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Attorneys for Plaintiffs

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

AARON ALVAREZ and MICHAEL ARMOUR,
individually, and on behalf of all others similarly
situated,

Plaintiffs,

v.

AMAROK LLC, a Delaware limited liability
company; and DOES 1 through 10, inclusive,

Defendants.

Case No.: 24CV008395 (Lead Case)
Case No.: 24CV013383

*Assigned for all purposes to:
Hon. Jill H. Talley
Dept. 23*

**DECLARATION OF JOHN G. YSLAS IN
SUPPORT OF PLAINTIFFS' MOTION
FOR FINAL APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT**

Final Approval Hearing:
Date: October 17, 2025
Time: 9:00 a.m.
Dept.: 23

Action Filed: April 30, 2024

DECLARATION OF JOHN G. YSLAS

I, John G. Yslas, declare as follows:

1. I am an attorney at law licensed to practice before all of the courts of the State of California. I am a Senior Partner at Wilshire Law Firm, PLC (“WLF”), counsel of record for Plaintiffs Aaron Alvarez and Michael Armour (collectively “Plaintiffs”). 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.

2. I submit this declaration in support of Plaintiffs’ Motion for Final Approval of Class Action and PAGA Settlement.

3. Plaintiffs are represented by WLF. The attorneys at WLF performed significant work and expended litigation costs in prosecuting this matter with no guarantee of payment.

4. WLF was selected by Best Lawyers and U.S. News & World Report as one of the nation’s Best Law Firms since 2020 and is comprised of more than 100 attorneys and over 600 employees. WLF is actively and continuously practicing in employment litigation, representing employees in both individual and class actions in both state and federal courts throughout California.

5. WLF is qualified to handle this Litigation because its attorneys are experienced in litigating Labor Code violations in individual, class action, and representative action cases. WLF 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.

6. I graduated from the University of California, Santa Barbara with High Honors in 1991 with Bachelor of Arts degrees in Psychology. I received my Juris Doctor from UCLA Law School in 1996.

7. Upon graduating from law school in 1996, I worked for a boutique law firm practicing general litigation which included employment law matters. Since 2000 (that is, the last 25 years) my practice has been exclusively focused on labor and employment matters including handling wage and hour class, collective and representative actions (including the

1 California Private Attorneys General Act, or “PAGA”), including in the international law firms
2 of Morgan, Lewis & Bockius LLP (where I was a senior associate), Foley & Lardner LLP
3 (where I was a partner and a national Vice Chair of the Labor and Employment Group), Norton
4 Rose Fulbright LLP (where I was a partner) and Seyfarth Shaw LLP (where I was a partner and
5 member of the Wage and Hour Practice Group). During my time at these law firms, I was the
6 primary attorney or took a major leading role in defending employers on numerous wage and
7 hour class, collective and representative actions.

8 8. In late June 2022 I left Seyfarth Shaw LLP and joined my current firm, Wilshire
9 Law Firm, PLC, to represent plaintiff employees. I have been and am handling many wage and
10 hour class and representative actions litigating such matters on behalf of plaintiff employees in
11 numerous Superior Courts and District Courts. From matters representing both plaintiffs and
12 defendants, I have successfully mediated the resolution of many wage and hour class,
13 collective, and representative actions. Just since starting to settle cases in late April 2023 I have
14 already successfully mediated matters in which I have been counsel or co-counsel resulting in
15 **over \$171 million** in settlements and verdicts which are in the process of being finalized, and
16 with numerous upcoming mediations scheduled. In those and numerous other matters, I have
17 managed and assisted with the litigation and settlement of many wage and hour PAGA and
18 class actions. In those actions, I performed similar tasks as those performed in the course of
19 prosecuting this action. Indeed, I recently tried and prevailed in achieving a jury verdict in a
20 wage and hour class action in the matter of Aguilar-Flores v. Javier’s – CC LLC, Los Angeles
21 County Superior Court, Case No. 19STCV36438 (damages anticipated in the future and a
22 motion for attorney’s fees to be filed after that).

23 9. I have received numerous awards for my legal work. For example, from 2015 to
24 2018, I was listed in Los Angeles Super Lawyers for Employment Litigation (Thomson
25 Reuters). I have also served on numerous prominent boards and in other leadership positions,
26 including serving as Southern California Regional President for the Hispanic National Bar
27 Association and on the board of directors of the Mexican American Bar Foundation. I also
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1 previously served on the 5-member Los Angeles Civil Service Commission, which generally
2 oversees the personnel decisions for the City of Los Angeles.

3 10. I have also published numerous blogs on labor and employment issues including
4 on wage and hour issues. For example, I published “Headline News: Wal-Mart v. Dukes-
5 Impact on Class Action Litigation” (while a partner with Foley & Lardner LLP) and “Are You
6 Really Protected From Wage-and-Hour Successor Liability in an Asset Purchase” (while a
7 partner with Seyfarth Shaw LLP). I have also been a presenter at numerous conferences,
8 including being a presenter involving the “Employment Law Update” at a National
9 Employment Law Council conference. I currently bill at an hourly rate of \$1,500.00.

10 11. Jeffrey C. Bils (“Mr. Bils”) is an eleventh-year Senior Attorney at WLF. He
11 graduated from the University of Wisconsin–Madison with a Bachelor of Arts in Journalism
12 and German, and received his Juris Doctor from the University of California, Los Angeles
13 School of Law in 2014. During law school, Mr. Bils was a Senior Editor on the UCLA Law
14 Review and an Articles Editor on the Entertainment Law Review. He served as a Judicial
15 Extern for the Hon. Consuelo Bland Marshall in United States District Court for the Central
16 District of California, and also for the Hon. Sandra R. Klein of United States Bankruptcy Court
17 for the Central District of California. Mr. Bils graduated ranked No. 7 in his graduating class
18 from UCLA School of Law. He was admitted to practice law in the State of California in 2014.
19 Since graduating from law school, Mr. Bils has focused his legal work primarily on
20 employment matters, including wage-and-hour class action and PAGA representative action
21 litigation, and he has helped obtain dozens of settlements on behalf California workers, as well
22 as on behalf of California employers during his years on the defense bar. He is a member of
23 the Beverly Hills Bar Association (BHBA), where he serves as a current member of the Board
24 of Governors and is a past Chair of the Labor & Employment Law Section Executive
25 Committee. He is also a member of the California Employment Lawyers Association (CELA).
26 Mr. Bils currently bills at an hourly rate of \$850.00.

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1 12. Eugene Zinovyev (“Mr. Zinovyev”) is a Junior Partner at WLF. He graduated
2 from the University of California, Berkeley, with a Bachelor of Arts in Political Economy of
3 Industrial Societies, and received his Juris Doctor from the University of California, San
4 Francisco School of Law in 2009. He has since practiced employment and wage and hour law
5 on both the plaintiff and defense sides. Mr. Zinovyev has tried multiple jury cases to verdict as
6 well as numerous bench trials. He has also briefed published appellate court decisions in both
7 state and federal court. Mr. Zinovyev is admitted to practice before all Federal District Courts
8 in California as well as the 9th Circuit Court of Appeals. He is also a member of the California
9 Employment Lawyers Association. He has mediated and settled dozens of class and
10 representative actions as well as individual civil matters. Mr. Zinovyev’s hourly billing rate is
11 \$900.00.

12 13. John Brown (“Mr. Brown”) is an Associate Attorney at WLF. He was admitted
13 to practice law in the State of California in 2004. Mr. Brown graduated from UC Berkeley with
14 a Bachelor of Arts and received his Juris Doctor from UCLA School of Law. His current
15 practice has been focused on class action employment law. Mr. Brown has participated in
16 dozens of settlements totaling tens of millions of dollars, from the memorandum of
17 understanding and settlement agreement drafting stage through to final approvals from the
18 court. Mr. Brown’s hourly billing rate is \$600.00.

19 14. Courtney M. Miller (“Ms. Miller”) is a Settlement Attorney at WLF. She was
20 admitted to practice law in the State of California in 2019. Ms. Miller graduated from the
21 University of California, Santa Cruz, with a Bachelor of Arts in Sociology. Prior to becoming
22 an attorney, Ms. Miller worked at a boutique civil litigation firm for nearly a decade, primarily
23 handling employment matters. She earned her Juris Doctor from Southwestern Law School in
24 2019. Ms. Miller has prosecuted wage and hour class and PAGA actions, almost exclusively,
25 since 2020. As a handling attorney, Ms. Miller obtained over \$30 million dollars in settlements
26 on behalf of California employees. Ms. Miller currently bills at an hourly rate of \$650.00.

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1 15. Lisa B. Iturriaga (“Ms. Iturriaga”) is a Settlement Attorney at WLF. She was
2 admitted to practice law in the State of California in 2021. Ms. Iturriaga graduated from
3 University of South Florida with a Bachelor of Science in Finance and a Bachelor of Arts in
4 Marketing. She received her Juris Doctor from Chapman University Dale E. Fowler School of
5 Law. Since graduating, Ms. Iturriaga’s practice has been in insurance defense (previously) and
6 employment law (currently). Since 2023, she has exclusively worked on plaintiffs’ side wage-
7 and-hour cases. Ms. Iturriaga currently bills at an hourly rate of \$550.00.

8 16. WLF’s hourly rates are comparable to those charged by other class action
9 plaintiffs’ counsel and the firms defending class actions. WLF’s hourly rates have been
10 approved by other courts in California. *See, e.g., Matthew Veliz v. DrinkPak, LLC*, Los Angeles
11 County Superior Court, Case No. 22STCV37384, *Ismael Villegas-Sanchez v. COE Orchard*
12 *Equipment, Inc.*, Sutter County Superior Court, Case No. CVCS22-0002261; *Jessica Bronsal*
13 *v. PTI Technologies Inc.*, Ventura County Superior Court, Case No. 202200570361CUOE;
14 *Miguel A. Vigil Ruiz v. The De Ruosi Group, LLC*, San Joaquin County Superior Court, Case
15 No. STK-CV-UOE-2022-8780; *Gutierrez v. Top Drawer Merch, LLC et al*, Los Angeles
16 County Superior Court, Case No. 23STCV04299; *Wing v. Road Machinery, LLC et al*, Kern
17 County Superior Court, Case No. BCV-22-102896; *Hernandez v. SGPS Showrig Los Angeles,*
18 *Inc.*, Los Angeles County Superior Court, Case No. 22STCV28155; *Azevedo v. Tulare Nursing*
19 *& Rehabilitation Hospital, Inc.*, Tulare County Superior Court, Case No. VCU293325; *Haser*
20 *v. Universal Chain of California, Inc.*, Sacramento County Superior Court, Case No. 34-2022-
21 00332268; *Caldera v. Performance Online, Inc. et al*, Riverside County Superior Court, Case
22 No. CVRI2306013; *Goosby v. CiminoCare, Inc.*, Sacramento County Superior Court, Case No.
23 34-2022-00329033; *Rooks v. Hot Cakes Restaurant Group, Inc.*, San Joaquin County Superior
24 Court, Case No. STK-CV-UOE-2022-11056; *Garcia v. Compassionate Heart*, Orange County
25 Superior Court, Case No. 30-2022-01294409-CU-OE-CXC; *Parra v. Citrus Valley*
26 *Management Services, Inc.*, Riverside County Superior Court, Case No. CVRI2301768; *Torres*
27 *v. HomeShield Pest Control Inc.*, Placer County Superior Court, Case No. S-CV-0049525;

1 *Cabrera v. Creekside Auto Group*, Santa Clara County Superior Court, Case No. 23CV415661;
2 *Simpson v. Arcos*, Riverside Superior Court, Case No. CVRI2303337; *Payne v. Planned*
3 *Parenthood: Shasta-Diablo, Inc.*, San Francisco County Superior Court, Case No. CGC-23-
4 607359. The total hours expended on this action are reasonable and in line with comparable
5 cases.

6 17. WLF has performed significant work and incurred litigation costs in prosecuting
7 this matter with no guarantee of any payment. The efforts expended by Plaintiffs' counsel to
8 achieve this result include, but are not limited to, the following:

9 a. the investigation of the matter, including meeting with Plaintiffs, reviewing
10 Defendant's policies, and requesting and reviewing Plaintiffs' employment records, and
11 exploring the corporate structure of Defendant;

12 b. filing the Actions;

13 c. preparing for hearings and meeting and conferring with Defendant regarding the
14 case;

15 d. meeting and conferring with Defendant regarding mediation, exchange of
16 informal discovery beforehand, and negotiating with opposing counsel regarding the
17 parameters thereof;

18 e. selecting a mediator and mediation date;

19 f. working with opposing counsel and expert consultants for the receipt of class
20 data and documents and analyzing the same with the aid of expert consultants and Plaintiff to
21 perform analyses of liability and exposure prior to attendance of the mediation in this matter;

22 g. reviewing policy documents from Defendant and researching applicable
23 defenses;

24 h. preparation of the mediation brief and damages model for use at mediation;

25 i. attendance at the mediations;

26 j. communicating with Plaintiffs regarding this matter;

27 k. negotiating, finalizing and fully executing the settlement agreement;
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1 l. preparing and filing the Motion for Preliminary Approval and supporting
2 documents;

3 q. communicating with any class members who sought additional information
4 regarding the settlement, including answering questions regarding the settlement and obtaining
5 updated addresses from class members for purposes of receiving the class notices and
6 administering the settlement checks; and

7 r. preparing the instant Motion for Final Approval and supporting documents.

8 18. WLF's current lodestar reflects the efficiencies achieved by attorneys
9 experienced in this field with **145.4** hours of work resulting in **\$114,705.00** in fees. A true and
10 correct copy of Class Counsel's detailed billing is attached hereto as **Exhibit 1**. The chart below
11 shows the calculation of hours spent by each of WLF's attorneys on this case:

Attorney	Hours	Hourly Rate	Total
Jeffrey C. Bils	5.2	\$850.00	\$4,420.00
Lisa B. Iturriaga	10.2	\$550.00	\$5,610.00
Courtney M. Miller	12.1	\$650.00	\$7,865.00
John G. Yslas	14.8	\$1,500.00	\$22,200.00
Eugene Zinovyev	42.5	\$900.00	\$38,250.00
John Brown	60.6	\$600.00	\$36,360.00
TOTAL	145.4		\$114,705.00

12 19. This amount surpasses the requested fee award of \$36,694.43, resulting in a
13 negative multiplier. This amount does not include the time Class Counsel will spend at the final
14 approval hearing and assisting the Settlement Administrator following final approval. WLF
15 dedicated significant resources to this case by dividing the tasks required according to skill
16 level. The hours expended by each attorney were not duplicative and reflect the extensive
17 investigation and analysis that was required to achieve this Settlement. This time could have
18 been spent on other potentially lucrative cases. WLF's lodestar reflects the efficiencies
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1 achieved by attorneys experienced in this field.

2 20. In litigation costs, WLF has incurred \$13,309.42 in costs for expenses such as
3 filing fees, service fees, mediation fees, and expert fees. Since Class Counsel's costs do not
4 exceed the maximum of \$15,000.00, the remaining \$1,690.58 will revert to the Net Settlement
5 Amount. A true and correct copy of WLF's cost reports in this matter are attached hereto as
6 **Exhibit 2**. All the costs incurred were reasonable and necessary for the prosecution of this case.

7 The costs are summarized as follows:

8 Category	Cost
9 Court Filing Fees	\$3,485.42
10 Service of Process Fees	\$219.00
11 LWDA Filing Fee for PAGA Notice	\$75.00
12 Mediation Fees	\$4,850.00
13 Expert Consultant Fees	\$4,680.00

14
15 21. Class Counsel has negotiated a settlement here that they believe is fair,
16 reasonable, and adequate based on their prior experience litigating these types of cases.

17 22. To date, the LWDA has not responded to or objected to the Settlement in this
18 matter.

19 23. The proposed cy pres recipient, the Katharine & George Alexander Community
20 Law Center, is a non-profit that provides pro bono advice and representation as to workers'
21 rights, consumer rights, and immigration rights, as stated on its website,
22 <https://law.scu.edu/centers/kgacalc/>. Thus the Katharine & George Alexander Community Law
23 Center meets the requirements of California Code of Civil Procedure § 384, which requires that
24 a cy pres be a nonprofit organization or foundation that supports projects that will benefit the
25 class or similarly situated persons, or that promotes the law consistent with the objectives and
26 purposes of the underlying cause of action or to nonprofit organizations providing civil legal
27 services to the indigent. I do not have any interest in the Katharine & George Alexander
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1 Community Law Center or its governance.

2 24. Class Counsel has reviewed the Sacramento County Superior Court's Checklist
3 for Approval of Class Action and/or Private Attorneys General Act ("PAGA") Settlements
4 ("Checklist"). Class Counsel's briefing complies with the Checklist.

5 I declare under penalty of perjury under the laws of the State of California that the
6 foregoing is true and correct. Executed on September 24, 2025, at Los Angeles, California.

7
8 
9 John G. Yslas

EXHIBIT 1

Attorney	Date	Task Completed	Hours	Rate
Jeffrey C. Bils	2/8/2024	Correspondence from opposing counsel with personnel file production	0.3	\$850.00
Jeffrey C. Bils	2/21/2024	Review note to file re teleconference with plaintiff re work location	0.2	\$850.00
Jeffrey C. Bils	4/1/2024	Correspondence from opposing counsel re personnel records requests	0.2	\$850.00
Jeffrey C. Bils	5/2/2024	Strategize with D. Weisband re next steps	0.4	\$850.00
Jeffrey C. Bils	5/3/2024	Teleconference with opposing counsel re potential mediation; strategize re potential mediation and next steps	1.0	\$850.00
Jeffrey C. Bils	5/6/2024	Correspondence with opposing counsel re service of complaint	0.2	\$850.00
Jeffrey C. Bils	5/6/2024	Strategize with D. Weisband re potential mediation	0.3	\$850.00
Jeffrey C. Bils	5/17/2024	Strategize re potential settlement; correspondence with opposing counsel re potential settlement	1.1	\$850.00
Jeffrey C. Bils	5/19/2024	Correspondence with opposing counsel re call to discuss case	0.2	\$850.00
Jeffrey C. Bils	5/21/2024	Teleconference with opposing counsel re next steps, including preparation	0.3	\$850.00
Jeffrey C. Bils	5/23/2024	Strategize re potential resolution and next steps	0.6	\$850.00
Jeffrey C. Bils	6/3/2024	Correspondence from opposing counsel re PAGA data and termination	0.2	\$850.00
Jeffrey C. Bils	9/18/2025	Strategize re approval of settlement	0.2	\$850.00

TOTALS: 5.2 \$4,420.00

Attorney	Date	Task Completed	Hours	Rate
Lisa B. Iturriaga	4/21/2025	Draft MPA and supporting documents; correspondence with Samantha A. Smith re MPA	3.8	\$550.00
Lisa B. Iturriaga	4/22/2025	Continue drafting MPA and supporting documents; further correspondence with Samantha A. Smith re MPA; Correspondence with defense counsel	5.0	\$550.00
Lisa B. Iturriaga	4/23/2025	Further correspondence with Samantha A. Smith re MPA	0.1	\$550.00
Lisa B. Iturriaga	4/24/2025	Further correspondence with defense counsel re MPA and supporting documents; revised Proposed Order	0.5	\$550.00
Lisa B. Iturriaga	6/2/2025	Correspondence with administrator	0.1	\$550.00
Lisa B. Iturriaga	6/3/2025	Review correspondence from administrator and defense counsel	0.2	\$550.00
Lisa B. Iturriaga	6/4/2025	Correspondence with administrator	0.1	\$550.00
Lisa B. Iturriaga	6/16/2025	Correspondence with administrator re class data	0.1	\$550.00
Lisa B. Iturriaga	6/17/2025	Review correspondence from defense counsel and administrator re class data	0.2	\$550.00
Lisa B. Iturriaga	9/19/2025	Correspondence w/ Courtney M. Miller re MFA	0.1	\$550.00

TOTALS: 10.2 \$5,610.00

Attorney	Date	Task Completed	Hours	Rate
Courtney M. Miller	9/12/2025	Email correspondence requesting final litigation costs	0.1	\$650.00
Courtney M. Miller	9/15/2025	Receipt of final litigation costs	0.1	\$650.00
Courtney M. Miller	9/15/2025	Review Sacramento County Superior Court's Checklist for Approval of Class Action and/or Private Attorneys General Act ("PAGA") Settlements as to motions for final approval	0.2	\$650.00
Courtney M. Miller	9/15/2025	Email correspondence to attorneys requesting detailed billing	0.1	\$650.00
Courtney M. Miller	9/18/2025	Review and propose edits to administrator declaration to be submitted with MFA; Email correspondence to administrator re same	0.3	\$650.00
Courtney M. Miller	9/18/2025	Email correspondence from attorneys re detailed billing	0.1	\$650.00
Courtney M. Miller	9/18/2025	Review final litigation costs and strike unrecoverable expenses	0.1	\$650.00
Courtney M. Miller	9/18/2025	Draft MFA supporting documents; review case file; prepare spreadsheet of settlement figures	3.0	\$650.00
Courtney M. Miller	9/19/2025	Email correspondence with attorneys re detailed billing	0.4	\$650.00
Courtney M. Miller	9/19/2025	Correspondence from and receipt of revised declaration from administrator	0.2	\$650.00
Courtney M. Miller	9/19/2025	Finalize client declarations in support of the MFA; correspondence with team re same	0.2	\$650.00
Courtney M. Miller	9/22/2025	Email correspondence from attorneys re detailed billing	0.2	\$650.00
Courtney M. Miller	9/22/2025	Email correspondence to administrator re escalator clause and further edits needed to the declaration; discussion with Lisa B. Iturriaga re same	0.4	\$650.00
Courtney M. Miller	9/22/2025	Draft MFA and MFA supporting documents; review case file; update spreadsheet of settlement figures	4.0	\$650.00

Courtney M. Miller	9/23/2025	Draft MFA and MFA supporting documents; review and finalize attorneys' detailed billing	2.0	\$650.00
Courtney M. Miller	9/23/2025	Telephone correspondence to defense counsel to discuss escalator issue	0.1	\$650.00
Courtney M. Miller	9/23/2025	Email correspondence to administrator and defense counsel requesting re escalator issue and finalizing the administrator declaration	0.1	\$650.00
Courtney M. Miller	9/24/2025	Finalize MFA and MFA supporting documents	0.5	\$650.00

TOTALS: 12.1 \$7,865.00

Attorney	Date	Task Completed	Hours	Rate
John G. Yslas	11/20/2024	Research and analysis related to causes of action and theories of case	1.4	\$1,500.00
John G. Yslas	11/24/2024	Analysis and work related to preparing for mediation including review of law, facts and outlining brief	3.9	\$1,500.00
John G. Yslas	11/25/2024	Analysis and attend mediation and analysis aftermath	8.1	\$1,500.00
John G. Yslas	11/26/2024	Analysis and input into agreement and approval motion	1.4	\$1,500.00

TOTALS: 14.8 \$22,200.00

Attorney	Date	Task Completed	Hours	Rate
Eugene Zinovyev	6/5/2024	Initial analysis case status and further handling	3.3	\$900.00
Eugene Zinovyev	6/5/2024	Communication with counsel and evaluation of potential class size	0.4	\$900.00
Eugene Zinovyev	6/6/2024	Correspondence with counsel re pleading extension	0.2	\$900.00
Eugene Zinovyev	6/6/2024	Prepare notice to counsel	0.2	\$900.00
Eugene Zinovyev	6/12/2024	Analyze class list in conjunction with demand evaluation	0.5	\$900.00
Eugene Zinovyev	6/13/2024	Development of initial demand	0.5	\$900.00
Eugene Zinovyev	6/14/2024	Analyze client documents for preparation of demand	0.7	\$900.00
Eugene Zinovyev	6/21/2024	Discussion and analysis of employee handbook	1.1	\$900.00
Eugene Zinovyev	6/26/2024	Further preparation of demand letter	0.6	\$900.00
Eugene Zinovyev	6/26/2024	Discuss case details with client Alvarez	0.5	\$900.00
Eugene Zinovyev	6/27/2024	Revisions to demand letter	0.7	\$900.00
Eugene Zinovyev	7/2/2024	Further analysis of class data and development of class demand	0.6	\$900.00
Eugene Zinovyev	11/24/2024	Prepare for mediation	5.6	\$900.00
Eugene Zinovyev	11/25/2024	Attend mediation	8.3	\$900.00
Eugene Zinovyev	11/26/2024	Evaluate litigation strategy and develop discovery plan	2.4	\$900.00
Eugene Zinovyev	12/6/2024	Discuss settlement status with client and co-counsel, evaluate new offer and determine handling	2.1	\$900.00
Eugene Zinovyev	12/7/2024	Preparation of initial MOU	0.9	\$900.00
Eugene Zinovyev	1/16/2025	Prepare for and participate in call with counsel re MOU terms	1.1	\$900.00
Eugene Zinovyev	1/23/2025	Further discussion with counsel client re MOU terms and revisions re same	1.6	\$900.00

Eugene Zinovyev	2/7/2025	Further discussion with counsel client re MOU terms and revisions re same	0.9	\$900.00
Eugene Zinovyev	2/11/2025	Preparation and revisions to settlement agreement	1.4	\$900.00
Eugene Zinovyev	2/19/2025	Preparation and revisions to settlement agreement	1.1	\$900.00
Eugene Zinovyev	4/8/2025	Communication with counsel re settlement agreement edits	0.7	\$900.00
Eugene Zinovyev	04/22/205	Analyze settlement approval progress	0.6	\$900.00
Eugene Zinovyev	5/7/2025	Analyze and supervise MPA preparation	0.7	\$900.00
Eugene Zinovyev	5/11/2025	Final Edits to MPA	1.2	\$900.00
Eugene Zinovyev	5/20/2025	Analyze settlement approval progress	0.6	\$900.00
Eugene Zinovyev	6/3/2025	Analyze settlement approval progress	0.5	\$900.00
Eugene Zinovyev	6/18/2025	Analyze settlement approval progress and communicate with client re same	0.4	\$900.00
Eugene Zinovyev	7/1/2025	Communicate concerning settlement progress	0.4	\$900.00
Eugene Zinovyev	7/14/2025	Analyze potential MFA issues	0.8	\$900.00
Eugene Zinovyev	7/28/2025	Evaluate expected MFA factors	0.7	\$900.00
Eugene Zinovyev	9/19/2025	Review of MFA	1.2	\$900.00

TOTALS: 42.5 \$38,250.00

Attorney	Date	Task Completed	Hours	Rate
John Brown	5/17/2024	2nd Intake	1.7	\$600.00
John Brown	6/4/2024	Case Analysis	0.1	\$600.00
John Brown	6/18/2024	Follow up with defense counsel re declaration of class size	0.2	\$600.00
John Brown	6/20/2024	Draft Demand Letter	3	\$600.00
John Brown	6/21/2024	Analyze issues related to Demand Letter	1.5	\$600.00
John Brown	6/24/2024	Analyze issues related to Demand Letter	0.3	\$600.00
John Brown	6/24/2024	Analyze issues related to Demand Letter	2	\$600.00
John Brown	6/25/2024	Analyze issues related to / draft Demand Letter	2	\$600.00
John Brown	6/26/2024	Draft Demand Letter	2	\$600.00
John Brown	6/26/2024	Analyze issues related to / draft Demand Letter	2	\$600.00
John Brown	6/26/2024	Analyze issues related to Demand Letter	1	\$600.00
John Brown	6/27/2024	Draft Demand Letter	1.3	\$600.00
John Brown	6/28/2024	Draft Demand Letter	0.2	\$600.00
John Brown	6/28/2024	Draft Demand Letter	1	\$600.00
John Brown	7/18/2024	Analyze issues related to case strategy	0.1	\$600.00
John Brown	7/22/2024	Follow up on CMC filing	0.5	\$600.00
John Brown	8/5/2024	Follow up on demand letter	0.1	\$600.00
John Brown	8/21/2024	Analyze next steps in matter	0.1	\$600.00
John Brown	8/22/2024	Settlement meeting with defense counsel	0.5	\$600.00
John Brown	9/11/2024	Review file and proposed mediators	0.2	\$600.00
John Brown	10/4/2024	Correspond with team / defense counsel re mediation scheduling	0.4	\$600.00
John Brown	11/1/2024	Review JCMCS and send to defense counsel	0.3	\$600.00
John Brown	11/14/2024	Draft Mediation Brief	7.5	\$600.00
John Brown	11/14/2024	Draft mediation brief	4	\$600.00
John Brown	11/18/2024	Review / revise / discuss mediation brief	4.2	\$600.00
John Brown	11/18/2024	Draft mediation brief	2	\$600.00
John Brown	11/19/2024	Review / revise / discuss mediation brief	7	\$600.00
John Brown	11/20/2024	Call clients, discuss geo tracking	0.6	\$600.00
John Brown	11/22/2024	Follow up on case / data	0.3	\$600.00

John Brown	11/25/2024	Attend mediation	8	\$600.00
John Brown	12/5/2024	Analyze status of case	0.1	\$600.00
John Brown	12/10/2024	Follow up with client re settlement	0.3	\$600.00
John Brown	12/17/2024	Follow up w/ client re settlement	0.2	\$600.00
John Brown	12/17/2024	Discuss case with client	0.3	\$600.00
John Brown	12/19/2024	Review draft MOU	0.4	\$600.00
John Brown	1/30/2025	Review of settlement status	0.2	\$600.00
John Brown	2/12/2025	Obtain admin quotes	0.5	\$600.00
John Brown	2/19/2025	Review / Discuss draft MOU	0.5	\$600.00
John Brown	2/24/2025	Review / Finalize PAGA Joint Statement.	0.3	\$600.00
John Brown	2/28/2025	Review status of case, analyze next steps	0.2	\$600.00
John Brown	3/3/2025	Draft Notice	1	\$600.00
John Brown	3/7/2025	Review status of case, analyze next steps	0.2	\$600.00
John Brown	3/24/2025	Follow up on Joint Statement	0.2	\$600.00
John Brown	3/25/2025	Review status of case, analyze next steps	0.1	\$600.00
John Brown	3/26/2025	Follow up on settlement status	0.2	\$600.00
John Brown	4/15/2025	Send settlement to defense counsel for execution	0.2	\$600.00
John Brown	4/21/2025	Follow up on deadlines	0.2	\$600.00
John Brown	8/13/2025	Draft Class CMC Statement	0.3	\$600.00
John Brown	8/13/2025	Finalize Class CMC Statement	0.3	\$600.00
John Brown	8/14/2025	Follow up regarding status of PAGA CMC	0.3	\$600.00
John Brown	8/26/2025	Follow up regarding status of Class CMC	0.3	\$600.00
John Brown	9/5/2025	Follow up with client re status of case	0.2	\$600.00

TOTALS: 60.6 \$36,360.00

EXHIBIT 2

Expenses Subtotals - Filtered Exp. Type

As of 2025-09-15 09:42:42 Pacific Standard Time/PST • Generated by Tara Arnold

Filtered By
Show: All matters
Matter: ID equals a0LPc000000pF3R
Expense Type equals E127 — DTF,DTF,E108 — Postage,E102 — Printing

Display Name ↑	Expense Type ↑		Date	Expense: Expense ID	Provider Name	Note	Amount	Reduction Amount	Amount Paid	Amount Due.
Aaron Alvarez - Wage & Hour: //	E108 — Postage		1/3/2024	E 3170389			\$7.18			\$7.18
			1/3/2024	E 3170390			\$7.18			\$7.18
	Subtotal	Sum					\$14.36	\$0.00	\$0.00	\$14.36
		Count	2							
Subtotal		Sum					\$14.36	\$0.00	\$0.00	\$14.36
		Count	2							
Total		Sum					\$14.36	\$0.00	\$0.00	\$14.36
		Count	2							



WILSHIRE
LAW FIRM

Client Cost Report

Account	Type	Date	Num	Name	Matter Display Name	Line Memo	Amount
501500 Cost of Sale : Court Filing Fees	C r e d i t Card	7/30/2025	CC083125TA-0799	One Legal LLC	Amarok, LLC (Alvarez) - Wage & Hour (Class Action)	25942047-249262-Atty Svc for Court Filing-Change of Address-Aaron Alvarez	\$26.28
501500 Cost of Sale : Court Filing Fees	C r e d i t Card	7/31/2025	CC083125TA-0901	One Legal LLC	Amarok, LLC (Alvarez) - Wage & Hour (Class Action)	25942177-249262-Atty Svc for Court Filing-Change of Address-Aaron Alvarez	\$26.28
501500 Cost of Sale : Court Filing Fees	C r e d i t Card	8/13/2025	CC083125TA-1346	One Legal LLC	Amarok, LLC (Alvarez) - Wage & Hour (Class Action)	26063960-249262-Atty Svc for Court Filing-CMS-Aaron Alvarez	\$26.28
Total							\$78.84

Wilshire Law Firm, PLC
Client Costs Detailed Report
All Transactions

09/15/25

Accrual Basis

Type	Date	Num	Class	Source Name	Memo	Amount	Balance
500000 · COS							
501500 · Court Filing Fees							
Credit C...	04/30/2024	22794631	Amarok(Alvarez).W&H	One Legal LLC	22794631-CCCS,Comp,Summ-Atty Svc for Court Filing-249262 Alva...	1,495.76	1,495.76
Credit C...	05/14/2024	22895557	Amarok(Alvarez).W&H	One Legal LLC	22895557-Case assn ntc,CCCS,Comp,-Atty Svc for Court Filing-24...	41.18	1,536.94
Credit C...	05/15/2024	22903990	Amarok(Alvarez).W&H	One Legal LLC	22903990-Personal svc proof-Atty Svc for Court Filing-249262 Alvar...	18.43	1,555.37
Credit C...	06/06/2024	23068843	Amarok(Alvarez).W&H	One Legal LLC	23068843-249262-Atty Svc for Court Filing-Ntc of Appearance-Amar...	18.43	1,573.80
Credit C...	07/05/2024	23270950	Amarok(Alvarez).W&H	One Legal LLC	23270950-249262-Atty Svc for Court Filing-Sum & Compl-Amarok(A...	1,495.76	3,069.56
Credit C...	07/23/2024	23370840	Amarok(Alvarez).W&H	One Legal LLC	23370840-249262-Atty Svc for Court Filing-Notice-Amarok(Alvarez)....	24.61	3,094.17
Credit C...	07/24/2024	23370879	Amarok(Alvarez).W&H	One Legal LLC	23370879-249262-Atty Svc for Court Filing-Notice-Amarok(Alvarez)....	24.61	3,118.78
Credit C...	11/22/2024	24195777	Amarok(Alvarez).W&H	One Legal LLC	24195777-249262-Atty Svc for Court Filing-Notice-Amarok(Alvarez)....	25.24	3,144.02
Credit C...	02/27/2025	24807151	Amarok(Alvarez).W&H	One Legal LLC	24807151-249262-Atty Svc for Court Filing-CMS-Amarok(Alvarez)....	26.28	3,170.30
Credit C...	03/26/2025	25007519	Amarok(Alvarez).W&H	One Legal LLC	25007519-249262-Atty Svc for Court Filing-CMS-Amarok(Alvarez)....	26.28	3,196.58
Credit C...	04/07/2025	25091985	Amarok(Alvarez).W&H	One Legal LLC	25091985-249262-Atty Svc for Court Filing-CMS-Amarok(Alvarez)....	26.28	3,222.86
Credit C...	04/24/2025	25234502	Amarok(Alvarez).W&H	One Legal LLC	25234502-249262-Atty Svc for Court Filing-Declar,Prop Ord,Apv-Am...	86.16	3,309.02
Credit C...	05/07/2025	25325703	Amarok(Alvarez).W&H	One Legal LLC	25325703-249262-Atty Svc for Court Filing-Ntc of Settlem-Amarok(A...	26.28	3,335.30
Credit C...	05/07/2025	25325411	Amarok(Alvarez).W&H	One Legal LLC	25325411-249262-Atty Svc for Court Filing-Ntc of Settlem-Amarok(A...	26.28	3,361.58
Bill	07/10/2024	78729	Amarok(Alvarez).W&H	Valpro Attorney Services, LLC	78729-Amarok(Alvarez).W&H-File POS	45.00	3,406.58
Total 501500 · Court Filing Fees						3,406.58	3,406.58
502500 · Legal Expenses							
Credit C...	05/02/2024		Amarok(Alvarez).W&H	Department of Industrial Relations	ORD-000281133 (249262) Amarok(Alvarez).W&H	75.00	75.00
Total 502500 · Legal Expenses						75.00	75.00
502700 · Mediation Fees							
Bill	11/05/2024	645332	Amarok(Alvarez).W&H	Judicate West	645332-Amarok(Alvarez).W&H Mediation Fees sked 11/25/2024	4,850.00	4,850.00
Total 502700 · Mediation Fees						4,850.00	4,850.00
503200 · Process Service Fees							
Bill	07/09/2024	78708	Amarok(Alvarez).W&H	Valpro Attorney Services, LLC	78708-Amarok(Alvarez).W&H-Servee Amarok LLC-S&C	219.00	219.00
Total 503200 · Process Service Fees						219.00	219.00
503300 · Professional Fees							
Bill	12/05/2024	13661	Amarok(Alvarez).W&H	Berger Consulting Group, LLC	13661 Amarok(Alvarez).W&H 7.20 hours of work	4,680.00	4,680.00
Total 503300 · Professional Fees						4,680.00	4,680.00
Total 500000 · COS						13,230.58	13,230.58
TOTAL						13,230.58	13,230.58

Expenses Subtotals - Filtered Exp. Type

As of 2025-09-15 09:47:27 Pacific Standard Time/PST • Generated by Tara Arnold

Filtered By
Show: All matters
Matter: ID equals a0LPc000000pF9t
Expense Type equals E127 — DTF,DTF,E108 — Postage,E102 — Printing

Display Name ↑	Expense Type ↑	Date	Expense: Expense ID	Provider Name	Note	Amount	Reduction Amount	Amount Paid	Amount Due.
Michael Armour - Wage & Hour: //	E108 — Postage	1/8/2024	E 3171322			\$7.18			\$7.18
		1/8/2024	E 3171319			\$7.18			\$7.18
	Subtotal	Sum				\$14.36	\$0.00	\$0.00	\$14.36
		Count	2						
Subtotal		Sum				\$14.36	\$0.00	\$0.00	\$14.36
		Count	2						
Total		Sum				\$14.36	\$0.00	\$0.00	\$14.36
		Count	2						