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Individually and on behalf of other similarly situated.

SUPERIOR COURT OF CALIFORNIA, COUNTY OF FRESNO

CIVIL UNLIMITED DIVISION

VERONICA BASURTO PIMENTEL, an individual and on behalf of others similarly situated,	)	CASE NO. 24CECG00675
Plaintiffs,	)	SUPPLEMENTAL DECLARATION OF
vs.	)	CHRISTOPHER E. NICHOLS IN
	)	SUPPORT OF MOTION AND MOTION
	)	FOR PRELIMINARY APPROVAL OF
	)	CLASS AND PAGA SETTLEMENT
AGUSTIN MADRIGAL JR., an individual; and	)	<i>Assigned for All Purposes to Dept. 502</i>
Does 1 through 100, inclusive,	)	<i>Hon. Kristi Culver Kapetan</i>
Defendants.	)	Date: November 18, 2025
	)	Time: 3:30 p.m.
	)	Dept: 502

I CHRISTOPHER E. NICHOLS, hereby state and declare as follows:

1. I am the Managing Partner of Nevels Nichols, LLP and counsel for Plaintiff Veronica Basurto Pimentel ("Plaintiff") in this matter. I am fully familiar with the facts, pleadings and history of this matter. The following facts are within my own personal knowledge, and if called as a witness, I could testify competently to the matters stated herein.

**SUPPLEMENTAL DECLARATION OF CHRISTOPHER NICHOLS IN SUPPORT OF
MOTION AND MOTION FOR PRELIMINARY APPROVAL OF SETTLEMENT**

1 2. I have personal knowledge of all the facts stated herein. I could and would competently
2 testify under oath to these facts in court if requested to do so.

3 3. This declaration is being submitted as a supplemental declaration in support of the
4 motion for preliminary approval of the proposed class action settlement with Defendant
5 AGUSTIN MADRIGAL JR. (“Defendant”), and seeks an entry of an order for:

6 (i) preliminarily approving the proposed settlement of this class and PAGA action with
7 Defendant;

8 (ii) for settlement purposes only, conditionally certifying the class;

9 (iii) provisionally appointing Plaintiff VERONICA BASURTO PIMENTEL as the Class
10 Representative;

11 (iv) provisionally appointing Lenden F. Webb and Katherine E. Cervantes, of WEBB
12 LAW GROUP, APC, and Brooke B. Nevels and Christopher E. Nichols of NEVELS
13 NICHOLS, LLP, as Class Counsel for the Class;

14 (v) approving the form and method for providing notice to the class and aggrieved
15 employees;

16 (vi) directing that notice of the proposed settlement be given to the class and aggrieved
17 employees;

18 (vii) appointing Simpluris Inc. as the Settlement Administrator;

19 (viii) and scheduling a final approval hearing date to consider Plaintiffs’ Motion for
20 Final approval of the settlement and entry of the judgment.

21 4. As there is already a declaration on file for both myself and Mr. Webb regarding the
22 Motion for Preliminary Approval, this declaration serves to provide only additional information
23 to address the Court’s concerns outlined in the tentative ruling issued on October 15, 2025.

24 **CLASS MEMBERS ESTIMATED SIZE AND ESTIMATED AWARD**

25 5. At the time of the Settlement, the Defendant estimated that there were 983 Class
26 Members who collectively worked a total of 6,086 Pay Periods during the Class Period.
27 Defendant also estimated at the time of the Settlement and mediation on January 7, 2025, that
28 there were 554 Aggrieved Employees who worked 3,254 Pay Periods during the PAGA Period.

6. Using the Gross Settlement Amount and based on this number of pay periods, this equates to \$46.82 per pay period. Using the estimated Net Settlement Amount, each Class Member would receive approximately \$24.94 per Pay Period. Since there are 6,086 Pay Periods at issue during the Class Period, on average, a Class Member would receive \$154.38.

POTENTIAL CLASS EXPOSURE AND DAMAGE CALCULATIONS

Unpaid Minimum Wage and Overtime

7. Assuming that there were two and a half (2.5) hours of unpaid wages per workweek in the putative class period based on anticipated testimony from the putative class members about a half hour a day being unpaid, using a \$15 minimum wage rate this would effectively mean that there would be \$228,225 owed in unpaid minimum wage. (6,086 workweeks x \$15 wage x 2.5 hours per week = \$228,225.)

8. Assuming further that these hours were all overtime, which is generous because many of the time records revealed employees working shifts less than 8 hours, so if there was unpaid time some of it would have not been overtime, this would have equated to an overtime premium amount of \$114,112.50. ($\$15/2 = \$7.5 \times 6086 \text{ workweeks} \times 2.5 \text{ hours per week} = 114,112.50$). Thus, the total amount of unpaid wages using the assumption of an average of 2.5 hours of unpaid time per week is \$342,337.50.

Derivative Claims for Inaccurate Paystubs and Waiting Time Penalties

9. If and only if Plaintiff were successful in proving unpaid hours, then the putative class could have been entitled to waiting time penalties under Labor Code 203 as well as paystub violations under Labor Code 226.

10. Given that PAGA and Labor Code 226 both have a 1 year statute of limitations, we assumed 3,254 pay periods where Labor Code 226 would have been timely. Sincere there were 554 aggrieved employees in the 1-year period, that means that conceivably for 554 of the pay periods that would have been the initial, or \$50 violation under Labor Code 226. The remaining 2700 pay periods would be at \$100. This equates to a total Labor Code 226 exposure of \$297,700 if the underlying wage claims could be proven.

1 11. For purposes of the mediation, we estimated 572 former employees, which at \$15 an
2 hour working full time at 40 hours per week would have equated to a daily rate of \$120 per
3 day, or effectively \$3,600 per former employee. This would have resulted in \$2,059,200 in
4 waiting time penalties if it could have been proven.

5 Meal and Rest Breaks

6 12. For purposes of meal and rest break exposure in this matter, we anticipated testimony
7 with 3 missed meal breaks and 3 missed rest breaks per week. This would effectively result in 6
8 break premiums being paid per each week in the class period. Given the assumed pay rate of
9 \$15 per hour, this would equate to a potential exposure on the meal and rest break claims at
10 \$547,740. (6,086 workweeks x \$15 x 6 missed breaks = \$547,740.)

11 Reimbursements

12 13. For the Labor Code 2802 reimbursement claim, Plaintiffs contended that certain tools
13 and protective gear such as gloves, shovels, pruning shears, etc.. was not provided to them for
14 them to carry out their duties. We assumed \$50 per employee in protective gear and equipment,
15 which given 983 class members would equate to approximately \$49,150 in unpaid
16 reimbursements.

17 Total Class Exposure

18 14. Given these calculations, the total sum exposure on the class action claims would have
19 been \$3,296,127.50 (\$547,740 + \$49,150 + \$297,700 + \$2,059,200 + \$342,337.50 =
20 \$3,296,127.50.) However, as one can see from the calculations, the bulk of this comes amount
21 from the waiting time penalties calculation, which is a derivative claim that relies upon other
22 violations and also is subject to a defense that there was no willfulness or a good-faith dispute,
23 which would have rendered waiting time penalties inapplicable.

24 15. It is also important to note that for purposes of case value, while there are almost 1,000
25 employees who comprise the putative class, the 6,086 pay periods worked during the class
26 action period that extends from 4 years prior to the filing is a relatively small number of pay
27 periods at issue. The employees who worked those 6,086 pay periods were also compensated at
28 effectively minimum wage, thus further reducing the potential for damages.

1 16. Because of the risks that are outlined in detail below, we determined that the actual
2 exposure here was much less than what we could concoct on paper. So much so that our
3 opening demand at mediation was approximately 1/3 of the total exposure amount given the
4 serious risks that warranted a reduction in the value of the matter. Said differently, while one
5 could look at the soaking wet value of this class claim in the millions of dollars, that calculation
6 is unrealistic, assumes many contested items in Plaintiff's favor and we considered it to be so
7 much beyond the realm of any possible outcome that we pegged the true exposure here closer
8 to \$1,000,000.

9 **ANALYSIS OF CLASS CLAIMS AND RISKS OF CONTINUED LITIGATION**

10 17. With regard to the claim for unpaid minimum wage, this claim was posited on two
11 different theories. First, that there was off-the-clock work performed by class members and
12 second that there was a failure to properly pay piece-rate workers for their rest breaks in
13 accordance with *Bluford v. Safeway Stores, Inc.* (2013) 216 Cal.App.4th 864. As rest breaks are
14 compensable time, the theory was that the piece-rate workers were not being properly
15 compensated for their breaks. Unfortunately, a review of the documents produced by Defendant
16 ahead of mediation revealed that the putative class members were in fact paid an appropriate
17 rate for their rest break time and this time was compensated for. This effectively wiped out one
18 of Plaintiff's main theories of recovery for unpaid wages on behalf of the putative class.

19 18. Plaintiff's other primary theory for unpaid wages, which relates to both the cause of
20 action for a failure to pay minimum wage as well as to the cause of action for a failure to pay
21 overtime is that there was off the clock work being performed by employees. This would
22 essentially be work performed before or after recorded shifts that was not reflected in
23 Defendant's timekeeping records. Specifically, this would have been preparation time before
24 Plaintiff and the putative class members hours began to be counted for the day or time at the
25 end of the shift while they were cleaning up or breaking down for the day that was done after
26 the time had been counted. While Plaintiffs believe there is some evidence to support these
27 claims, establishing them on a class-wide basis would be very challenging. Defendant
28 maintained a timekeeping system that shows all hours employees were reported to have

1 worked. Plaintiffs contend that employees regularly performed additional tasks outside those
2 recorded hours, for example, preparing workstations before clocking in, closing out duties after
3 clocking out. However, because the time records facially comply with applicable wage and
4 hour laws, Plaintiffs would bear the burden of showing that the records are inaccurate and that
5 Defendant knew or should have known of the additional work.

6 19. Defendant would also likely argue that any discrepancies between recorded and actual
7 hours reflect employee choice or minor clerical error rather than a company-wide practice.
8 Proving company-wide knowledge under these circumstances, across different work locations
9 at various farms would require significant individualized evidence, such as testimony from
10 managers across multiple locations which presents substantial litigation risk.

11 20. Even if some employees worked outside of recorded hours, the *amount* of such time
12 potentially varied significantly based on position, supervisor, and workload. Some employees
13 may not have worked any unrecorded time at all, which obviously presents a huge hurdle for
14 Plaintiff in certifying the class.

15 21. Defendant would rely on these variations to argue that individualized inquiries
16 predominate, making certification of the off-the-clock claim improper under *Duran v. U.S.*
17 *Bank Nat'l Assn.* (2014) 59 Cal.4th 1. Plaintiffs' ability to maintain class certification or
18 representative proof of aggregate damages would therefore be uncertain.

19 22. Another concern was that originally Plaintiffs believed that the putative class worked
20 on the weekend which would have increased the likelihood of overtime being worked by the
21 employees. Unfortunately, the time records reviewed in anticipation of mediation did not bear
22 that out and there was no weekend work. Defendants expressly denied that any work was ever
23 done on the weekend, further limiting the potential for there to be overtime hours worked. This
24 had the effect of reducing the unpaid wages that were even on the table for the Plaintiff and the
25 putative class to recover.

26 23. With regard to meal and rest breaks, a challenge posed was that the time records in
27 question showed compliant breaks being taken by the putative class members. Defendant
28 argued that they had a practice of taking communal breaks where all employees were relieved

1 during the same time and those times were marked on the timesheets for the employees. While
2 Plaintiffs believe that there is some room to challenge this as effectively supervisors were
3 notating the time that everyone allegedly took their breaks, the documents do tend to show that
4 there were compliant breaks taken which presents a serious challenge for Plaintiffs in asserting
5 otherwise.

6 24. As for the claimed reimbursements, Defendants contended that they provided all tools
7 and equipment to the Plaintiffs, thus rendering it so that there were no business expenses
8 incurred by the putative class members. If Plaintiffs could prove that this was not true, one
9 expected difficulty would be in substantiating the amount of any unpaid reimbursements as it is
10 likely that the employees would not have receipts or records of the specific amounts paid for
11 gloves, shovels, scissors and other tools or gear.

12 25. Another issue with the reimbursement claim for purposes of class certification is that on
13 different farms where the employees were working this could have been handled differently,
14 leading to individualized inquiries about who needed to be reimbursed and for what. Although
15 Defendants contended that they provided everyone with the tools they needed to do their work,
16 Plaintiffs' counsel considered the possibility that it could have been an issue on some farms and
17 not an issue on other farms, which could have defeated certification on this issue.

18 26. The derivative claims also increase the risk in this case considering the bulk of the
19 calculated exposure above comes from the Labor Code §203 claim, which logically tracks
20 given the high volume of turnover and number of former employees. The problem this poses is
21 that not only would Plaintiffs need to prove the unpaid wages, but then they would need to
22 overcome the defenses under Labor Code 203 which can prevent waiting time penalties from
23 being owed. Courts have repeatedly held that waiting-time penalties under Labor Code §203
24 require proof of willfulness and are barred where a good-faith dispute exists. (*Barnhill v.*
25 *Robert Saunders & Co.* (1981) 125 Cal.App.3d 1, 7–8; *Amaral v. Cintas Corp. No. 2* (2008)
26 163 Cal.App.4th 1157, 1201; 8 Cal. Code Regs. §13520.) Here, Defendant would assert that it
27 maintained a good-faith belief that all wages were properly paid. Moreover, determining
28

1 whether and when each seasonal worker separated, and whether any wages remained unpaid at
2 that time, would require individualized inquiries, rendering classwide recovery uncertain.

3 27. Plaintiffs also asserted a derivative claim under Labor Code §226, alleging that
4 Defendant's wage statements failed to reflect all hours worked and meal/rest premiums owed.
5 However, establishing a "knowing and intentional" violation, as required by §226(e), presents
6 significant evidentiary challenges. Defendant would contend that any inaccuracies were
7 inadvertent and resulted from its good-faith reliance on timekeeping and payroll data. (See
8 *Lopez v. Friant & Associates, LLC* (2017) 15 Cal.App.5th 773, 782–784.)

9 **PRACTICAL CONCERNS RELATED TO FARM LABOR**

10 28. As this matter involves farm labor, Plaintiff's counsel would be remiss to not bring up
11 the challenges that this putative class poses for marshaling evidence to support a motion for
12 class certification. While Plaintiff believes there is a community of interest sufficient for a class
13 action, farm labor is by its nature a seasonal and transitory business with laborers often
14 migrating across the state and working for short spurts at each location. Indeed, looking at the
15 number of putative class members here which is 983, and the 6,086 workweeks worked in the
16 class period, the average number of weeks worked per class member is only ~6 (6,086 divided
17 by 983 = 6.19), which is remarkably low. This poses a serious practical concern and heightens
18 Plaintiff's risk associated with success on the action as it would be very difficult to successfully
19 obtain declarations from the numerous short-term employees. It would similarly be difficult to
20 show a community of interest given how short the tenure of many of these employees was as
21 they may not recall specific facts from a job they worked at for only a few weeks years ago.

22 29. Another pragmatic concern is that the putative class was comprised primarily
23 immigrants and migrant laborers who do not speak English as a first language. Additionally,
24 from Plaintiff's counsel's experience in gathering evidence in similar class actions many
25 immigrants do not want to be involved in legal matters if they do not have documents which
26 allow for them to work legally in the United States. While immigration status does not impact
27 the ability to bring a claim or the right to be paid for labor performed, the practical reality is
28 that members of the putative class may have been skeptical of coming forward to provide

1 testimony, which presents a challenge for Plaintiffs in meeting their burden on a motion for
2 class certification. Ultimately, these industry specific concerns rendered moving for class
3 certification a significant risk for Plaintiff as it was anticipated that only a miniscule fraction of
4 putative class members would have been able to provide declarations.

5 30. As mentioned above, another major factor here is that the putative class members in
6 question worked at different farm locations for different periods of time. This poses an issue for
7 Plaintiff in certifying the class in that if the supervisors at one farm acted differently than at
8 another, or if the putative class members had a different experience at one farm versus another,
9 the class action is at risk of not being certified given individualized inquiries. Given that the
10 work took place with so many short-term employees across so many different work locations
11 the risk of individualized inquiries dominating in this case warranted a serious reduction in the
12 case's value.

13 31. Class Counsel is also aware that the Defendant in this matter is an individual, thus
14 collectability of any awarded monetary damages could become an issue if Defendant is not
15 financially fit and/or becomes insolvent. To that end, even if Plaintiffs were able to certify the
16 class and obtain a recovery on the higher end of their estimates, it is highly unlikely that they
17 would ever be able to collect this money for the putative class members from an individual
18 defendant as there is no corporate entity involved in this case.

19 32. The risks in this case were quite high from both a certification standpoint, merits
20 standpoint, and collectability standpoint. Certification was the primary concern here, because of
21 the substantial amount of case law favoring a denial of class certification as a result of finding
22 individualized issues in similar situations. This was the primary reason that a substantial
23 reduction was warranted, because we as class counsel had to ensure that all absent class
24 members were going to receive benefits from a resolution of their claims and take that risk into
25 account. Ultimately, I feel confident we came to a fair result to recover compensation for what I
26 and my client believed were substantive violations of the Labor Code which cost employees
27 money out of pocket. We negotiated as much as we possibly could on this front and used best
28 efforts and judgment to weigh the risks against the potential of recovery.

1 33. Based upon their evaluation, Plaintiff and Class Counsel have determined that the
2 Settlement set forth in the Agreement is in the best interest of the Settlement Class Members.

3 **PAGA VALUATION AND ALLOCATION**

4 34. The Settlement allocates \$14,250 to resolve claims under the Private Attorneys General
5 Act (“PAGA”), of which 75% (\$10,687.50) will be paid to the LWDA and 25% (\$3,562.50)
6 will be distributed to Aggrieved Employees based on pay periods worked during the PAGA
7 period, regardless of whether they opted out of the class.

8 35. While the previously submitted declaration notes that there could be a potential
9 exposure of \$1,627,000 on the PAGA claim, this number reflects stacked PAGA penalties
10 which under the updated PAGA scheme that came into effect on June 19, 2024, are expressly
11 disallowed. While the ability to obtain stacked penalties on cases filed before June 19, 2024, is
12 theoretically a disputed issue and they are not expressly disallowed, there is also not express
13 authority allowing for them to be awarded. We believe that given the update to the law and the
14 practical reality that a PAGA award is more likely to be reduced as opposed to multiplied, the
15 \$1,627,000 number is exponentially more than the settlement value of the PAGA claim.

16 36. The \$1,627,000 figure in question was derived by taking the number of pay periods,
17 3,254, multiplying it by 5 for each claimed Labor Code violation to get 16,270 and then
18 multiplying that number by a PAGA penalty of \$100 to equate to \$1,627,000. This would be
19 assuming a penalty proven for 5 different labor code violations in each of the pay periods and
20 that stacked penalties could be awarded. Effectively, this number relies on \$500 being awarded
21 for each PAGA pay period. A more realistic assessment of the total potential exposure of the
22 PAGA claim would be to multiply the number of pay periods by \$100, which would equate to
23 \$325,400.

24 37. However, even if the value of the exposure on the PAGA claims was assessed to be
25 \$325,400, this assumes that the Court would award \$100 per penalty in all pay periods. In
26 *Carrington v. Starbucks Corp.*, 30 Cal. App. 5th 504 (2018), the court affirmed a judgment
27 which only provided for a PAGA penalty of \$5 per violation. Therefore, at trial, any PAGA
28 penalties awarded could be significantly less than Plaintiffs’ calculation even where Plaintiffs

1 prevailed on the PAGA claim. This is especially true in this case where the Defendants have
2 strong defenses to some of the claims and it is possible that some of the claimed violations, if
3 they even exist, are mere technicalities. If the \$5 per pay period figure from *Carrington* were
4 used here and penalties were proven in all pay periods, which should not be taken for granted,
5 that would equate to only \$16,270 in PAGA penalties being awarded.

6 38. The decision in *O'Connor v. Uber*, 201 F.Supp.3d 1110, 1133 (N.D. Cal. 2016), and the
7 LWDA's response therein is illustrative. The LWDA first states that "when viewing the
8 monetary relief allocated to PAGA claims under a settlement, the LWDA recognizes that the
9 PAGA sum need not necessarily be viewed through the same lens as the relief obtained by
10 absent class members on other claims (i.e., the percentage of recovery-to-exposure on the
11 PAGA claims need not necessarily equal the percentage of recovery on the other claims)."
12 (LWDA Response at p.3). The LWDA also indicated that the payment of money to the
13 aggrieved employees furthers the purposes of PAGA and that the Court considers that primary
14 consideration. "The LWDA recognizes that this Court does not review the PAGA allocation in
15 isolation, but rather reviews the settlement as a whole, to determine whether it is fundamentally
16 fair, reasonable and adequate, with primary consideration for the interests of absent class
17 members." (LWDA Response at p.4).

18 39. In reaching the settlement of the PAGA claim, Class Counsel was also aware of what
19 allocations other Courts have approved for similar PAGA settlements as compared to the total
20 settlement amount. A class settlement that allocates approximately 5% of the total settlement
21 value to resolve the PAGA claims, as this one does, is also supported by what has been
22 approved in other wage-and-hour class settlements. Indeed, Courts often approve PAGA
23 settlement amounts in the range of between .27 to 1.7 percent of the total settlement. See *Davis*
24 *v. Brown Shoe Co.*, 2015 U.S. Dist. LEXIS 149010 (E.D. Cal. 2015)(PAGA Payment of \$5,000
25 in a \$1.5 million class settlement); *Zamora v. Ryder Integrated Logistics, Inc.*, 2014 U.S. Dist.
26 LEXIS 184096 (S.D. Cal. 2014) (\$7,500 payment to LWDA for PAGA on a \$1.5 million class
27 settlement); *Lusby v. Gamestop Inc.*, 2015 U.S. Dist. LEXIS 42637 (N.D. Cal. 2015) (PAGA
28 Payment of \$5,000 in a \$500,000 class settlement); *Cruz v. Sky Chefs, Inc.*, 2014 U.S. Dist

1 Lexis 17693 (N.D. Cal. 2014) (approving payment of \$10,000 to the LWDA for PAGA out of
2 \$1,750,000 class settlement); *Chu v. Wells Fargo Investments, LLC*, 2011 WL 672645, *1
3 (N.D. Cal. 2011) (approving PAGA payment of \$7,500 to the LWDA out of \$6.9 million
4 common-fund settlement); *Franco v. Ruiz Food Products, Inc.*, 2012 WL 5941801, *13 (E.D.
5 Cal. 2012) (approving PAGA payment of \$7,500 to the LWDA out of \$2.5 million common-
6 fund settlement); *Hopson v. Hanesbrands Inc.*, 2009 WL 928133, *9 (N.D. Cal. 2009)
7 (approving PAGA allocation that was .49% of \$408,420.32 gross settlement); *Garcia v.*
8 *Gordon Trucking, Inc.*, 10-cv-00324-AWI-SKO, Dkt. 149-3, 165 (E.D. Cal.) (approving a class
9 settlement of \$3,700,000, with \$10,000 allocated to the PAGA claim); *McKenzie v. Federal*
10 *Express Corp.*, CV 10-02420 GAF (PLAx), Dkt. 139 & 141 (C.D. Cal.) (court approved a
11 settlement in an amount of \$8.25 million, with \$82,500 allotted to the PAGA claim); *DeStefan*
12 *v. Frito-Lay*, 8:10-cv-00112-DOC (C.D. Cal.) (court approved a class settlement of \$2 million,
13 with \$10,000 allocated to PAGA); *Martino v. Ecolab Inc.*, No. 3:14CV04358 (N.D. Cal. 2017)
14 (\$100,000 allotted as PAGA penalties or 0.48% of \$21,000,000 settlement amount); *East v.*
15 *Comprehensive Educational Services Inc.*, Fresno Superior Court Case No. 11-CECG-04226
16 (2015) (\$10,000 allotted as PAGA penalties or 0.13% of \$7,595,846 settlement amount);
17 *Bararsani v. Coldwell Banker Residential Brokerage Company*, Los Angeles Superior Court
18 Case No. BC495767 (2016)(\$10,000 allotted as PAGA penalties or 0.22% of \$4,500,000
19 settlement amount); *Moppin v. Los Robles Medical Center*, No. 5:15CV01551 (C.D. Cal. 2017)
20 (\$15,000 allotted as PAGA penalties or 0.40% of \$3,775,000 settlement amount); *Scott-George*
21 *v. PVH Corporation*. No., 2:13CV00441 (E.D. Cal. 2017) (\$15,000 allotted as PAGA penalties
22 or 0.46% of \$3,250,000 settlement amount); *Nehrlich v. RPM Mortgage Inc.*, Orange County
23 Superior Court Case No. 30-2013-00666783-CU-OE-CXC (2017) (\$10,000 allotted as PAGA
24 penalties or 0.40% of \$2,500,000 settlement amount); *Rubio v. KTI Incorporated*, San
25 Bernardino Superior Court Case No. CIVDS-14-06132 (2015) (\$1,000 allotted as PAGA
26 penalties or 0.18% of \$550,000 settlement amount); *Gray v. Mountain View Child Care Inc.*,
27 San Bernardino Superior Court Case No. CIVDS-14-02285 (2016) (\$2,500 allotted as PAGA
28 penalties or 0.37% of \$675,000 settlement amount); *Perez v. West Coast Liquidators Inc. d/b/a*

**SUPPLEMENTAL DECLARATION OF CHRISTOPHER NICHOLS IN SUPPORT OF
MOTION AND MOTION FOR PRELIMINARY APPROVAL OF SETTLEMENT**

1 *Big Lots*, San Bernardino Superior Court Case No. CIVDS-14-17863 (2016) (\$3,000 allotted as
2 PAGA penalties or 0.33% of \$900,000 settlement amount); *Penaloza vs. PPG Industries Inc.*,
3 Los Angeles Superior Court No. BC471369 (2013)(\$5,000 allotted as PAGA penalties or
4 0.38% of \$1,300,000 settlement amount); *Mejia v. DHL Express (USA) Inc.*, No.
5 2:15CV00890 (C.D. Cal. 2017) (\$5,000 allotted as PAGA penalties or 0.34% of \$1,450,000
6 settlement amount). As a result, the \$14,250 allocation here to PAGA penalties is in line with
7 what other Courts have approved in the past.

8 **SERVICE ON THE LWDA**

9 40. Concurrently with filing these supplemental papers, I am also submitting these
10 documents to the LWDA and that is reflected on the attached proof of service. In order to
11 ensure that there is no doubt about these documents being submitted to the LWDA, I am
12 submitting not only the supplemental documents, but also the original documents from the prior
13 filing and I am listing those documents on the proof of service as being served on the LWDA as
14 well.

15 **FEES AND COSTS INCURRED**

16 **Attorney's Fees**

17 41. This action required the Nevels Nichols LLP to spend time on this litigation that could
18 have been spent on other matters where we bill clients hourly. At various times during the
19 litigation of this class action, this lawsuit has consumed my time as well as my firm's
20 resources. My firm has not been paid anything for our work on this case since it was filed. It is
21 my opinion that law firms in such a position expect to receive a multiplier in cases such as
22 these because of the risk taken, the extent to which firms are unable to take on other cases, the
23 delay in getting paid and the costs we have to advance.

24 42. While our firm has taken this matter on a contingency and has not been paid anything
25 for our work performed yet, we do track all time spent on matters and keep detailed billing
26 records through our case management platform Clio.

27 43. While other courts across the state have approved us for much higher billing rates such
28

1 as \$775 in Alameda County just this past year, for this particular matter, my partner Brooke B.
2 Nevels and I billed at a localized rate of \$475 to adjust for the local rates in the central valley.
3 We believe that this rate is eminently reasonable given that other Courts across the state have
4 approved much higher rates, as well as our experience in the field and that this is complex
5 litigation.

6 44. My firm has spent 75.9 hours on this matter for a total of \$30,335.00 incurred to date in
7 terms of fees. A detailed accounting of the time spent on this matter has been attached hereto as
8 “Exhibit 1”.

9 45. It is important to note that this number does not capture all time that will be expended
10 on this matter as we still need to appear at the hearing for the preliminary approval, coordinate
11 with the administrator to notice the class, and then move for final approval and ensure that the
12 funds are distributed to the class members. I anticipate that we will incur another \$5,000 to
13 \$10,000 seeing this case through to its conclusion, however that estimate could change
14 depending on if there is additional briefing required by the Court or other issues that necessitate
15 additional time spent on the matter.

16 46. While our practice is to typically submit fee information on the motion for final
17 approval as there is still more work to be performed on this matter and the total is not finalized,
18 Plaintiff’s counsel understands the Court’s desire to cross-check the common fund amount of
19 fees sought at \$95,000 against the current lodestar on the case. Adding up the fees from Webb
20 Law Group APC with Nevels Nichols, LLP, the current lodestar is \$70,105.25.

21 47. With a fee request of \$95,000 as 33.3% of the common fund, for purposes of a lodestar
22 cross-check this means that we are effectively currently requesting a 1.35x multiplier in this
23 case. However, as mentioned above additional work will need to be performed in this matter to
24 get it to its conclusion, so it is likely that end lodestar value will be closer to 1.1 or 1.2x.

25 48. A lodestar that equates to a multiplier of 1.1 to 1.35 is well within the acceptable range
26 for settlements in the state of California and courts routinely grant fee awards in this amount.
27 For example, in *Laffitte v. Robert Half International Inc.* (2016) 1 Cal.5th 480, 503–505
28 wherein the Court discussed cross-checking a common fund award via lodestar at length, the

1 Court approved a common fund amount that equated to 2.03x. See also *Wershba v. Apple*
2 *Computer, Inc.*, 91 Cal.App.4th at p. 255 [“multipliers can range from 2 to 4 or even higher”];
3 *City of Oakland v. Oakland Raiders* (1988) 203 Cal.App.3d 78 [affirming a multiplier of 2.34];
4 *Chavez v. Netflix, Inc.* (2008) 162 Cal.App.4th 43 [affirming a multiplier of 2.53]. *Vizcaino v.*
5 *Microsoft Corp.* (9th Cir. 2002) 290 F.3d 1043 [affirming multiplier of 3.65]. *Vasquez v. State*
6 *of California* (2008) 45 Cal.4th 243 [affirming a multiplier of 1.3].

7 49. Given the risk undertaken by Class Counsel that there could be no recovery in this case
8 and the fact that class counsel has had to work on this matter for multiple years without any
9 payment, a relatively modest multiplier of 1.1 to 1.35 is appropriate for the risk undertaken in
10 this litigation.

11 Hard Costs

12 50. To date we have incurred \$2,647.37 in hard costs. A detailed accounting of the hard
13 costs incurred on this matter has been attached hereto as “Exhibit 1”.

14 51. Our co-counsel the Webb Law Group has \$4,577.35 in hard costs, meaning that we
15 have expended a combined \$7,224.72 in hard costs. We will incur additional hard costs through
16 filing these papers and the motion for final approval papers. It is possible that there could be
17 other hard costs incurred depending on if the Court requests additional briefing of issues. Given
18 that we currently only have a total of \$7,224.72 in hard costs, we expect that even accounting
19 for additional filing fees, the do not exceed amount of \$10,000 in hard costs will not be met and
20 there may be approximately \$2,200 to \$2,600 remaining which would then be re-allocated back
21 into the settlement fund for distribution to the class members. Plaintiff’s counsel will have this
22 final number ready for the Court with the motion for final approval so that the Court may enter
23 an order on that motion which reflects the final costs total.

24 I declare under penalty of perjury under the laws of the State of California that the
25 foregoing is true and correct. Executed on November 7, 2025, at San Diego, California.

26 

27 _____
28 CHRISTOPHER E. NICHOLS

EXHIBIT 1

Activities Export

11/07/2025

6:05 PM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
11/07/2025		Office conference withAttorney CEN and Attorney BBN regarding the finalization of the declaration for the Motion for Preliminary Approval and approach to take with certain arguments about case value. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Brooke Nevels	0.40h	\$475.00	-	\$190.00
11/07/2025		Office conference withAttorney CEN and Attorney BBN regarding the finalization of the declaration for the Motion for Preliminary Approval and approach to take with certain arguments about case value. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.40h	\$475.00	-	\$190.00
11/07/2025		Telephone conference with Co-Counsel Cervantes regarding the finalization of the declaration for the Motion for Preliminary Approval. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.30h	\$475.00	-	\$142.50
11/07/2025		Review of billing records and compile billing records for the Court to consider on the supplemental declaration of Attorney CEN. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	1.30h	\$475.00	-	\$617.50
11/07/2025		Draft supplemental Declaration of Attorney CEN for the Motion for Preliminary Approval. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	3.40h	\$475.00	-	\$1,615.00
					76.30h		\$70.00	\$30,335.00
							0.40h	75.90h

Activities Export

11/07/2025

6:05 PM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
11/07/2025		Office conference between Attorney CEN and Attorney BBN regarding plan for supplemental briefing for Motion for Preliminary Approval. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Brooke Nevels	0.20h	\$475.00	-	\$95.00
11/07/2025		Office conference between Attorney CEN and Attorney BBN regarding plan for supplemental briefing for Motion for Preliminary Approval. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.20h	\$475.00	-	\$95.00
11/07/2025		Receipt and review of correspondence from Co-Counsel Cervantes about Declaration on preliminary approval. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.10h	\$475.00	-	\$47.50
11/07/2025		Draft correspondence to Co-Counsel Cervantes regarding the declaration and plan for including their fees in our declaration as a total. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.20h	\$475.00	-	\$95.00
11/07/2025		Receipt and review of Co-Counsel's Notice and Order for Remote Appearance. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.10h	\$475.00	-	\$47.50
11/05/2025		Review of tentative ruling to determine main areas where we need to provide supplemental briefing.	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.40h	\$475.00	-	\$190.00
					76.30h		\$70.00	\$30,335.00
							0.40h	75.90h

Activities Export

11/07/2025

6:05 PM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
Unbilled								
10/29/2025		Draft correspondence to Co-Counsel Cervantes regarding the paragraphs to use as sample verbiage and sample declaration for preliminary approval that may help address court's concern. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.20h	\$475.00	-	\$95.00
10/29/2025		Receipt and review of correspondence from co-counsel regarding sample declaration and being in line with the Court's tentative. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.20h	\$475.00	-	\$95.00
10/29/2025		Draft correspondence to Co-Counsel Cervantes about the content of the declaration from her firm, focus on fee amount. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.20h	\$475.00	-	\$95.00
10/22/2025		Receipt and review of correspondence from Co-Counsel Cervantes about next steps with filing updated papers for motion for preliminary approval. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.10h	\$475.00	-	\$47.50
10/21/2025		Prepare Motion for Preliminary Approval - Declaration of Simpluris. File save aforementioned document to Client file.	00047-El Dorado Farms Pimentel v. Madrigal	Noah Adams	0.10h	\$250.00	-	\$25.00
					76.30h		\$70.00	\$30,335.00
							0.40h	75.90h

Activities Export

11/07/2025

6:05 PM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		Unbilled						
10/16/2025		Draft correspondence to Co-Counsel Cervantes to provide declaration from admin and to discuss plan for hearing and filing updated papers. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.20h	\$475.00	-	\$95.00
10/16/2025		Receipt and review of correspondence from Simpluris containing new declaration for preliminary approval. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.20h	\$475.00	-	\$95.00
10/16/2025		Receipt and review of correspondence from Simpluris admin requesting Caption for declaration. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.10h	\$475.00	-	\$47.50
10/16/2025		Receipt and review of correspondence to Administrator requesting a declaration for preliminary approval. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.10h	\$475.00	-	\$47.50
10/16/2025		Add continued hearing date on Motion for Preliminary Approval of Settlement to firm calendar as court rule with related deadlines. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Raha Razavi	0.10h	\$175.00	-	\$17.50
10/16/2025		Attend Motion for Preliminary Approval. Draft summary	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.30h	\$475.00	-	\$142.50
					76.30h		\$70.00 0.40h	\$30,335.00 75.90h

Activities Export

11/07/2025

6:05 PM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		correspondence regarding same with updated dates for Co-Counsel. Unbilled						
10/16/2025		Revise Declaration template for Simpluris. Draft correspondence to Simpluris re attached Declaration template. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Noah Adams	0.20h	\$250.00	-	\$50.00
10/16/2025		Draft correspondence to Simpluris re request for declaration. Prepared declaration caption page. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Noah Adams	0.20h	\$250.00	-	\$50.00
10/16/2025		Add remote appearance credentials to Motion for Preliminary Approval firm calendar entry. Non-billable	00047-El Dorado Farms Pimentel v. Madrigal	Raha Razavi	0.10h	\$175.00	\$17.50	-
10/16/2025		(PCD .1) Review correspondence from Opposing Counsel re tentative ruling. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Noah Adams	0.10h	\$250.00	-	\$25.00
10/16/2025		Review tentative ruling. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Noah Adams	0.20h	\$250.00	-	\$50.00
10/15/2025		Brief exchange of correspondence with Co-Counsel Cervantes about initial plan to re-file motion and then subsequent plan to request continuance and then supplement	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.20h	\$475.00	-	\$95.00
					76.30h		\$70.00 0.40h	\$30,335.00 75.90h

Activities Export

11/07/2025
6:05 PM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		the filing. Unbilled						
10/15/2025		Office conference between Attorney BBN and Attorney CEN regarding Motion tentative ruling, deficiencies, and areas where we can supplement. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Brooke Nevels	0.40h	\$475.00	-	\$190.00
10/15/2025		Office conference between Attorney BBN and Attorney CEN regarding Motion tentative ruling, deficiencies, and areas where we can supplement. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.40h	\$475.00	-	\$190.00
10/15/2025		Telephone conference with Fresno Superior Court to notify them of request for oral argument. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.20h	\$475.00	-	\$95.00
10/15/2025		Receipt and review of confirmation from Opposing Counsel Mark that he agrees with the plan of continuing the motion date. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.10h	\$475.00	-	\$47.50
10/15/2025		Draft correspondence to Opposing Counsel Mark to explain that we prefer his idea and will request oral argument not to argue the motion but to get a continuance so we can file updated papers. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.20h	\$475.00	-	\$95.00
					76.30h		\$70.00 0.40h	\$30,335.00 75.90h

Activities Export

11/07/2025

6:05 PM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
10/15/2025		Receipt and review of correspondence from Opposing Counsel Mark about the idea of requesting oral argument to get a continued hearing date. Discussion of potential timeline as opposed to new motion. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.20h	\$475.00	-	\$95.00
10/15/2025		Draft correspondence to Opposing Counsel regarding the Court's tentative and deficiencies that we will need to correct. Discussion of filing new motion. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.20h	\$475.00	-	\$95.00
10/15/2025		Receipt and review of tentative ruling denying Motion for Preliminary Approval. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.30h	\$475.00	-	\$142.50
10/15/2025		Receipt and review of consent to E-Service which has been filed. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.10h	\$475.00	-	\$47.50
10/15/2025		Receipt and review of tentative ruling on Motion for Preliminary Approval. Memo to file. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Brooke Nevels	0.20h	\$475.00	-	\$95.00
10/15/2025		File save and forward Tentative Ruling on Motion for Preliminary Approval. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Raha Razavi	0.10h	\$175.00	-	\$17.50
					76.30h		\$70.00 0.40h	\$30,335.00 75.90h

Activities Export

11/07/2025

6:05 PM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
10/15/2025		Office conference between Attorney CEN and Legal Assistant RAH re forwarding the tentative ruling. Non-billable	00047-El Dorado Farms Pimentel v. Madrigal	Raha Razavi	0.10h	\$175.00	\$17.50	-
10/15/2025		File save Consent to Electronic Service to reflect accepted filing status. Memo to file. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Raha Razavi	0.10h	\$175.00	-	\$17.50
10/08/2025		Receipt and review of Order Granting Remote Appearance for Dept 502. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.10h	\$475.00	-	\$47.50
10/08/2025		Review and approve Consent to Electronic Service and Notice of E-Service Address Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.10h	\$475.00	-	\$47.50
10/08/2025		(PCD .1) Draft and prepare Consent to Electronic Service. Exchange of internal memo with Attorney CEN re the same. File and serve. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Raha Razavi	0.30h	\$175.00	-	\$52.50
10/08/2025		File save Order Granting Remote Appearance. Memo to Attorney CEN re the same. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Raha Razavi	0.10h	\$175.00	-	\$17.50
10/08/2025		Brief exchange of correspondence with co-counsel Cervantes	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.10h	\$475.00	-	\$47.50
					76.30h		\$70.00	\$30,335.00
							0.40h	75.90h

Activities Export

11/07/2025

6:05 PM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		regarding attendance at hearing on preliminary approval. Unbilled						
10/06/2025		File save Notice and Order re Remote Appearance to reflect accepted filing status. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Raha Razavi	0.10h	\$175.00	-	\$17.50
10/01/2025		Review and approve of Notice of Remote appearance for Defendants. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.10h	\$475.00	-	\$47.50
10/01/2025		Review and approve of Notice of and Order re Remote Appearance. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.10h	\$475.00	-	\$47.50
10/01/2025		File and serve Notice and Order re Remote Appearance. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Raha Razavi	0.10h	\$175.00	-	\$17.50
10/01/2025		Draft and prepare Notice and Order re Remote Appearance at Hearing on Motion for Preliminary Approval. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Raha Razavi	0.20h	\$175.00	-	\$35.00
10/01/2025		Receipt of internal memo from Attorney CEN re action to draft Notice of Remote Appearance at Hearing on Motion for Preliminary Approval. Non-billable	00047-El Dorado Farms Pimentel v. Madrigal	Raha Razavi	0.10h	\$175.00	\$17.50	-
					76.30h		\$70.00 0.40h	\$30,335.00 75.90h

Activities Export

11/07/2025

6:05 PM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
09/30/2025		Internal correspondence between Attorney CEN, Attorney BBN, and Law Clerk NPA re drafting Motion for Final Approval. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Noah Adams	0.10h	\$250.00	-	\$25.00
09/26/2025		Receipt and review of Court filed versions of the Motion for Preliminary Approval. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.10h	\$475.00	-	\$47.50
09/26/2025		Review accepted Motion for Preliminary Approval documents. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Noah Adams	0.10h	\$250.00	-	\$25.00
09/26/2025		File save Motion for Preliminary Approval - Notice, Memorandum of Points and Authorities, Decl. of Nichols, Decl. of Webb, and Decl. of Pimentel to reflect accepted filing status. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Raha Razavi	0.10h	\$175.00	-	\$17.50
09/25/2025		Receipt and review of Notice and Order for Remote Appearance from co-counsel. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.10h	\$475.00	-	\$47.50
09/22/2025		Receipt and review of Notice and Order for Remote Appearance. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.10h	\$475.00	-	\$47.50
09/22/2025		File save Plaintiff's Notice and Order re Remote Appearance at Hearing on Motion for Preliminary	00047-El Dorado Farms Pimentel v. Madrigal	Raha Razavi	0.10h	\$175.00	-	\$17.50
					76.30h		\$70.00 0.40h	\$30,335.00 75.90h

Activities Export

11/07/2025
6:05 PM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		Approval. Unbilled						
09/19/2025		Internal correspondence between Attorney CEN and Law Clerk NPA re filing of motion for preliminary approval. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Noah Adams	0.10h	\$250.00	-	\$25.00
09/19/2025		Serve Motion for Preliminary Approval. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Noah Adams	0.10h	\$250.00	-	\$25.00
09/19/2025		File Motion for Preliminary Approval. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Noah Adams	0.20h	\$250.00	-	\$50.00
09/19/2025		Revise Declaration of Nichols to include exhibit. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Noah Adams	0.30h	\$250.00	-	\$75.00
09/19/2025		Internal correspondence between Attorney CEN and Law Clerk NPA re finalizing motion for preliminary approval. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Noah Adams	0.10h	\$250.00	-	\$25.00
09/19/2025		Finalized Motion for Preliminary Approval. Drafted Proof of Service. Attached all relevant exhibits. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Noah Adams	0.70h	\$250.00	-	\$175.00
09/19/2025		Review finalized declarations of Pimentel and Webb. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Noah Adams	0.20h	\$250.00	-	\$50.00
					76.30h		\$70.00 0.40h	\$30,335.00 75.90h

Activities Export

11/07/2025

6:05 PM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
09/19/2025		Review correspondence from Co-Counsel re finalized declarations. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Noah Adams	0.10h	\$250.00	-	\$25.00
09/19/2025		Receipt and review of declarations from Webb and Pimentel regarding preliminary approval. Memo to file regarding same. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.20h	\$475.00	-	\$95.00
09/18/2025		Multiple memorandums to file regarding exhibits for the declarations to the Motion for Preliminary approval. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.20h	\$475.00	-	\$95.00
09/18/2025		Review correspondence between Attorney CEN and Co-Counsel re documents needing signatures. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Noah Adams	0.10h	\$250.00	-	\$25.00
09/18/2025		Review and revise the Declaration of Webb for Motion for Pre-approval. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.20h	\$475.00	-	\$95.00
09/18/2025		Review and revise the Declaration of Pimentel for Motion for Pre-approval. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.20h	\$475.00	-	\$95.00
09/18/2025		Draft correspondence to Co-Counsel Cervantes regarding revisions to declarations and obtaining signatures before filing	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.20h	\$475.00	-	\$95.00
					76.30h		\$70.00 0.40h	\$30,335.00 75.90h

Activities Export

11/07/2025
6:05 PM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		motion for preliminary approval. Unbilled						
09/18/2025		Internal correspondence between Attorney CEN and Law Clerk NPA re attachments of finalized forms and agreements. Review finalized forms and agreements. File save finalized documents and agreements to Client file. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Noah Adams	0.30h	\$250.00	-	\$75.00
09/18/2025		Internal correspondence between Attorney CEN and Law Clerk NPA re motion for preliminary approval. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Noah Adams	0.10h	\$250.00	-	\$25.00
09/18/2025		Internal correspondence between Attorney CEN and Law Clerk NPA re upcoming deadline to file Motion for Preliminary Approval. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Noah Adams	0.10h	\$250.00	-	\$25.00
09/12/2025		Internal correspondence between Attorney CEN and Law Clerk NPA re motion for preliminary deadline. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Noah Adams	0.10h	\$250.00	-	\$25.00
09/10/2025		File save Minute Order re continued Case Management Conference. Add to firm calendar as court rule, memo to file re the same. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Raha Razavi	0.20h	\$175.00	-	\$35.00
					76.30h		\$70.00 0.40h	\$30,335.00 75.90h

Activities Export

11/07/2025

6:05 PM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
09/10/2025		Receipt and review of Minute Order Continuing CMC. Memo to file regarding same. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.10h	\$475.00	-	\$47.50
09/08/2025		File save Defendants' Case Management Statement. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Raha Razavi	0.10h	\$175.00	-	\$17.50
09/08/2025		Receipt and review of Defendant's Notice of Remote Appearance. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.10h	\$475.00	-	\$47.50
09/03/2025		(NB) Review ROA to determine status of Case Management Conference and tentative pleading deadlines. Non-billable	00047-El Dorado Farms Pimentel v. Madrigal	Raha Razavi	0.10h	\$175.00	\$17.50	-
08/15/2025		Receipt and review of multiple correspondences from co-counsel about Case Management Statement. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.20h	\$475.00	-	\$95.00
08/15/2025		Receipt and review of Case Management Statement. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.10h	\$475.00	-	\$47.50
08/15/2025		(PCD .1) File saved Plaintiff Case Management Statement. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Mika Ince	0.10h	\$140.00	-	\$14.00
07/30/2025		Call between Legal Assistant MSI and Fresno Court regarding	00047-El Dorado Farms Pimentel v. Madrigal	Mika Ince	0.20h	\$140.00	-	\$28.00
					76.30h		\$70.00 0.40h	\$30,335.00 75.90h

Activities Export

11/07/2025

6:05 PM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		scheduling hearing then sent Attorney CEN internal memo regarding it. Unbilled						
07/30/2025		Called and left voicemail for Fresno Court calendar clerk in regards to scheduling hearing. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Mika Ince	0.10h	\$140.00	-	\$14.00
07/25/2025		Receipt and review of correspondence from Co-Counsel Cervantes containing declaration of Webb. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.10h	\$475.00	-	\$47.50
07/25/2025		Reviewed and revised Motion for Preliminary Approval - Memo P&A's to reflect citations to Declaration of Webb. File saved Declaration of Webb to Client file. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Noah Adams	0.50h	\$175.00	-	\$87.50
07/23/2025		Draft memo to file regarding revisions to motion for preliminary approval declaration and points and authorities. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.20h	\$475.00	-	\$95.00
07/23/2025		Draft correspondence to co-counsel Cervantes to provide her with initial drafts of motion for preliminary approval. Discussion of strategy with the declarations and what should be included where.	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.20h	\$475.00	-	\$95.00
					76.30h		\$70.00 0.40h	\$30,335.00 75.90h

Activities Export

11/07/2025

6:05 PM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
Unbilled								
07/23/2025		Internal memo between Attorney CEN and Law Clerk NPA re Declaration of Nichols in Support of Motion for Preliminary Approval. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Noah Adams	0.10h	\$175.00	-	\$17.50
07/23/2025		Review and revise Memo of Points and Authorities for Preliminary Approval. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.70h	\$475.00	-	\$332.50
07/23/2025		Review and revise Declaration of Nichols for Preliminary Approval. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.40h	\$475.00	-	\$190.00
07/23/2025		Review and revise Declaration of Pimentel for Preliminary Approval. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.20h	\$475.00	-	\$95.00
07/23/2025		Review and revise Notice of Motion for Preliminary Approval. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.20h	\$475.00	-	\$95.00
07/23/2025		Telephonic correspondence between Attorney CEN and Law Clerk NPA re Motion for Preliminary Approval Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.30h	\$475.00	-	\$142.50
07/23/2025		Telephonic correspondence between Attorney CEN and Law Clerk NPA re Motion for Preliminary Approval	00047-El Dorado Farms Pimentel v. Madrigal	Noah Adams	0.30h	\$175.00	-	\$52.50
					76.30h		\$70.00 0.40h	\$30,335.00 75.90h

Activities Export

11/07/2025
6:05 PM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
Unbilled								
07/15/2025		Drafted Declaration of Nichols in Support of Motion for Preliminary Approval. Revised Memorandum of Points and Authorities to reflect accurate citations to Declaration of Nichols and Pimentel.	00047-El Dorado Farms Pimentel v. Madrigal	Noah Adams	1.40h	\$175.00	-	\$245.00
Unbilled								
07/15/2025		Drafted Declaration of Pimentel in Support of Motion for Preliminary Approval.	00047-El Dorado Farms Pimentel v. Madrigal	Noah Adams	0.70h	\$175.00	-	\$122.50
Unbilled								
07/14/2025		Drafted Declaration of Pimentel in Support of Motion for Preliminary Approval.	00047-El Dorado Farms Pimentel v. Madrigal	Noah Adams	0.40h	\$175.00	-	\$70.00
Unbilled								
07/14/2025		Drafted Motion for Preliminary Approval - Memorandum of Points and Authorities	00047-El Dorado Farms Pimentel v. Madrigal	Noah Adams	3.70h	\$175.00	-	\$647.50
Unbilled								
07/14/2025		Internal memo between Attorney CEN and Law Clerk NPA re weaknesses to our case	00047-El Dorado Farms Pimentel v. Madrigal	Noah Adams	0.10h	\$175.00	-	\$17.50
Unbilled								
07/02/2025		(PCD .3) Drafted Motion for Preliminary Approval - Memorandum of Points and Authorities.	00047-El Dorado Farms Pimentel v. Madrigal	Noah Adams	1.60h	\$175.00	-	\$280.00
Unbilled								
					76.30h		\$70.00 0.40h	\$30,335.00 75.90h

Activities Export

11/07/2025

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
07/01/2025		Drafted Motion for Preliminary Approval - Memo P&A's. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Noah Adams	0.70h	\$175.00	-	\$122.50
06/30/2025		(PCD .2) Began preparing and drafting Motion for Preliminary Approval - Memorandum of Points and Authorities Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Noah Adams	0.50h	\$175.00	-	\$87.50
06/27/2025		Brief exchange of correspondence with co-Counsel Cervantes regarding drafting of motion, status update an outline of arguments. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.20h	\$475.00	-	\$95.00
06/27/2025		Brief exchange of internal correspondence regarding Webb Law Group, client's declaration and next steps with motion. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.20h	\$475.00	-	\$95.00
06/27/2025		(PCD .6) Researched and prepared to draft Motion for Preliminary Approval - Memorandum of Points and Authorities. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Noah Adams	0.60h	\$175.00	-	\$105.00
06/27/2025		(PCD .1) Internal memo between Law Clerk NPA and Attorney CEN regarding drafting declarations for Motion for Preliminary Approval. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Noah Adams	0.10h	\$175.00	-	\$17.50
					76.30h		\$70.00 0.40h	\$30,335.00 75.90h

Activities Export

11/07/2025

6:05 PM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
06/27/2025		Drafted Motion for Preliminary Approval - Notice. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Noah Adams	1.00h	\$175.00	-	\$175.00
06/27/2025		(PCD .1) Reviewed correspondence between Attorney CEN, Webb Law Group, and opposing counsel. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Noah Adams	0.10h	\$175.00	-	\$17.50
06/24/2025		Receipt and review of fully executed version of settlement agreement. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.10h	\$475.00	-	\$47.50
06/16/2025		Receipt and review of correspondence from Opposing Counsel Mark with update about signing timeline. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.10h	\$475.00	-	\$47.50
06/13/2025		Draft correspondence to return executed class action settlement agreement. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.10h	\$475.00	-	\$47.50
06/13/2025		Receipt and review of correspondence containing partially executed settlement agreement. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.10h	\$475.00	-	\$47.50
06/13/2025		Review of Settlement Agreement for Signature. Execute same. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.20h	\$475.00	-	\$95.00
					76.30h		\$70.00 0.40h	\$30,335.00 75.90h

Activities Export

11/07/2025

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
06/12/2025		Brief exchange of correspondence with co-counsel about plan for drafting motion for preliminary approval. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.10h	\$475.00	-	\$47.50
06/12/2025		Memorandum to file regarding sample for draft of motion for preliminary approval and instructions for drafting same. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.20h	\$475.00	-	\$95.00
06/12/2025		Receipt and review of correspondence from Co-Counsel about status of finalizing settlement agreement. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.10h	\$475.00	-	\$47.50
05/30/2025		Receipt and review of corrections from Opposing Counsel Mark and communications between Mark and Co-Counsel Katherine about circulating the agreement for signatures. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.10h	\$475.00	-	\$47.50
05/29/2025		Receipt and review of Order to Continue Case Management Conference. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.10h	\$475.00	-	\$47.50
05/29/2025		File saved Joint Stipulation and [Proposed] Order to Continue CMC and calendared new hearing date. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Mika Ince	0.10h	\$140.00	-	\$14.00
					76.30h		\$70.00 0.40h	\$30,335.00 75.90h

Activities Export

11/07/2025

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
05/26/2025		Receipt and review of Stipulation received by the Court. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.10h	\$475.00	-	\$47.50
05/20/2025		Receipt and review of correspondence from Co-Counsel Cervantes regarding the approval and circulation for signatures of the longford Settlement Agreement. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.10h	\$475.00	-	\$47.50
05/20/2025		Draft correspondence to Co-Counsel with my assessment of revisions and ones to flag. Discussion of applicability to circumstances and communication of approval to Mark. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.30h	\$475.00	-	\$142.50
05/20/2025		Receipt and review of correspondence from Co-Counsel KEC regarding her revisions and review of settlement agreement. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.40h	\$475.00	-	\$190.00
05/16/2025		File saved Joint Stipulation to Continue Case Management Conference and Proposed Order re the same. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Raha Razavi	0.10h	\$175.00	-	\$17.50
05/15/2025		Draft correspondence to Opposing Counsel Mark providing authority for him to add my signature to the stipulation and providing update.	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.20h	\$475.00	-	\$95.00
					76.30h		\$70.00	\$30,335.00
							0.40h	75.90h

Activities Export

11/07/2025

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		Unbilled						
05/15/2025		Draft correspondence to Co-Counsel regarding the stipulation to continue CMC and next steps as it pertains to CMC statement. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.10h	\$475.00	-	\$47.50
05/13/2025		Receipt and review of correspondence from Opposing Counsel Mark with CMC continuance stipulation and asking for update. Review of stipulation. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.20h	\$475.00	-	\$95.00
04/01/2025		Filed and served Notice of Change of Address. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Raha Razavi	0.10h	\$150.00	-	\$15.00
04/01/2025		Prepare Notice of Change of Address for filing Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Shelby Durham	0.10h	\$175.00	-	\$17.50
03/28/2025		Update the Proof of Service to reflect the Change of Address Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Shelby Durham	0.10h	\$175.00	-	\$17.50
03/28/2025		Draft the Notice of Change of Address of Counsel Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Shelby Durham	0.20h	\$175.00	-	\$35.00
03/14/2025		Draft correspondence to Opposing Counsel Mark regarding follow up on revisions. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.10h	\$475.00	-	\$47.50
					76.30h		\$70.00	\$30,335.00
							0.40h	75.90h

Activities Export

11/07/2025

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
03/03/2025		Receipt and review of correspondence from Simpluris about declaration for purposes of preliminary approval. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.10h	\$475.00	-	\$47.50
03/03/2025		Draft correspondence to Opposing Counsel Mark to provide class notice as well. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.10h	\$475.00	-	\$47.50
03/03/2025		Draft correspondence to provide Opposing Counsel Mark with pay period dispute form, opt-out and objection form. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.10h	\$475.00	-	\$47.50
03/03/2025		Draft correspondence to Patrick Ivie with Simpluris to update them on the status of finalizing obtaining preliminary approval. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.10h	\$475.00	-	\$47.50
02/26/2025		Draft correspondence to Opposing Counsel Mark regarding exhibits and timeline for providing them to him. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.10h	\$475.00	-	\$47.50
02/26/2025		Receipt and review of correspondence from Opposing Counsel regarding follow up on Exhibits. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.10h	\$475.00	-	\$47.50
					76.30h		\$70.00 0.40h	\$30,335.00 75.90h

Activities Export

11/07/2025
6:05 PM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
02/12/2025		Receipt and review of correspondence from Co-Counsel Katherine about settlement agreement and bids for administration. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.10h	\$475.00	-	\$47.50
02/12/2025		Draft correspondence to Co-Counsel to advise that Simpluris has the best bid of the three and based on past bids, Phoenix is usually cheaper, but here simpluris is less so we should go with them. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.10h	\$475.00	-	\$47.50
02/12/2025		Receipt and review of correspondence from co-counsel and Phoenix class action admin bid. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.10h	\$475.00	-	\$47.50
02/11/2025		Draft correspondence to co-counsel to provide redlines for Settlement Agreement. Discussion regarding exhibits and drafting of same. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.20h	\$475.00	-	\$95.00
02/11/2025		Review and revise the Settlement Agreement draft. Prepare a redline to be sent to co-counsel with changes. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.90h	\$475.00	-	\$427.50
02/04/2025		Draft correspondence to co-counsel regarding quotes and	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.10h	\$475.00	-	\$47.50
					76.30h		\$70.00 0.40h	\$30,335.00 75.90h 24/51

Activities Export

11/07/2025

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		potential for obtaining additional quote. Unbilled						
02/04/2025		Receipt and review of correspondence from co-counsels office containing two quotes for the administration. Review of Simpluris and CPT quotes. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.20h	\$475.00	-	\$95.00
02/03/2025		File saved Minute Order re Case Management Conference and updated firm calendar to reflect hearing and updated deadlines. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Raha Razavi	0.20h	\$125.00	-	\$25.00
02/03/2025		Receipt and review Case Management Conference Minute Order. Memo to file regarding same. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.20h	\$475.00	-	\$95.00
01/23/2025		Draft correspondence to co-counsel regarding administrator search and the process of obtaining quotes from Phoenix, Simpluris, and CPT as well as what information to request, Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.30h	\$475.00	-	\$142.50
01/22/2025		Receipt and review of draft of the Settlement Agreement long form from Co-Counsel Cervantes. Brief review of document.	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.20h	\$475.00	-	\$95.00
					76.30h		\$70.00	\$30,335.00
							0.40h	75.90h

Activities Export

11/07/2025
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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
Unbilled								
01/21/2025		(PCD .1) Receipt and review of Defendant Madrigal Case Management Statement via U.S. Mail. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Raha Razavi	0.10h	\$125.00	-	\$12.50
01/16/2025		Receipt and review of Defendant's Case Management Conference Statement. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Brooke Nevels	0.20h	\$475.00	-	\$95.00
01/16/2025		File saved fully executed Memorandum of Understanding to Client file. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Raha Razavi	0.10h	\$125.00	-	\$12.50
01/16/2025		File saved Defendant's Case Management Conference Statement. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Raha Razavi	0.10h	\$125.00	-	\$12.50
01/16/2025		Receipt and review of fully executed settlement agreement. Memo to file regarding same. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.20h	\$475.00	-	\$95.00
01/16/2025		Receipt and review of Defendant's Case Management Conference statement. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.10h	\$475.00	-	\$47.50
01/16/2025		Receipt and review of Case Management Conference	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.10h	\$475.00	-	\$47.50
					76.30h		\$70.00 0.40h	\$30,335.00 75.90h

Activities Export

11/07/2025
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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		Statement. Unbilled						
01/13/2025		File saved Pimentel Case Management Statement. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Raha Razavi	0.10h	\$125.00	-	\$12.50
01/10/2025		Draft correspondence to co-counsel Katherine discussing strategy for draft of long form and then preliminary approval motion based on variables determined in the longform such as cy pres, administrator and other aspects. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.30h	\$475.00	-	\$142.50
01/10/2025		Receipt and review of correspondence from Co-Counsel Katherine about clarification on long form as exhibit and preliminary approval drafting. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.10h	\$475.00	-	\$47.50
01/10/2025		Draft correspondence to Co-Counsel regarding draft for longform settlement agreement and samples to refer to. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.10h	\$475.00	-	\$47.50
01/10/2025		Draft correspondence to Opposing Counsel Mark regarding LA model form being used and how we can send him a longform. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.10h	\$475.00	-	\$47.50
					76.30h		\$70.00 0.40h	\$30,335.00 75.90h

Activities Export

11/07/2025

6:05 PM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
01/10/2025		Receipt and review of correspondence from Opposing Counsle Mark about how we have a standard form and he would expect to use that as its tied to our approval motions. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.10h	\$475.00	-	\$47.50
01/08/2025		Receipt and review of correspondence from Opposing Counsel Mark containing executed MOU. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.10h	\$475.00	-	\$47.50
01/08/2025		Draft correspondence to Co-Counsel Katherine about obtaining final signiture from Client. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.10h	\$475.00	-	\$47.50
01/08/2025		Receipt and review of correspondence from Opposing Counsel Mark regarding the change being made and sending for signature. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.10h	\$475.00	-	\$47.50
01/08/2025		Draft correspondence to Opposing Counsel about how the change to 20% is fine especially due to the workweek representation. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.10h	\$475.00	-	\$47.50
01/08/2025		Receipt and review of correspondence from Opposing Counsel Mark about discrepancy with escalator clause. Discussion	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.10h	\$475.00	-	\$47.50
					76.30h		\$70.00	\$30,335.00
							0.40h	75.90h
								28/51

Activities Export

11/07/2025

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		regarding percentages and how the pay period count likely wont change. Unbilled						
01/08/2025		Draft correspondence to opposing counsel Mark about work at mediation. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.10h	\$475.00	-	\$47.50
01/07/2025		Receipt and review of copy of initial intake notes for issue spotting around mediation. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.20h	\$475.00	-	\$95.00
01/07/2025		Receipt and review of correspondence from Opposing Counsel about MOU review. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.10h	\$475.00	-	\$47.50
01/07/2025		Draft correspondence to Opposing Counsel Mark about the MOU draft. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.10h	\$475.00	-	\$47.50
01/07/2025		Attend Mediation. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	6.80h	\$475.00	-	\$3,230.00
01/07/2025		Draft Memorandum of Understanding for mediation. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	1.40h	\$475.00	-	\$665.00
01/07/2025		Office conference with Attorney Christopher E. Nichols and Attorney Brooke B. Nevels	00047-El Dorado Farms Pimentel v. Madrigal	Brooke Nevels	0.20h	\$475.00	-	\$95.00
					76.30h		\$70.00 0.40h	\$30,335.00 75.90h

Activities Export

11/07/2025
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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		regarding strategy with opening demand for mediation. Unbilled						
01/04/2025		Draft correspondence to Co-Counsel Cervantes regarding the unpaid wage claim and need for additional detail and specification from Client Pimental. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.20h	\$475.00	-	\$95.00
01/04/2025		Draft correspondence to Mediator Saldana to deliver mediation brief. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.20h	\$475.00	-	\$95.00
01/03/2025		Brief exchange of correspondence between co-counsel about mediation preparation, main items we need and client involvement. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.20h	\$475.00	-	\$95.00
01/03/2025		Receipt and review of Invitation and Pre-Mediation Information from mediator on Pimentel v. Madrigal. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.30h	\$475.00	-	\$142.50
01/03/2025		Review of employment records produced by Defendant including paystubs, payroll registers, and time records. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.60h	\$475.00	-	\$285.00
01/03/2025		Draft mediation brief. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	3.10h	\$475.00	-	\$1,472.50
					76.30h		\$70.00 0.40h	\$30,335.00 75.90h

Activities Export

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
01/02/2025		Begin draft of mediation brief by outlining damages calculations and determining how to argue certain claims for the context of mediation. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	1.70h	\$475.00	-	\$807.50
12/12/2024		Review of class data and payroll documents provided by Opposing Counsel Mark. Review of data to determine damages calculations. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	2.20h	\$475.00	-	\$1,045.00
12/11/2024		Review of Piminental's employment records. Analyze and determine viability of arguments for same. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.80h	\$475.00	-	\$380.00
12/10/2024		Receipt and review of correspondence from Opposing Counsel Bell regarding document production and containing download link. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.10h	\$475.00	-	\$47.50
12/10/2024		Receipt and review of correspondence from Opposing Counsel about update on production ahead of mediation. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.10h	\$475.00	-	\$47.50
12/03/2024		File saved Pimental Payroll Records. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Raha Razavi	0.10h	\$125.00	-	\$12.50
					76.30h		\$70.00 0.40h	\$30,335.00 75.90h

Activities Export

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
12/02/2024		Receipt and review of correspondence from Opposing Counsel Mark regarding the workweeks and pay periods count. Brief review of payroll records. Memo to file regarding same. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.20h	\$475.00	-	\$95.00
11/25/2024		Receipt and review of correspondence from Opposing Counsel Mark about document timing and record production. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.10h	\$475.00	-	\$47.50
11/25/2024		Draft correspondence to co-counsel about the lack of documents. Discussion about follow up with opposing counsel. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.10h	\$475.00	-	\$47.50
10/22/2024		Receipt and review of notice of hearing continued to February. Memo to file regarding same. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.10h	\$475.00	-	\$47.50
10/21/2024		Brief exchange of correspondence with Co-Counsel about Case Management Conference. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.10h	\$475.00	-	\$47.50
10/14/2024		Receipt and review of Defendant's Case Management Statement. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Brooke Nevels	0.20h	\$475.00	-	\$95.00
10/11/2024		File save and upload to client file.	00047-El Dorado Farms	Raha	0.20h	\$125.00	-	\$25.00
					76.30h		\$70.00	\$30,335.00
							0.40h	75.90h

Activities Export

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		Add calendar reminders. Memo same. Unbilled	Pimentel v. Madrigal	Razavi				
10/09/2024		Upload Defense Case Management Statement and Notice of Remote Appearance. Memo same. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Raha Razavi	0.20h	\$125.00	-	\$25.00
10/08/2024		Receipt and review of Defendants CMC Statement and Notice of Remote Appearance Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.10h	\$475.00	-	\$47.50
10/02/2024		Receipt and review of numerous correspondences from Opposing Counsel, Co-Counsel, and Mediator Saldaña related to mediation scheudling and the new date of January 7th. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.10h	\$475.00	-	\$47.50
10/02/2024		Draft correspondence to Co-Counsel about plan for Belaire-West discovery and next steps. Discussion regarding Belaire timing. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.10h	\$475.00	-	\$47.50
10/02/2024		Reciept and review of correspondence from Co-Counsel regarding their notification to mediator about cancellation. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.10h	\$475.00	-	\$47.50
					76.30h		\$70.00 0.40h	\$30,335.00 75.90h

Activities Export

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
10/02/2024		Review of multiple emails regarding the rescheduling of mediation. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Brooke Nevels	0.20h	\$475.00	-	\$95.00
10/01/2024		Draft correspondence to Co-Counsel Webb regarding availabiltiy for mediation and rescheduling. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.10h	\$475.00	-	\$47.50
10/01/2024		Receipt and review of correspondence from Co-Counsel about notifying opposing counsel of the mediation cancellation. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.10h	\$475.00	-	\$47.50
10/01/2024		File save and upload InfoTrack invoice to Client file. Memo same. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Raha Razavi	0.10h	\$125.00	-	\$12.50
10/01/2024		File save and upload e-filed ADR Stipulation to Client file. Memo same. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Raha Razavi	0.10h	\$125.00	-	\$12.50
10/01/2024		Receipt and review of correspondence from Opposing Counsel Mark about how they need to postpone discovery. Draft correspondence to co-counsel Webb about Belaire and moving forward with discovery. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.20h	\$475.00	-	\$95.00
					76.30h		\$70.00 0.40h	\$30,335.00 75.90h

Activities Export

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
09/30/2024		Brief exchange of correspondence with co-counsel about Case Management Conference attendance. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.10h	\$475.00	-	\$47.50
09/30/2024		File ADR Stipulation with Fresno County Court. Draft correspondence to serve ADR Stipulation to other parties. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Raha Razavi	0.20h	\$125.00	-	\$25.00
09/30/2024		Receipt and review of ADR Stipulation signed by Opposing Counsel Mark. Execute and file save same. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.10h	\$475.00	-	\$47.50
09/30/2024		File save and upload Case Management Statement to Client file. Memo same. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Raha Razavi	0.10h	\$125.00	-	\$12.50
09/26/2024		Draft of Alternative Dispute Resolution Stipulation. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.20h	\$475.00	-	\$95.00
09/26/2024		Draft correspondnence to provide Opposing Counsle Mark with a copy of the ADR stipulation and explanation about avoiding OSC. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.10h	\$475.00	-	\$47.50
09/25/2024		Reciept and review of Case Management Statement.	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.10h	\$475.00	-	\$47.50
					76.30h		\$70.00	\$30,335.00
							0.40h	75.90h

Activities Export

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		Correspondence to co-counsel regarding ADR stip. Unbilled						
09/19/2024		Receipt and review of ~7 emails from Opposing Counsel Karuthers and Co-Counsel Webb about the sampling, adjusted sampling size, and the timing of production ahead of mediation. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.10h	\$475.00	-	\$47.50
09/18/2024		Telephone conference between Attorney CEN and Co-Counsel Cervantes regarding preparation for mediation, valuation for mediation, and next steps with mediation brief. Memo to file regarding same. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.30h	\$475.00	-	\$142.50
09/18/2024		Attend Zoom conference with Opposing Counsel Karuthers, Co-Counsel Webb and Co-Counsel Cervantes. Memo to file regarding same. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.20h	\$475.00	-	\$95.00
09/16/2024		Receipt and review of multiple correspondences from Opposing Counsel Mark and co-counsel Katherine regarding time for call. Calendar same. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.10h	\$475.00	-	\$47.50
09/13/2024		Receipt and review of	00047-El Dorado Farms	Christopher	0.20h	\$475.00	-	\$95.00
					76.30h		\$70.00 0.40h	\$30,335.00 75.90h 36/51

Activities Export

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		correspondence from Opposing Counsel Mark regarding data/ documents neccesary for mediation and numbers related to workweek and PAGA pay period counts. Unbilled	Pimentel v. Madrigal	Nichols				
07/18/2024		Receipt and review of correspondence from Co-Counsel with First Amended Complaint. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.10h	\$475.00	-	\$47.50
07/15/2024		Receipt and review of correspondence from Opposing Counsel's office for Answer. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.20h	\$475.00	-	\$95.00
07/12/2024		Receipt and reivew of Complaint, First Amended, which includes PAGA. File save same. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.10h	\$475.00	-	\$47.50
06/27/2024		Draft correspondence to Co-Counsel KEC to provide her with the First Amended Complaint and exhibit to same. Discussion about review and approval of First Amended Complaint. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.30h	\$475.00	-	\$142.50
06/27/2024		Receipt of email correspondence from Co-Counsel regarding udpate on FAC and addint the PAGA cause of action.	00047-El Dorado Farms Pimentel v. Madrigal	Brooke Nevels	0.10h	\$475.00	-	\$47.50
					76.30h		\$70.00 0.40h	\$30,335.00 75.90h

Activities Export

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
Unbilled								
06/26/2024		Receipt and review of co-counsel Cervantes update and information regarding PAGA amendment filing time. Discussion of mediation and amendment timeline.	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.10h	\$475.00	-	\$47.50
Unbilled								
06/17/2024		Subject: Re: Pimentel v. Madrigaleceipt and reivew of email correspondence from Mediator Saldana regarding Engagement Letter, MEdiation Agreement, and invoice regarding mediation. Memo to CEN regarding the same.	00047-El Dorado Farms Pimentel v. Madrigal	Brooke Nevels	0.20h	\$475.00	-	\$95.00
Unbilled								
06/14/2024		Receipt and review of Mediation Docs sent by the mediator to prepare us for mediation.	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.10h	\$475.00	-	\$47.50
Unbilled								
06/10/2024		Receipt and review of correspondence from Opposing Counsel Karruthers regarding acceptance of information regarding mediation dates.	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.10h	\$475.00	-	\$47.50
Unbilled								
06/10/2024		Receipt and review of email correspondence regarding Opposing Counsel's availblity for mediation.	00047-El Dorado Farms Pimentel v. Madrigal	Brooke Nevels	0.10h	\$475.00	-	\$47.50
Unbilled								
					76.30h		\$70.00 0.40h	\$30,335.00 75.90h

Activities Export

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
06/07/2024		Draft correspondence to Opposing Counsel Mark about our mediation availabiltiy. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.10h	\$475.00	-	\$47.50
06/07/2024		Receipt and review of correspondence from Co-Counsel Webb about his availabiltiy for mediation. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.10h	\$475.00	-	\$47.50
06/07/2024		Receipt and review of correspondence from Opposing Counsel Mark about mediation availability. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.10h	\$475.00	-	\$47.50
06/06/2024		Receipt and review of Order granting continuance of Case Management Conference. Calendar and file save same. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.20h	\$475.00	-	\$95.00
06/05/2024		Draft correspondence to Opposing Counsel Mark letting him know that his plan sounds good and once Laurie has given him dates, to let us know. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.10h	\$475.00	-	\$47.50
06/03/2024		Receipt and review of update from Co-Counsel's Paralegal PRI about the case status and amendment to complaint to add PAGA. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.10h	\$475.00	-	\$47.50
					76.30h		\$70.00 0.40h	\$30,335.00 75.90h

Activities Export

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
05/31/2024		Receipt and review of correspondence from Co-Counsel about Answer and POS. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.10h	\$475.00	-	\$47.50
05/30/2024		Receipt and review of Defenadnt's Answer to the Class Action Complaint. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Brooke Nevels	0.10h	\$475.00	-	\$47.50
05/30/2024		Receipt and review of service of the Defendant's Answer. File save same. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.20h	\$475.00	-	\$95.00
05/29/2024		Receipt and review of Notice of Jury Fee Deposit. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.10h	\$475.00	-	\$47.50
05/29/2024		Receipt and review of correspondence from Opposing Counsel Mark about stipulation and order and moving of CMC. Discussion about mediation and scheudling for late September. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.10h	\$475.00	-	\$47.50
05/29/2024		Draft correspondence to Opposing Counsel Mark regarding the mediator selection, class size and time frame for mediation. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.20h	\$475.00	-	\$95.00
05/29/2024		Receipt and review of Plaintiff's Case Management Statement and	00047-El Dorado Farms Pimentel v. Madrigal	Brooke Nevels	0.20h	\$475.00	-	\$95.00
					76.30h		\$70.00 0.40h	\$30,335.00 75.90h

Activities Export

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		Notice of Jury FEe Deposit. Unbilled						
05/28/2024		Receipt and review of correspondence from Co-Counsel related to jury fee deposit and CMC statement. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.10h	\$475.00	-	\$47.50
05/28/2024		Receipt and review of correspondence serving jury deposit and CMC statement. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.10h	\$475.00	-	\$47.50
05/28/2024		Receipt and review of email exchanges regarding workweek counts and proposed mediator. Memo to fiel. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Brooke Nevels	0.20h	\$475.00	-	\$95.00
05/28/2024		Office conference between Attorney CEN and Attorney BBN regarding the calculations and rough ballpark for settlement and mediator to propose for case. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Brooke Nevels	0.10h	\$475.00	-	\$47.50
05/28/2024		Office conference between Attorney CEN and Attorney BBN regarding the calculations and rough ballpark for settlement and mediator to propose for case. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.10h	\$475.00	-	\$47.50
05/28/2024		Review of class size and data	00047-El Dorado Farms	Christopher	0.30h	\$475.00	-	\$142.50
					76.30h		\$70.00 0.40h	\$30,335.00 75.90h

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		information and compare same with other cases in this industry. Determine the size of this class, likely settlement range, and draft correspondence to co-counsel about same and suggestion for mediator. Unbilled	Pimentel v. Madrigal	Nichols				
05/28/2024		Receipt and review of correspondence from Opposing Counsel Mark Kruthers regarding class size and workweek count. Discussion regarding PAGA figures for same. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.20h	\$475.00	-	\$95.00
05/28/2024		Zoom videoconference with Co-Counsel Cervantes and Paralegal Priscilla regarding the class size information and takeaways from same, next steps including mediation, and timeline for production around mediation. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.20h	\$475.00	-	\$95.00
05/24/2024		Receipt and review of service copy of Stipulation to Set Aside Default and file save same. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.10h	\$475.00	-	\$47.50
05/23/2024		Receipt and review of correspondence from Opposing Counsel Kruthers about how he has the spreadsheet but needs the pay period count and wants to	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.10h	\$475.00	-	\$47.50
					76.30h		\$70.00 0.40h	\$30,335.00 75.90h

Activities Export

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		double-check. Unbilled						
05/23/2024		Draft correspondnence to Opposoiing Counsel Mark about workweek count and anticipated timeline for same as this is needed to start the process. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.20h	\$475.00	-	\$95.00
05/23/2024		Receipt and review of correspondence from Opposing Counsel Mark reporting that he is still working with his client to get a clear workweek/pay period count. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.10h	\$475.00	-	\$47.50
05/23/2024		Receipt and review of correspondence from Co-Counsel about follow up on workweeks/ payperiods etc... and then similar email sent to Opposing Counsel Mark about same. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.10h	\$475.00	-	\$47.50
05/23/2024		Receipt and review of correspondence from Co-Counsel's paralegal with redline and signed version of stipulation. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.10h	\$475.00	-	\$47.50
05/22/2024		Draft revisions to stipulation in redline and draft email to Co-Counsel Cervantes delivering same and explaining concerns with timelines and defendant.	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.20h	\$475.00	-	\$95.00
					76.30h		\$70.00 0.40h	\$30,335.00 75.90h 43/51

Activities Export

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
Unbilled								
05/22/2024		Receipt and review of correspondence from Opposing Counsel Kruthers with Exhibit A attached. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.10h	\$475.00	-	\$47.50
05/21/2024		Receipt and brief review of stipulation from Opposing Counsel Kruthers related to default set aside. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.20h	\$475.00	-	\$95.00
05/15/2024		Draft correspondence to Opposing Counsel Mark confirming that we agree a stipulation for the more limited topics makes sense and we can work out the remainder as we proceed to mediation. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.10h	\$475.00	-	\$47.50
05/15/2024		Receipt and review of correspondence from Opposing Counsel Mark about how he is going to send a more limited stipulation since a more global one is not possible at this time while they compile information. Discussion of timing of same. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.10h	\$475.00	-	\$47.50
05/15/2024		Draft correspondence to Opposing Counsel Mark informing him that we'd like the default issue sorted out before the CMC next month.	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.10h	\$475.00	-	\$47.50
					76.30h		\$70.00 0.40h	\$30,335.00 75.90h 44/51

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		Request update on stipulation. Unbilled						
05/15/2024		Receipt and review of status correspondence from co-counsel's paralegal. Update calendar accordingly and note upcoming events. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.10h	\$475.00	-	\$47.50
05/14/2024		Receipt and review of file transfer from Co-Counsel. File save and organize same. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.20h	\$475.00	-	\$95.00
05/13/2024		Receipt and review of case status update from Paralegal Priscilla. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Brooke Nevels	0.10h	\$475.00	-	\$47.50
05/08/2024		Receipt and reivew of email correspondence from Opposing Counsel regarding status of the stipultion to set aside the default, and action plan moving forward with mediation. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Brooke Nevels	0.20h	\$475.00	-	\$95.00
05/07/2024		Receipt and review of correspondence from Opposing Counsel Mark regarding update on stipulation and status of pay periods and work week counts. Draft response agreeing. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.20h	\$475.00	-	\$95.00
					76.30h		\$70.00 0.40h	\$30,335.00 75.90h

Activities Export

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
05/07/2024		Draft correspondence to Opposing Counsel Mark regarding timeline for stipulation to set aside default. Discussion about having a coversation with opposing counsel to get on same page before mediation. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.20h	\$475.00	-	\$95.00
04/29/2024		Receipt and review of status email from Ms. Glaze. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Brooke Nevels	0.10h	\$475.00	-	\$47.50
04/26/2024		Draft correspondence to co-counsel explaining that we do not have the production yet and that a Zoom may be overkill for the circumstances given the brevity of the anticipated call. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.10h	\$475.00	-	\$47.50
04/26/2024		Reciept and review of correspondence from Co-Counsel about being open to mediation but needing more information before making a decision. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.10h	\$475.00	-	\$47.50
04/25/2024		Draft correspondnence to Co-Counsel Cervantes explaining mediator preferences and discussing how we will want to approach in terms of obtaining information related to class size. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.20h	\$475.00	-	\$95.00
					76.30h		\$70.00 0.40h	\$30,335.00 75.90h

Activities Export

11/07/2025

6:05 PM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
04/25/2024		Draft correspondence to Co-Counsel regarding First Amended Complaint. Discussion regarding timing for filing updated Complaint. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.20h	\$475.00	-	\$95.00
04/25/2024		Office conference between Attorney CEN and Attorney BBN regarding mediation preferences. Discussion about proposed mediators sent from Opposing Counsel, cost, and which we would be agreeable to. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Brooke Nevels	0.20h	\$475.00	-	\$95.00
04/25/2024		Office conference between Attorney CEN and Attorney BBN regarding mediation preferences. Discussion about proposed mediators sent from Opposing Counsel, cost, and which we would be agreeable to. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.20h	\$475.00	-	\$95.00
04/25/2024		Receipt and review of proposed mediators from Opposing Counsel. Receipt of email from Co-Counsel regarding recommendation on mediators. Office conference with Attorney CEN regarding the same. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Brooke Nevels	0.20h	\$475.00	-	\$95.00
04/24/2024		Receipt and review of correspondence from Opposing Counsel Mark about mediation, proposed mediators and status of	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.10h	\$475.00	-	\$47.50
					76.30h		\$70.00 0.40h	\$30,335.00 75.90h

Activities Export

11/07/2025
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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		draft stipulation. Unbilled						
04/23/2024		Receipt and review of PAGA letter filing confirmation. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.10h	\$475.00	-	\$47.50
04/23/2024		Receipt and review of the PAGA letter. File save same. Draft correspondence to co-counsel regarding filing of same. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.10h	\$475.00	-	\$47.50
04/19/2024		Receipt and review of Notice of Change of Handling Attorney and Reruest for Entry of Default file stamped. File save same. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.10h	\$475.00	-	\$47.50
04/19/2024		Draft correspondence to Co-Counsel Cervantes indicating that the email information is good to go and that if they have issues with the requests, we can get on a 3-way conference call to go over it. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.10h	\$475.00	-	\$47.50
04/19/2024		Draft correspondence to co-counsel Cervantes regarding the mediation, reuquirements for informal information/documents we need before mediation and thoughts related to mediator selection. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.30h	\$475.00	-	\$142.50
					76.30h		\$70.00 0.40h	\$30,335.00 75.90h

Activities Export

11/07/2025
6:05 PM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
04/19/2024		Receipt of correspondence from Co-counsel Cevantes regarding mediaiton, default set aside and our thoughts on both. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.10h	\$475.00	-	\$47.50
04/19/2024		Receipt and review of correspondence from Opposing Counsel Stein introducing Mark Kruthers and explaining that they would like to mediate sooner rather than later but will need to gather info. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.20h	\$475.00	-	\$95.00
04/19/2024		Receipt and review of email exchanges with Attorneys LFW, KEC and CEN regarding action to get information regarding the class pursuant ot Kullar /Dunk. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Brooke Nevels	0.20h	\$475.00	-	\$95.00
04/15/2024		Receipt and review of email exchanges with Attorney LFW and CEN regarding thoughts on adding PAGA to the Complaint. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Brooke Nevels	0.20h	\$475.00	-	\$95.00
04/12/2024		Receipt and review of correspondence from Co-Counsel Katherine regarding removal of PAGA claims. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.10h	\$475.00	-	\$47.50
04/12/2024		Draft correspondence to Co-Counsel Webb explaining the	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.30h	\$475.00	-	\$142.50
					76.30h		\$70.00 0.40h	\$30,335.00 75.90h 49/51

Activities Export

11/07/2025
6:05 PM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		merits of including a PAGA claim in this matter and expalining that it will only provide additional leverage at this phase of the case. Discussion about benefits of PAGA and circumstance in this case where it would not be best suited for it. Unbilled						
04/12/2024		Receipt and review of correspondence from Co-Counsel Katherine to Opposing Counsel Stein about default and open to a discussion about settlement or setting aside. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.10h	\$475.00	-	\$47.50
04/11/2024		Draft correspondence to co-counsel Katherine agreeing with allowing them out of default to work towards a settlement and approving of response. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.10h	\$475.00	-	\$47.50
04/11/2024		Receipt and review of correspondence from Opposing Counsel Stein about how he just got a copy of the suit. Review of KEC proposed response. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.20h	\$475.00	-	\$95.00
04/08/2024		Receipt and review of case stauts update from Co-Counsel with information about potential default. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.10h	\$475.00	-	\$47.50
					76.30h		\$70.00 0.40h	\$30,335.00 75.90h
					50/51			

Activities Export

11/07/2025
6:05 PM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
04/04/2024		Reciept and review of updated request for entyr of default. Approval of same and correspondence to co-counsel's paralegal to confirm it is ready for filing. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.10h	\$475.00	-	\$47.50
04/03/2024		Draft correspondence to co-counsel's office instructing them to take default and disucssing methods to itemize damages for prove up. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.10h	\$475.00	-	\$47.50
04/03/2024		Draft correspondence to co-counsel's office to suggest revisions to Request for Entry of Default. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.10h	\$475.00	-	\$47.50
04/03/2024		Receipt and review of Request for Entry of Default. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	0.10h	\$475.00	-	\$47.50
					76.30h		\$70.00 0.40h	\$30,335.00 75.90h

EXHIBIT 2

Activities Export

11/07/2025

7:31 PM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
10/15/2025		CA: File To Existing - #21144830 - Veronica Pimentel vs. Agustin Mad...: Designation of Electronic Service Filed (1 filing) Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Raha Razavi	1.00	\$22.89	-	\$22.89
10/06/2025		CA: File To Existing - #21060848 - Veronica Pimentel vs. Agustin Madrigal, JR / COMPLEX / CLASS ACTION: Notice (2 filings) Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Raha Razavi	1.00	\$22.89	-	\$22.89
09/26/2025		CA: File To Existing - #20923667 - Veronica Pimentel vs. Agustin Madrigal, JR / COMPLEX / CLASS ACTION: Motion (5 filings) Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Noah Adams	1.00	\$82.89	-	\$82.89
01/07/2025		Mediation expense. Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Christopher Nichols	1.00	\$2,500.00	-	\$2,500.00
10/01/2024		CA: File To Existing - #16781020 - Veronica Pimentel vs. Agustin Madrigal, JR / COMPLEX / CLASS ...: Stipulation (1 filing) Unbilled	00047-El Dorado Farms Pimentel v. Madrigal	Raha Razavi	1.00	\$18.70	-	\$18.70
							\$0.00 0.00h	\$2,647.37 0.00h

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF FRESNO

I am employed in the County of San Diego, State of California. I am over the age of 18 and not a party to the within action. My primary business address is 10650 Treena Street, Suite 212, San Diego, California, 92131. On Friday, November 7, 2025, I served a copy of the following documents:

- **Supplemental Declaration Of Christopher Nichols In Support Of Motion For Preliminary Approval**
- **Supplemental Declaration Of Lenden F. Webb In Support Of Preliminary Approval**
- **Declaration Of Michael Bui (Adminsitrator)**
- **Motion for Preliminary Approval – Notice**
- **Motion for Preliminary Approval – Memorandum of Points and Authorities**
- **Motion for Preliminary Approval – Declaration of Nichols**
- **Motion for Preliminary Approval – Declaration of Webb**
- **Motion for Preliminary Approval – Declaration of Pimentel**

[x] **By Electronic Service:** Based on a court order, Code of Civil Procedure Section 1010.6 and California Rules of Court Rule 2.251, or an agreement of the parties to accept electronic service. I caused the above documents to be sent to the person(s) at the e-mail address(es) set forth below. **Only as to the Supplemental Declarations of Nichols and Webb and the Declaration of Bui.**

[x] **By Electronic Transmission through LWDA's website:** I caused the above documents to be sent to the LWDA through their online filing submission platform at <https://www.dir.ca.gov/Private-Attorneys-General-Act/Private-Attorneys-General-Act.html>

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Attorneys for Plaintiffs

Labor and Workforce Development Agency
Submitted electronically via the LWDA's online PAGA filing portal at:
<https://www.dir.ca.gov/Private-Attorneys-General-Act/Private-Attorneys-General-Act.html>

I declare under penalty of perjury under the laws of the State of California that the above is true and correct. Executed on Friday, November 7, 2025, at San Diego, California.


CHRISTOPHER E. NICHOLS