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Attorneys for Plaintiff

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF ORANGE**

MILTON RAMON SANTA CRUZ,
individually, and on behalf of other members
of the general public similarly situated;

Plaintiff,

v.

TECTONIC TRANSPORT, a California
corporation; and DOES 1 through 100,
inclusive;

Defendants.

Case No.: 30-2023-01320697-CU-OE-CXC

Assigned for All Purposes to:
Honorable David A. Hoffer
Department CX-103

CLASS ACTION

**DECLARATION OF DOUGLAS HAN IN
SUPPORT OF MOTION FOR FINAL
APPROVAL OF CLASS ACTION
SETTLEMENT, ATTORNEY FEE
AWARD, COST AWARD, AND CLASS
REPRESENTATIVE ENHANCEMENT
PAYMENT**

RELATED TO ROA NO. 92

[Notice of Motion and Motion for Final
Approval; Declaration of Class Representative
(Milton Ramon Santa Cruz); Declaration of
Settlement Administrator (Amanda Howard);
filed concurrently herewith]

Hearing Date: October 20, 2025
Hearing Time: 1:30 p.m.
Hearing Place: Department CX-103

Complaint Filed: April 21, 2023
FAC Filed: March 21, 2024
Trial Date: None Set

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I, **DOUGLAS HAN**, hereby declare as follows:

1. I am an attorney licensed to practice law in California and founder of Justice Law Corporation, attorneys of record for Plaintiff Milton Ramon Santa Cruz (“Plaintiff”). The facts set forth in this declaration are within my personal knowledge. If called as a witness, I could and would competently testify as follows.

PRELIMINARY APPROVAL OF SETTLEMENT

2. On April 18, 2025, in Department CX-103 of the above-entitled court, Honorable Randall J. Sherman preliminarily approved the Joint Stipulation of Class Action and PAGA Settlement and Amendment to the Joint Stipulation of Class Action and PAGA Settlement (Collectively, “Agreement,” “Settlement Agreement,” or “Settlement”), provisionally certified the Justice Law Corporation as Class Counsel, conditionally certified the Class, and appointed Plaintiff as the class representative for settlement purposes. The Court ordered the mailing of the Notice of Class Action Settlement and Exclusion Form. The Court adopted the notice procedures specified in the Agreement, which were outlined in the motion for preliminary approval, and ordered they be implemented. ILYM Group, Inc. was appointed by the Court to serve as the Settlement Administrator to administer the terms of the Agreement.

3. The Settlement was approved by Plaintiff. As of the date of this signed declaration, no objections have been received regarding the Attorney Fee Award, Cost Award, Class Representative Enhancement Payment, and Administration Costs.

WORK PERFORMED BY JUSTICE LAW CORPORATION

4. Class Counsel actively engaged in this litigation since it was initially filed. Prior to the filing and continuing over the duration of this case, Class Counsel conducted an investigation of the factual and legal issues. This included drafting and propounding form interrogatories, special interrogatories, requests for admission, and requests for production of documents. Pursuant to discovery, exchange of information, and in preparation for early mediation, Class Counsel received, among other things, the following information and evidence

1 to properly evaluate the claims: (a) personnel records; (b) Class Members' demographic
2 information (*e.g.*, information bearing on the Class size); (c) documents pertaining to Defendant
3 Tectonic Transport's ("Defendant") relevant policies, practices, and procedures (*e.g.*, meal and
4 rest breaks, timekeeping and payroll, reimbursement, etc.), such as employee handbook, policy
5 documents, etc.; and (d) sampling of time and payroll records. Using the information obtained,
6 Class Counsel determined: (i) Class Members' average hourly rates of pay; (ii) number of
7 current and former Class Members employed during the Class Period; (iii) number of Class
8 Members employed during the Private Attorney General Act of 2004 ("PAGA") Period; (iv)
9 number of shifts worked by the Class Members during the Class Period; (v) number of hours
10 worked during shifts; (vi) number, length, and timing of meal and rest breaks taken; and (vii)
11 number of workweeks and pay periods within the Class and PAGA Period.

12 5. Class Counsel analyzed documents produced from Defendant and other
13 sources. Class Counsel also located, interviewed, and obtained statements from putative class
14 members. These interviews enabled Class Counsel to determine the extent and frequency of the
15 alleged violations, as well as learn more about the day-to-day circumstances giving rise to the
16 violations. Collectively, this information better prepared Class Counsel for mediation, thereby
17 increasing the likelihood of negotiating a settlement.

18 6. The documents analyzed provided a critical understanding of the nature of
19 the work performed by the Class Members and policies, practices, and procedures in place. The
20 documents were used in analyzing liability and damages in connection with all phases of the
21 litigation and mediation process. The document and data exchanges allowed Class Counsel to
22 determine the strengths and weaknesses of the claims and defenses. The investigation included:
23 (a) determining Plaintiff's suitability as the putative class representative through interviews and
24 analyses of employment documents and related records; (b) evaluating the potential claims and
25 applicable defenses; (c) researching wage-and-hour class actions similar to the claims alleged,
26 nature of the positions, and type of employer in the instant case; (d) locating and interviewing
27 putative class members to obtain corroboration for the legal theories developed; (e) drafting the
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1 written notices to the California Labor and Workforce Development Agency; (f) drafting and
2 propounding the formal discovery requests; (g) analyzing the labor policies, practices, and
3 procedures in place pursuant to the documents produced; (h) researching class certification and
4 manageability in similar cases; (i) estimating and calculating potential damages for settlement
5 purposes; (j) drafting the mediation brief and damages analysis; (k) preparing for and
6 participating in a full day of mediation; and (l) drafting, updating, and finalizing the Settlement
7 Agreement (and exhibits), including amendments.

8 7. After the exchange of relevant information and evidence, the Parties
9 participated in mediation. The mediator helped to manage the Parties' expectations and provided
10 a useful, neutral analysis of the issues and risks to both sides. Under the auspices of the mediator,
11 the Parties managed to negotiate a settlement for this matter via a mediator's proposal. At all
12 times, the negotiations were adversarial and non-collusive.

13 8. Class Counsel seek an Attorney Fee Award of \$91,666.67 (1/3 of the
14 Gross Settlement Amount). This percentage award is commensurate with the: (a) risks
15 undertaken; (b) immense time, effort, and expense dedicated to this matter; (c) skill and
16 determination displayed along with the quality of work; (d) results achieved; and (e) other cases
17 turned down to devote time and effort to this matter. This was not a clear-cut case because
18 several factors made this case challenging. These factors include: (i) difficulties in pinning down
19 job responsibilities, wages paid, and meal and rest breaks taken; (ii) myriad of documents that
20 had to be reviewed and analyzed prior to mediation; (iii) shifting wage-and-hour laws overlaid
21 by the risks of class certification being denied; (iv) initial difficulty determining commonality
22 and typicality; and (v) Defendant's initial firm resistance to the relief.

23 9. I am aware that the common and acceptable rate for contingency
24 representation in wage-and-hour class action litigation is forty percent (40%) before trial, with
25 the range being from thirty-three and one-third percent (33.3%) up to fifty percent (50%).

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1 10. Class Counsel incurred many hours of work in connection with this case
2 that the fee request is also justified under a lodestar analysis. The total hours worked by Justice
3 Law Corporation totals 292.4 hours (113.8 hours for Douglas Han, 100.1 hours for Shunt
4 Tatavos-Gharajeh, and 78.5 hours for Lizette Rodriguez). Attached hereto as **Exhibit 1** is the
5 Task & Time Chart setting forth the breakdown of time for the requisite tasks. These hours do
6 not include the additional administrative oversight during the payment period, preparation of the
7 final report, and reporting before the Court regarding final disbursement.

8 11. Based upon the total of 292.4 hours worked and utilizing reasonable
9 hourly rates commensurate with the attorneys' experience, the base lodestar fees calculation is
10 \$221,750. The hourly rates are \$900 per hour for myself, \$800 per hour for my associate Shunt
11 Tatavos-Gharajeh, and \$500 per hour for my former associate Lizette Rodriguez. These hourly
12 rates are commensurate with our individual backgrounds, background of our firm, and our
13 training and experience in litigating class actions, particularly wage-and-hour matters.

14 12. In support of Class Counsel's hourly rates, attached hereto as **Exhibit 2** is
15 an excerpt of the 2022 Real Rate Report compiled by Wolters Kluwer that surveyed the hourly
16 rates charged in 2022 by hundreds of attorneys in the Los Angeles County area. For example, the
17 real market rates of Los Angeles County area attorneys who practiced "Litigation" are surveyed
18 at page 16 of the report, which describes the 2022 rates charged by 322 Los Angeles County
19 partners and 408 Los Angeles County associates. For that category, the Third Quartile Los
20 Angeles County rates were \$1,045 per hour for partners and \$855 per hour for associates.
21 Similarly, page 26 of the report describes the 2022 rates charged by 63 Los Angeles County
22 associates with "Fewer Than 3 Years" of experience. For this category, the Third Quartile Los
23 Angeles County rate was \$654 per hour for associates. Page 26 of the report also describes the
24 2022 rates charged by 144 Los Angeles County associates with "3 to Fewer Than 7 Years" of
25 experience. For that category, the Third Quartile Los Angeles County rate was \$838 per hour for
26 associates. Next, page 26 of the report describes the 2022 rates charged by 171 Los Angeles
27 County associates with "7 or More Years" of experience. For that category, the Third Quartile
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Los Angeles County rate was \$840 per hour for associates. Likewise, page 32 of the report describes the 2022 rates charged by 183 Los Angeles County partners with “Fewer Than 21 Years” of experience. For this category, the Third Quartile Los Angeles County rate was \$1,075 per hour for partners. Finally, our requested hourly rates are in line with the Laffey Matrix, attached hereto as **Exhibit 3**.

13. As stated above, Class Counsel’s base lodestar fees calculation is \$221,750. When cross-checked with the Attorney Fee Award, it results in a negative multiplier of 0.41. The lodestar multiplier applied is supported by applicable factors (listed above) and is consistent with the multipliers in other common fund cases and with the fees charged in the marketplace. Furthermore, the hours spent are fully documented and consistent with those that would be expected in a matter of this duration, complexity, and amounts at stake.

14. The Attorney Fee Award is in line with the awards in similar cases in California and is consistent with the market rates. Class Counsel have been routinely awarded at least one-third (1/3) fee requests or more in similar class action and representative matters throughout California, including Orange County. (See *Grimes v. Pacific Cardiovascular Associates Medical Group, Inc.*, Orange County Superior Court, Case No. 30-2020-01168857-CU-OE-CXC, final approval granted on July 2, 2025 granting 35% fee request; *Sanchez v. Horizon Health & Sub-Acute, LLC*, Orange County Superior Court, Case No. 30-2021-01226692-CU-OE-CXC, final approval granted on June 6, 2024 granting 1/3 fee request; *Marquez v. Nihon Kohden America, Inc.*, Orange County Superior Court, Case No. 30-2021-01184495-CU-OE-CXC, final approval granted on December 21, 2023 granting 1/3 fee request; *Albanez v. OCMBC, Inc. d/b/a Loanstream Mortgage*, Orange County Superior Court, Case No. 30-2019-01078636-CU-OE-CXC, final approval granted on March 6, 2023 granting 1/3 fee request; *Martin v. Ameripeac, Inc.*, Orange County Superior Court, Case No. 30-2020-01170846-CU-OE-CXC, final approval granted on January 24, 2023 granting 1/3 fee request; *Itzep v. Axonics Modulation Technologies, Inc.*, Orange County Superior Court, Case No. 30-2020-01140962-CU-OE-CXC, final approval granted on January 13, 2023 granting 35% fee request;

1 *Dam v. Rubber-Cal, Inc.*, Orange County Superior Court, Case No. 30-2020-01176087-CU-OE-
2 CXC, final approval granted on September 30, 2022 granting 33% fee request; *Rhodes v.*
3 *Cavotec Dabico US, Inc., et al.*, Orange County Superior Court, Case No. 30-2021-01177305-
4 CU-OE-CXC, final approval granted on July 28, 2022 granting 33% fee request; *Beltran v.*
5 *Stremicks Heritage Foods, LLC*, Orange County Superior Court, Case No. 30-2019-01043445-
6 CU-OE-CXC, final approval granted on February 10, 2022 granting 33% fee request; *Hernandez*
7 *v. Saint-Gobain Performance Plastics Corporation*, Orange County Superior Court, Case No.
8 30-2020-01142388-CU-OE-CXC, final approval granted on December 6, 2021 granting 33% fee
9 request; *Pichardo v. American Financial Network, Inc.*, Orange County Superior Court, Case
10 No. 30-2016-00880472-CU-OE-CXC, PAGA approval granted on April 7, 2021 granting 33%
11 fee request; *Lomeland v. Consolidated Fire Protection, Inc., et al.*, Orange County Superior
12 Court, Case No. 30-2019-01056877-CU-OE-CXC, final approval granted on February 3, 2021
13 granting 35% fee request; *Harrington v. Arlon Graphics, LLC*, Orange County Superior Court,
14 Case No. 30-2018-00970444-CU-OE-CXC, final approval granted on October 19, 2020 granting
15 35% fee request; *Ratcliffe v. Gold Star Mortgage Financial*, Orange County Superior Court,
16 Case No. 30-2017-00918768-CU-OE-CXC, final approval granted on January 22, 2020 granting
17 33% fee request; *Chuen v. 911 Mobile Mechanics, LLC*, Orange County Superior Court, Case
18 No. 30-2017-00943421-CU-OE-CXC, final approval granted on August 23, 2019 granting 35%
19 fee request; *Emerson v. Ganahl Lumber Company*, Orange County Superior Court, Case No. 30-
20 2014-00747750-CU-OE-CXC, final approval granted on April 26, 2017 granting 33% fee
21 request; and *Aceves v. Cambro Manufacturing Company*, Orange County Superior Court, Case
22 No. 30-2015-00810013-CU-OE-CXC, final approval granted on April 14, 2017 granting 33% fee
23 request.) Consequently, the fee request is well within a reasonable range.

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16. Since its inception, our firm has almost exclusively focused on the prosecution of consumer and employment class actions, involving wage-and-hour claims, unfair business practices or consumer fraud. Our firm has successfully litigated to conclusion over three hundred (300) wage-and-hour class or representative actions. Currently, we are the attorneys of record in over a dozen employment-related putative class actions in both state and federal courts in California. During this time, in association with other law firms, we have obtained millions of dollars on behalf of thousands of individuals in California.

18. Our firm also has appellate experience that resulted in the following cases being published that defined and clarified wage and hour law: (a) *Oswald v. Murray Plumbing & Heating Corp.* (2022) 82 Cal.App.5th 938; (b) *Garner v. Inter-State Oil Co.* (2020) 52 Cal.App.5th 619; (c) *Brooks v. AmeriHome Mortgage Co., LLC* (2020) 47 Cal.App.5th 624; (d) *Nieto v. Fresno Beverage Company, Inc.* (2019) 33 Cal.App.5th 274; and (e) *Esparza v. KSI Industries, L.P.* (2017) 13 Cal.App.5th 1228.

19. Shunt Tatavos-Gharajeh is a Partner at my office. Shunt received his undergraduate degree from University of California, Los Angeles and earned a Juris Doctor degree from Southwestern University School of Law. Shunt was admitted to practice in California in December 2010. Shunt is admitted to practice in the Courts of California. The focus of Shunt's practice is class action wage-and-hour law. Shunt has worked on multiple class action cases and representative actions that have been granted approval, including *Keles v. The Art of*

1 *Shaving – FL, LLC*, Alameda County Superior Court, Case No. RG13687151; *Esters v. HDB*
2 *LTD. Limited Partnership*, Kern County Superior Court, Case No. S-1500-CV-279879; *Guzman*
3 *v. International City Mortgage, Inc.*, San Bernardino County Superior Court, Case No.
4 CIVDS1502516; *Davidson v. Lentz Construction General Engineering Contractor*, Kern County
5 Superior Court, Case No. S-1500-CV-279853; *Betancourt v. Hugo Boss USA, Inc.*, Los Angeles
6 County Superior Court, Case No. BC506988; *Porras v. DBI Beverage, Inc.*, Santa Clara County
7 Superior Court, Case No. 1-14-CV-266154; *Hartzell v. Truitt Oilfield Maintenance Corporation*,
8 Kern County Superior Court, Case No. S-1500-CV-283011; *Navarro-Salas v. Markstein*
9 *Beverage Co.*, Sacramento County Superior Court, Case No. 34-2015-00174957-CU-OE-
10 GDS; *White v. Pilot Travel Centers, LLC*, San Joaquin County Superior Court, Case No. STK-
11 CV-UOE-2013-0009098; *McKinnon v. Renovate America, Inc., et al.*, San Diego County
12 Superior Court, Case No. 37-2015-00038150-CU-OE-CTL; *Antoine v. Riverstone Residential*
13 *CA, Inc.*, Sacramento County Superior Court, Case No. 34-2013-00155974-CU-OE-GDS; *Pina*
14 *v. Zim Industries, Inc.*, Kern County Superior Court, Case No. S-1500-CV-284498; *Amaya v.*
15 *Certified Payment Processing*, Sacramento County Superior Court, Case No. 34-2015-
16 00186623-CU-OE-GDS; *Burke v. Petrol Production Supply, Inc.*, Kern County Superior Court,
17 Case No. BCV-15-101092; *Ceron v. Hydro Resources-West, Inc.*, Kern County Superior Court,
18 Case No. BCV-15-101461; *Chavana v. Golden Empire Equipment, Inc.*, Kern County Superior
19 Court, Case No. BCV-16-102796; *De La Torre v. Acuity Brands Lighting, Inc.*, San Bernardino
20 County Superior Court, Case No. CIVDS1601800; *Dobbs v. Wood Group PSN, Inc.*, Kern
21 County Superior Court, Case No. BCV-16-101078; *Gonzalez v. Matagrano, Inc.*, San Francisco
22 County Superior Court, Case No. CGC-16-550494; *Harbabikian v. Williston Financial Group,*
23 *LLC*, Ventura County Superior Court, Case No. 56-2016-004485186-CU-OE-VTA; *Prince v.*
24 *Ponder Environmental Services, Inc.*, Kern County Superior Court, Case No. BCV-16-
25 100784; *Ramirez v. Crestwood Operations, LLC*, Kern County Superior Court, Case No. BCV-
26 17-100503; *Reyes v. Halliburton Energy Services, Inc.*, Kern County Superior Court, Case No.
27 S-1500-CV-280215; *Rodriguez v. B&L Casing Serve, LLC*, Kern County Superior Court, Case

No. S-1500-CV-282709; *Marketstar Wage and Hour Cases*, Alameda County Superior Court, Case No. JCCP004820; *Rodriguez v. Delta Sierra Beverage, LLC*, Sacramento County Superior Court, Case No. 34-2017-00206727-CU-OE-GDS; *Stuck v. Jerry Melton & Sons Construction, Inc.*, Kern County Superior Court, Case No. BCV-16-101516; *Blevins v. California Commercial Solar, Inc.*, Kern County Superior Case, No. BCV-17-100571; *Cisneros v. Wilbur-Ellis Company, LLC*, Kern County Superior Court, Case No. BCV-17-102836; and *Castro v. General Production Service of California, Inc.*, Kern County Superior Court, Case No. BCV-15-101164. Shunt was also certified as class counsel in *Fulmer v. Golden State Drilling, Inc.*, Kern County Superior Court, Case No. S-1500-CV-279707; *Manas v. Kenai Drilling Limited*, Los Angeles County Superior Court, Case No. BC546330; *Nuncio v. MMI Services, Inc.*, Kern County Superior Court, Case No. S-1500-CV-282534; and *Ferrer v. Ameriflex, Inc.*, Riverside County Superior Court, Case No. RIC2002157, cases that were certified after a contested class certification. Shunt is handling class actions pending in California.

20. Lizette Rodriguez was an Associate Attorney at my office. Lizette received her undergraduate degree from Cornell University in Government with a minor in Inequalities Studies. Lizette earned a Juris Doctor degree from Pepperdine University School of Law and was admitted to practice in California in January 2021. Lizette is admitted to practice in all state courts of California. The focus of Lizette's practice is wage-and-hour class action and representative PAGA matters. During her time with Justice Law Corporation, Lizette worked on several wage-and-hour class action and representative PAGA matters that have been granted approval, including *Gandionco v. Allergan, Inc., et al.*, San Joaquin County Superior Court, Case No. STK-CV-UOE-2022-0003077; *Shadinger v. Wesco Distribution, Inc.*, Sacramento County Superior Court, Case No. 34-2021-00298583-CU-OE-GDS; *Miranda v. Askew Industrial Corporation*, Los Angeles County Superior Court, Case No. 21STCV40337; *Fox v. Cares Community Health and One Community Health*, Sacramento County Superior Court, Case No. 34-2019-00271128-CU-OE-GDS [Consolidated With Case No. 34-2020-00282587-CU-OE-GDS]; *Mendoza v. Allied Sales and Distribution, Inc.*, Los Angeles County Superior Court, Case

No. 20STCV31836; *Weisman v. General Atomics, et al.*, San Diego County Superior Court, Case No. 37-2021-00000331-CU-OE-CTL; *Johnson v. Stelvio Transport LLC*, San Diego County Superior Court, Case No. 37-2021-00006153-CU-OE-CTL [Consolidated with 37-2021-00009951-CU-OE-CTL]; *Alcala v. Ultra Clean Technology Systems and Services, Inc. d/b/a Ultra Clean Technology*, Alameda County Superior Court, Case No. RG21094281 [Consolidated With Case No. RG21103305]; *Mathews v. Pinterest, Inc.*, San Francisco County Superior Court, Case No. CGC-21-589584; *De Alba v. Pacific Consolidated Industries, LLC*, Riverside County Superior Court, Case No. CRVI2200092; *Cendejas v. Performance Machine, LLC*, Los Angeles County Superior Court, Case No 22STCV33442 [Consolidated with 23STCV06759]; and *Reach v. LJ's Cleaning Solutions CA, LLC*, Shasta County Superior Court, Case No. 23CV-0201731. Lizette also worked on several wage-and-hour class action and representative PAGA matters that were pending in various courts in California.

CLASS REPRESENTATIVE ENHANCEMENT PAYMENT

21. The Settlement Agreement provides for the payment of the Class Representative Enhancement Payment of \$7,500 to Plaintiff for the time and effort spent serving as the class representative. Plaintiff spent several hours (and days) producing relevant documents and past employment records (*e.g.*, personnel records), as well as providing the facts and evidence necessary to prove the allegations (*e.g.*, description of work experience and work environment). Plaintiff was accessible whenever needed by Class Counsel and actively tried to obtain and provide as much information as possible to benefit the Class (*e.g.*, giving the names and contact information of putative class members, discussing applicable legal theories, gathering information from putative class members). Plaintiff even assisted Class Counsel with reviewing the documents produced by Defendant and other sources, developing a strategy to obtain additional documents, determining the importance of the documents produced, and reviewing the operative complaints, answer, and formal discovery requests. Plaintiff also prepared for and made himself available to attend mediation, provided input on the negotiations, and reviewed and approved the Settlement Agreement (and exhibits), including its amendments.

1 Plaintiff was made aware of and accepted the risks and sacrifices associated with serving as the
2 class representative (*e.g.*, providing a broader release, risking an adverse judgment for attorneys’
3 fees and costs, losing a potential source of income). It is appropriate and just for Plaintiff to
4 receive the Class Representative Enhancement Payment, in addition to the Individual Settlement
5 Share, for the services on behalf of the Class Members.

6 **LITIGATION COSTS AND EXPENSES INCURRED BY**

7 **JUSTICE LAW CORPORATION**

8 22. Class Counsel incurred \$18,146 in costs and litigation expenses as
9 reflected in **Exhibit 5**. These costs and expenses were reasonable and necessary.

10 23. Plaintiff agreed to a contingency agreement in the retainer agreement of at
11 least thirty-eight percent (38%). Class Counsel have borne all the risks and costs of litigation.

12 **CONCLUSION**

13 24. I submit that the Settlement reached herein is fair, reasonable, and
14 adequate. I submit that the Settlement is in the best interest of Plaintiff and Class Members.

15 25. Class Counsel do not have any fee-splitting arrangement with any other
16 counsel in this matter.

17
18 I declare that under the penalty of perjury under the laws of California, the foregoing is
19 true and correct. Executed on this 19th day of September 2025 at Pasadena, California.

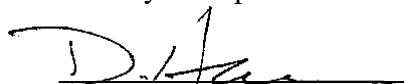
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EXHIBIT 1

SANTA CRUZ V. TECTONIC TRANSPORT
(ORANGE COUNTY SUPERIOR COURT CASE No. 30-2023-01320697-CU-OE-CXC)
ATTORNEY TASK AND TIME CHART

TASKS	JUSTICE LAW CORPORATION			
	DH	STG	LR	FIRM TOTAL
Investigation and Research / Due Diligence				
Pre-Lawsuit Investigation of the Key Facts with a Focus on 1) Class Certification Elements, including Adequacy, Typicality, Superiority, and Commonality; 2) Merits of Plaintiff's Claims and the Merits of the Claims of the Putative Class Members; and 3) Potential Damages Exposure of Defendant with respect to the Damages Sustained by Milton Ramon Santa Cruz's	2.5	2.8	2.1	7.4
Prepare a Discovery Strategy Plan of Action, including Topics of Inquiry Important to Certification, Liability, and Damages/Civil Penalties	1.9	3.1	1.5	6.5
Investigation of Defendant's Organizational and Corporate Structure, and Executive Reporting Structure as It Relates to the Employment and Management of the Putative Class Members	1.3	2.7	1.7	5.7
Meet and Communicate with Named Plaintiff Milton Ramon Santa Cruz throughout the Pendency of the Case	11.3	10.8	9.1	31.2
Research and Analysis of Defendant's Litigation History Involving Wage-and-Hour Issues and Other Related Employment Issues	1.9	2.1	1.2	5.2
Research and Analysis of Potential Defenses Defendants May Raise, Including, <i>de minimis</i> Work, Non-compensable Off-the-clock Work, compliant policies and manageability and arbitration agreements	1.7	2.3	1.8	5.8
Communicating with Putative Class members, and Conduct Interviews, and Request Authorization for Personnel Records	13.2	11.9	9.3	34.4
Analysis and Review of Time Records and Corresponding Wage Statements of Putative Class Members with a Focus on Violation Rates for Missed, Short, Late, or Interrupted Meal and Rest Periods, and Whether Any Corresponding Premium Pay Was Issued by Defendant or Regular Rate was Properly Calculated	7.8	9.2	6.1	23.1

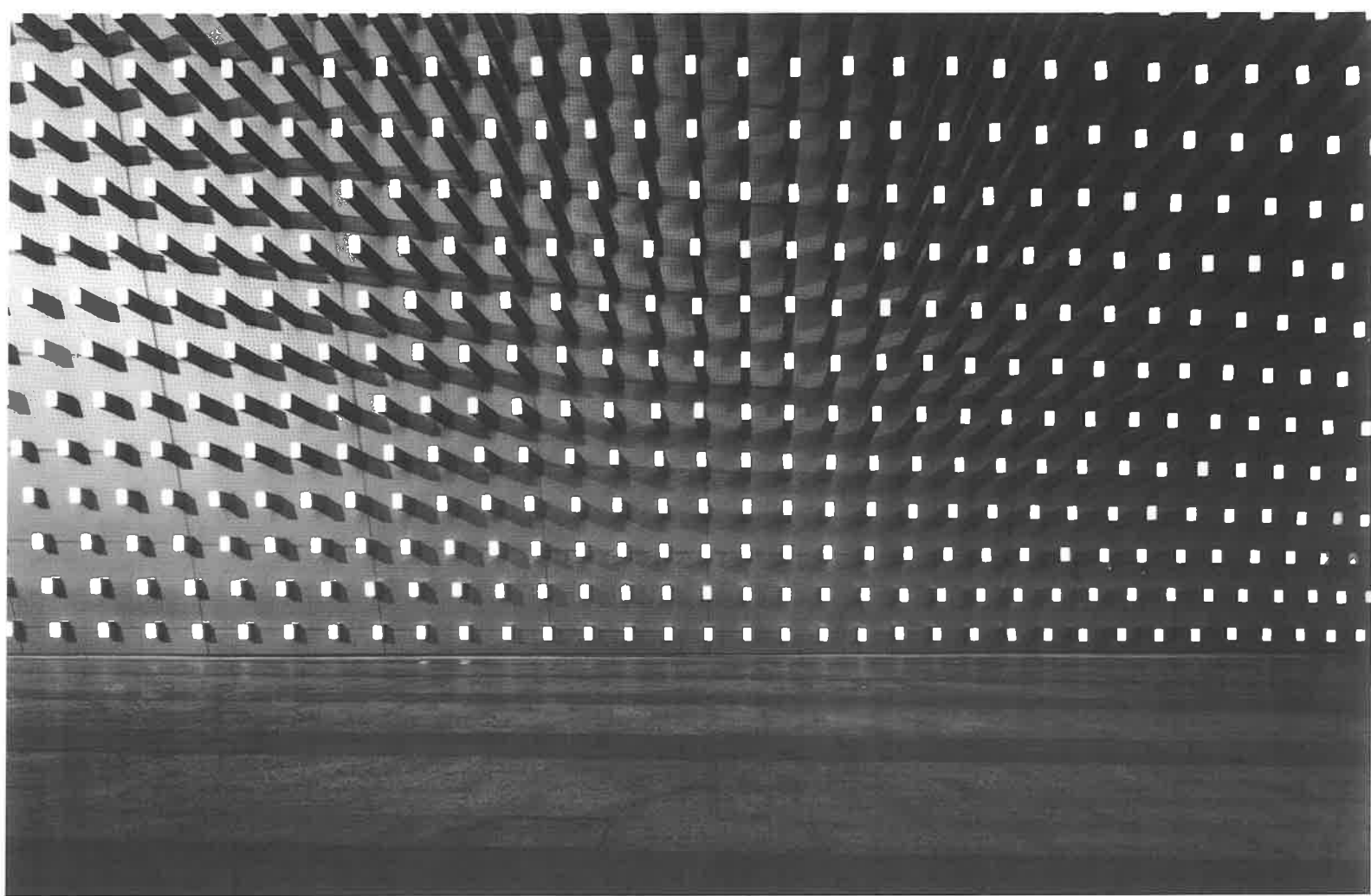
Pleadings and Court Filings					
Draft Plaintiff Milton Ramon Santa Cruz's Class Action Complaint for Damages; Legal Research and Analysis of All Claims Involved (Filed 4.21.23)	1	1.5	1.1	3.6	
Review and Analyze Defendant Tectonic Transport's Answer to Plaintiff's Class Action Complaint; Research Affirmative Defenses (Filed 6.6.23)	0.2	0.4	0.6	1.2	
Review Court's Minute Order Dated June 14, 2023	0.1	0.1	0.1	0.3	
Prepare Plaintiff Milton Ramon Santa Cruz's Notice of Complex Determination and Initial Case Management Conference (Filed 6.15.23)	0.1	0.1	0.2	0.4	
Review Court's Minute Order Dated June 28, 2023	0.1	0.1	0.1	0.3	
Prepare Joint Initial Status Conference Statement Regarding October 19, 2023 Initial Status Conference (Filed 10.16.23)	0.3	0.2	0.1	0.6	
Review Court's Minute Order Dated October 18, 2023	0.1	0.1	0.1	0.3	
Prepare Joint Initial Status Conference Statement Regarding March 22, 2024 Initial Status Conference (Filed 3.14.24)	0.3	0.2	0.1	0.6	
Review Court's Minute Order Dated March 20, 2024	0.1	0.1	0.1	0.3	
Draft Stipulation and [Proposed] Order Regarding Filing First Amended Complaint (Filed 3.20.24)	0.2	0.5	0.4	1.1	
Review Court's Order Granting Leave to File First Amended Complaint (Filed 3.20.24)	0.1	0.1	0.2	0.4	
Draft Plaintiff Milton Ramon Santa Cruz's First Amended Class Action Complaint for Damages; Legal Research and Analysis of All Claims Involved; Prepare Notice of Entry of Order (Filed 3.21.24)	0.7	1.8	0	2.5	
Prepare Joint Statement Regarding August 8, 2024 Status Conference (Filed 3.14.24)	0.3	0.2	0.1	0.6	
Review Court's Tentative Ruling Regarding December 13, 2024 Plaintiff's Motion for Preliminary Approval of Class Action Settlement (Filed 12.11.24)	0.2	0.1	0.3	0.6	
Review Court's Minute Order Dated December 13, 2024	0.1	0.1	0	0.2	

Review Court's Tentative Ruling Regarding April 18, 2025 Plaintiff's Continued Motion for Preliminary Approval of Class Action Settlement (Filed 4.14.25)	0.5	0.3	0	0.8
Review Court's Order Preliminarily Approving Class Action and PAGA Settlement; Prepare Notice of Entry of Order (Filed 4.18.25)	0.1	0.1	0	0.2
Review Court's Minute Order Dated April 18, 2025	0.1	0.1	0	0.2
Prepare Plaintiff's Notice of Tentative Ruling Regarding April 18, 2025 Motion for Preliminary Approval Hearing (Filed 4.18.25)	0.3	0.2	0	0.5
Review Court's Notice of Case Reassignment to Honorable David A. Hoffer (Filed 4.28.25)	0.1	0.1	0	0.2
Review Court's Minute Order Dated August 22, 2025	0.1	0.1	0	0.2
Review Court's Order Granting Plaintiff's Motion for Final Approval of Class Action Settlement; Prepare Notice of Entry of Order (Anticipated)	0.3	0.2	0	0.5
Appearances				
Prepare for and Attend Plaintiff's Motion for Final Approval of Class Action Settlement Hearing (Anticipated)	2	0	0	2
Discovery and Depositions				
Draft Letter to Defense Counsel Re: Request for Personnel File, Pay Stubs and Time Records for Plaintiff Milton Ramon Santa Cruz	1.5	0	0	1.5
Review and Analyze Plaintiff Milton Ramon Santa Cruz's Personnel File, Pay Stubs, and Time Records Produced by Defendant	1.6	2.3	0	3.9
Draft Plaintiff Milton Ramon Santa Cruz's Form Interrogatories - General (Set One), Requests for Production of Documents (Set One), Requests for Admissions (Set One) and Special Interrogatories (Set One) to Defendant Tectonic Transport (Propounded 5.18.23)	0.2	0.8	1.4	2.4
Mediation and Settlement				
Draft Mediation Information Letter to Defense Counsel Dated December 6, 2023	0.6	0.6	1	2.2

Review Analyze Documents and Data Produced by Defendant in Response to the Mediation Information Letter, including Sample Time Keeping and Corresponding Pay Records	6.3	9.8	8.7	24.8
Prepare for Mediation, including Research Merits of Claims, Performing Damages Analysis, Drafting Mediation Brief, and Compiling Mediation Exhibits and Putative Class Members Declarations	6.2	8.1	7.3	21.6
Prepare for and Attend Mediation with Mediator Lisa Klerman (via Zoom on February 22, 2024)	8.5	8.5	8.5	25.5
Negotiate, Draft and Finalize Settlement Agreement Terms with Defense Counsel; Meet and Confer and Revise Settlement Agreement and Class Notice	4.4	0	5.8	10.2
Coordinate Settlement Administration with Settlement Administrator; Ongoing Monitoring of Settlement Administration; Respond to Class Member Inquiries; Communicate with Class Member Re: Deadline and Claims Procedures	2.6	1.9	0	4.5
Letters and Correspondence				
Draft Notice to State of California Labor & Workforce Development Agency Re Milton Ramon Santa Cruz's Claim for Penalties Under the Labor Code Private Attorneys General Act of 2004, California Labor Code sections 2698, <i>et seq.</i> (Submitted to LWDA on 3.14.24)	1.3	0.8	0	2.1
Draft Correspondence to, and Respond to Correspondence from, Telephone conference calls with Defense Counsel throughout the Pendency of the Lawsuit	8.1	10.5	7.2	25.8
Law and Motion				
Prepare Plaintiff's Notice of Motion and Motion for Preliminary Approval of Class Action Settlement; Conditional Certification, Approval of Class Notice, Setting of Final Approval Hearing Date; Memorandum of Points and Authorities in Support Thereof; Declaration of Douglas Han In Support Thereof; Declaration of Lisa Mullins; and Declaration of Nicholas Arellano (Filed 7.29.24)	11.8	3.1	2.2	17.1
Prepare Plaintiff's [Proposed] Order Preliminarily Approving Class Action and PAGA Settlement and Setting Hearing for Final Approval of Settlement (Filed 7.30.24)	0.4	0.1	0.1	0.6
Prepare Plaintiff's Supplemental Brief in Support of Preliminary Approval of Class Action Settlement; Supplemental Declaration of Douglas Han in Support Thereof; Supplemental Declaration of Nicholas Arellano; [Proposed] Amended Order Preliminarily Approving Class Action and PAGA Settlement and Setting Hearing for Final Approval of Settlement (Filed 2.21.25)	3.7	0.8	0	4.5

Prepare Plaintiff's Notice of Motion and Motion for Final Approval of Class Action Settlement, Attorneys' Fees, Costs, and Service Payments Briefing and Supporting Documents (Anticipated)	7.6	1.2	0	8.8
Total Hour Per Lawyer:	113.8	100.1	78.5	-
Total Hours Combined:	292.4			

EXHIBIT 2



ELM Solutions

2022 Real Rate Report[®]

The industry's leading
analysis of law firm rates,
trends, and practices

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A Letter to Our Readers

Welcome to the Wolters Kluwer ELM Solutions Real Rate Report®, the industry's leading data-driven benchmark report for lawyer rates.

Our Real Rate Report has been a relied upon data analytics resource to the legal industry since its inception in 2010 and continues to evolve. The Real Rate Report is powered by the Wolters Kluwer ELM Solutions LegalVIEW® data warehouse, which has grown to include \$155B+ in anonymized legal data.

Last year, we launched our LegalVIEW Insights report series, which presented the first-of-its-kind legal analysis of total outside spend, vendor counts, staffing ratios, and other matters. This year, LegalVIEW Insights has gone even deeper into these issues and, together with the Real Rate Report, is a great tool to benchmark performance and improve from there.

The legal services industry relies on internal analytics and the use of external data resources, such as the LegalVIEW data warehouse, to support legal management strategies. The depth and details of the data in the Real Rate Report enable you to better benchmark and make more informed investment and resourcing decisions for your organization.

As with past Real Rate Reports, all of the data analyzed are from corporations' and law firms' e-billing and time management solutions. We have included lawyer and paralegal rate data filtered by specific practice and sub-practice areas, metropolitan areas, and types of matters to give legal departments and law firms greater ability to pinpoint areas of opportunity. We strive to make the Real Rate Report a valuable and actionable reference tool for legal departments and law firms.

As always, we welcome your comments and suggestions on what information would make this publication more valuable to you. We thank our data contributors for participating in this program. And we thank you for making Wolters Kluwer ELM Solutions your trusted partner for legal industry domain expertise, data, and analytics and look forward to continuing to provide market-leading, expert solutions that deliver the best business outcomes for collaboration among legal departments and law firms.

Sincerely,



Barry Ader

Vice President, Product Management and Marketing
Wolters Kluwer ELM Solutions

Report Use Considerations

2022 Real Rate Report

- Examines law firm rates over time
- Identifies rates by location, experience, firm size, areas of expertise, industry, and timekeeper role (i.e., partner, associate, and paralegal)
- Itemizes variables that drive rates up or down

All the analyses included in the report derive from the actual rates charged by law firm professionals as recorded on invoices submitted and approved for payment.

Examining real, approved rate information, along with the ranges of those rates and their changes over time, highlights the role these variables play in driving aggregate legal cost and income. The analyses can energize questions for both corporate clients and law firm principals.

Clients might ask whether they are paying the right amount for different types of legal services, while law firm principals might ask whether they are charging the right amount for legal services and whether to modify their pricing approach.

Some key factors¹ that drive rates²:

Attorney location - Lawyers in urban and major metropolitan areas tend to charge more when compared with lawyers in rural areas or small towns.

Litigation complexity - The cost of representation will be higher if the case is particularly complex or time-consuming; for example, if there are a large number of documents to review, many witnesses to depose, and numerous procedural steps, the case is likely to cost more (regardless of other factors like the lawyer's level of experience).

Years of experience and reputation - A more experienced, higher-profile lawyer is often going to charge more, but absorbing this higher cost at the outset may make more sense than hiring a less expensive lawyer who will likely take time and billable hours to come up to speed on unfamiliar legal and procedural issues.

Overhead - The costs associated with the firm's support network (paralegals, clerks, and assistants), document preparation, consultants, research, and other expenses.

Firm size - The rates can increase if the firm is large and has various timekeeper roles at the firm. For example, the cost to work with an associate or partner at a larger firm will be higher compared to a firm that has one to two associates and a paralegal.

¹ David Goguen, J.D., University of San Francisco School of Law (2020) Guide to Legal Services Billing Retrieved from: <https://www.lawyers.com/legal-info/research/guide-to-legal-services-billing-rates.html>

² Source: 2018 RRR. Factor order validated in multiple analyses since 2010

Section I: High-Level Data Cuts

Cities

By Matter Type

2022 - Real Rates for Associate and Partner

Trend Analysis - Mean

City	Matter Type	Role	n	First Quartile	Median	Third Quartile	2022	2021	2020
Jackson MS	Litigation	Associate	56	\$55	\$225	\$250	\$178	\$203	\$175
	Non-Litigation	Partner	24	\$315	\$420	\$485	\$418	\$394	\$375
		Associate	25	\$55	\$126	\$255	\$155	\$125	\$259
Kansas City MO	Litigation	Partner	74	\$413	\$450	\$556	\$472	\$450	\$450
		Associate	50	\$252	\$329	\$385	\$319	\$316	\$305
	Non-Litigation	Partner	101	\$411	\$487	\$615	\$519	\$487	\$464
		Associate	73	\$250	\$320	\$385	\$322	\$312	\$285
Las Vegas NV	Non-Litigation	Partner	20	\$350	\$425	\$525	\$440	\$422	\$432
		Associate	11	\$238	\$267	\$368	\$301	\$297	\$282
Little Rock AR	Non-Litigation	Partner	11	\$215	\$215	\$308	\$264	\$256	\$298
Los Angeles CA	Litigation	Partner	322	\$516	\$725	\$1,045	\$799	\$739	\$702
		Associate	408	\$400	\$615	\$855	\$642	\$606	\$564
	Non-Litigation	Partner	521	\$596	\$868	\$1,201	\$903	\$902	\$858
		Associate	667	\$441	\$603	\$845	\$653	\$712	\$648

Section I: High-Level Data Cuts

Cities

By Years of Experience

2022 - Real Rates for Associate

Trend Analysis - Mean

City	Years of Experience	n	First Quartile	Median	Third Quartile	2022	2021	2020
Kansas City MO	3 to Fewer Than 7 Years	15	\$270	\$325	\$360	\$318	\$295	\$283
	7 or More Years	28	\$292	\$334	\$391	\$333	\$312	\$302
Los Angeles CA	Fewer Than 3 Years	63	\$429	\$595	\$654	\$556	\$524	\$488
	3 to Fewer Than 7 Years	144	\$486	\$688	\$838	\$662	\$626	\$530
	7 or More Years	171	\$351	\$550	\$840	\$600	\$634	\$586
Miami FL	3 to Fewer Than 7 Years	19	\$300	\$360	\$457	\$380	\$331	\$313
	7 or More Years	36	\$295	\$450	\$595	\$460	\$433	\$385
Minneapolis MN	Fewer Than 3 Years	11	\$374	\$405	\$446	\$408		\$230
	3 to Fewer Than 7 Years	27	\$340	\$451	\$510	\$421	\$358	\$356
	7 or More Years	27	\$423	\$468	\$585	\$478	\$438	\$392
Nashville TN	7 or More Years	12	\$219	\$245	\$345	\$282	\$266	\$262
New Orleans LA	3 to Fewer Than 7 Years	12	\$232	\$243	\$265	\$261	\$242	\$245
	7 or More Years	18	\$243	\$312	\$343	\$306	\$318	\$294
New York NY	Fewer Than 3 Years	142	\$443	\$622	\$775	\$629	\$600	\$652

Section I: High-Level Data Cuts

Cities

By Years of Experience

2022 - Real Rates for Partner

Trend Analysis - Mean

City	Years of Experience	n	First Quartile	Median	Third Quartile	2022	2021	2020
Kansas City MO	Fewer Than 21 Years	46	\$400	\$450	\$537	\$473	\$411	\$397
	21 or More Years	68	\$440	\$553	\$658	\$539	\$497	\$491
Las Vegas NV	Fewer Than 21 Years	12	\$284	\$381	\$495	\$389	\$349	\$343
	21 or More Years	13	\$350	\$425	\$515	\$468	\$456	\$472
Los Angeles CA	Fewer Than 21 Years	183	\$533	\$801	\$1,075	\$804	\$797	\$682
	21 or More Years	333	\$550	\$765	\$1,133	\$863	\$842	\$808
Memphis TN	Fewer Than 21 Years	14	\$288	\$331	\$380	\$345	\$317	\$328
	21 or More Years	15	\$355	\$415	\$425	\$394	\$382	\$375
Miami FL	Fewer Than 21 Years	57	\$370	\$450	\$598	\$490	\$498	\$443
	21 or More Years	104	\$388	\$581	\$749	\$584	\$580	\$536
Milwaukee WI	21 or More Years	16	\$302	\$454	\$613	\$589	\$515	\$530
Minneapolis MN	Fewer Than 21 Years	36	\$470	\$530	\$607	\$532	\$486	\$499
	21 or More Years	84	\$507	\$675	\$796	\$656	\$620	\$589
Nashville TN	Fewer Than 21 Years	28	\$375	\$405	\$535	\$449	\$405	\$397

Section I: High-Level Data Cuts

Cities

By Matter Type

2022 - Real Rates for Associate and Partner

Trend Analysis - Mean

City	Role	n	First Quartile	Median	Third Quartile	2022	2021	2020
Las Vegas NV	Associate	15	\$250	\$308	\$361	\$314	\$313	\$283
	Partner	16	\$215	\$250	\$311	\$271	\$260	\$287
Little Rock AR	Associate	17	\$150	\$150	\$185	\$173	\$171	\$188
	Partner	743	\$550	\$825	\$1,140	\$863	\$844	\$796
Los Angeles CA	Associate	1007	\$429	\$610	\$847	\$649	\$676	\$618
	Partner	22	\$265	\$325	\$360	\$326	\$343	\$339
Louisville KY	Associate	20	\$196	\$248	\$271	\$240	\$232	\$232
	Partner	11	\$378	\$425	\$535	\$447	\$426	\$437
Madison WI	Partner	30	\$290	\$359	\$425	\$365	\$349	\$354
Memphis TN	Associate	156	\$271	\$387	\$476	\$393	\$379	\$372
	Partner	214	\$364	\$528	\$688	\$542	\$535	\$504
Miami FL	Associate	23	\$265	\$290	\$361	\$312	\$310	\$300
	Partner	36	\$290	\$375	\$464	\$448	\$449	\$448
Milwaukee WI	Associate	168	\$454	\$626	\$728	\$611	\$576	\$543
	Partner	168	\$454	\$626	\$728	\$611	\$576	\$543
Minneapolis MN	Partner	168	\$454	\$626	\$728	\$611	\$576	\$543

EXHIBIT 3

LAFFEY MATRIX

History

Case Law

See the Matrix

Contact us

Home

			Years Out of Law School *				
Year	Adjustmt Factor**	Paralegal/ Law Clerk	1-3	4-7	8-10	11-19	20 +
6/01/24- 5/31/25	1.080182	\$258	\$473	\$581	\$839	\$948	\$1141
6/01/23- 5/31/24	1.059295	\$239	\$437	\$538	\$777	\$878	\$1057
6/01/22- 5/31/23	1.085091	\$225	\$413	\$508	\$733	\$829	\$997
6/01/21- 5/31/22	1.006053	\$208	\$381	\$468	\$676	\$764	\$919
6/01/20- 5/31/21	1.015894	\$206	\$378	\$465	\$672	\$759	\$914
6/01/19- 5/31/20	1.0049	\$203	\$372	\$458	\$661	\$747	\$899
6/01/18- 5/31/19	1.0350	\$202	\$371	\$455	\$658	\$742	\$894
6/01/17- 5/31/18	1.0463	\$196	\$359	\$440	\$636	\$717	\$864
6/01/16- 5/31/17	1.0369	\$187	\$343	\$421	\$608	\$685	\$826
6/01/15- 5/31/16	1.0089	\$180	\$331	\$406	\$586	\$661	\$796
6/01/14- 5/31/15	1.0235	\$179	\$328	\$402	\$581	\$655	\$789
6/01/13- 5/31/14	1.0244	\$175	\$320	\$393	\$567	\$640	\$771
6/01/12- 5/31/13	1.0258	\$170	\$312	\$383	\$554	\$625	\$753
6/01/11- 5/31/12	1.0352	\$166	\$305	\$374	\$540	\$609	\$734
6/01/10- 5/31/11	1.0337	\$161	\$294	\$361	\$522	\$589	\$709
6/01/09- 5/31/10	1.0220	\$155	\$285	\$349	\$505	\$569	\$686
6/01/08- 5/31/09	1.0399	\$152	\$279	\$342	\$494	\$557	\$671
6/01/07-5/31/08	1.0516	\$146	\$268	\$329	\$475	\$536	\$645
6/01/06-5/31/07	1.0256	\$139	\$255	\$313	\$452	\$509	\$614
6/1/05-5/31/06	1.0427	\$136	\$249	\$305	\$441	\$497	\$598
6/1/04-5/31/05	1.0455	\$130	\$239	\$293	\$423	\$476	\$574
6/1/03-6/1/04	1.0507	\$124	\$228	\$280	\$405	\$456	\$549
6/1/02-5/31/03	1.0727	\$118	\$217	\$267	\$385	\$434	\$522
6/1/01-5/31/02	1.0407	\$110	\$203	\$249	\$359	\$404	\$487
6/1/00-5/31/01	1.0529	\$106	\$195	\$239	\$345	\$388	\$468
6/1/99-5/31/00	1.0491	\$101	\$185	\$227	\$328	\$369	\$444
6/1/98-5/31/99	1.0439	\$96	\$176	\$216	\$312	\$352	\$424
6/1/97-5/31/98	1.0419	\$92	\$169	\$207	\$299	\$337	\$406

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

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

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

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

EXHIBIT 4

Cases	Court	Case Number	Judge
Rodney Hoffman v. Blattner Energy Inc.	United States District Court of California Central District	ED CV 14-2195-DMG (DTBx)	Dolly Gee
Nabor Navarro v. Trans-West Intermodal, Inc.	San Bernardino County Superior Court	CIVDS1700850	Brian McCarville
Caryn Rafferty et al. v. Academy Mortgage Corporation	Sacramento County Superior Court	34-2016-00191285-CU-OE-GDS	David Brown
Carrie Baker v. Central Coast Home Health	San Luis Obispo County Superior Court	17CV-0219	Tana Coates
Jamar Farmer v. Cooks Collision, Inc.	Napa County Superior Court	17CV000969	Diane Price
Ricardo Ortega et al. v. Nestle Waters North America, Inc.	Los Angeles County Superior Court	BC623610	Carolyn Kuhl
Landon Fulmer, Jr. et al. v. Golden State Drilling, Inc.	Kern County Superior Court	S-1500-CV0279707-SDS	Stephen Schuett
Carlos McCollum et al. v. Delta Tech Service, Inc.	Solano County Superior Court	FCS049504	Scott Daniels
Carl Morel et al. v. Aseptic Solutions USA Ventures, LLC	Riverside County Superior Court	RIC1711383	Craig Riemer
Genio Chuen v. 911 Mobile Mechanic, LLC	Orange County Superior Court	30-2017-00943421-CU-OE-CXC	Glenda Sanders
Elbern Gentry v. Eugene Burger Management Corporation	Sacramento County Superior Court	34-2015-00182515-CU-OE-GDS	David Brown
Maurice Bunche et al. v. Mettler-Toledo Rainin, LLC	Alameda County Superior Court	RG18899279	Winifred Smith
Carlos Koreisz et al. v. On Q Financial, Inc	Ventura County Superior Court	56-2018-00511 126-CU-OE-VTA	Mark Borrell
Jason Manas et al. v. Kenai Drilling Limited	Los Angeles County Superior Court	BC546330	Daniel Buckley
Michelle Xiong et al. v. Hilltop Ranch, Inc.	Merced County Superior Court	18CV-01340	Brian McCabe
Karen Morgan v. Childtime Childcare, Inc.	United States District Court of California Central District	8:17-cv-01641 AG (KESx)	Andrew Guilford
Daniel Flores v. Wilmar Oils & Fats (Stockton), LLC	San Joaquin County Superior Court	STK-CV-UOE-2018-0012758	Barbara Kronlund
Jordan Dahlberg et al. v. Fresno Beverage Company dba Valley Wide Beverage	Tulare County Superior Court	VCU279083	Bret Hillman
Jorge Proctor v. Helena Agri Enterprises, LLC	San Diego County Superior Court	37-2018-00057894-CU-OE-CTL	Joel Wohlfeil
Christine Arman v. Circor Aerospace, Inc.	Riverside County Superior Court	RIC1613578	Sunshine Sykes
Anthony Nuncio et al. v. MMI Services, Inc.	Kern County Superior Court	S-1500-CV-282534	David R. Lampe
Mario R. Guerrero et al. v. Plaza Home Mortgage, Inc.	Imperial County Superior Court	ECU001150	L. Brooks Anderholt
Mansour Nije v. Lucira Health, Inc. f/k/a Diassess, Inc.	Alameda County Superior Court	RG20055890	Julia A. Spain
Patricial Alcantar et al v. Bay Equity, LLC	Marin County Superior Court	CIV1903376	James Chou
Efrain Perez v. Freedom Medical, Inc.	San Bernardino County Superior Court	CIVDS1903517	Bryan F. Foster
Beverly Saolom v. Pulmonox Corporation	San Mateo County Superior Court	19-CIV-05070	Nancy Fineman
Matthew Tucker v. BYD Coach & Bus, LLC	Los Angeles County Superior Court	BC698921	Amy Hogue
Jose Duval v. Dawson Oil Company	Sacramento County Superior Court	34-2020-00276862-CU-OE-GDS	Shama H. Mesiwala
Steven DelCorso v. Westland Technologies, Inc.	Stanislaus County Superior Court	CV-20-002807	John R. Mayne
Priscilla Ramirez v. Amphastar Pharmaceuticals, Inc.	San Bernardino County Superior Court	CIVDSZO11327	David Cohn
Jose Zuniga v. Central Valley Concrete, Inc.	Merced County Superior Court	20CV-00490	Brian McCabe
Robert Enriquez v. MCE Corporation	Contra Costa County Superior Court	MSC20-01744	Edward Weil
Amanda Cunningham v. Cottonwood H.C., Inc. dba Cottonwood Post-Acute Rehab	Yolo County Superior Court	CV2021-1375	Daniel M. Wolk
Nguyen Ngo, et al. v. Medimpact Healthcare Systems, Inc.	San Diego County Superior Court	37-2020-00015657-CU-OE-CTL	Keri Katz
Steven Jefferson v. McCormack Baron Management, Inc.	San Francisco County Superior Court	CGC-20-588162	Richard B. Ulmer Jr.
Allen Morgan v. Wehah Farm, Inc dba Lundberg Family Farms	Butte County Superior Court	20CV02554	Stephen E. Benson
Earl Rhodes, et al. v. Cavotec Dabico US Inc., et al.	Orange County Superior Court	30-2021-01177305-CU-OE-CXC	Peter Wilson
Alexandra Pelgrift v. The 21st Amendment Brewery Cafe	San Francisco County Superior Court	CGC-20-585227	Ethan P. Schulman
Beverly Salom, et al. v. Lumentum Operations LLC, et al.	Santa Clara County Superior Court	19CV354198	Sunil R. Kulkarni
Leroy Rost v. Lehigh Hanson, Inc. et al.	San Luis Obispo County Superior Court	20CV-0225	Tana L. Coates
Suleni Itzep, et al. v. Axonics Modulation Technologies, Inc.	Orange County Superior Court	30-2020-01140962-CU-OE-CXC	Lon F. Hurwitz
Earl Gandionco v. Allergan, Inc. et al.	San Joaquin County Superior Court	STK-CV-UOE-2022-0003077	Robert T. Waters
Kris Brehm, et al. v. Platinum Living Services, Inc. dba Oakwood Village	Placer County Superior Court	S-CV-0046296 (Consolidated with S-CV-0046676)	Michael Jones
Jarid Gomez, et al. v. Parker-Hannifin Corporation	Ventura County Superior Court	56-2022-00563952-CU-OE-VTA	Benjamin Coats
Ana Vargas, et al. v. Spates Fabricators, Inc.	Riverside County Superior Court	CVRI2100462	Harold W. Hopp
Jacob Blea v. Pacific Groservice Inc., et al.	Santa Clara County Superior Court	20CV275150	Sunil R. Kulkarni
Anthony Penca v. Sierra Nevada Brewing Co.	Butte County Superior Court	21CV02883	Tamara L. Mosbarger
Armoni Lloyd v. National Warehouse Management, LLC	Kern County Superior Court	BCV-22-102213	David R. Zulfa
Edgar Mata, et al. v. Day-Lee Foods Inc.	Los Angeles County Superior Court	20STCV21663	Kenneth R. Freeman
Samyra McCrea v. Rockridge Market Hall, LLC dba Market Hall Foods, et al.	Alameda County Superior Court	22CV005647	Evelio Grillo
Sarah Chasen, et al. v. Alliance Building Services, LLC (WA)	King County Superior Court	24-2-02041-1	Cindi Port
Joshua King v. Beacon Sales Acquisition, Inc. (WA)	King County Superior Court	22-2-14226-0 SEA	Marshall L. Ferguson

EXHIBIT 5

JUSTICE LAW CORPORATION CASE COST DETAIL
Tectonic Transport adv. Santa Cruz

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
11/16/22	United States Postal Service	Mailing Correspondence	\$ 35.20
12/12/22	United States Postal Service	Mailing Correspondence	\$ 3.20
2/10/23	SignNow	Attorney Services	\$ 5.00
2/23/23	United States Postal Service	Service of Documents	\$ 9.59
3/28/23	SignNow	Attorney Services	\$ 5.00
4/21/23	OneLegal	Filing & Filing Fee	\$ 1,492.98
4/28/23	OneLegal	Service of Process	\$ 112.73
5/1/23	OneLegal	Filing	\$ 15.65
5/18/23	United States Postal Service	Service of Documents	\$ 3.95
6/21/23	OneLegal	Filing	\$ 15.65
7/31/23	General Logistics Systems	Mailing Correspondence	\$ 15.32
10/16/23	OneLegal	Filing	\$ 13.33
10/16/23	United States Postal Service	Mailing Correspondence	\$ 1.66
2/22/24	Lisa Klerman	Mediation Fees	\$ 11,000.00
2/23/24	General Logistics Systems	Mailing Correspondence	\$ 21.63
2/28/24	Berger Consulting Group	Expert Review and Analysis of Payroll Records	\$ 3,280.00
3/14/24	OneLegal	Filing	\$ 15.39
3/14/24	Labor and Workforce Development Agency	PAGA Filing Fee	\$ 75.00
3/14/24	United States Postal Service	Service of Documents	\$ 1.68
3/18/24	Orange County Superior Court	Document Retrieval	\$ 7.50
3/20/24	OneLegal	Filing	\$ 17.71
3/20/24	United States Postal Service	Service of Documents	\$ 12.80
3/21/24	OneLegal	Filing	\$ 20.59
3/25/24	OneLegal	Filing	\$ 17.71
4/3/24	OneLegal	Filing	\$ 17.71
7/29/24	General Logistics Systems	Service of Documents	\$ 26.10
7/30/24	General Logistics Systems	Service of Documents	\$ 14.44
7/30/24	OneLegal	Filing	\$ 35.42
7/30/24	United States Postal Service	Service of Documents	\$ 1.73
7/30/24	OneLegal	Filing & Filing Fee	\$ 79.48
2/21/25	General Logistics Systems	Service of Documents	\$ 15.40
2/21/25	OneLegal	Filing	\$ 59.46
4/18/25	OneLegal	Filing	\$ 17.71
4/18/25	United States Postal Service	Service of Documents	\$ 6.35
4/21/25	OneLegal	Filing	\$ 39.64
	SignNow	Attorney Services	\$ 5.00
	OneLegal	Filing & Filing Fee (Anticipatory)	\$ 79.48
	General Logistics Systems	Service of Documents	\$ 15.40
	OneLegal	Filing (Anticipatory)	\$ 19.82
		Service of Documents	\$ 3.04
	LexisNexis	Legal Research	\$ 1,400.00
	Justice Law Corporation (In House)	Photocopies (637 @ \$0.15 per page)	\$ 110.55
Total Cost			\$ 18,146.00

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PROOF OF SERVICE
1013A(3) CCP

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action. My business address is 751 N. Fair Oaks Avenue, Suite 101, Pasadena, California 91103 and my electronic service address is manderson@justicelawcorp.com.

On September 22, 2025, I served the foregoing document described as

DECLARATION OF DOUGLAS HAN IN SUPPORT OF MOTION FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT, ATTORNEY FEE AWARD, COST AWARD, AND CLASS REPRESENTATIVE ENHANCEMENT PAYMENT

for the following case: **Santa Cruz v. Tectonic Transport**
LWDA/Court Case No.: **LWDA Case No.: LWDA-CM-1016599-24**
Court Case No.: 30-2023-01320697-CU-OE- CXC
Orange County Superior Court

on interested parties in this action by electronically submitting as follows:

State of California
Labor & Workforce Development Agency
800 Capitol Mall, MIC-55
Sacramento, California 95814

[X] BY ELECTRONIC SUBMISSION

Pursuant to California Senate Bill No. 836, I caused the documents described above to be electronically submitted by and through the procedure stated on the website of the State of California Labor and Workforce Development Agency.

[X] STATE

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

Executed on September 22, 2025, at Pasadena, California.



Mariah Anderson