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9 *Attorneys for Plaintiff Leopoldo Martinez-Bravo and the Settlement Class*

10 [Additional counsel on following page]

11 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
 12 **FOR THE COUNTY OF SANTA BARBARA**

13 LEOPOLDO MARTINEZ-BRAVO,
 14 individually and on behalf of others similarly
 15 situated, and as an aggrieved employee and
 16 Private Attorney General,

17 Plaintiff,

18 vs.

19 MIKE KELLEY CONSTRUCTION, INC., a
 20 California corporation; BLAKE KELLEY, an
 21 individual and DOES 1 through 50, inclusive,

22 Defendants.

23 ROBERTO RAMON JOYA ESTRADA AKA
 24 ROBERTO R. FLORES CRUZ individually
 25 and on behalf of all similarly situated
 26 individuals

27 Plaintiff,

28 vs.

MIKE KELLEY CONSTRUCTION, INC., a
 California corporation; BLAKE KELLEY, an
 individual and DOES 1 through 100, inclusive,

Defendants.

Lead Case No. 24CV05385 (Martinez-
 Bravo) Case No. 24CV05393
 (Estrada)

[Cases consolidated on January 8,
 2025]

[Assigned for all purposes to the
 Honorable Thomas P. Anderle, Dept.
 3]

**DECLARATION OF XAVIER
 VILLEGAS IN SUPPORT OF
 MOTION FOR FINAL
 APPROVAL OF CLASS ACTION
 AND PAGA SETTLEMENT**

*[Notice of Motion and Motion,
 Declarations of Elliot J. Siegel,
 Heather Davis, Leopoldo Martinez-
 Bravo, Roberto Ramon Joya
 Estrada, and Elizabeth Botero Bravo,
 and [Proposed] Order filed
 concurrently]*

Hearing Date: June 24, 2026
 Hearing Time: 10:00 a.m.
 Dept.: 3

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16 *Attorneys for Plaintiff Roberto Ramon Joya Estrada and the Settlement Class*

1 **DECLARATION OF XAVIER VILLEGAS**

2 I, Xavier Villegas, declare as follows:

3 1. I am a member in good standing of the bar of the State of California and am
4 admitted to practice before this Court. I have personal knowledge of the facts stated in this
5 declaration and could testify competently to them if called upon to do so. This declaration
6 does not purport to exhaust my knowledge of the subjects discussed.

7 2. I am owner and principal attorney at Law Office of Xavier Villegas, APC and
8 co-counsel for Plaintiff Leopoldo Martinez-Bravo ("Plaintiff Martinez-Bravo"). Protection
9 Law Group, LLP are the attorneys of record for Plaintiff Roberto Ramon Joya Estrada AKA
10 Roberto R. Flores Cruz ("Plaintiff Joya Estrada"). Plaintiffs Martinez-Bravo and Plaintiff
11 Joya Estrada are collectively known as "Plaintiffs".

12 **Academic and Professional Background**

13 3. In 2006 I received a B.A. from The University of Iowa where I was a Dean's
14 List student. In 2011, I received a J.D. from Santa Clara University School of Law where I
15 received recognition for my academic performance and volunteer work in the community. I
16 became a member of the bar in December 2013.

17 4. My experience in plaintiff's wage and hour law and litigation started during
18 my last year of law school as a certified law student at Santa Clara University School of Law's
19 Alexander Community Law Center. As a certified law student, I successfully represented
20 clients in individual wage and hour cases in matters and before the Labor Commissioner.

21 5. After passing the California bar, I started my own practice as a sole
22 practitioner in Sacramento, California. My solo practice included primarily pre-litigation
23 and litigation matters in state and federal courts from individual wage and hour cases,
24 consumer protection cases, personal injury, and criminal defense to real estate injunction
25 litigation to help clients stay in their homes during the housing crisis, and white-collar
26 defense as a contract attorney for other firms.

27 6. In 2015, I accepted a two-year contract position with the State of California
28 as a Staff Attorney where I litigated cases weekly before the Workers' Compensation Appeals

1 Board in venues across Southern California, drafted and responded to discovery,
2 interviewed witnesses, routinely deposed relevant parties and physicians, drafted and
3 argued pre-trial and post-trial motions, and took two cases to trial. In 2017, I accepted a
4 Senior Attorney position with Lawyers for Workplace Fairness, a plaintiff's employment law
5 firm where I handled all types of plaintiff's employment law cases comprising claims of
6 discrimination, sexual harassment, whistleblower retaliation, and wage and hour law for all
7 manner of violations under both state and federal laws. In that capacity I also successfully
8 supervised three teams of two to three associate attorneys and coached and mentored those
9 attorneys.

10 7. In 2019, I accepted a Mid-Level Attorney position with The Bloom Firm.
11 During my employment at The Bloom Firm, I played a significant role on the employment
12 law matters I was staffed on, including successfully settling six- and seven-figure cases and
13 worked in pre-litigation and litigation matters ranging from employment law, sexual
14 harassment, sexual assault and battery, discrimination, retaliation, wage and hour law,
15 personal injury, and contract law. I also supervised the work of junior attorneys and support
16 staff.

17 8. Since 2020, I returned to a full-time solo practice where 99% of my cases are
18 exclusively plaintiff's employment law ranging from wage and hour law cases, including
19 individual cases, representative cases, PAGA cases, and class actions, in regard to all manner
20 of claims as well from wrongful termination, discrimination for protected categories under
21 FEHA, whistleblower retaliation, and sexual harassment. The other 1% of my solo practice
22 comprises one applicant's workers' compensation case.

23 9. I am experienced in employment law litigation, including wage and hour law
24 and class actions, and other complex litigation. Throughout my career, I have gained
25 significant experience regarding the obligations and burdens of representing multiple
26 clients in representative cases. This knowledge has allowed me and my office, Law Office of
27 Xavier Villegas, APC, to successfully represent thousands of employees in numerous
28 employment actions.

1 10. My practice is primarily focused on representing employees in individual,
2 representative, and/or class action litigation in California State and federal courts. I am
3 currently prosecuting claims on behalf of PAGA putative class members and/or class
4 members in *Andrew James Estes v. Marshall Medical Center*; Case No. 25CV005803
5 (Sacramento County Superior Court 2026) (wage and hour case relating to unlawful meal
6 and rest period policies, an unlawful uniform time clock rounding policy, and failure to
7 reimburse business expenses); *Rachel Loreen Giudici v. East Lawn, Inc., et al.*; Case No.
8 25CV021657 (Sacramento County Superior Court 2025) (wage and hour case relating to
9 unlawful meal and rest periods, failure to pay all wages owed due to a policy in violation of
10 the *de minimis* doctrine, and failure to reimburse business expenses); *Carlos Ivan*
11 *Rodriguez Jr. v. Chrisp Company, et al.*; Case No. 25CV107769 (Alameda County Superior
12 Court 2025) (wage and hour case relating to unlawful meal and rest periods and failure to
13 reimburse business expenses); *Fernando Gonzalez v. Express Services, Inc. DBA Express*
14 *Employment Professionals and Columbia Fruit Processing LLC*, Case No.
15 2024CUOE032261 (Ventura County Superior Court 2024) (wage and hour case relating to
16 unlawful meal and rest periods, failure to pay minimum and/or overtime wages, and failure
17 to reimburse business expenses); *Gisela Rodriguez v. Reflectech, Incorporated*, Case No.
18 24CVO10783 (Sacramento County Superior Court 2024) (wage and hour case relating to
19 failure to pay minimum and overtime wages, failure to permit and to record compliant meal
20 and rest periods, violation of sick leave laws, and failure to reimburse business expenses);
21 *Noel Payan v. Evolve Growth Initiatives, LLC*, Case No. 24CVO4586 (Santa Barbara County
22 Superior Court 2024) (wage and hour case relating to failure to pay minimum and overtime
23 wages, failure to permit compliant meal and rest periods and/or noncompliant on-duty
24 meal periods, and failure to reimburse business expenses); *Gerardo Ramirez v. Garcia's*
25 *Landscaping Maintenance, Inc.*, Case No. 56-2023-00576200-CU-OE-VTA (Ventura
26 County Superior Court 2023) (wage and hour case relating to failure to authorize and permit
27 compliant meal and rest periods, including failure to record meal periods, uniform time
28 clock rounding, failure to reimburse business expenses, and failure to pay all wages);

11. I was appointed and certified as adequate class and/or PAGA counsel in *Alejandra Hernandez, et al. v. Yolo Federal Credit Union*, Case No. CV-2021-1000 (Yolo County Superior Court 2021) (final approval on August 4, 2022); *Irene Gomez v. Purple Heart Compassion, Inc.*, Case No. 22STCVO4548 (Los Angeles County Superior Court 2022) (final approval on April 13, 2023); *Kevin Valle Urena v. Raypak, Inc.*, Case No. 56-2022-00563198-CU-OE-VTA (Ventura County Superior Court 2022) (final approval on June 9, 2023); *Brandon Goetz v. Dynacorn International, LLC* Case No. 56-2023-00575474-CU-OE-VTA (Ventura County Superior Court 2023) (final approval on September 18, 2023); *Kelly Del Manzano, et al. v. The Rocket Fizz Soda Pop Shop, LLC*, Case No. 56-2023-00574163-CU-OE-VTA (Ventura County Superior Court 2023) (final approval on October 12, 2023); *Rafael Lopez v. Bay State Milling Company*, Case No. CV2023-0742 (Yolo County Superior Court 2023) (final approval on May 15, 2024); *Marjan Iranrouh v. Highlands Community Charter And Technical Schools*, Case No. 34-2022-00324342 (Sacramento County Superior Court 2022) (final approval on August 2, 2024); *Paula Norton v. Strategic Staffing Solutions-S3, L.L.C., et al.*, Case No. 3:23-cv-06648 (United States District Court Northern District of California) (final approval on June 12, 2025); *Lorena Ortiz, et al., v. Target Corporation*, Case No. CV2023-0586 (Yolo County Superior Court) (final approval on July 10, 2025); and *Ana Molina v. LattCo Services, Inc.*, Case No. 23CVO10964 (Sacramento County Superior Court) (final approval on July 11, 2025).

12. I was preliminarily certified as adequate class and/or PAGA counsel in *Leopoldo Martinez-Bravo v. Mike Kelley Construction, Inc.*, Case No. 24CVO5385 (preliminary approval on February 18, 2026).

The Attorneys' Fees Request is Reasonable

13. Plaintiffs' Counsel request that the Court finally approve an award of reasonable attorneys' fees equal to thirty-five percent (35) of the Maximum Settlement Amount (\$174,650). This award is reasonable considering the experience Plaintiffs' Counsel have in employment actions, legal expertise required to litigate this case and negotiate this

1 settlement, Plaintiffs' Counsel's contingent risk in litigation, and significant amount of
 2 actual lodestar time that Plaintiffs' Counsel have dedicated to this case. The attorneys' fees
 3 sought are comparable to attorneys' fee awards granted in similar cases and represent the
 4 fair market value of services rendered by Plaintiffs' Counsel.

5 14. My law office maintained contemporaneous records of all its hours worked on
 6 this case by billing my time in increments of one-tenth (1/10) of an hour into an electronic
 7 timekeeping system. I access the timekeeping system regularly to assess the number of
 8 hours worked for each case that my law office handles. I relied on these timekeeping records
 9 for this case to prepare this declaration. True and correct copies of my office's
 10 contemporaneous records of all hours worked on this matter are attached as **Exhibit A** and
 11 true and correct copies of my office's costs incurred and paid totaling \$3,199.39 as **Exhibit**
 12 **B**. Additionally, **Appendix 1** provides an explanation of these costs by category, which
 13 includes but is not limited to: filing fees, mailing fees, service fees, mediation costs, and
 14 hearing attendance costs.

15 15. The chart below presents a general summary showing the number of hours
 16 that I performed in this case through May 28, 2026.

Name	Current Rate ¹	Hours	Pre-Multiplier Lodestar
Xavier Villegas	\$775 per hour	98.7	\$76,492.50
Total Lodestar		98.7	\$76,492.50

20 16. My Office's efforts in this case have included, but are not limited to: a pre-
 21 filing investigation, interviewing Plaintiff, reviewing Plaintiff's personnel file, analyzing
 22 Plaintiff's claims and Defendant's potential defenses to the same, conducting legal research,
 23 preparing the class action Complaint and PAGA Notice, meeting and conferring with
 24 Defendant's counsel regarding informal discovery, preparing formal and informal discovery

25
 26 ¹ Under longstanding law, Class Counsel are entitled to use their current billing rate
 27 across the length of the litigation. *See, e.g., Gates v. Deukmejian*, 987 F.2d 1392, 1406 (9th
 28 Cir. 1992) ("We long have recognized that district courts have the discretion to compensate
 prevailing parties for any delay in the receipt of fees by awarding fees at current rather than
 historic rates in order to adjust for inflation and loss of the use funds.").

1 requests, and attending related hearings, reviewing documentation produced by Defendant,
2 performing review and analyses of Class Member data files including per-shift time punch
3 data, plus itemized wage statements, for a 20% sample of the of the Class, reviewing all
4 compensation, security, payroll, time-keeping, time tracking, and meal/rest period policy-
5 related documents in effect during the relevant period, and class claim prosecution,
6 telephone conferences and email exchanges with Class Counsel's expert regarding damages,
7 preparing a mediation brief, attending an all-day mediation, drafting, negotiating, and
8 revising the Settlement Agreement and notice packet, preparing for and appearing at
9 hearings, preparing and filing the Motions for Preliminary and Final Approval, monitoring
10 the notice and settlement administration processes, communicating with the Class
11 Administrator, reviewing calculations regarding Class settlement distribution, and
12 otherwise litigating the case.

13 17. These hours can be generally categorized as follows:

14 a. Case Investigation and Pleadings:

15 As Class Counsel, I spent approximately 20.8 hours on the initial case
16 investigation and initiation, including interviewing Plaintiff regarding the
17 factual allegations behind the Class's claims, and drafting and filing the
18 PAGA Notice and drafting, revising, and filing the Complaint;
19 investigating the Class's claims, and conducting research regarding the
20 adequacy of the claims.

21 b. Informal and Formal Discovery:

22 As Class Counsel spent approximately 37.3 hours preparing informal
23 discovery requests, preparing for serving relevant informal and formal
24 discovery requests, obtaining and reviewing informal and formal discovery
25 regarding the Class, and reviewing Defendant's production of informal and
26 formal discovery (including productions of data and documents relating to
27 the Class; per-shift actual time punch data, plus itemized wage statements
28 for a 20% sample of the Class; a list of Class Members containing

individual pay rates, classifications, and start and end dates of employment; and all compensation, security, payroll, time-keeping, time tracking, and meal/rest period policy-related documents in effect during the relevant period; as well as aggregate information for the Class and policy documentation), including the aforementioned in preparation for mediation, and conferring with Co-Counsel.

c. Mediation and Settlement:

As Class Counsel I spent approximately 15.5 hours preparing a mediation brief, reviewing our expert's final damages calculations & communicating with the expert, performing substantial data analyses of the informal discovery, attending an all-day mediation, negotiating, drafting, and revising the Memorandum of Understanding followed by the Settlement Agreement, conferring with client and obtaining statements in support of mediation, preparing the Settlement Agreement, and incidentally related work post-mediation and/or necessary to settle this Action, including corresponding with opposing counsel and conferring with Co-Counsel.

d. Hearings, Approval, and Settlement Administration:

As Class Counsel I spent approximately 25.1 hours drafting and revising the Motion for Preliminary Approval (including supporting documents and declarations), preparing for attending the hearing on the Motion for Preliminary Approval, communicating with the Settlement Administrator regarding the notice and settlement administration process, communicating with the Class Administrator and Defense Counsel regarding the Class Member data, reviewing calculations regarding Class settlement distribution, and drafting and revising the Motion for Final Approval (including supporting documents and declarations), including corresponding with opposing counsel and conferring with Co-Counsel.

18. These hours do not include an estimated 5-15 additional hours to be spent

1 preparing for and attending the hearing for final approval, as well as time for oversight of
2 the post-approval settlement administration, including distribution of funds, and attending
3 a final compliance hearing, as applicable.

4 19. I am not aware of any conflicting interests between my firm and any of its
5 attorneys, on the one hand, and Plaintiffs or any other Aggrieved Employee, on the other.

6 20. Plaintiffs' Counsel have a fee-splitting arrangement and co-counsel
7 agreement, which has been fully disclosed and agreed to by Plaintiffs, who have signed a
8 written consent as to the fee split pursuant to California Rules of Professional
9 Responsibility, Rule 1.5.1. The fee-splitting arrangement provides that Law Office of Xavier
10 Villegas, APC and King & Siegel LLP shall receive fifty percent (50%) of the Attorneys' Fee
11 Award and the remaining fifty percent (50%) of the Attorney's Fee Award going to
12 Protection Law Group.

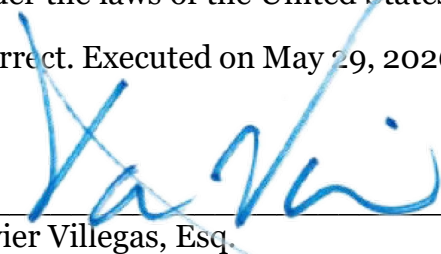
13 *Status of Individual Litigation*

14 21. As described in Plaintiff Martinez-Bravo's Declaration in Support of Motion
15 for Preliminary Approval and his Declaration in Support of Motion for Final Approval, he
16 had also filed a separate civil complaint alleging individual claims arising under the Fair
17 Employment and Housing Act.

18 22. At the Parties' July 9, 2026 mediation, Mr. Martinez-Bravo agreed to
19 withdraw his individual FEHA claims as part of his agreement to a Civil Code section 1542
20 waiver and in accordance therewith successfully filed a Request for Dismissal with prejudice
21 of the FEHA action on January 9, 2026.

22
23 I declare under penalty of perjury under the laws of the United States and the State
24 of California that the foregoing is true and correct. Executed on May 29, 2026 in Camarillo,
25 California.

26 By:

27 
Xavier Villegas, Esq.
28 Attorney for Plaintiff and the Settlement Class

Appendix 1

<u>DATE</u>	<u>EXPENSE</u>	<u>DESCRIPTION</u>	<u>Amount</u>
4/24/2024	Filing	PAGA Notice (electronic submission) to LWDA	\$75.00
4/24/2024	Mailing	Certified mailing of PAGA Notice to ASP and ER	\$17.46
5/8/2024	Mailing	Certified mailing of PAGA Notice to ER	\$8.73
10/11/2024	Filing	170.6 Motion (1 of 2)	\$20.20
10/11/2024	Filing	170.6 Motion (2 of 2)	\$20.20
1/6/2025	Filing	CMS (1 of 2)	\$22.20
1/16/2025	Filing	CMS (2 of 2)	\$22.20
1/27/2025	Fees	Jury Deposit (1 of 2)	\$173.20
1/27/2028	Fees	Jury Deposit (2 of 2)	\$173.20
3/18/2025	Fees	Mediator's Fees	\$2,667.00
TOTAL			\$3,199.39

EXHIBIT A

Type	Date	Hours	Activity category	Description	Rate (\$)	Billable (\$)	User
TimeEntry	7/30/2023	0.8	Communicate (with client)	PC came to SMJ to complete his Quest with me in person and in Spanish.	\$590.00	\$472.00	Xavier Villegas
TimeEntry	4/24/2024	2.8	Draft/revise	PAGA Notice and filed same with LWDA and mailed on ER/ASP via certified mail.	\$590.00	\$1,652.00	Xavier Villegas
TimeEntry	5/28/2024	0.4	Communicate (other external)	Emails to/from EJS conferring on case status and strategy for moving case forward.	\$590.00	\$236.00	Xavier Villegas
TimeEntry	5/28/2024	0.1	Communicate (other outside counsel)	Emails to/from OPC re 1198.5 and 226 production and status of ER/DFNT's HB.	\$590.00	\$59.00	Xavier Villegas
TimeEntry	5/28/2024	0.7	Research	PAGA and SOL and Equitable Tolling.	\$590.00	\$413.00	Xavier Villegas
TimeEntry	5/28/2024	0.4	Communicate (other external)	Emails from/to EJS conferring on case status and strategy for moving case forward.	\$590.00	\$236.00	Xavier Villegas
TimeEntry	5/29/2024	0.1	Communicate (other external)	Conferred with EJS re case status and moving case forward.	\$590.00	\$59.00	Xavier Villegas
				TC, text, email to CL re case status and strategy for moving case forward and also emailed all			
TimeEntry	6/5/2024	0.4	Communicate (with client)	1198.5/226 ER/DFNT production to CL.	\$590.00	\$236.00	Xavier Villegas
TimeEntry	6/6/2024	0.6	Communicate (with client)	TC from/to CL re case status and strategy for moving case forward.	\$590.00	\$354.00	Xavier Villegas
TimeEntry	7/5/2024	1.1	Draft/revise	EA Class Action packet in Spanish and English.	\$615.00	\$676.50	Xavier Villegas
				Email to EJS re draft/finalized EA class axn/paga packet and case status and strategy for moving			
TimeEntry	7/5/2024	0.2	Communicate (other external)	case forward.	\$615.00	\$123.00	Xavier Villegas
TimeEntry	7/5/2024	1	Communicate (with client)	Met with CL in person in Ventura to execute class axn/paga SAR.	\$615.00	\$1,291.50	Xavier Villegas
TimeEntry	7/9/2024	0.1	Communicate (other external)	Emails from/to EJS re EA status.	\$615.00	\$61.50	Xavier Villegas
TimeEntry	7/22/2024	0.8	Communicate (with client)	Finalized EA Package and emailed fully executed copies to CL.	\$615.00	\$492.00	Xavier Villegas
				Emails to/from EJS and K&S team re fully executed EA package and client file for co-counseling			
TimeEntry	7/22/2024	0.6	Communicate (other external)	status and strategy for moving forward.	\$615.00	\$369.00	Xavier Villegas
TimeEntry	8/2/2024	0.4	Communicate (with client)	TC w/ CL re case status.	\$615.00	\$246.00	Xavier Villegas
TimeEntry	8/7/2024	0.1	Communicate (other external)	Conferred with EJS on case status re monthly punch list.	\$615.00	\$61.50	Xavier Villegas
TimeEntry	8/27/2024	0.3	Communicate (with client)	Re case status and strategy for moving case forward.	\$615.00	\$184.50	Xavier Villegas
TimeEntry	9/17/2024	5.5	Draft/revise	Class Action Complaint and email to EJS conferring on same.	\$725.00	\$3,987.50	Xavier Villegas
TimeEntry	9/18/2024	0.4	Communicate (other external)	Conferred with EJS re case status and strategy for moving case forward.	\$725.00	\$290.00	Xavier Villegas
TimeEntry	9/19/2024	0.4	Communicate (other external)	Conferred with EJS re case status and strategy for moving case forward re complaint edits.	\$725.00	\$290.00	Xavier Villegas
TimeEntry	9/24/2024	2.2	Draft/revise	Complaint package.	\$725.00	\$3,262.50	Xavier Villegas
TimeEntry	9/26/2024	1.4	Draft/revise	Finalized Complaint and conferred with EJS/MCC re same for filing.	\$725.00	\$2,030.00	Xavier Villegas
TimeEntry	10/7/2024	0.2	Communicate (other external)	Email to K&S re status and strategy for moving case forward and calendaring relevant dates.	\$725.00	\$145.00	Xavier Villegas
TimeEntry	10/7/2024	0.3	Communicate (other external)	Email to EJS re potential for 170.6 motion and pertinent analysis re judicial assignment.	\$725.00	\$217.50	Xavier Villegas
TimeEntry	10/8/2024	0.8	Draft/revise	NAR and packet.	\$725.00	\$580.00	Xavier Villegas
TimeEntry	10/8/2024	0.1	Communicate (other outside counsel)	Emailed NAR and packet.	\$725.00	\$72.50	Xavier Villegas
TimeEntry	10/8/2024	0.5	Draft/revise	Draft 170.6 motion and email to EJS for conferring on same.	\$725.00	\$362.50	Xavier Villegas
TimeEntry	10/9/2024	0.2	Communicate (other outside counsel)	Emails from/to OPC re NARs and CCP 1010.6(e) email service.	\$725.00	\$145.00	Xavier Villegas
TimeEntry	10/10/2024	0.2	Draft/revise	Finalized 170.6 motion for filing tomorrow.	\$725.00	\$290.00	Xavier Villegas
				Finalized 170.6 motion, TC to ct clerk re efilng, conferred with EJS, submitted for efilng via lawyer			
TimeEntry	10/11/2024	0.5	Draft/revise	services, and served on OPC.	\$725.00	\$725.00	Xavier Villegas
TimeEntry	10/18/2024	0.1	Communicate (other external)	Invoices and receipts for filing Class/Individual 170.6 motions.	\$725.00	\$72.50	Xavier Villegas
TimeEntry	10/24/2024	0.1	Communicate (other outside counsel)	Email to OPC re NAR status.	\$725.00	\$145.00	Xavier Villegas
TimeEntry	11/1/2024	0.2	Communicate (other outside counsel)	Emails from/to OPC re executing NAR and updated NAR.	\$725.00	\$217.50	Xavier Villegas
TimeEntry	11/1/2024	0.1	Communicate (other external)	Email from/to EJS re case status on NAR.	\$725.00	\$72.50	Xavier Villegas
TimeEntry	11/7/2024	0.3	Communicate (other outside counsel)	Emails to/from OPC and conferring with EJS re SOP via NAR.	\$725.00	\$290.00	Xavier Villegas
TimeEntry	11/13/2024	0.4	Communicate (other external)	Conferred with EJS re case status and strategy for moving case forward.	\$725.00	\$290.00	Xavier Villegas
TimeEntry	11/14/2024	0.3	Communicate (other outside counsel)	Emails from/to OPC and EJS re signed NAR and calendared accordingly.	\$725.00	\$290.00	Xavier Villegas
TimeEntry	11/26/2024	2.3	Draft/revise	PLTF's offensive disco set one.	\$725.00	\$1,667.50	Xavier Villegas
TimeEntry	11/27/2024	1.8	Draft/revise	PLTF's offensive disco set one and conferred with EJS re same.	\$725.00	\$1,305.00	Xavier Villegas
TimeEntry	12/3/2024	0.2	Communicate (other external)	Conferred with EJS re M/C ltr from OPC on consolidation.	\$725.00	\$145.00	Xavier Villegas
				Emails to/from PLTF's attys for related case and scheduled mtg thereon and conferring with EJS re			
TimeEntry	12/3/2024	0.2	Communicate (other outside counsel)	same.	\$725.00	\$145.00	Xavier Villegas
TimeEntry	12/9/2024	0.4	Communicate (other external)	Teams mtg w/ Estrada attys and post-conferring with EJS.	\$725.00	\$290.00	Xavier Villegas
TimeEntry	12/9/2024	0.1	Communicate (other outside counsel)	Email from EJS to OPC re m/c'ing on consolidation.	\$725.00	\$72.50	Xavier Villegas
TimeEntry	12/10/2024	2.4	Draft/revise	Stip to consolidate and order and conferred with EJS re same.	\$725.00	\$1,740.00	Xavier Villegas
TimeEntry	12/10/2024	0.3	Communicate (other external)	Emails with draft stip to consolidate to Estrada attys and OPC and conferring with EJS re same.	\$725.00	\$217.50	Xavier Villegas
TimeEntry	12/11/2024	0.3	Communicate (other external)	Conferring with Estrada attys re case status and moving forward re proposing mediation.	\$725.00	\$217.50	Xavier Villegas
TimeEntry	12/11/2024	0.3	Communicate (with client)	TC to CL re case status and execution of JPA.	\$725.00	\$217.50	Xavier Villegas
TimeEntry	12/11/2024	0.1	Communicate (other outside counsel)	Emails to/from EJS and OPC re proposing mediation.	\$725.00	\$72.50	Xavier Villegas
TimeEntry	12/12/2024	0.4	Communicate (other external)	Conferred with EJS re case status and strategy for moving case forward.	\$725.00	\$290.00	Xavier Villegas

TimeEntry	12/13/2024	0.2	Communicate (other external)	Emails from/to EJS re CL's execution of JPA.	\$725.00	\$145.00	Xavier Villegas
TimeEntry	12/18/2024	2.4	Draft/revise	Response to 12/12/24 M/C Ltr from OPC and relevant legal analysis/research and conferring with EJS re same.	\$725.00	\$1,740.00	Xavier Villegas
TimeEntry	12/18/2024	1.8	Communicate (other outside counsel)	Conferred with EJS on finalizing M/C response ltr to OPC, finalized, and emailed to OPC.	\$725.00	\$1,305.00	Xavier Villegas
TimeEntry	12/18/2024	0.2	Communicate (other external)	JPA executed by co-PLTF email from co-counsel.	\$725.00	\$145.00	Xavier Villegas
TimeEntry	12/18/2024	0.3	Communicate (other outside counsel)	Conferred with EJS re finalizing stip to consolidate, emails from co-counsel re execution of same, and emails to/from OPC re execution of same.	\$725.00	\$217.50	Xavier Villegas
TimeEntry	12/23/2024	0.4	Communicate (other outside counsel)	Emails to/from OPC and conferring with EJS re DFNT's extension to Answer complaint.	\$725.00	\$290.00	Xavier Villegas
TimeEntry	12/27/2024	0.2	Communicate (other external)	Email from co-counsel re JPA and conferred with EJS re same.	\$725.00	\$145.00	Xavier Villegas
TimeEntry	12/27/2024	0.2	Communicate (with client)	Comms w/ CL re status of JPA.	\$725.00	\$145.00	Xavier Villegas
TimeEntry	12/28/2024	0.1	Communicate (other external)	Conferred with EJS re case status.	\$725.00	\$72.50	Xavier Villegas
TimeEntry	12/30/2024	0.5	Communicate (other outside counsel)	Further M/C Ltr from OPC and my prelim review of same.	\$725.00	\$362.50	Xavier Villegas
TimeEntry	1/2/2025	0.2	Communicate (other outside counsel)	Email from OPC w/ draft decl re dismissal of 558.1 DFNT.	\$725.00	\$145.00	Xavier Villegas
TimeEntry	1/3/2025	0.3	Communicate (other outside counsel)	Draft Decl for 558.1 DFNT from OPC and my prelim asmt of same.	\$725.00	\$217.50	Xavier Villegas
TimeEntry	1/3/2025	0.7	Communicate (other outside counsel)	Teleconf with OPC and EJS and pre-post prep/debriefing.	\$725.00	\$507.50	Xavier Villegas
TimeEntry	1/6/2025	0.4	Communicate (with client)	TC/texts with CL re JPA status and execution via wet ink and AdobeSign.	\$725.00	\$290.00	Xavier Villegas
TimeEntry	1/7/2025	0.4	Communicate (other outside counsel)	Communications with CL re executing JPA, updated EJS for his execution, and fully executed and emailed to co-counsel at PLG.	\$725.00	\$290.00	Xavier Villegas
TimeEntry	1/7/2025	1.1	Draft/revise	Further resp ltr to OPC's 12/30/24 further m/c ltr re FEHA and Class cases issues and email to EJS conferring on same.	\$725.00	\$1,305.00	Xavier Villegas
TimeEntry	1/7/2025	0.6	Communicate (other external)	Conferred with EJS re m/c ltr response to OPC re 12/30/24 further m/c ltr, edited same, and further conferring for finalization.	\$725.00	\$435.00	Xavier Villegas
TimeEntry	1/7/2025	0.3	Communicate (other outside counsel)	Email svc from opc of CMS re CLASS AXN and my prelim assessment of same.	\$725.00	\$217.50	Xavier Villegas
TimeEntry	1/10/2025	0.4	Communicate (other external)	Emails to/from co-counsel and EJS re draft single pleading and consolidation order and moving case forward.	\$725.00	\$290.00	Xavier Villegas
TimeEntry	1/13/2025	0.1	Communicate (other external)	Emails to co-counsel LPG from EJS re single pleading and filing in light of consolidation order.	\$725.00	\$72.50	Xavier Villegas
TimeEntry	1/14/2025	0.1	Communicate (other outside counsel)	MCC email to OPC re svc of consolidated class axn C/O.	\$725.00	\$72.50	Xavier Villegas
TimeEntry	1/15/2025	0.1	Communicate (other outside counsel)	Email notice of remote app from OPC and resp to same.	\$725.00	\$72.50	Xavier Villegas
TimeEntry	1/15/2025	0.3	Communicate (other external)	Conferred with EJS re case status and strategy for moving case forward and also emails from/to OPC re single pleading C/O.	\$725.00	\$217.50	Xavier Villegas
TimeEntry	1/16/2025	0.2	Communicate (other external)	Emails to/from EJS and co-counsel re case status and strategy for moving case forward re OPC issues with combined pleading.	\$725.00	\$145.00	Xavier Villegas
TimeEntry	1/20/2025	0.1	Communicate (other outside counsel)	CLASS: Email from OPC confirming agreement to mediate.	\$725.00	\$72.50	Xavier Villegas
TimeEntry	1/21/2025	0.2	Communicate (other external)	Emails from/to co-counsel re OPC's agmt to mediate and EJS response to same re strategy on moving forward.	\$725.00	\$145.00	Xavier Villegas
TimeEntry	1/23/2025	0.3	Communicate (other external)	Emails from/to co-counsel re pre-mediation data negotiations and email from same to OPC re scheduling telconf on same.	\$725.00	\$217.50	Xavier Villegas
TimeEntry	1/23/2025	0.2	Communicate (other external)	Emails from/to OPC and co-counsel re scheduling Teams mtg next wk.	\$725.00	\$145.00	Xavier Villegas
TimeEntry	1/25/2025	0.2	Managa data/files	Obtained zoom links for upcoming CMC.	\$725.00	\$217.50	Xavier Villegas
TimeEntry	1/27/2025	0.6	Communicate (other outside counsel)	Teams mtg w/ co-counsel and OPC and EJS re pre-mediation data. And post-debriefing.	\$725.00	\$435.00	Xavier Villegas
TimeEntry	1/27/2025	0.3	Communicate (other external)	Finalized and filed Jury Fee Deposit Notices and served on OPC/co-counsel.	\$725.00	\$362.50	Xavier Villegas
TimeEntry	1/28/2025	0.1	Communicate (other external)	Emails from lawyers svcs confirming acceptance of filing of jury fees.	\$725.00	\$72.50	Xavier Villegas
TimeEntry	1/29/2025	1.5	Appear for/attend	CMC and pre/post prep and debriefing and conferring with EJS.	\$725.00	\$1,087.50	Xavier Villegas
TimeEntry	1/29/2025	0.1	Communicate (other external)	Emails to/from co-counsel re confirmation of mediation date and mediator.	\$725.00	\$72.50	Xavier Villegas
TimeEntry	1/29/2025	0.2	Communicate (other external)	Emails to/from co-counsel and mediator re mediation logistics.	\$725.00	\$145.00	Xavier Villegas
TimeEntry	1/29/2025	0.4	Communicate (other external)	Email from mediator re relevant mediation docs and invoices and conferring with EJS re same.	\$725.00	\$290.00	Xavier Villegas
TimeEntry	1/31/2025	0.1	Communicate (other external)	Emails to/from MCC re POS and NAR filings.	\$725.00	\$72.50	Xavier Villegas
TimeEntry	2/11/2025	0.3	Communicate (other outside counsel)	Email from OPC w/ draft stip to stay disco attached and my prelim review of same.	\$725.00	\$217.50	Xavier Villegas
TimeEntry	2/14/2025	0.2	Communicate (other outside counsel)	Emails from/to OPC re signed stip for stay pending mediation.	\$725.00	\$145.00	Xavier Villegas
TimeEntry	3/4/2025	0.3	Communicate (other outside counsel)	Emails from/to OPC confirming stay on PLTF's disco pending mediation per conferring with EJS.	\$725.00	\$217.50	Xavier Villegas
TimeEntry	3/19/2025	0.4	Communicate (other external)	Updated punch list and conferred with EJS on case status and strategy for moving case forward.	\$725.00	\$290.00	Xavier Villegas
TimeEntry	5/4/2025	0.2	Communicate (other external)	Emails from/to Counsel Jeff from PLG and EJS and me re status and scheduling teleconf.	\$725.00	\$145.00	Xavier Villegas
TimeEntry	5/5/2025	0.1	Communicate (other external)	Email to co-counsel from Protection Law Group re scheduling teleconf.	\$725.00	\$72.50	Xavier Villegas
TimeEntry	5/6/2025	0.1	Communicate (other external)	Email from Protection Law Group re calendaring teleconf.	\$725.00	\$72.50	Xavier Villegas
TimeEntry	5/7/2025	0.5	Communicate (other external)	Teleconf with co-counsel Jeff re status and strategy for moving forward re upcoming mediation.	\$725.00	\$362.50	Xavier Villegas

TimeEntry	6/3/2025	0.2	Communicate (other outside counsel)	Emails from co-counsel and OPC re status of pre-mediation data.	\$725.00	\$145.00	Xavier Villegas
TimeEntry	6/9/2025	0.8	Communicate (other outside counsel)	Emails from/to OPC and co-counsel re pre-mediation data and my prelim review of same.	\$725.00	\$580.00	Xavier Villegas
TimeEntry	6/27/2025	0.1	Communicate (other external)	Emails from/to co-counsel re status and moving forward re class damages and mediation.	\$725.00	\$72.50	Xavier Villegas
TimeEntry	6/30/2025	0.2	Communicate (other external)	Texts from/to EJS and to co-counsel re status on mediation brief and our inserts.	\$725.00	\$145.00	Xavier Villegas
				PLFT's inserts to Class/PAGA mediation brief and relevant factual/legal analysis and phone call with CL and conferring with EJS and co-counsel re same.	\$725.00	\$2,755.00	Xavier Villegas
TimeEntry	7/1/2025	3.8	Draft/revise		\$725.00	\$145.00	Xavier Villegas
TimeEntry	7/2/2025	0.2	Communicate (other external)	Emails to/from mediator requesting 2-day extension and conferring with EJS re same.	\$725.00	\$290.00	Xavier Villegas
TimeEntry	7/2/2025	0.4	Communicate (other external)	Emails from/to co-counsel and TC with same re class mediation brief.	\$725.00		Xavier Villegas
				Email from mediator's office re need for LOXV APC's executed mediation agreement and execution of same.	\$725.00	\$145.00	Xavier Villegas
TimeEntry	7/7/2025	0.2	Communicate (other external)	Emails from/to co-counsel re draft MOU.	\$725.00	\$72.50	Xavier Villegas
TimeEntry	7/7/2025	0.1	Communicate (other external)		\$725.00	\$217.50	Xavier Villegas
TimeEntry	7/8/2025	0.3	Communicate (other external)	Emails from/to co-counsel and EJS re class damages analysis and review of same.	\$725.00		Xavier Villegas
TimeEntry	7/9/2025	6.5	Appear for/attend	Mediation and pre/post prep and debriefing.	\$725.00	\$4,712.50	Xavier Villegas
				Email from mediator and from/to EJS re status on mediator's proposal and conferring on status moving forward.	\$725.00	\$145.00	Xavier Villegas
TimeEntry	7/10/2025	0.2	Communicate (other external)	Email to co-counsel re MOU status.	\$725.00	\$72.50	Xavier Villegas
TimeEntry	7/14/2025	0.1	Communicate (other external)	Email to EJS re status.	\$725.00	\$72.50	Xavier Villegas
TimeEntry	7/15/2025	0.1	Communicate (other external)	Emails to/from EJS and co-counsel re MOU status.	\$725.00	\$72.50	Xavier Villegas
TimeEntry	7/15/2025	0.1	Communicate (other external)		\$725.00		Xavier Villegas
TimeEntry	7/15/2025	0.2	Communicate (other external)	Emails from/to EJS and co-counsel re updated draft MOU, and my review of same.	\$725.00	\$145.00	Xavier Villegas
				Emails from/to co-counsel and conferring with EJS and same re edits/updates to draft MOU and my review of same and suggested edits.	\$725.00	\$362.50	Xavier Villegas
TimeEntry	7/16/2025	0.5	Communicate (other external)	Email to co-counsel re MOU status and upcoming motions.	\$725.00	\$72.50	Xavier Villegas
TimeEntry	7/18/2025	0.1	Communicate (other external)		\$725.00		Xavier Villegas
TimeEntry	7/18/2025	0.3	Communicate (other outside counsel)	Email from OPC w/ revised/edited MOU and my review of same.	\$725.00	\$217.50	Xavier Villegas
TimeEntry	7/21/2025	0.1	Communicate (other external)	Email from co-counsel re revised MOU from OPC and conferring on moving forward.	\$725.00	\$72.50	Xavier Villegas
TimeEntry	7/22/2025	0.3	Communicate (other external)	Emails from/to co-counsel and with OPC re MOU and review of same with new edits.	\$725.00	\$217.50	Xavier Villegas
TimeEntry	8/4/2025	0.1	Communicate (other external)	Emails to/from EJS re status.	\$725.00	\$72.50	Xavier Villegas
TimeEntry	8/4/2025	0.1	Communicate (other external)	Email to co-counsel re status on MOU and OPC response.	\$725.00	\$72.50	Xavier Villegas
TimeEntry	8/6/2025	0.3	Communicate (other external)	Conferring with EJS re status and TC/VM/email to co-counsel re status.	\$725.00	\$217.50	Xavier Villegas
TimeEntry	8/7/2025	0.4	Communicate (other external)	Emails from/to co-counsel and with EJS re Apex, and to OPC for final approval of finalized MOU.	\$725.00	\$290.00	Xavier Villegas
TimeEntry	8/12/2025	0.2	Communicate (other external)	Emails from/to EJS re executing MOA.	\$725.00	\$145.00	Xavier Villegas
TimeEntry	8/12/2025	0.3	Communicate (with client)	Communications with CL re scheduling in person appt for execution of MOA.	\$725.00	\$217.50	Xavier Villegas
TimeEntry	8/13/2025	0.1	Communicate (other external)	Email to EJS re status and moving forward re in-person appt with CL.	\$725.00	\$72.50	Xavier Villegas
				Emails from OPC and to EJS re noticing ct of sttmt (review of draft) in advance of CMC and dismissal re feha case.	\$725.00	\$290.00	Xavier Villegas
TimeEntry	8/13/2025	0.4	Communicate (other outside counsel)	In person appt with CL for execution of MOU and emailed same to co-counsel for execution by co-PLFT.	\$725.00	\$1,015.00	Xavier Villegas
TimeEntry	8/13/2025	1.4	Communicate (with client)		\$725.00		Xavier Villegas
TimeEntry	8/13/2025	0.3	Draft/revise	Edited DFNT's draft Notice of Stip and emailed redline to EJS for final conferring.	\$725.00	\$217.50	Xavier Villegas
				Emails from/to EJS and to co-counsel re draft Notice of Settlement for approval and response to OPC.	\$725.00	\$290.00	Xavier Villegas
TimeEntry	8/13/2025	0.4	Communicate (other external)		\$725.00		Xavier Villegas
TimeEntry	8/15/2025	0.2	Communicate (other external)	Emails from/to co-counsel and to OPC re fully executed MOU.	\$725.00	\$145.00	Xavier Villegas
				Conferring with EJS on status and strategy for moving forward on long form and TC to co-counsel on same.	\$725.00	\$145.00	Xavier Villegas
TimeEntry	8/19/2025	0.2	Communicate (other external)		\$725.00	\$217.50	Xavier Villegas
TimeEntry	8/20/2025	0.3	Communicate (other external)	Conferring with EJS re status and strategy for moving case forward via my office punch list.	\$725.00	\$72.50	Xavier Villegas
TimeEntry	8/25/2025	0.1	Communicate (other external)	Email to co-counsel re status of long form.	\$725.00	\$72.50	Xavier Villegas
TimeEntry	8/26/2025	0.1	Communicate (other external)	Email from co-counsel re status of long form draft.	\$725.00	\$72.50	Xavier Villegas
TimeEntry	8/27/2025	0.1	Communicate (other external)	Email to co-counsel re long form status resp.	\$725.00	\$72.50	Xavier Villegas
TimeEntry	8/29/2025	0.1	Communicate (other external)	Emails from/to co-counsel re status on drafting long form.	\$725.00	\$72.50	Xavier Villegas
				Checked long form status, conferring with EJS re same, and email to co-counsel on status and our assistance re same.	\$725.00	\$145.00	Xavier Villegas
TimeEntry	9/16/2025	0.2	Communicate (other external)		\$725.00		Xavier Villegas
TimeEntry	9/18/2025	0.3	Communicate (other external)	Emails from/to co-counsel re draft long form and my prelim review of same.	\$725.00	\$217.50	Xavier Villegas
				Emails from/to co-counsel and EJS re status of long form and email from/to counsel and OPC on status.	\$725.00	\$145.00	Xavier Villegas
				Emails to/from co-counsel and OPC and drafts long form and exh A (class notice) with edits/revisions and my review of same.	\$725.00	\$217.50	Xavier Villegas
TimeEntry	9/30/2025	0.3	Communicate (other outside counsel)		\$725.00		Xavier Villegas
				Emails from/to OPC and co-counsel and EJS re DFNT's revisions to draft Long Form and my prelim review of same.	\$725.00	\$290.00	Xavier Villegas
TimeEntry	10/8/2025	0.4	Communicate (other external)		\$725.00		Xavier Villegas

TimeEntry	10/13/2025	0.2	Communicate (other external)	Emails from/to co-counsel and OPC re finalized Class Notice and my review of same.	\$725.00	\$145.00	Xavier Villegas
TimeEntry	10/14/2025	0.1	Communicate (other external)	Conferring with EJS re case status.	\$725.00	\$72.50	Xavier Villegas
				Conferring with EJS on status and moving forward per pending long form with OPC and			
TimeEntry	10/15/2025	0.2	Communicate (other external)	forthcoming draft MPA with co-counsel.	\$725.00	\$145.00	Xavier Villegas
TimeEntry	10/21/2025	0.2	Communicate (other outside counsel)	Emails to/from co-counsel to OPC re executing long form.	\$725.00	\$145.00	Xavier Villegas
TimeEntry	10/23/2025	0.2	Communicate (other outside counsel)	Emails from/to OPC re fully executing long form.	\$725.00	\$145.00	Xavier Villegas
TimeEntry	10/27/2025	0.2	Communicate (with client)	TC and email to CL re executing long form.	\$725.00	\$145.00	Xavier Villegas
				TC w/ CL and emailed his executed long form to co-counsel and OPC and emails to co-counsel on			
TimeEntry	10/28/2025	0.3	Communicate (other external)	filing of same and drafting MPA.	\$725.00	\$217.50	Xavier Villegas
TimeEntry	10/29/2025	0.1	Communicate (other external)	Email from co-counsel and conferring with EJS re same on moving forward with MPA/MFA.	\$725.00	\$72.50	Xavier Villegas
				Conferring with EJS re working with co-counsel and moving forward re same, including email to co-			
TimeEntry	11/3/2025	0.2	Communicate (other external)	counsel re drafting MPA/MFA.	\$725.00	\$145.00	Xavier Villegas
TimeEntry	11/21/2025	0.2	Communicate (other external)	Emails from/to co-counsel re draft MPA and moving forward.	\$725.00	\$145.00	Xavier Villegas
TimeEntry	11/24/2025	0.3	Communicate (other external)	OSC from ct, conferring with EJS re same, and calendaring.	\$725.00	\$217.50	Xavier Villegas
TimeEntry	12/4/2025	1.1	Draft/revise	XV and CL Decls for MPA.	\$725.00	\$797.50	Xavier Villegas
TimeEntry	12/5/2025	1.1	Draft/revise	CL decl per further conferring with EJS.	\$725.00	\$797.50	Xavier Villegas
				Finalized CL's decl, conferring with EJS re same, and emailed to co-counsel for further conferring			
TimeEntry	12/7/2025	0.8	Draft/revise	on draft MPA.	\$725.00	\$580.00	Xavier Villegas
TimeEntry	12/8/2025	0.1	Communicate (other external)	Emails from/to co-counsel re decls for MFA.	\$725.00	\$72.50	Xavier Villegas
				Finalized my decl and CL's decl from MFA, emails and TC to CL re his decl and review of same for			
TimeEntry	12/8/2025	0.5	Communicate (with client)	execution.	\$725.00	\$362.50	Xavier Villegas
				Emails to co-counsel with executed decls for me and CL for MPA and communications with CL re			
TimeEntry	12/9/2025	0.4	Communicate (other external)	same.	\$725.00	\$290.00	Xavier Villegas
TimeEntry	12/11/2025	0.3	Communicate (other external)	Email from co-counsel with finalized MPA and my prelim review of same.	\$725.00	\$217.50	Xavier Villegas
				Tentative ruling from court, review of same, and conferring with EJS and co-counsel on moving			
TimeEntry	2/17/2026	0.4	Communicate (other external)	forward.	\$725.00	\$290.00	Xavier Villegas
TimeEntry	2/17/2026	0.2	Communicate (other outside counsel)	Emails to/from EJS and OPC, including court, re submitting on the tentative.	\$725.00	\$145.00	Xavier Villegas
				Emails and texts to/from EJS re tentative submission and today's appearance and with co-counsel			
TimeEntry	2/18/2026	0.2	Communicate (other external)	re same.	\$725.00	\$145.00	Xavier Villegas
TimeEntry	2/18/2026	0.1	Communicate (other external)	Email from/to Ct and EJS re tentative ruling.	\$725.00	\$72.50	Xavier Villegas
TimeEntry	2/18/2026	0.2	Communicate (other external)	Emails to/from EJS and co-counsel re signed Order on MPA from Court and review of same.	\$725.00	\$145.00	Xavier Villegas
TimeEntry	2/20/2026	0.1	Communicate (other external)	Min Order to TPA from EJS.	\$725.00	\$72.50	Xavier Villegas
TimeEntry	3/4/2026	0.1	Communicate (other external)	Co-counsel emails to/from TPA re court's order re MPA.	\$725.00	\$72.50	Xavier Villegas
TimeEntry	3/5/2026	0.1	Communicate (other external)	Emails from/to TPA re status.	\$725.00	\$72.50	Xavier Villegas
TimeEntry	3/9/2026	0.3	Draft/revise	Status, current calendaring, and strategy for moving forward for conferring with co-counsel.	\$725.00	\$217.50	Xavier Villegas
TimeEntry	3/10/2026	0.1	Communicate (other external)	Emails from/to TPA and EJS re data post-MPA approval.	\$725.00	\$72.50	Xavier Villegas
TimeEntry	3/10/2026	0.3	Communicate (other external)	Emails from/to TPA and EJS and conferring with EJS on TPA's excel re disbursement schedule.	\$725.00	\$217.50	Xavier Villegas
TimeEntry	3/11/2026	0.1	Communicate (other external)	Emails from/to OPC and TPA re approval of current admin schedule.	\$725.00	\$72.50	Xavier Villegas
TimeEntry	3/13/2026	0.1	Communicate (other external)	Emails from/to TPA/Apex re Class Notice mailing status.	\$725.00	\$72.50	Xavier Villegas
TimeEntry	3/16/2026	0.3	Communicate (with client)	TC w/ CL re status.	\$725.00	\$217.50	Xavier Villegas
TimeEntry	3/24/2026	0.1	Communicate (other external)	Status report from TPA re notice and emails from/to TPA and EJS.	\$725.00	\$72.50	Xavier Villegas
TimeEntry	3/26/2026	0.1	Communicate (other external)	Email to co-counsel re status on recent sttmt package drafts.	\$725.00	\$72.50	Xavier Villegas
TimeEntry	4/2/2026	0.1	Communicate (other external)	Email from TPA with weekly report.	\$725.00	\$72.50	Xavier Villegas
TimeEntry	4/10/2026	0.1	Communicate (other external)	Weekly status report from TPA.	\$725.00	\$72.50	Xavier Villegas
TimeEntry	4/16/2026	0.4	Communicate (other external)	TC to putative class member in response to VM re status and email from TPA re weekly report.	\$725.00	\$290.00	Xavier Villegas
TimeEntry	4/17/2026	0.2	Communicate (other external)	Conferring with EJS on status and strategy for moving case forward.	\$725.00	\$145.00	Xavier Villegas
TimeEntry	4/24/2026	0.1	Communicate (other external)	Email from TPA with weekly report.	\$725.00	\$72.50	Xavier Villegas
				Emails from/to co-counsel re draft MFA and with EJS re same and strategy for moving case			
TimeEntry	5/15/2026	0.2	Communicate (other external)	forward.	\$725.00	\$145.00	Xavier Villegas
				MFA and pertinent legal research, including local court rules and courtroom rules and procedures			
TimeEntry	5/15/2026	0.5	Draft/revise	applicable.	\$725.00	\$362.50	Xavier Villegas
TimeEntry	5/18/2026	0.9	Draft/revise	MFA.	\$725.00	\$652.50	Xavier Villegas
TimeEntry	5/26/2026	5.8	Draft/revise	MFA.	\$725.00	\$4,205.00	Xavier Villegas
TimeEntry	5/27/2026	5.5	Draft/revise	MFA and conferring with EJS and co-counsel re same.	\$725.00	\$3,987.50	Xavier Villegas
TimeEntry	5/28/2026	2.5	Draft/revise	MFA package for finalization and conferring with EJS re same.	\$725.00	\$1,812.50	Xavier Villegas

98.7

\$75,082.50

At \$775
Hourly Rate: \$76,492.50

EXHIBIT B



Xavier Villegas <xavier@xaviervillegaslaw.com>

State of California - Department of Industrial Relations Customer Receipt / Purchase Confirmation

LWDA DO NOT REPLY <lwdadonotreply@dir.ca.gov>

Wed, Apr 24, 2024 at 12:31 PM

To: "xavier@xaviervillegaslaw.com" <xavier@xaviervillegaslaw.com>

Thank you for your payment.

Order Information

Merchant: State of California - Department of Industrial Relations

Case Number: LWDA-CM-1024201-24

Order Number: ORD-000280310

Total:\$75.00

Card Type: Visa

Date: 4/24/2024

Billing Information

Name: Xavier Villegas

Email: xavier@xaviervillegaslaw.com

Billing Address:

2390 Las Posas Road, C168

Camarillo, California

93010

9590 9518 0000 0090 E102

U.S. Postal Service™
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(Domestic Mail Only; No Insurance Coverage Provided)

For delivery information visit our website at www.usps.com

Santa Barbara, CA 93101

Postage	\$4.40	0060
	\$3.65	15
Certified Fee	\$0.00	
Return Receipt Fee (Endorsement Required)	\$0.00	
Restricted Delivery Fee (Endorsement Required)	\$0.00	
Total Postage & Fees	\$0.68	
Postmark Here		
04/24/2024		
Sent To: Mike Kelley Construction, Inc. and Michael Kelley		
Attn: Legal Department/Human Resources		
Street, Apt. No., or PO Box No. P.O. Box 4287		
City, State, ZIP+4 Santa Barbara, CA 93101		

PS Form 3800, August 2006 See Reverse for Instructions

U.S. Postal Service™
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For delivery information visit our website at www.usps.com

Santa Barbara, CA 93101

Postage	\$4.40	0060
	\$3.65	15
Certified Fee	\$0.00	
Return Receipt Fee (Endorsement Required)	\$0.00	
Restricted Delivery Fee (Endorsement Required)	\$0.00	
Total Postage & Fees	\$0.68	
Postmark Here		
04/24/2024		
Sent To: Mike Kelley Construction, Inc. and Michael Kelley		
Attn: Michael Timothy Kelley, Agent for Service of Process		
Street, Apt. No., or PO Box No. 409 E. Haley Street		
City, State, ZIP+4 Santa Barbara, CA 93101		

PS Form 3800, August 2006 See Reverse for Instructions



CAMARILLO
2150 PICKWICK DR
CAMARILLO, CA 93010-9998
(800)275-8777

04/24/2024 02:08 PM

Product	Qty	Unit Price	Price
---------	-----	------------	-------

First-Class Mail® Letter	1		\$0.68
--------------------------	---	--	--------

Santa Barbara, CA 93101

Weight: 0 lb 0.80 oz

Estimated Delivery Date

Fri 04/26/2024

Certified Mail®		\$4.40
-----------------	--	--------

Tracking #:

7013060000081360656

Return Receipt		\$3.65
----------------	--	--------

Tracking #:

9590 9402 3688 7335 1766 78

Total		\$8.73
-------	--	--------

First-Class Mail® Letter	1		\$0.68
--------------------------	---	--	--------

Santa Barbara, CA 93101

Weight: 0 lb 0.80 oz

Estimated Delivery Date

Fri 04/26/2024

Certified Mail®		\$4.40
-----------------	--	--------

Tracking #:

7013060000081360663

Return Receipt		\$3.65
----------------	--	--------

Tracking #:

9590 9402 3688 7335 1766 92

Total		\$8.73
-------	--	--------

Grand Total:		\$17.46
--------------	--	---------

Credit Card Remit		\$17.46
-------------------	--	---------

Card Name: VISA

Account #: XXXXXXXXXX6018

Approval #: 57710D

Transaction #: 763

AID: A0000000031010

AL: VISA CREDIT

PIN: Not Required

Chip

Text your tracking number to 28777 (2USPS) to get the latest status. Standard Message and Data rates may apply. You may also visit www.usps.com USPS Tracking or call 1-800-222-1811.

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Tell us about your experience. Go to: <https://postalexperience.com/Pos> or scan this code with your mobile device,



or call 1-800-410-7420.

UFN: 051158-0060

Receipt #: 840-59130083-4-10773382-2

Clerk: 15



NEWBURY PARK
3401 GRANDE VISTA DR
NEWBURY PARK, CA 91320-9998
(800)275-8777

05/08/2024

04:53 PM

Product	Qty	Unit Price	Price
First-Class Mail® Letter	1		\$0.68
Santa Barbara, CA 93101			
Weight: 0 lb 0.80 oz			
Estimated Delivery Date			
Fri 05/10/2024			
Certified Mail®			\$4.40
Tracking #:			
70130600000081360335			
Return Receipt			\$3.65
Tracking #:			
9590 9402 8089 2349 8543 83			
Total			\$8.73

Grand Total: \$8.73

Credit Card Remit \$8.73

Card Name: VISA
Account #: XXXXXXXXXXXX6018
Approval #: 38067D
Transaction #: 878
AID: A0000000031010
AL: VISA CREDIT
PIN: Not Required

Chip

Text your tracking number to 28777 (2USPS) to get the latest status. Standard Message and Data rates may apply. You may also visit www.usps.com USPS Tracking or call 1-800-222-1811.

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Refunds for guaranteed services only.
Thank you for your business.

Tell us about your experience.
Go to: <https://postalexperience.com/Pos>
or scan this code with your mobile device,



or call 1-800-410-7420.

UFN: 057813-0201
Receipt #: 840-59130039-2-3454371-2
Clerk: 4

7013 0600 0000 8136 0335

U.S. Postal Service™ CERTIFIED MAIL™ RECEIPT (Domestic Mail Only; No Insurance Coverage Provided)	
For delivery information visit our website at www.usps.com	
Santa Barbara, CA 93101	
Postage	\$4.40
Certified Fee	\$3.65
Return Receipt Fee (Endorsement Required)	\$0.00
Restricted Delivery Fee (Endorsement Required)	\$0.00
Total Postage & Fees	\$8.73
Sent To	
Attn: Michael Timothy Kelley, Agent for	
Service of Process	
409 E. Haley Street	
Santa Barbara, CA 93101	

0201
NEWBURY PARK CA
Postmark Here
MAY -8 2024
05/08/2024

PS Form 3800, August 2006 See Reverse for Instructions



1400 North McDowell Blvd. Suite 300
Petaluma, CA 94954
1-800-938-8815 ext. 1
TIN: 85-4343705

Invoice

Date	10/11/2024
Customer	0150286
Invoice	16005592
Due Date	10/18/2024
Terms	Weekly
Amount Due	\$0.00

Bill To
Law Office of Xavier Villegas, APC 2390 Las Posas Road C168 Camarillo CA 93010

Order Number	23919572
Billing Code	24CV05385
Case Number	24CV05385
Court Transaction Number	16932025
Contact	Xavier Villegas
Attorney	Xavier Villegas
Case Title	Leopoldo Martinez-BravovsMike Kelley Construction Inc et al
Documents	Motion
Court	Superior Court of California, Santa Barbara County
Assignment Details	

STATUTORY DISBURSEMENTS*	AMOUNT
Court Technology Access Fee	\$5.00
eCheck Fee++	\$0.25
SUBTOTAL	\$5.25

ONE LEGAL FEES	AMOUNT
eFiling Charge	\$14.95
Convenience Fee†	\$0.66
Convenience Fee Waived	(\$0.66)
SUBTOTAL	\$14.95

FEES SUMMARY	AMOUNT
Disbursements	\$5.25
One Legal Fees	\$14.95
TOTAL BILLED	\$20.20

Payment via Check to Lockbox:
INFOTRACK US, INC
P.O.Box 735453
Dallas, TX 75373-5453

Please include remittance information with check payment. Do not send payments to office address.

Past due balance may be charged a late payment fee and/or a late charge of up to 1.5% per month (18% per annum).

* These mandatory fees are charged by the court or required by statute and are not One Legal service fees. One Legal disburses these fees on your behalf.

++ When it is most cost effective, One Legal disburses fees on your behalf via eCheck. We pass these savings directly on to you. Learn more at www.onelegal.com/echeck.

‡ When paying invoices by credit card, a convenience fee will be assessed in accordance with applicable law and Terms of Service accepted at time of order. To avoid these fees, you can choose to pay via ACH.



1400 North McDowell Blvd. Suite 300
Petaluma, CA 94954
1-800-938-8815 ext. 1
TIN: 85-4343705

Invoice

Date	10/11/2024
Customer	0150286
Invoice	16005583
Due Date	10/18/2024
Terms	Weekly
Amount Due	\$0.00

Bill To
Law Office of Xavier Villegas, APC 2390 Las Posas Road C168 Camarillo CA 93010

Order Number	23919488
Billing Code	24CV05365
Case Number	24CV05365
Court Transaction Number	16931925
Contact	Xavier Villegas
Attorney	Xavier Villegas
Case Title	Leopoldo Martinez-BravovsMike Kelley Construction Inc et al
Documents	Motion
Court	Superior Court of California, Santa Barbara County
Assignment Details	

STATUTORY DISBURSEMENTS*	AMOUNT
Court Technology Access Fee	\$5.00
eCheck Fee++	\$0.25
SUBTOTAL	\$5.25

ONE LEGAL FEES	AMOUNT
eFiling Charge	\$14.95
Convenience Fee†	\$0.66
Convenience Fee Waived	(\$0.66)
SUBTOTAL	\$14.95

FEES SUMMARY	AMOUNT
Disbursements	\$5.25
One Legal Fees	\$14.95
TOTAL BILLED	\$20.20

Payment via Check to Lockbox:
INFOTRACK US, INC
P.O.Box 735453
Dallas, TX 75373-5453

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1400 North McDowell Blvd. Suite 300
Petaluma, CA 94954
1-800-938-8815 ext. 1
TIN: 85-4343705

Invoice

Date	1/16/2025
Customer	0150286
Invoice	16231946
Due Date	1/23/2025
Terms	Weekly
Amount Due	\$0.00

Bill To
Law Office of Xavier Villegas, APC 2390 Las Posas Road C168 Camarillo CA 93010

Order Number	24524159
Billing Code	24CV05365
Case Number	24CV05365
Court Transaction Number	17946686
Contact	Xavier Villegas
Attorney	Xavier Villegas
Case Title	Leopoldo Martinez-BravovsMike Kelley Construction Inc
Documents	Case Management Statement
Court	Superior Court of California, Santa Barbara County
Assignment Details	

STATUTORY DISBURSEMENTS*	AMOUNT
Court Technology Access Fee	\$5.00
eCheck Fee++	\$0.25
SUBTOTAL	\$5.25

ONE LEGAL FEES	AMOUNT
eFiling Charge	\$16.95
Convenience Fee‡	\$0.72
Convenience Fee Waived	(\$0.72)
SUBTOTAL	\$16.95

FEES SUMMARY	AMOUNT
Disbursements	\$5.25
One Legal Fees	\$16.95
TOTAL BILLED	\$22.20

Past due balance may be charged a late payment fee and/or a late charge of up to 1.5% per month (18% per annum).

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‡ When paying invoices by credit card, a convenience fee will be assessed in accordance with applicable law and Terms of Service accepted at time of order. To avoid these fees, you can choose to pay via ACH.



1400 North McDowell Blvd. Suite 300
Petaluma, CA 94954
1-800-938-8815 ext. 1
TIN: 85-4343705

Invoice

Date	1/6/2025
Customer	0150286
Invoice	16204126
Due Date	1/13/2025
Terms	Weekly
Amount Due	\$0.00

Bill To
Law Office of Xavier Villegas, APC 2390 Las Posas Road C168 Camarillo CA 93010

Order Number	24446682
Billing Code	24CV05365
Case Number	24CV05365
Court Transaction Number	17815818
Contact	Xavier Villegas
Attorney	Xavier Villegas
Case Title	Leopoldo Martinez-BravovsMike Kelley Construction Inc et al
Documents	Document – Other
Court	Superior Court of California, Santa Barbara County
Assignment Details	

STATUTORY DISBURSEMENTS*	AMOUNT
Court Technology Access Fee	\$5.00
eCheck Fee++	\$0.25
SUBTOTAL	\$5.25

ONE LEGAL FEES	AMOUNT
eFiling Charge	\$16.95
Convenience Fee‡	\$0.72
Convenience Fee Waived	(\$0.72)
SUBTOTAL	\$16.95

FEES SUMMARY	AMOUNT
Disbursements	\$5.25
One Legal Fees	\$16.95
TOTAL BILLED	\$22.20

Past due balance may be charged a late payment fee and/or a late charge of up to 1.5% per month (18% per annum).

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1400 North McDowell Blvd. Suite 300
Petaluma, CA 94954
1-800-938-8815 ext. 1
TIN: 85-4343705

Invoice

Date	1/28/2025
Customer	0150286
Invoice	16257112
Due Date	2/4/2025
Terms	Weekly
Amount Due	\$0.00

Bill To
Law Office of Xavier Villegas, APC 2390 Las Posas Road C168 Camarillo CA 93010

Order Number	24591873
Billing Code	24CV05385
Case Number	24CV05385
Court Transaction Number	18057649
Contact	Xavier Villegas
Attorney	Xavier Villegas
Case Title	Leopoldo Martinez-Bravo et alvsMike Kelley Construction Inc et al
Documents	Notice of Jury Deposit
Court	Superior Court of California, Santa Barbara County
Assignment Details	

STATUTORY DISBURSEMENTS*	AMOUNT
Court Filing Fee	\$150.00
Court Technology Access Fee	\$5.00
eCheck Fee++	\$0.25
SUBTOTAL	\$155.25

ONE LEGAL FEES	AMOUNT
eFiling Charge	\$16.95
Disbursement Administration Charge	\$1.00
Convenience Fee‡	\$5.63
Convenience Fee Waived	(\$5.63)
SUBTOTAL	\$17.95

FEES SUMMARY	AMOUNT
Disbursements	\$155.25
One Legal Fees	\$17.95
TOTAL BILLED	\$173.20

Past due balance may be charged a late payment fee and/or a late charge of up to 1.5% per month (18% per annum).

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‡ When paying invoices by credit card, a convenience fee will be assessed in accordance with applicable law and Terms of Service accepted at time of order. To avoid these fees, you can choose to pay via ACH.



1400 North McDowell Blvd. Suite 300
Petaluma, CA 94954
1-800-938-8815 ext. 1
TIN: 85-4343705

Invoice

Date	1/28/2025
Customer	0150286
Invoice	16257093
Due Date	2/4/2025
Terms	Weekly
Amount Due	\$0.00

Bill To
Law Office of Xavier Villegas, APC 2390 Las Posas Road C168 Camarillo CA 93010

Order Number	24591820
Billing Code	24CV05365
Case Number	24CV05365
Court Transaction Number	18057595
Contact	Xavier Villegas
Attorney	Xavier Villegas
Case Title	Leopoldo Martinez-BravovsMike Kelley Construction Inc
Documents	Notice of Jury Deposit
Court	Superior Court of California, Santa Barbara County
Assignment Details	

STATUTORY DISBURSEMENTS*	AMOUNT
Court Filing Fee	\$150.00
Court Technology Access Fee	\$5.00
eCheck Fee++	\$0.25
SUBTOTAL	\$155.25

ONE LEGAL FEES	AMOUNT
eFiling Charge	\$16.95
Disbursement Administration Charge	\$1.00
Convenience Fee‡	\$5.63
Convenience Fee Waived	(\$5.63)
SUBTOTAL	\$17.95

FEES SUMMARY	AMOUNT
Disbursements	\$155.25
One Legal Fees	\$17.95
TOTAL BILLED	\$173.20

Past due balance may be charged a late payment fee and/or a late charge of up to 1.5% per month (18% per annum).

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www.onelegal.com/echeck.

‡ When paying invoices by credit card, a convenience fee will be assessed in accordance with applicable law and Terms of Service accepted at time of order. To avoid these fees, you can choose to pay via ACH.

Payment Receipt**\$2,667.00**

Law Offices of Kevin T Barnes

1020 Parkside Commons
Suite 101-E
Greensboro, Georgia 30642
(323) 549-9100

Account Holder

Law Office of Xavier Villegas, APC
2390 Las Posas Road, C168
Camarillo, California 93010

Payment Summary

Account:	Operating eCheck	Amount Paid:	\$2,667.00
Reference:	Invoice ID: 2025-273-KB	Payment Method:	eCheck Via THE CALIFORNIA CREDIT UNION
		Account Number:	*****7068
		Auth Code:	W5BSYW
		Payment Date:	March 18, 2025 03:45 pm
		Transaction Id:	130957595
		Payment Id:	6PNgbfsGS-aTS6qp6qucVw



kbarneslaw.com/
kevin@kevinbarnesmediation.com



Xavier Villegas <xavier@xaviervillegaslaw.com>

Payment Receipt from Law Offices of Kevin T Barnes for \$2,667.00

No-reply-notification@lawpay.com <No-reply-notification@lawpay.com> Tue, Mar 18, 2025 at 12:45 PM
To: Xavier@xaviervillegaslaw.com

Payment Receipt \$2,667.00

Law Offices of Kevin T Barnes 1020 Parkside Commons Suite 101-E Greensboro, Georgia 30642 (323) 549-9100	Account Holder Law Office of Xavier Villegas, APC 2390 Las Posas Road , C168 Camarillo, California 93010
---	--

Payment Summary

Account:	Operating eCheck	Amount Paid:	\$2,667.00
Reference:	Invoice ID: 2025-273-KB	Payment Method:	eCheck Via THE CALIFORNIA CREDIT UNION
		Account Number:	*****7068
		Auth Code:	W5BSYW
		Payment Date:	March 18, 2025 03:45 pm
		Transaction Id:	130957595
		Payment Id:	6PNgbfsGS-aTS6qp6qucVw