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14 Attorneys for Plaintiff MONET L. STERLING,
15 (additional counsel listed on the next page)

16 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

17 **COUNTY OF LOS ANGELES**

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

19 Plaintiff,

20 vs.

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

23 Defendants.

Case No.: 23STCV08293

Assigned for All Purposes to:

Hon. Bruce G. Iwasaki

Dept. 58

**DECLARATION OF JOHN YOUNG IN
SUPPORT OF PLAINTIFFS' MOTION FOR
APPROVAL OF PAGA SETTLEMENT**

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13 on behalf of the State of California, and others similarly situated and aggrieved

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23 to the Private Attorney General Act

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1 aggrieved employees. The issue on this motion is not why the court should award a fee to
2 commensurate with thirty-three and one-third percent (33%) of the settlement amount, but why the
3 court should not award such a fee. The settlement comes after protracted litigation, and mediation.
4 Under the lodestar method, a base fee amount is calculated from a compilation of time reasonably
5 spent on the case and the reasonable hourly compensation of the attorney. The base amount is then
6 adjusted in light of various factors. (*Serrano III*, supra, 20 Cal.3d at 48.) Attached hereto as **Exhibit**
7 **A** is a true and accurate copy of the attorneys' fees incurred by Mahoney Law Group, APC in
8 litigating this matter, totaling forty thousand eight hundred fifteen dollars (\$40,815.00). Plaintiff
9 requests the Court find that counsel's requests of hourly rates reasonable. These rates are reasonable
10 in light of the rates charged by other counsel in the class action community. A reasonable hourly
11 rate is the prevailing rate charged by attorneys of similar skill and experience in the relevant
12 community. (*PLCM Group, Inc. v. Drexler* (2000) 22 Cal.4th 1084, 1095.) The court may also
13 consider other factors when determining a reasonable hourly rate, e.g., the attorney's skill and
14 experience, the nature of the work performed, the relevant area of expertise and the attorney's
15 customary billing rates. (*Flannery v. California Highway Patrol* (1998) 61 Cal.App.4th 629, 632.)

16 5. One difficulty in determining the hourly rate of attorneys of similar skill and
17 experience in the relevant community is the scarcity of hourly fee-paying clients in class and PAGA
18 action litigation. As a practical matter, few, if any, consumers pay attorneys' fees on an hourly basis
19 for such extensive litigation, and thus retainer agreements in such cases are based on a contingency
20 fee relationship. Therefore, there is no customary billing rate, but the nature of class and PAGA
21 action work should be strongly considered by the court. Mr. Mahoney's rate of \$850.00 per hour
22 has been approved in similar type lawsuits in state court. My rate of up to \$600.00 per hour has
23 been approved in similar type lawsuits in state court.

24 6. Plaintiffs' counsel is only paid if they win and must advance all costs until the case
25 is resolved. All of counsel's skill and experience justify the requested rate. Mahoney Law Group,
26 APC practices litigation with a focus on representing employees in employment matters on class
27 action cases. Further, the nature of their work and counsels' expertise justifies the requested rate as
28 well. This refers to the nature of the work in this case involved a class action and California's wage
and hour law. The issues in the case are also very difficult area of law and not within the knowledge

1 of many lawyers. Class action and or PAGA cases also require specialized learning and the
2 willingness to take large risks.

3 7. In sum, Plaintiffs' Counsel are attorneys who command a high rate. They have had
4 success in PAGA actions, are held in high regard by the legal community, and their practice is an
5 unusual niche area. This case was not a "fender-bender" that any lawyer could litigate but a highly
6 specialized area of employment law that requires skilled and experienced attorneys. To obtain such
7 an attorney on the free market, a client must pay appropriate compensation. Therefore, Plaintiffs'
8 counsel's requested rates are fair and reasonable. Counsel requests that the court find that these
9 hours were reasonable expended in this litigation. The courts are quite liberal in the evidence
10 required to prove an attorney's hours. Detailed time records are not required. An attorney's
11 testimony alone may suffice: "Testimony of an attorney as to the number of hours worked on a
12 particular case is sufficient evidence to support an award of attorney fees, even in the absence of
13 detailed time records." (*Martino v. Denevi* (1986) 182 Cal.App.3d 553, 559.) Mahoney Law Group,
14 APC typically works on a contingency basis, only recovering fees if successful in the action. This
15 is the agreement Mahoney Law Group, APC has with Plaintiff Andrew Tarigan in this matter,
16 providing for a contingency fee of 33.33%-40%. Mahoney Law Group, APC submits the following
17 hours reflecting work performed on this matter by attorneys and paralegals at Mahoney Law Group,
18 APC. Each attorney and paralegal at Mahoney Law Group, APC maintains contemporaneous hours
of time worked and does not engage in block billing.

19 8. Reasonable hours include, in addition to time spent during litigation, the time spent
20 before the action is filed, including time spent interviewing the clients, investigating the facts and
21 the law, and preparing the initial pleadings. *New York Gaslight Club, Inc. v. Carey* (1980) 447 U.S.
22 54, 62. Further, the fee award should include fees incurred to establish and defend the attorneys' fee
23 claim. *Serrano v. Priest* (1982) 32 Cal.3d 621, 639 ("*Serrano IV*"). Therefore, under either the
24 common fund or Lodestar theory, Plaintiffs' counsel's requested attorneys' fees are reasonable and
25 should be approved by this court.

26 9. Attached hereto as **Exhibit B** is a true and accurate copy of the costs Plaintiff's
27 counsel has incurred out-of-pocket in litigating this matter. The costs to-date currently total six
28 thousand twelve dollars and five cents (\$6,012.05). Such costs include the court filing fees, and

1 mediation fees and are of the type routinely billed in wage and hour class and PAGA action lawsuits.
2 Plaintiff requests that this Court issue an order awarding counsel reimbursement for such costs.

3 **EXPERIENCE OF PLAINTIFFS' COUNSEL**

4 10. I am a 2014 graduate of the Thomas Jefferson School of Law where I earned my Juris
5 Doctor Degree. I have been a licensed practitioner since December 2014 and have been admitted to
6 practice in the following courts: United States Central District Court, and all California State Courts.

7 11. I began working at Mahoney Law Group, APC in October 2018. My practice is
8 primarily dedicated to employment law.

9 12. As Plaintiff's Counsel, I am qualified because I have over five years of experience in
10 civil litigation matters, and am supervised by lead attorney Kevin Mahoney, who has extensive
11 experience with employment class action and PAGA litigation, as detailed below.

12 13. I have never faced any disciplinary action or received any sanction for misconduct or
13 an ethical violation

14 14. During my employment at Mahoney law Group, APC, I have been involved in
15 numerous wage and hour class and PAGA actions. Some examples of wage and hour class and
16 PAGA action cases where I have, or am currently serving as lead and/or co-lead counsel include:
17 *Bran v. International Forklift*, Los Angeles Superior Court Case No. 19STCV03453; *Cambron v.*
18 *Mario's Tree Service, Inc.*, San Bernardino Superior Court Case No. CIVDS1927324; *Cardenas v.*
19 *Global Specialties Direct Inc.*, Los Angeles Superior Court Case No. 19STCV03454; *Castro v.*
20 *Silver Creek Properties*, Ventura Superior Court Case No. 56-2019-00523447-CU-OE-VTA; *Contri*
21 *v. Barley Forge Brewing Co., LLC*, Orange Superior Court Case No. 30-2018-01023732-CU-OE-
22 CXC; *Garcia v. SCH Whittier LLC*, Los Angeles Superior Court Case No. 19STCV03461; *Guevara*
23 *v. Personnel Staffing Group, LLC, et al.* Superior Court of Riverside Case No. RIC1904864; *Lewis*
24 *v. McManga Foods, Inc.*, Riverside Superior Court Case No. RIC1904964; *Lopez v. RPV Pancakes,*
25 *Inc.*, Los Angeles Superior Court Case No. 19STCV46913; *Marron v. B.D.R. Industries, Inc.* Los
26 Angeles Superior Court Case No. 19STCV35497; *Mendoza v. GT's Living Foods, LLC*, Los Angeles
27 Superior Court Case No. 19STCV43740; *Monzon v. Channel Control Merchants of California, LLC*,
28 Los Angeles Superior Court Case No. BC716443; *Morales v. Fitness Alliance, LLC*, United States
District Court, Central District of California, Eastern District, Case No. 16-CV-02325; *Palacios*

1 *Vasquez v. Lyneer Staffing, LLC*, Los Angeles Superior Court Case No. 19STCV10628; *Portilla v.*
2 *MYR Group, Inc. et al.*, San Bernardino Superior Court Case No. CIVDS2005484; *Quinonez v.*
3 *Consolidated Staffing Solutions, Inc.*, Los Angeles Superior Court Case No. 18STCV04942;
4 *Rampley v. Bear Valley Community Healthcare District*, United State District Court, Central District
5 Case No. 5:21-cv-01270-JWH-SHK; *Rojas v. Applied Composite Structures, Inc.*, Los Angeles
6 Superior Court Case 19STCV04652; *Santos v. Amiluc Family, Inc.*, Los Angeles Superior Court
7 Case No. 19STCV03707; *Sarinana, et al. v. Shelfbot Co.*, Orange County Superior Court Case 30-
8 2021-01207546-CU-OE-CXC; *Tellez v. Harvest Landscape Enterprises, Inc.*, United State District
9 Court, Central District Case No. 2:19-cv-09015-GW-SK; *Trejo v. Lyneer Staffing Solutions, LLC*,
10 Los Angeles Superior Court Case 19STCV10411; *Villa v. Ralphs-Pugh Co. Inc.*, Solano Superior
11 Court Case FCS057223; *Villegas v. AOCLSC Inc., et al.*, Los Angeles Superior Court Case
12 22STCV17702.

13 15. Mr. Kevin Mahoney has been an attorney since 2005. From 2005 to 2009, he worked
14 for Rose, Klein & Marias, a prominent workers' compensation litigation firm. During that time, he
15 handled over 40 administrative workers' compensation hearings. The firm also handled some civil
16 employment litigation matters. In 2007, Mr. Mahoney began assisting on the litigation and
17 settlement of several employment law class action matters to completion through the final approval
18 process. In August 2009, Mr. Mahoney voluntarily resigned from Rose, Klein & Marias and co-
19 founded Mahoney, Perry & Burrows in Long Beach, California (now Mahoney Law Group, APC).
20 Mahoney Law Group handles individual and class employment matters involving wage and hour
21 claims, PAGA matters, discrimination claims, harassment claims and wrongful termination claims.
22 An example of some of the class and PAGA matters Mr. Mahoney and Mahoney Law Group, APC
23 have acted as lead/class counsel are: *Denise Mays v Children's Hospital of Los Angeles*, Case No.
24 BC477830 [wage and hour class involving split shift differential pay for nursing staff]; *Sanchez v*
25 *St. Mary's*, San Bernardino Superior Court Case No. CIVDS13048981 [wage and hour class
26 involving split shift differential pay for nursing staff]; *Romo v Durham School Services, L.P.*, USDC
27 Northern District of Illinois Case No. 1:17-cv-1929 [collective action on behalf of bus drivers];
28 *Pulido v Front Porch Communities and Services, et al.*, Los Angeles Superior Court Case No.
BC607175 [wage and hour class action on behalf of Certified Nursing Assistants]; *Valerie Brooks v*

1 *Life Care Centers of America, Inc. et al.*, USDC California Central District Case No. SACV 12-
2 00659-CJC(RNBx) [wage and hour class action on behalf of nursing staff]; *Harvey Holt, et al. v.*
3 *Parsec, Inc.*, USDC Central District of California Case No. CV-9540-VBF [WARN Act/California
4 wage and hour class action]; *TBC Retail Group Wage and Hour Cases*, Los Angeles County Superior
5 Court Case No. JCCP4701 [wage and hour class action on behalf of auto mechanics being paid
6 alleged improper piece rate]; *Mackall v Healthsource Global Staffing, Inc.*, USDC Northern District
7 of California Case No. 16-cv-03810-WHO [wage and hour class action on behalf of Registered
8 Nurses]; *Oceguera v TM Wireless, Inc.*, Los Angeles County Superior Court Case No. BC553295
9 [wage and hour class actions involving commission pay issues for non-exempt retail employees];
10 *Branch v PM Realty Group, LP.*, Los Angeles Superior Court Case No. BC575759 [WARN Act and
11 wage and hour class action]; *Erasmus Ochavo v Molina Healthcare, Inc.*, Los Angeles County
12 Superior Court Case No. BC591325 [wage and hour class action on behalf of nurses and respiratory
13 therapists]; *Curiel v Glendora Grand, Inc.*, Los Angeles Superior Court Case No. BC618831[wage
14 and hour class action on behalf of Certified Nursing Assistants]; *Bibriesca v QVEST Sanitation,*
15 *LLC, et al*, Los Angeles County Superior Court Case No. BC568019 [wage and hour class action on
16 behalf of sanitation workers]; *Dante Booker v The Goodyear Tire and Rubber Company*, Los
17 Angeles County Superior Court Case No. BC498399 [wage and hour class action on behalf of
18 mechanics]; *Manuel Diaz v Excel Sheet Metal, Inc.*, Los Angeles County Superior Court Case No.
19 BC504033 [wage and hour class action on behalf of manufacturing employees]; *Fernando Albiar,*
20 *et al. v. Spectrum Athletics-Canoga Park, et al.* Case No. BC413860; *Gerardo Ortega, et al. v. CR*
21 *& R Inc.*, Case No. BC414434; *Kurt Casadine v Maxim Healthcare Services, Inc.*, USDC Central
22 District of California Case No. CV 12-10078-DMG (CWx) [wage and hour class action on behalf
23 of health care employees]; and *Esmerelda Fernandez, et al v Teva Parenteral Medicines, Inc.*,
24 Orange County Superior Court Case No. 30-2010-00412849-CU-OE-CXC [wage and hour class on
25 behalf of pharmaceutical manufacturing employees]; *Levanoff v. SoCal Wings, et al.*, Orange County
26 Superior Court Case No. 30-2011-00511808-CU-OE-CXC [PAGA trial]; *James v. American*
27 *Corporate Security*, Los Angeles County Superior Court Case No. BC525388 [class/PAGA matter];
28 *Brown v. Blazin' Wings, Inc. (Buffalo Wild Wings)*, Los Angeles County Superior Court Case No.
BC620185 [PAGA only].

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EXHIBIT A

ITEM	STATUS	DATE	HRS	RATE	TOTAL	BILLED BY
Dispositive Motions REVIEW AND REDLINE PROPOSED ORDER AND JUDGMENT GRANTING APPROVAL OF PAGA SETTLEMENT	BILLABLE	9/19/2024	0.8	\$600.00	\$480.00	JAY
Dispositive Motions REVIEW AND REDLINE NOTICE OF MOTION FOR APPROVAL OF PAGA SETTLEMENT	BILLABLE	9/19/2024	0.2	\$600.00	\$120.00	JAY
Communicate (with client) CONFER WITH CLIENT	BILLABLE	9/19/2024	0.3	\$600.00	\$180.00	JAY
Dispositive Motions REVIEW MOTION FOR APPROVAL OF PAGA SETTLEMENT	BILLABLE	9/19/2024	1.2	\$600.00	\$720.00	JAY
Dispositive Motions DRAFT DECLARATION FOR PLAINTIFF TARIGAN IN SUPPORT OF MOTION FOR APPROVAL OF PAGA SETTLEMENT	BILLABLE	9/18/2024	0.9	\$600.00	\$540.00	JAY
Dispositive Motions DRAFT DECLARATION IN SUPPORT OF APPROVAL OF PAGA SETTLEMENT	BILLABLE	9/18/2024	2.1	\$600.00	\$1,260.00	JAY

ITEM	STATUS	DATE	HRS	RATE	TOTAL	BILLED BY
Analysis/Strategy CONFER WITH K. MAHONEY REGARDING CASE	BILLABLE	9/13/2024	0.3	\$600.00	\$180.00	JAY
Analysis/Strategy DISCUSS CASE STATUS WITH J. YOUNG	BILLABLE	9/13/2024	0.3	\$850.00	\$255.00	KM
Settlement CONFER WITH OPPOSING COUNSEL	BILLABLE	9/11/2024	0.4	\$600.00	\$240.00	JAY
Communicate (with client) CONFERENCE WITH CLIENT	BILLABLE	9/3/2024	0.2	\$600.00	\$120.00	JAY
Pleadings DRAFT STIPULATION TO CONTINUING HEARING	BILLABLE	8/27/2024	0.4	\$600.00	\$240.00	JAY
Communicate (with client) CONFERENCE WITH CLIENT	BILLABLE	8/20/2024	0.3	\$600.00	\$180.00	JAY
Pleadings REVIEW STIPULATION TO FILE FIRST AMENDED COMPLAINT	BILLABLE	8/20/2024	0.2	\$600.00	\$120.00	JAY
Pleadings EMAIL TO COUNSEL RE PAGA COMPLAINT	BILLABLE	8/12/2024	0.1	\$600.00	\$60.00	JAY

ITEM	STATUS	DATE	HRS	RATE	TOTAL	BILLED BY
Communicate (with client) CONFER WITH CLIENT	BILLABLE	8/6/2024	0.8	\$600.00	\$480.00	JAY
Pleadings EMAIL OPPOSING COUNSEL REGARDING PENDING PAGA COMPLAINT	BILLABLE	8/1/2024	0.1	\$600.00	\$60.00	JAY
Settlement EMAIL COUNSEL RE SETTLEMENT AGREEMENT	BILLABLE	8/1/2024	0.1	\$600.00	\$60.00	JAY
Pleadings EMAIL CO COUNSEL RE FILINGS	BILLABLE	7/30/2024	0.2	\$600.00	\$120.00	JAY
Settlement REVIEW LONGFORM SETTLEMENT AGREEMENT	BILLABLE	7/12/2024	0.6	\$600.00	\$360.00	JAY
Communicate (with client) PROVIDE CLIENT UPDATES	BILLABLE	7/8/2024	0.2	\$600.00	\$120.00	JAY
Pleadings DRAFT STIPULATION TO CONTINUE CMC	BILLABLE	6/24/2024	0.4	\$600.00	\$240.00	JAY
Settlement REVIEW SETTLEMENT AGREEMENT	BILLABLE	6/6/2024	1.2	\$600.00	\$720.00	JAY

ITEM	STATUS	DATE	HRS	RATE	TOTAL	BILLED BY
 Communicate (with client) PROVIDE CLIENT UPDATE	BILLABLE	6/3/2024	0.2	\$600.00	\$120.00	
 Settlement REVIEW AND REVISE LONGFORM SETTLEMENT AGREEMENT	BILLABLE	5/31/2024	1.4	\$600.00	\$840.00	
 Communicate (with client) CONFER WITH CLIENT	BILLABLE	5/7/2024	0.4	\$600.00	\$240.00	
 Settlement REVIEW REVISED MEMORANDUM OF UNDERSTANDING	BILLABLE	5/6/2024	0.2	\$600.00	\$120.00	
 Settlement REVIEW PROPOSED MOU	BILLABLE	5/2/2024	0.3	\$600.00	\$180.00	
 Communicate (with client) CONFER WITH CLIENT	BILLABLE	5/2/2024	0.3	\$600.00	\$180.00	
 Communicate (with client) CONFER WITH CLIENT	BILLABLE	4/29/2024	0.4	\$600.00	\$240.00	
 Communicate (with client) CONFER WITH CLIENT	BILLABLE	4/23/2024	0.3	\$600.00	\$180.00	

ITEM	STATUS	DATE	HRS	RATE	TOTAL	BILLED BY
Analysis/Strategy CONFERENCE WITH K. MAHONEY RE CASE STATUS	BILLABLE	4/17/2024	0.4	\$600.00	\$240.00	JAY
Analysis/Strategy DISCUSS CASE STATUS WITH J. YOUNG	BILLABLE	4/17/2024	0.4	\$850.00	\$340.00	KM
Settlement ATTEND MEDIATION	BILLABLE	4/16/2024	8.7	\$600.00	\$5,220.00	JAY
Settlement REVIEW AND SIGN MEDIATION DOCUMENTS	BILLABLE	4/15/2024	0.3	\$600.00	\$180.00	JAY
Settlement REVIEW AND REVISE MEDIATION BRIEF	BILLABLE	4/11/2024	1.4	\$600.00	\$840.00	JAY
Analysis/Strategy REVIEW DOCUMENTS FROM CO COUNSEL	BILLABLE	4/11/2024	0.4	\$600.00	\$240.00	JAY
Communicate (with client) CONFERENCE WITH CLIENT	BILLABLE	4/10/2024	0.4	\$600.00	\$240.00	JAY
Analysis/Strategy EMAIL COUNSEL RE PENDING PAGA MATTERS	BILLABLE	4/9/2024	0.1	\$850.00	\$85.00	KM

ITEM	STATUS	DATE	HRS	RATE	TOTAL	BILLED BY
Analysis/Strategy CONFERENCE WITH KIM MAHONEY RE CASE STATUS	BILLABLE	4/4/2024	0.3	\$600.00	\$180.00	JAY
Analysis/Strategy CONFERENCE WITH ATTORNEY J. YOUNG REGARDING CASE	BILLABLE	4/4/2024	0.3	\$850.00	\$255.00	KM
Written Discovery DOWNLOAD AND REVIEW/SUMMARIZE DEFENDANT'S INFORMAL DISCOVERY PRODUCTION FOR MEDIATION	BILLABLE	3/15/2024	1.6	\$600.00	\$960.00	JAY
Communicate (with client) DRAFT CORRESPONDENCE TO CLIENT	BILLABLE	1/9/2024	0.4	\$600.00	\$240.00	JAY
Communicate (with client) PROVIDE CLIENT UPDATE	BILLABLE	11/17/2023	0.3	\$600.00	\$180.00	JAY
Court Mandated Conferences EMAIL OPPOSING COUNSEL RE CMC	BILLABLE	9/27/2023	0.1	\$600.00	\$60.00	JAY

ITEM	STATUS	DATE	HRS	RATE	TOTAL	BILLED BY
Court Mandated Conferences DRAFT STIPULATION TO CONTINUE CMC	BILLABLE	9/27/2023	0.4	\$600.00	\$240.00	JAY
Analysis/Strategy CONFER WITH PARALEGAL REGARDING CASE STATUS	BILLABLE	9/25/2023	0.3	\$600.00	\$180.00	JAY
Written Discovery CONFER WITH OPPOSING COUNSEL RE PENDING DISCOVERY	BILLABLE	9/25/2023	0.2	\$600.00	\$120.00	JAY
Settlement EMAIL ALL COUNSEL RE MEDIATION	BILLABLE	9/21/2023	0.1	\$600.00	\$60.00	JAY
Settlement EMAIL ALL COUNSEL RE MEDIATION	BILLABLE	9/20/2023	0.1	\$600.00	\$60.00	JAY
Dispositive Motions REVIEW AND SUMMARIZE DEFENDANT'S MOTION TO COMPEL ARBITRATION AND SUPPORTING DOCUMENTS	BILLABLE	9/15/2023	2.1	\$600.00	\$1,260.00	JAY
Communicate (with client) CONFER WITH CLIENT	BILLABLE	9/11/2023	0.6	\$600.00	\$360.00	JAY

ITEM	STATUS	DATE	HRS	RATE	TOTAL	BILLED BY
Analysis/Strategy REVIEW JOINT PROSECUTION AGREEMENT	BILLABLE	9/8/2023	0.6	\$600.00	\$360.00	JAY
Analysis/Strategy REVIEW PAGA NOTICE IN RELATED PAGA ACTION	BILLABLE	9/5/2023	0.3	\$600.00	\$180.00	JAY
Analysis/Strategy CONFER WITH COUNSEL IN OTHER PAGA MATTERS AGAINST DEFENDANT	BILLABLE	8/31/2023	0.2	\$600.00	\$120.00	JAY
Analysis/Strategy CONFER WITH K. MAHONEY RE CASE STRATEGY	BILLABLE	8/30/2023	0.4	\$600.00	\$240.00	JAY
Analysis/Strategy DISCUSS CASL WITH J. YOUNG	BILLABLE	8/30/2023	0.4	\$850.00	\$340.00	KM
Settlement EMAIL OPPOSING COUNSEL RE MEDIATION	BILLABLE	8/28/2023	0.1	\$600.00	\$60.00	JAY
Fact Investigation/Development RESEARCH CASES AGAINST EMPLOYER PROVIDED BY OPPOSING COUNSEL (8); DRAFT MEMORANDUM FOR THE FILE RE RELATED CASL (11)	BILLABLE	8/25/2023	1.9	\$600.00	\$1,140.00	JAY

ITEM	STATUS	DATE	HRS	RATE	TOTAL	BILLED BY
Dispositive Motions RESPOND TO DEFENDANT'S CORRESPONDENCE	BILLABLE	8/24/2023	0.2	\$600.00	\$120.00	JAY
Dispositive Motions REVIEW DEFENDANT'S CORRESPONDENCE RE ARBITRATION	BILLABLE	8/23/2023	0.3	\$600.00	\$180.00	JAY
Written Discovery CONFER WITH PARALEGAL RE DISCOVERY	BILLABLE	8/18/2023	0.2	\$600.00	\$120.00	JAY
Written Discovery DRAFT REQUEST FOR PRODUCTION OF DOCUMENTS SET ONE	BILLABLE	8/17/2023	2.5	\$600.00	\$1,500.00	JAY
Written Discovery DRAFT BELAIRE WEST NOTICE	BILLABLE	8/17/2023	1.6	\$600.00	\$960.00	JAY
Written Discovery DRAFT REQUEST FOR ADMISSION SET ONE	BILLABLE	8/17/2023	1.2	\$600.00	\$720.00	JAY
Written Discovery DRAFT SPECIAL INTERROGATORIES SET ONE	BILLABLE	8/16/2023	0.4	\$600.00	\$240.00	JAY

ITEM	STATUS	DATE	HRS	RATE	TOTAL	BILLED BY
Written Discovery DRAFT SPECIAL INTERROGATORIES, SLT TWO	BILLABLE	8/16/2023	1.8	\$600.00	\$1,080.00	JAY
Analysis/Strategy CONFER WITH OTHER COUNSEL	BILLABLE	8/7/2023	0.3	\$600.00	\$180.00	JAY
Analysis/Strategy DRAFT JOINT PROSECUTION AGREEMENT	BILLABLE	8/7/2023	1.1	\$600.00	\$660.00	JAY
Analysis/Strategy REVIEW AND SUMMARIZE RELATED CASE RULINGS	BILLABLE	8/3/2023	1.3	\$600.00	\$780.00	JAY
Pleadings REVIEW OPPOSING COUNSEL CORRESPONDENCE UPDATE CASE CALENDAR	BILLABLE	8/2/2023	0.2	\$600.00	\$120.00	JAY
Pleadings REVIEW AND REDLINE PAGA COMPLAINT DRAFTED BY J. YOUNG	BILLABLE	7/28/2023	1.1	\$850.00	\$935.00	KM
Pleadings DRAFT PAGA COMPLAINT	BILLABLE	7/27/2023	3.8	\$600.00	\$2,280.00	JAY
Communicate (with client) CONFER WITH CLIENT	BILLABLE	7/18/2023	0.6	\$600.00	\$360.00	JAY

ITEM	STATUS	DATE	HRS	RATE	TOTAL	BILLED BY
Analysis/Strategy DISCUSS CASE WITH K MAHONEY	BILLABLE	7/5/2023	0.3	\$600.00	\$180.00	JAY
Analysis/Strategy CONFER WITH J. YOUNG RE CASE STRATEGY	BILLABLE	7/5/2023	0.3	\$850.00	\$255.00	KM
Pleadings REVIEW CORRESPONDENCE FROM OPPOSING COUNSEL AND PROPOSED STIPULATION	BILLABLE	6/29/2023	0.6	\$600.00	\$360.00	JAY
Fact Investigation/Developme REVIEW CORRESPONDENCE AND PURPORTED ARBITRATION AGREEMENT	BILLABLE	6/27/2023	1.2	\$600.00	\$720.00	JAY
Analysis/Strategy CONFER WITH K. MAHONEY	BILLABLE	6/27/2023	0.4	\$600.00	\$240.00	JAY
Analysis/Strategy DISCUSS CASE STRATEGY WITH J. YOUNG	BILLABLE	6/27/2023	0.4	\$850.00	\$340.00	KM
Pleadings EMAIL OPPOSING COUNSEL REGARDING SERVICE	BILLABLE	6/20/2023	0.1	\$600.00	\$60.00	JAY

ITEM	STATUS	DATE	HRS	RATE	TOTAL	BILLED BY
Analysis/Strategy DISCUSS WITH K. MAHONEY CASE UPDATE	BILLABLE	6/12/2023	0.2	\$600.00	\$120.00	JAY
Analysis/Strategy CONFER WITH J. YOUNG RE CASE STATUS	BILLABLE	6/12/2023	0.2	\$850.00	\$170.00	KM
Analysis/Strategy REVIEW CORRESPONDENCE FROM EMPLOYER'S COUNSEL UPDATE CASE FILE	BILLABLE	5/25/2023	0.2	\$600.00	\$120.00	JAY
Analysis/Strategy CONFER WITH PARALEGAL RE CASE STATUS	BILLABLE	5/17/2023	0.2	\$600.00	\$120.00	JAY
Pleadings REVIEW FILE AND DRAFT PAGA LETTER	BILLABLE	5/16/2023	2.2	\$600.00	\$1,320.00	JAY
Analysis/Strategy CONFER WITH PC REGARDING POTENTIAL CASE	BILLABLE	5/11/2023	1.1	\$600.00	\$660.00	JAY
Fact Investigation/Developme RESEARCH EMPLOYER	BILLABLE	5/11/2023	1.5	\$600.00	\$900.00	JAY

ITEM	STATUS	DATE	HRS	RATE	TOTAL	BILLED BY
Analysis/Strategy CONFER WITH K. MAHONEY REGARDING POTENTIAL CASE	BILLABLE	5/10/2023	0.4	\$600.00	\$240.00	JAY
Analysis/Strategy DISCUSS CASE WITH ATTORNEY J. YOUNG	BILLABLE	5/10/2023	0.4	\$850.00	\$340.00	KM
Analysis/Strategy REVIEW AND SUMMARIZE DOCUMENTS PRODUCED BY CLIENT	BILLABLE	5/3/2023	0.8	\$600.00	\$480.00	JAY
Analysis/Strategy REVIEW INITIAL INTAKE AND DRAFT MEMORANDUM TO THE FILE	BILLABLE	4/24/2023	12	\$850.00	\$1,020.00	KM
			65.90	\$40,815.00 USD		

EXHIBIT B

EXPENSE	STATUS	DATE	PRICE	TOTAL	QTY	BILLED BY
Electronic Service Provider ONE LEGAL: 06277303 EFILING CHARGE - NOTICE	BILLABLE	8/12/2024	\$19.71	\$19.71	1	BAM
Electronic Service Provider ONE LEGAL: 06270706 EFILING CHARGE - NOTICE	BILLABLE	8/9/2024	\$19.71	\$19.71	1	BAM
Electronic Service Provider ONE LEGAL: 06152607 COURT FILING FEE - STIPULATION AND ORDER, STIPULATION AND ORDER	BILLABLE	6/26/2024	\$40.30	\$40.30	1	BAM
Electronic Service Provider ONE LEGAL: 06145844 COURT FILING FEE - STIPULATION AND ORDER, STIPULATION AND ORDER	BILLABLE	6/24/2024	\$40.30	\$40.30	1	BAM
Postage MEDIATION LETTER	BILLABLE	1/8/2024	\$0.63	\$0.63	1	BAM
Electronic Service Provider ONE LEGAL - NOTICE INV# 21876701 CK# PAID CC	BILLABLE	12/21/2023	\$17.66	\$17.66	1	MF
Electronic Service Provider ONE LEGAL - NOTICE INV# 21810518 CK# PAID CC	BILLABLE	12/12/2023	\$17.66	\$17.66	1	MF

EXPENSE	STATUS	DATE	PRICE	TOTAL	QTY	BILLED BY
Courtfees ONE LEGAL - 05506698 FILING CHARGE - NOTICE	BILLABLE	12/12/2023	\$17.66	\$17.66	1	BAM
Electronic Service Provider ONE LEGAL - STIPULATION AND ORDER INV# 21319336 CK# PAID CC	BILLABLE	10/5/2023	\$38.25	\$38.25	1	MF
Arbitrators/mediators KYRIACOU MEDIATION - MEDIATION FEES INV# 8003418a CK# 80170	BILLABLE	9/27/2023	\$4,100.00	\$4,100.00	1	MF
Electronic Service Provider ONE LEGAL - NOTICE INV# 21053881 CK# PAID CC	BILLABLE	8/22/2023	\$17.66	\$17.66	1	MF
Electronic Service Provider ONE LEGAL - PROOF OF PERSONAL SERVICE INV# 20951203 CK# PAID CC	BILLABLE	8/15/2023	\$17.66	\$17.66	1	MF
Postage USPS-POSTAGE-STATUS LETTER	BILLABLE	8/2/2023	\$2.31	\$2.31	1	MF
Electronic Service Provider ONE LEGAL - CIVIL CASE COVER SHEET INV# 20901737 CK# PAID CC	BILLABLE	7/31/2023	\$17.66	\$17.66	1	MF
Electronic Service Provider ONE LEGAL - CIVIL CASE COVER SHEET INV# 20901329 CK# PAID CC	BILLABLE	7/31/2023	\$13.33	\$13.33	1	MF

EXPENSE	STATUS	DATE	PRICE	TOTAL	QTY	BILLED BY
Electronic Service Provider ONE LEGAL - SUMMONS INV# 20895279 CK# PAID CC	BILLABLE	7/31/2023	\$17.66	\$17.66	1	MF
Delivery services/messengers SERVE: DOTHAN SECURITY, INC., SUMMONS; COMPLAINT; CIVIL CASE COVER SHEET; ADR, INV# 9283805 CK# PAID CC	BILLABLE	7/31/2023	\$106.75	\$106.75	1	AC
Electronic Service Provider ONE LEGAL - COMPLAINT - CIVIL CASE COVER SHEET - SUMMONS INV# 20890782 CK# PAID CC	BILLABLE	7/28/2023	\$1,494.99	\$1,494.99	1	MF
Postage USPS-POSTAGE-NOTICE OF ISC	BILLABLE	7/19/2023	\$1.11	\$1.11	1	MF
Postage USPS POSTAGE STATUS LETTER	BILLABLE	6/29/2023	\$2.70	\$2.70	1	MF
Postage USPS-POSTAGE-LWDA LETTER	BILLABLE	5/17/2023	\$8.34	\$8.34	1	MF
				\$6,012.05 USD		