forth the amount of time spent (rounded to the nearest 0.1 hour) on each task in each case, with explanatory descriptions of each task performed. My colleagues and I followed this practice throughout this litigation. To calculate my firm's lodestar for this case, I reviewed the time records and exercised discretion in eliminating excessive entries. Using these time records, my office derived the following summary chart of timekeeping activities of the attorneys working on this case:

Person	Role	Hours	Rate	Lodestar
Justin F. Marquez	Senior Partner (14+ years)	7.5	\$1,500	\$11,250
Arsiné Grigoryan	Associate Attorney (7th Year)	10.6	\$800	\$8,480
Total:		18.1		\$19,730

6. There are additional hours devoted by me (and by my colleagues) to this litigation that are not reflected in Plaintiffs' Counsel's request for attorneys' fees.

7. We can provide complete, detailed billing records in the event the Court requests them, but would request the opportunity to redact attorney-client privileged information and any other privileged information.

8. Additional time will be required by Plaintiffs' Counsel to monitor the settlement and respond to inquiries and oversee administration of the settlement and distribution of the fund. I estimate that my office will commit no less than 8 hours to those tasks.

9. As of the drafting of this Motion, my office has incurred \$3,385.71 in expenses litigating this action. These expenses were reasonably necessary to the litigation and were actually incurred by my office. They should be reimbursed in full, up to the maximum amount allowed in the Settlement Agreement. Attached as **Exhibit A** to this declaration is a breakdown of costs incurred by my office.

10. Plaintiff's counsel's costs request includes a \$500 case administration fee for in-house services. For in-house costs, California has explicitly recognized the recoverability of in-house in Cal. State Bar Arbitration Advisory 2021-01, which states, in pertinent part: "[T]he

1 attorney may recoup costs and expenses reasonably incurred in connection with the client's matter
2 for services performed in house, such as photocopying, long distance telephone calls, computer
3 research, special deliveries, secretarial overtime, and other similar services so long as the charge
4 reasonably reflects the lawyer's actual cost for the services rendered.' (San Diego County Bar
5 Association Ethics Opinion No. 2013-3, at p. 5 (citing ABA Formal Opinion No. 93-379).)" This
6 reflects the realities of running a law firm in today's environment. While many law firms
7 previously outsourced services to vendors, more and more lawyers – and especially those in the
8 larger law firm context – are bringing these recoverable services in-house to enhance the level of
9 service to the client. The firms then utilize reasonable methodologies to charge the client for the
10 value of the in-house services.

11 11. While the general guiding principle is that, absent certain disclosures, the lawyer
12 cannot charge overhead (making rent payments, purchasing utilities, securing malpractice
13 insurance, etc.) to the client, the ethics opinions recognize that many categories of in-house costs
14 incurred on behalf of clients are properly charged to the client, including, but not limited to, the
15 following, or the modern equivalent¹: photocopying, long-distance telephone calls, computer
16 assisted legal research, travel and parking, mileage, special deliveries, messenger charges,
17 secretarial overtime, other staff overtime when the actions of the client or the nature of the case
18 require it, client file storage costs, postage, FedEx or other overnight delivery service charges and
19 similar services, including a "reasonable allocation of overhead expenses directly associated with
20 the provision of the service", so long as the charge reasonably reflects the lawyer's actual cost for
21 the service rendered. (See, ABA Formal Opinion No. 93-379; Cal. State Bar Arbitration Advisory
22 2021-01; *In the Matter of Kroff* (Review Dept. 1998) 3 Cal. State Bar Ct. Rptr. 838, endorsing the

23 _____
24 ¹ Many of the ethics opinions nationwide discussing in-house costs are older, and thus
25 have not kept up with the evolving law firm model or law firm technology. For example, rather
26 than having a traditional phone system with telephone equipment and long-distance charges, law
27 firms communicate with clients through computerized systems and connectivity software. Rather
28 than printing and storing hardcopy files, law firms use sophisticated digital case management and
client file storage systems. Another example is photocopying, rather than making copies on a
copy machine, law firms have invested in sophisticated scanning systems, which allow the law
firm to go paperless, which in turn benefits the client.

ABA opinion).)

12. For larger law firms, these recoverable in-house costs can be substantial, even though they reflect only a very small percentage of the overall operational costs of the firm. None of the applicable ethics authorities appear to discuss specifically how in-house costs should be calculated, and, in fact, the American Bar Association, in Formal Opinion No. 93-379, has recognized that it is not appropriate for an ethics committee to opine on the same. Specifically, the opinion offered the following guidance: “It is not appropriate for the Committee, in addressing ethical standards, to opine on the various accounting issues as to how one calculates direct costs what may or may not be included in allocated overhead. These are questions which should properly be reserved for our colleagues in the accounting profession.” This leaves law firms and their accounting professionals to figure out the methodology.

MY EXPERIENCE AND QUALIFICATIONS

13. Wilshire Law Firm was selected by Best Lawyers and U.S. News & World Report as one of the nation’s Best Law Firms for every year since 2020 and is comprised of over 70 attorneys and over 500 employees. Wilshire Law Firm, PLC is actively and continuously practicing in employment litigation, representing employees in both individual and class actions in both state and federal courts throughout California.

14. Wilshire Law Firm, PLC is qualified to handle this litigation because its attorneys are experienced in litigating Labor Code violations in both individual, class action, and representative action cases. Wilshire Law Firm, PLC has handled, and is currently handling, numerous wage and hour class action lawsuits, as well as class actions involving consumer rights and data privacy litigation in both state and federal courts throughout California.

15. I graduated from the University of California, Los Angeles’s College Honors Program in 2004 with Bachelor of Arts degrees in History and Japanese, *magna cum laude* and *Phi Beta Kappa*. As an undergraduate, I also received a scholarship to study abroad for one year at Tokyo University in Tokyo, Japan. I received my Juris Doctor from Notre Dame Law School in 2008.

16. My practice is focused on advocating for the rights of consumers and employees

1 in class action litigation and appellate litigation. I am currently the primary attorney in charge
2 of litigating several class action cases in state and federal court across the United States.

3 17. I have received numerous awards for my legal work. From 2017 to 2020, Super
4 Lawyers selected me as a “Southern California Rising Star,” and from 2022 to 2024, I was selected
5 as a “Southern California Super Lawyer.” I was selected as one of the “Best Lawyers in America”
6 in 2023 and 2024. In 2016 and 2017, the National Trial Lawyers selected me as a “Top 40 Under
7 40” attorney. I am also rated 10.0 (“Superb”) by Avvo.com.

8 9. I am on the California Employment Lawyers Association (CELA)’s Wage and Hour
9 Committee and Mentor Committee, and I was selected to speak at CELA’s 2019 Advanced Wage
10 & Hour Seminar on the topic of manageability of class actions and at CELA’s 2024 Advanced
11 Wage & Hour Seminar on the topic of multiple cases against the same defendant Since 2013, I
12 have actively mentored young attorneys through CELA’s mentorship program.

13 14. I am also an active member of the Consumer Attorneys of California (CAOC). I
14 am a member of CAOC’s Diversity Committee, and I help assist the CAOC in defeating bills that
15 harm employees. Indeed, I recently helped assist Jacqueline Serna, Esq., Legislative Counsel for
16 CAOC, in defeating AB 443, which proposed legislation that sought to limit the enforceability of
17 California Labor Code § 226.

18 15. As the attorney responsible for day-to-day management of this matter at the
19 Wilshire Law Firm, PLC, I have over thirteen years of experience with litigating wage and hour
20 class actions. Over the last thirteen years, I have managed and assisted with the litigation and
21 settlement of several wage and hour class actions. In those class actions, I performed similar tasks
22 as those performed in the course of prosecuting this action. My litigation experience includes:

- 23 a. I served as lead or co-lead in negotiating class action settlements worth
24 over \$10 in gross recovery to class members for each year since 2020,
25 including over \$37.5 million in 2022 and over \$75 million in 2023.
26 b. I lead a team of attorneys that successfully obtained class certification of
27 meal period, rest period, and related derivative claims on April 5, 2024
28 in *Aguilar-Flores v. Javier’s CC LLC*, Los Angeles Superior Court No.

19STCV36438 (Hon. Elihu M. Berle).

- c. I was part of the team of attorneys that prevailed in *Moore v. Centrelake Medical Group, Inc.* (2022) 83 Cal.App.5th 515, the first California appellate decision in a data breach class action holding that consumer plaintiffs adequately alleged injury in fact under the benefit of the bargain theory and monitoring-costs theory.
- d. In 2022, Top Verdict recognized Wilshire Law Firm and myself for having one case in the Top 20 Labor & Employment Settlements (including number 19 for the \$4.1 Million settlement in the FPI Management Wage and Hour Cases) and four additional cases in the Top 50 Labor & Employment Settlements (numbers 36, 39, 41, and 49).
- e. In 2021, Top Verdict recognized Wilshire Law Firm and myself for having one case in the top 20 Labor & Employment Settlements (including number 19 for the \$1.6 million settlement in *Moreno v. Pretium Packaging, L.L.C.*) and four additional cases in the Top 50 Labor & Employment Settlements (numbers 27, 30, 33, and 37).
- f. To my knowledge, I am the only attorney to appear on each of the following Top Verdict lists for 2018 in California: Top 20 Civil Rights Violation Verdicts, Top 20 Labor & Employment Settlements, and Top 50 Class Action Settlements.
- g. As lead counsel, on April 29, 2021, I prevailed against CVS Pharmacy, Inc. by winning class certification on behalf of hundreds of thousands of consumers for misleading advertising claims in *Joseph Mier v. CVS Pharmacy, Inc.*, U.S. Dist. Ct. C.D. Cal. no. SA CV 20-1979-DOC-(ADSx).
- h. As lead counsel, I prevailed against Bank of America by winning class certification on behalf of thousands of employees for California Labor Code violations; defeating appellate review of the court's order

certifying the class; defeating summary judgment; and defeating a motion to dismiss. (*Frausto v. Bank of America, N.A.* (N.D. Cal. 2019) 334 F.R.D. 192, 2020 WL 1290302 (9th Cir. Feb. 27, 2020), 2019 WL 5626640 (N.D. Cal. Oct. 31, 2019), 2018 W.L. 3659251 (N.D. Cal. Aug. 2, 2018).). The decision certifying the class in *Frausto* is also discussed in Class Certification Under Fed. R. Civ. P. 23 in Action by Information Technology or Call Center Employees for Violation of State Law Wage and Hour Rules, 35 A.L.R. Fed. 3d Art. 8.

- i. I was the primary author of the class certification and expert briefs in *ABM Industries Overtime Cases* (2017) 19 Cal.App.5th 277, a wage and hour class action for over 40,000 class members for off-the-clock, meal period, split shift, and reimbursement claims. *ABM Industries Overtime Cases* is the first published California appellate authority to hold that an employer’s “auto-deduct policy for meal breaks in light of the recordkeeping requirements for California employers is also an issue amenable to classwide resolution.” (*Id.* at p. 310.)² Notably, the Court of Appeal also held that expert analysis of timekeeping records can also support the predominance requirement for class certification. (*Id.* at p. 310-11.) In 2021, the case settled for \$140 million, making it one of the largest ever wage and hour class action settlements for hourly-paid employees in California.
- j. I briefed, argued, and won *Yocupicio v. PAE Group, LLC* (9th Cir. 2015) 795 F.3d 1057. The Ninth Circuit ruled in my client’s favor and held that non-class claims under California’s Private Attorney Generals Act (“PAGA”) cannot be used to calculate the amount in controversy under

² As a California district court observed before the *ABM Industries Overtime* decision, “[t]he case law regarding certification of auto-deduct classes is mixed.” (*Wilson v. TE Connectivity Networks, Inc.* (N.D. Cal. Feb. 9, 2017) No. 14-CV-04872-EDL, 2017 WL 1758048, *7.)

the Class Action Fairness Act (“CAFA”). This case is cited in several leading treatises such as Wright & Miller’s Federal Practice & Procedure, and Newberg on Class Actions. In October 2016, the U.S. Supreme Court denied review of a case that primarily concerned *Yocupicio*. That effort was led by Theodore J. Boutrous, who brought the cert petition, with amicus support from a brief authored by Andrew J. Pincus.³ Considering that leading Supreme Court practitioners from the class action defense bar were very motivated in undermining *Yocupicio* case, but failed, this demonstrates the national importance of the *Yocupicio* decision.

- k. On December 13, 2018, the United States District Court granted final approval of the \$2,500,000 class action settlement in *Mark Brulee, et al. v. DAL Global Services, LLC* (C.D. Cal. Dec. 13, 2018) No. CV 17-6433 JVS(JCGx), 2018 WL 6616659 in which I served as lead counsel. In doing so, the Court found: “Class Counsel’s declarations show that the attorneys are experienced and successful litigators.” (*Id.* at p. *10.)
- l. *Gasio v. Target Corp.* (C.D. Cal. Sep. 12, 2014) 2014 U.S. Dist. LEXIS 129852, a reported decision permitting class-wide discovery even though the employer has a lawful policy because “[t]he fact that a company has a policy of not violating the law does not mean that the employees follow it, which is the issue here.” The court also ordered defendant to pay for the cost of *Belaire-West* notice.
- m. In 2013, I represented a whistleblower that reported that his former employer was defrauding the State of California with the help of bribes to public employees. The case, a false claims (qui tam) action, resulted in the arrest and criminal prosecution of State of California employees

³ <http://www.chamberlitigation.com/cases/abm-industries-inc-v-castro>.

by the California Attorney General's Office.

n. In 2013, I was part of a team of attorneys that obtained conditional certification for over 2,000,000 class members in a federal labor law case for misclassification of independent contractors that did crowdsourced work on the Internet, *Otey v. CrowdFlower, Inc.*, N.D. Cal. Case No. 12-cv-05524-JST (MEJ), resulting in the following pro-plaintiff reported decisions:

i. 2013 U.S. Dist. LEXIS 151846 (N.D. Cal. Oct. 22, 2013) (holding that an unaccepted Rule 68 offer doesn't moot plaintiff's claims, and granting plaintiff's motion to strike defendant's affirmative defenses based on *Twombly/Iqbal*).

ii. 2013 U.S. Dist. LEXIS 122007 (N.D. Cal. Aug. 27, 2013) (order granting conditional collective certification).

iii. 2013 U.S. Dist. LEXIS 95687 (N.D. Cal. July 8, 2013) (affirming the magistrate judge's discovery ruling which held that "evidence of other sources of income is irrelevant to the question of whether a plaintiff is an employee within the meaning of the FLSA").

iv. 2013 U.S. Dist. LEXIS 91771 (N.D. Cal. June 20, 2013) (granting broad discovery because "an FLSA plaintiff is entitled to discovery from locations where he never worked if he can provide some evidence to indicate company-wide violations").

o. From 2012 to 2013, I was part of a team of attorneys that obtained class certification for over 60,000 class members for off-the-clock claims, *Linares v. Securitas Security Services USA, Inc.*, Los Angeles Superior Court No. BC416555. We also successfully opposed subsequent appeals to the California Court of Appeal and California Supreme Court.

16. Arsiné Grigoryan is an Associate Attorney at my office. She earned two Bachelor of Arts degrees from the University of California, Berkeley in (1) Political Science with an

emphasis on international relations and (2) Media Studies. She obtained her Juris Doctor degree from Southwestern Law School. She is presently admitted to practice in all state courts of California (admitted in 2017) and before all federal district courts in California. The focus of her practice at Wilshire Law Firm is currently on class action wage-and-hour law, including Private Attorneys General Act of 2004 (“PAGA”) matters. Prior to joining Wilshire Law Firm, PLC, she worked at a law firm specializing in wage-and-hour class action cases. She is also handling more than a dozen active class action matters currently pending and prosecuting multiple PAGA collective action matters in various courts throughout the State of California. Her current contingency billing rate for this case is \$800.00 per hour which is commensurate with Ms. Grigoryan’s years of experience and work in this practice area.

17. My current contingent billing rate of \$1,500.00 per hour is consistent with my actual billing rate for paid legal industry consulting services, my practice area, lead appellate experience in the Ninth Circuit Court of Appeals, numerous awards received, legal market and accepted hourly rates:

- a. I have been paid for legal industry consulting services at \$1,500 per hour by Gerson Lehrman Group (GLG), a company that provides financial information and advises investors and consultants with business clients seeking expert advice. GLG is one of the largest companies that provides expert consulting services. GLG’s clients include corporations, hedge funds, private equity firms, and consulting firms. I have worked with GLG on numerous occasions at a rate of \$1,500 per hour, including on three recent occasions in October and November of 2023.
- b. On May 6, 2022, the Hon. Jay A. Garcia-Gregory of the United States District Court in Puerto Rico approved my \$850 hourly rate when he granted final approval of the class action settlement in *Serrano v. Inmediata Corp.*, No. 3:19-cv-01811-JAG, Dkt. 57 (U.S. Dist. Ct. P.R. May 6, 2022).
- c. On September 9, 2021, the Hon. Peter Wilson of the Orange County Superior Court approved my \$800 hourly rate when he granted final approval of the class action settlement in *Ricardo Campos Hernandez v. Adams Iron Co., Inc.*, No. 30-2019-

01066522-CU-OE-CXC.

- d. On August 6, 2021, the Hon. Stanley Blumenfeld, Jr. of the United States District Court granted final approval of the \$1,600,000 class action settlement in *Carlos Moreno v. Pretium Packaging, Inc.* (C.D. Cal. Aug. 6, 2021) No. 8:19-cv-02500-SB-DFM, 2021 WL 3673845 in which I served as lead counsel. In doing so, the Court approved my then \$750 hourly rate after finding it was “reasonable, given the qualifications of the attorneys who worked on this matter.” (*Id.* at p. *3.)
- e. On January 19, 2021, the Hon. Elihu M. Berle of the Los Angeles County Superior Court approved my \$750 hourly rate when he granted final approval of the class action settlement in *Faye Zhang v. Richemont North America, Inc.*, Case No. 19STCV32396.

18. I am informed and believe that the fee and costs requested by Wilshire are reasonable. My office invested significant time and resources into the case, with any potential payment deferred to the end of the case.

19. Plaintiff’s Counsel elected to bear the contingency risk of this litigation for the benefit of the Aggrieved Employees under PAGA, as well as for the State of California (who elected not to take the case after receiving the PAGA notice).

20. The risk to my office has been very significant. Indeed, we have taken on a number of class action cases that have resulted in thousands of attorney hours being expended and ultimately having certification denied, the defendant company going bankrupt. The contingent risk in these types of cases is very real and they do occur regularly. Furthermore, we were precluded from focusing on, or taking on, other cases which could have resulted in a larger, and less risky, monetary gain.

21. In the high-risk, high-cost practice of class action and PAGA litigation, Wilshire Law Firm has endured financial losses in several of its cases. I believe that the particular risk of taking on this high-cost, high-risk case supports our lodestar-based fee calculation.

22. Because most individuals cannot afford to pay for representation in litigation on an hourly basis, Wilshire Law Firm represents all of its employment law clients on a contingency

1 fee basis. Pursuant to this arrangement, we are not compensated for our time unless we prevail at
2 trial or successfully settle our clients' cases. Because Wilshire Law Firm is taking the risk that we
3 will not be reimbursed for our time unless our client settles or wins his or his case, we cannot afford
4 to represent an individual employee on a contingency basis if, at the end of our representation, we
5 receive less than the amount of attorney's fees negotiated with defendant. It is therefore essential
6 that we recover our requested fees in cases like this matter where defendants avoid service and,
7 ultimately liability for the violations of wage and hour laws they committed against their
8 employees so we are to remain in practice so as to be able to continue representing other individuals
9 in civil rights employment disputes.

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

12 Executed on November 25, 2024, at Los Angeles, California.

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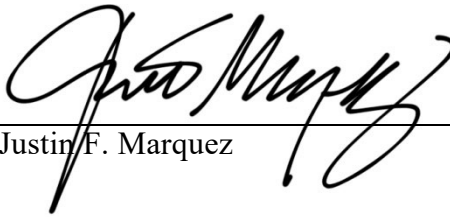

Justin F. Marquez

Exhibit A

Wilshire Law Firm, PLC
Transaction Detail by Account
All Transactions

9/24/2024
Accrual Basis

<u>Type</u>	<u>Date</u>	<u>Num</u>	<u>Memo</u>	<u>Amount</u>	<u>Balance</u>
COS					
Legal Expenses					
	9/14/2023	848896021	Legal Research	28.43	28.43
	12/22/2023		Document Retrieval	8.00	8.00
	1/18/2024		PAGA Fee	75.00	75.00
	5/20/2024		Document Retrieval	2.00	2.00
	9/6/2024		Document Retrieval	2.00	2.00
Total LEGAL EXPENSES				115.43	115.43
Process Service Fees					
	11/28/2023	21708674	Attorney Services	1,494.99	1,494.99
	1/2/2024	69294	Attorney Services	370.00	370.00
	1/3/2024	69822	Attorney Services	45.00	45.00
	3/12/2024	22434980	Attorney Services	19.71	19.71
	3/27/2024	22539750	Attorney Services	19.71	19.71
	5/21/2024	22945693	Attorney Services	467.55	467.55
	5/28/2024	76593	Attorney Services	45.00	45.00
	5/28/2024	76579	Attorney Services	142.00	142.00
	6/6/2024	22434980(2)	Attorney Services	1.00	1.00
	6/6/2024	22539750(2)	Attorney Services	1.00	1.00
	6/18/2024	23143886	Attorney Services	20.74	20.74
	7/24/2024	23382916	Attorney Services	20.74	20.74
	9/5/2024	23671081	Attorney Services	20.74	20.74
Total PROCESS SERVICE FEES				2,668.18	2,668.18
Other Costs					
	7/15/2023		Case Administration Fee for In-House Services	500.00	500.00
	7/15/2023	E-3151184	Printing Cost	1.89	1.89
	8/23/2023	E-3140111	Postage Cost	7.18	7.18
	8/23/2023	E-3140110	Postage Cost	7.18	7.18
	8/23/2023	E-3140109	Postage Cost	7.18	7.18
	8/23/2023	E-3140108	Postage Cost	7.18	7.18
	8/17/2023	E-3162618	Printing Cost	1.89	1.89
	9/18/2023	E-3144984	Postage Cost	7.18	7.18
	9/18/2023	E-3144981	Postage Cost	7.18	7.18
	9/18/2023	E-3144980	Postage Cost	7.18	7.18
	9/18/2023	E-3144977	Postage Cost	7.18	7.18
	1/17/2024	E-3173499	Postage Cost	7.42	7.42
	1/17/2024	E-3173498	Postage Cost	7.42	7.42
	1/17/2024	E-3173496	Postage Cost	7.42	7.42
	1/17/2024	E-3173495	Postage Cost	7.42	7.42
	1/17/2024	E-3173494	Postage Cost	7.42	7.42
	4/15/2024	E-3195700	Printing Cost	1.89	1.89
	5/7/2024	E-3206016	Printing Cost	1.89	1.89
Total OTHER COSTS				602.10	602.10
TOTAL				3,385.71	3,385.71