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Attorneys for Plaintiff VERONICA BASURTO PIMENTEL,  
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,

Plaintiffs,

vs.

AGUSTIN MADRIGAL JR., an individual; and  
Does 1 through 100, inclusive,

Defendants.

CASE NO. 24CECG00675

**DECLARATION OF CHRISTOPHER E.  
NICHOLS IN SUPPORT OF MOTION  
AND MOTION FOR FINAL APPROVAL  
OF CLASS AND PAGA SETTLEMENT**

*Assigned for All Purposes to Dept. 502  
Hon. Kristi Culver Kapetan*

Date: May 5, 2026  
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

**DECLARATION OF CHRISTOPHER NICHOLS IN SUPPORT OF MOTION AND  
MOTION FOR FINAL APPROVAL OF CLASS AND PAGA SETTLEMENT**

1 history of this matter. The following facts are within my own personal knowledge, and if called  
2 as a witness, I could testify competently to the matters stated herein.

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

5 3. This declaration is being submitted in support of the motion for final approval of the  
6 proposed class action settlement with Defendant AGUSTIN MADRIGAL JR. ("Defendant"),  
7 and seeks an entry of an order for:

8 (i) granting final approval of the Settlement;

9 (ii) confirming certification of the Settlement Class for settlement purposes;

10 (iii) confirming the appointment of Plaintiff VERONICA BASURTO PIMENTEL as  
11 Class Representative;

12 (iv) confirming the appointment of Class Counsel;

13 (v) approving the requested attorneys' fees, costs, and expenses;

14 (vi) approving the requested Class Representative service payment;

15 (vii) approving the PAGA allocation, including the payment to the LWDA; and

16 (viii) entering final judgment in accordance with the terms of the Settlement.

17 **BACKGROUND AND EXPERIENCE OF DECLARANT AND FIRM**

18 4. My partner, Brooke B. Nevels, and I worked on this matter while we were still with the  
19 Webb Law Group when from the time that they initiated the matter in February of 2024 until  
20 April of 2024.

21 5. Subsequently, in April of 2024, we started our own firm, Nevels Nichols, LLP and  
22 continued to work on the matter.

23 6. Both Ms. Nevels and I have extensive experience litigating employment matters under  
24 the California Labor Code, including class and PAGA actions. Throughout the course of our  
25 careers, we have represented hundreds of employees in wage and hour actions. We have also  
26 obtained numerous PAGA settlements which have been approved by various courts throughout  
27 the state.  
28

1       7. We have been appointed class counsel in numerous matters, including the following:  
2       *Brown v. ESA Management*, San Joaquin Superior Court Case No. STK-CV-UOE-2019 7162;  
3       *Lawrenz v. BlackTalon*, Sacramento County Case No. 34-2019-00267748, *Malinoff v. Ron Du*  
4       *Pratt Ford, Inc.*, Solano County Case No. FCS053263, *Brick v. California Hydronics Inc.*  
5       Alameda County No. Case No. 22-CV-018191, and our firm is currently prosecuting numerous  
6       other class action matters where we are pursuing certification and obtaining settlements on  
7       behalf of Class Members.

8       8. In addition to our experience representing employees as class counsel, we have also  
9       defended over numerous employers in wage and hour class actions and PAGA matters giving  
10      us a thorough understanding of the dynamics of class action litigation in the employment  
11      context on both sides. We believe that our experience working on these cases both on behalf of  
12      Plaintiffs and Defendants provides us with insight into case valuation and potential risks that  
13      helped us to do the best that we possibly could for the Class in this matter.

14      9. Our firm has no ties to the Defendant in this matter, and we have no conflicts that would  
15      preclude us being appointed as Class Counsel. This settlement was reached as the result of an  
16      arm's length negotiation. Our only interest in this matter is obtaining as much relief as possible  
17      for the Class Members. Given our absence of conflict and qualifications, we believe it is  
18      appropriate that we be appointed Class Counsel.

#### 19                                   **PROCEDURAL AND LITIGATION HISTORY**

20      10. On April 4, 2024, my firm, Nevels Nichols LLP, filed a Notice of Change of Handling  
21      Attorney, and then worked to prepare the case to be entered into default, and subsequently were  
22      informed that counsel existed for the Defendant, so we exchanged information and then  
23      meditated.

24      11. Over the course of over two years of litigation the Parties engaged in the investigation  
25      of the claims, including the production of documents, class data, and other information,  
26      allowing for the full and complete analysis of liabilities and defenses to the claims in this  
27      matter. Thereafter, based on this exchange of information and meaningful progress in the case,  
28      parties mediated.

1 12. In preparation for the mediation on January 7, 2025, Defendant provided Class Counsel  
2 with informal discovery and documents, including payroll data and data concerning the  
3 composition of the Settlement Class Members. We analyzed the data and prepared and  
4 submitted a mediation brief and damages valuation to the Mediator Laurie Saldaña, which  
5 ultimately resulted in the settlement of this Action.

6 13. On January 7, 2025, the Parties participated in a full-day mediation session with Ms.  
7 Saldaña, during which material terms of the settlement were negotiated and agreed upon. This  
8 mediation resulted in the drafting of the Memorandum of Understanding, which was  
9 subsequently finalized in the Settlement Agreement and executed by all Parties.

10 14. The Court preliminarily approved the Plaintiff's Motion for Preliminary Approval of  
11 Class Settlement on November 18, 2025, finding that the terms of the settlement were  
12 "reasonable, fair, and adequate under the circumstances."

13 15. Following the Preliminary Approval Order, the Court-approved Class Notice was  
14 disseminated to the Class on February 13, 2026. As of the date of this filing, there have been  
15 **No valid opt-outs or objections received**, indicating strong and unanimous support for the  
16 Settlement.

#### 17 **TERMS OF SETTLEMENT AND ALLOCATION**

18 16. On January 7, 2025 my office, along with co-counsel, reached a settlement in principle  
19 with Defendant following extensive arm's-length negotiations. The material terms were  
20 formalized in the written Settlement Agreement, filed concurrently with the Motion for Final  
21 Approval.

22 17. The proposed non-reversionary Settlement provides a Gross Settlement Amount of  
23 \$285,000. (Settlement Agreement ¶ 3.1). This amount fully resolves all claims asserted by the  
24 Settlement Class and includes all payments for Individual Class Payments, PAGA penalties, a  
25 Class Representative Enhancement, attorneys' fees and litigation costs, and administration  
26 expenses. Defendant's employer-side payroll taxes are excluded from the Gross Settlement and  
27 will be paid separately.  
28

1 18. After deducting the requested amounts for attorney's fees (\$95,000.00), litigation costs  
2 \$7,402.45<sup>1</sup> settlement administration costs (\$9,000.00), the PAGA allocation (\$14,250.00), and  
3 the Class Representative's enhanced payments (\$5,000), the estimated Net Settlement Amount  
4 is \$154,347.55, to be distributed pro rata based on the number of Class Pay Periods worked by  
5 each Participating Class Member during the Class Period. (Settlement Agreement ¶ 3.2.4). The  
6 980 Participating Class Members are expected to receive meaningful relief, with no objections  
7 or requests for exclusion received.

8 19. Subject to Court approval, the Settlement allocates \$14,250.00 toward PAGA penalties,  
9 with \$10,687.50 payable to the LWDA and \$3,562.50 to Aggrieved Employees, regardless of the  
10 opt-out status. PAGA payments will be allocated based on dividing the amount of Aggrieved  
11 Employees 25% share of PAGA Penalties by the total number of PAGA Pay Periods worked by  
12 all Aggrieved Employees during the PAGA Period, then multiplying the result by each  
13 Aggrieved Employee's PAGA Pay Periods. (Settlement Agreement ¶ 3.2.8).

14 20. Simpluris Inc. has served as the Settlement Administrator and estimates final  
15 administration costs at \$9,000. The Administrator will distribute all payments within 14 days of  
16 the Effective Date. Uncashed checks will be void after 180 days, with residual funds redirected  
17 to the California Farmworker Foundation, in compliance with CPP § 384(b). (Settlement  
18 Agreement ¶ 4.4.3).

19 21. Plaintiff seeks approval of attorneys' fees in the amount of \$95,000.00 (33.33% of the  
20 Gross Settlement), litigation costs of \$7,402.45, (note that although costs were requested in the  
21 amount of \$10,000.00, true costs were less which means additional money for the net settlement  
22 amount to be distributed pro rata to the Class based on the aforementioned criteria), and a service  
23 award of \$5,000.00. These amounts are reasonable based on Class Counsel's work performed,  
24 lodestar cross-check, and results achieved. Supporting declarations and documentation are  
25 submitted herewith.

26 **SETTLEMENT ADMINISTRATION AND CLASS NOTICE**

27 \_\_\_\_\_  
28 <sup>1</sup> Although the settlement allocated up to \$10,000 in class counsel litigation costs, only  
\$7,402.45 was incurred, thus the remaining \$2,597.55 is returned to the class to be distributed.

1 22. Nevels Nichols LLP obtained a bid from Simpluris Inc., with an estimated bid of  
2 \$9,000.00. We selected Simpluris Inc. to administer the settlement, which they will be paid the  
3 Administrator Expense Payment not to exceed \$9,000.00 except for a showing of good cause and  
4 as approved by the Court. Attached hereto as "Exhibit A" is a true and correct copy of the quote  
5 received from Simpluris Inc. to not exceed \$9,000. To the extent the Administration Expenses are  
6 less or the Court approves payment less than \$9,000, the Administrator will put the remainder in  
7 the Net Settlement Amount.

8 23. On February 13, 2026, the Settlement Administrator mailed the Court-approved Class  
9 Notice to the Class Members, which provided each class member with the terms of the  
10 Settlement, including notice of the claims at issue and the financial terms of the settlement,  
11 including the attorneys' fees, costs, and service award that were being sought, how individual  
12 settlement awards would be calculated, and the specific, estimated payment amount to that  
13 individual. Class Members were given 45 days from when the Administrator mailed the Notice  
14 Packet (plus an additional 14 days for Class Members whose Class Notices were re-mailed) to  
15 exclude themselves from (opt-out of) or object to the Class Settlement. There have been no valid  
16 objections, and no requests to opt-out were received prior to the deadline.

17 24. In my experience, the absence of any objections or exclusions in a wage and hour class  
18 action supports a conclusion that the Settlement is fair, reasonable, and adequate.

19 **LWDA NOTIFICATION AND PAGA ALLOCATION**

20 25. As required by California Labor Code § 2699(1)(2), a copy of the settlement and this  
21 Motion for Final Approval, including all supporting documents and the executed Settlement  
22 Agreement, was served on the California Labor & Workforce Development Agency ("LWDA").  
23 A proof of service confirming this contemporaneous submission is included with this filing.

24 26. Subject to Court approval, the Settlement allocates \$14,250.00 toward PAGA penalties,  
25 with 75% (\$10,687.50) payable to the LWDA and 25% (\$3,562.50) to Aggrieved Employees,  
26 regardless of the opt-out status. PAGA payments will be allocated based on dividing the  
27 amount of Aggrieved Employees 25% share of PAGA Penalties by the total number of PAGA  
28

1 Pay Periods worked by all Aggrieved Employees during the PAGA Period, then multiplying  
2 the result by each Aggrieved Employee's PAGA Pay Periods. (Settlement Agreement ¶ 3.2.8).

3 27. The allocation of approximately 5% of the total \$285,000 Gross Settlement Amount to  
4 PAGA claims is consistent with allocations approved in other wage and hour settlements across  
5 the state. Courts have regularly approved PAGA allocations ranging from 0.13% to 10% of the  
6 total settlement value. See *Davis v. Brown Shoe Co.*, U.S. Dist. LEXIS 149010 (E.D. Cal. 2015)  
7 (PAGA Payment of \$5,000 in a \$1.5 million class settlement); *Zamora v. Ryder Integrated*  
8 *Logistics, Inc.*, U.S. Dist. LEXIS 184096 (S.D. Cal. 2014) (PAGA Payment of \$7,500 in a \$1.5  
9 million class settlement); and *Chu v. Wells Fargo Investments, LLC*, WL 672645 (N.D. Cal.  
10 2011) (PAGA Payment of \$7,500 in a \$6.9 million common-fund settlement). As a result, the  
11 \$14,250.00 allocation here to PAGA penalties is in line with what other Courts have approved in  
12 the past.

13 28. As discussed in *O'Connor v. Uber Technologies, Inc.*, 201 F. Supp. 3d 1110, 1133 (N.D.  
14 Cal. 2016), the LWDA recognizes that the value of PAGA claims in a settlement need not directly  
15 mirror the percentage recovery on class claims and that courts should review the overall fairness,  
16 reasonableness, and adequacy of the settlement with primary consideration to the interests of  
17 absent class members. The allocation here is well within the range of reasonableness and serves  
18 the intended purposes of PAGA.

#### 19 **DAMAGES ANALYSIS AND ESTIMATED EXPOSURE**

20 29. The calculations to compensate for the amount due to the Class Members at the time this  
21 Settlement was negotiated were calculated by Plaintiffs' Counsel, Christopher Nichols.  
22 Plaintiff's Counsel analyzed the data for scores of putative class members to determine the  
23 potential maximum damages for the class claims.

24 30. At the time of the Settlement, the Defendant estimated that there were 983 Class Members  
25 who collectively worked a total of 6,086 Pay Periods during the Class Period. Defendant also  
26 estimated at the time of the Settlement that there were 554 Aggrieved Employees who worked  
27 3,254 Pay Periods during the PAGA Period.

1 31. We estimated that the total amount of unpaid wages, including unpaid regular and  
2 overtime wages, was \$342,337.50.

3 32. This estimate was based on the assumption that there were two and a half (2.5) hours of  
4 unpaid wages per workweek in the putative class period (about a half hour a day being unpaid)  
5 and that these hours were overtime hours (which is generous because many of the time records  
6 revealed employees worked shifts that would not have qualified them for overtime hours). Using  
7 a \$15 minimum wage rate this would effectively mean that there would be \$228,225 owed in  
8 unpaid minimum wage (6,086 workweeks x \$15 wage x 2.5 hours per week = \$228,225) and an  
9 overtime premium of amount of \$114,112.50. ( $\$15/2 = \$7.5 \times 6086 \text{ workweeks} \times 2.5 \text{ hours per}$   
10  $\text{week} = 114,112.50$ ).

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

14 34. Given that PAGA and Labor Code 226 both have a 1 year statute of limitations, we  
15 assumed 3,254 pay periods where Labor Code 226 would have been timely. Sincere there were  
16 554 aggrieved employees in the 1-year period, that means that conceivably for 554 of the pay  
17 periods that would have been the initial, or \$50 violation under Labor Code 226. The remaining  
18 2700 pay periods would be at \$100. This equates to a total Labor Code 226 exposure of \$297,700  
19 if the underlying wage claims could be proven.

20 35. For purposes of meal and rest break exposure in this matter, we anticipated 3 missed meal  
21 breaks and 3 missed rest breaks per week. This would effectively result in 6 break premiums  
22 being paid per each week in the class period. Given the assumed pay rate of \$15 per hour, this  
23 would equate to a potential exposure on the meal and rest break claims at \$547,740. ( $6,086$   
24  $\text{workweeks} \times \$15 \times 6 \text{ missed breaks} = \$547,740$ .)

25 36. For the Labor Code 2802 reimbursement claim, Plaintiffs contended that certain tools and  
26 protective gear was not provided to them for them to carry out their duties. We assumed \$50 per  
27 employee in protective gear and equipment, which given 983 class members, would equate to  
28 approximately \$49,150 in unpaid reimbursements.

1 37. Given these calculations, the total sum exposure on the class action claims would have  
2 been \$3,296,127.50 (\$547,740 + \$49,150 + \$297,700 + \$2,059,200 + \$342,337.50 =  
3 \$3,296,127.50.)

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

#### 11 **ASSESSMENT OF RISK AND UNCERTAINTY**

12 39. My firm has invested significant time and resources over nearly three years to  
13 investigate, litigate, and resolve this matter. This included reviewing voluminous documents,  
14 coordinating discovery, conducting damages analyses, preparing legal briefing, and  
15 participating in mediation. Through these efforts, we developed a deep understanding of the  
16 factual and legal issues central to this case.

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

26 41. Plaintiff's other primary theory for unpaid wages, which relates to both the cause of  
27 action for a failure to pay minimum wage as well as to the cause of action for a failure to pay  
28 overtime is that there was off the clock work being performed by employees. This would

1 essentially be work performed before or after recorded shifts that was not reflected in  
2 Defendant's timekeeping records. Specifically, this would have been preparation time before  
3 Plaintiff and the putative class members hours began to be counted for the day or time at the  
4 end of the shift while they were cleaning up or breaking down for the day that was done after  
5 the time had been counted. While Plaintiffs believe there is some evidence to support these  
6 claims, establishing them on a class-wide basis would be very challenging. Defendant  
7 maintained a timekeeping system that shows all hours employees were reported to have  
8 worked. Plaintiffs contend that employees regularly performed additional tasks outside those  
9 recorded hours, for example, preparing workstations before clocking in, closing out duties after  
10 clocking out. However, because the time records facially comply with applicable wage and  
11 hour laws, Plaintiffs would bear the burden of showing that the records are inaccurate and that  
12 Defendant knew or should have known of the additional work.

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

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

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

26 45. Another concern was that originally Plaintiffs believed that the putative class worked on  
27 the weekend which would have increased the likelihood of overtime being worked by the  
28 employees. Unfortunately, the time records reviewed in anticipation of mediation did not bear

1 that out and there was no weekend work. Defendants expressly denied that any work was ever  
2 done on the weekend, further limiting the potential for there to be overtime hours worked. This  
3 had the effect of reducing the unpaid wages that were even on the table for the Plaintiff and the  
4 putative class to recover.

5 46. With regard to meal and rest breaks, a challenge posed was that the time records in  
6 question showed compliant breaks being taken by the putative class members. Defendant  
7 argued that they had a practice of taking communal breaks where all employees were relieved  
8 during the same time and those times were marked on the timesheets for the employees. While  
9 Plaintiffs believe that there is some room to challenge this as effectively supervisors were  
10 notating the time that everyone allegedly took their breaks, the documents do tend to show that  
11 there were compliant breaks taken which presents a serious challenge for Plaintiffs in asserting  
12 otherwise.

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

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

25 49. The derivative claims also increase the risk in this case considering the bulk of the  
26 calculated exposure above comes from the Labor Code §203 claim, which logically tracks  
27 given the high volume of turnover and number of former employees. The problem this poses is  
28 that not only would Plaintiffs need to prove the unpaid wages, but then they would need to

1 overcome the defenses under Labor Code 203 which can prevent waiting time penalties from  
2 being owed. Courts have repeatedly held that waiting-time penalties under Labor Code §203  
3 require proof of willfulness and are barred where a good-faith dispute exists. (*Barnhill v.*  
4 *Robert Saunders & Co.* (1981) 125 Cal.App.3d 1, 7–8; *Amaral v. Cintas Corp. No. 2* (2008)  
5 163 Cal.App.4th 1157, 1201; 8 Cal. Code Regs. §13520.) Here, Defendant would assert that it  
6 maintained a good-faith belief that all wages were properly paid. Moreover, determining  
7 whether and when each seasonal worker separated, and whether any wages remained unpaid at  
8 that time, would require individualized inquiries, rendering classwide recovery uncertain.

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

15 51. Additionally, there are some practical concerns related to the nature of farm labor and  
16 collectability of any judgement. While Plaintiff believes there is a community of interest  
17 sufficient for a class action, farm labor is by its nature a seasonal and transitory business with  
18 laborers often migrating across the state and working for short spurts at each location. Indeed,  
19 looking at the number of putative class members here which is 983, and the 6,086 workweeks  
20 worked in the class period, the average number of weeks worked per class member is only ~6  
21 (6,086 divided by 983 = 6.19), which is remarkably low. This poses a serious practical concern  
22 and heightens Plaintiff’s risk associated with success on the action as it would be very difficult  
23 to successfully obtain declarations from the numerous short-term employees. It would similarly  
24 be difficult to show a community of interest given how short the tenure of many of these  
25 employees was as they may not recall specific facts from a job they worked at for only a few  
26 weeks year ago.

27 52. Another pragmatic concern is that the putative class was comprised primarily  
28 immigrants and migrant laborers who do not speak English as a first language. Additionally,

1 from Plaintiff's counsel's experience in gathering evidence in similar class actions many  
2 immigrants do not want to be involved in legal matters if they do not have documents which  
3 allow for them to work legally in the United States. While immigration status does not impact  
4 the ability to bring a claim or the right to be paid for labor performed, the practical reality is  
5 that members of the putative class may have been skeptical of coming forward to provide  
6 testimony, which presents a challenge for Plaintiffs in meeting their burden on a motion for  
7 class certification. Ultimately, these industry specific concerns rendered moving for class  
8 certification a significant risk for Plaintiff as it was anticipated that only a miniscule fraction of  
9 putative class members would have been able to provide declarations.

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

16 54. Finally, there were some concerns as for the collectability of certain PAGA fees. The  
17 Settlement allocates \$14,250 to resolve claims under the Private Attorneys General Act  
18 ("PAGA"), of which 75% (\$10,687.50) will be paid to the LWDA and 25% (\$3,562.50) will be  
19 distributed to Aggrieved Employees based on pay periods worked during the PAGA period,  
20 regardless of whether they opted out of the class.

21 55. While the previously submitted declaration notes that there could be a potential  
22 exposure of \$1,627,000 on the PAGA claim, this number reflects stacked PAGA penalties  
23 which under the updated PAGA scheme that came into effect on June 19, 2024, are expressly  
24 disallowed. While the ability to obtain stacked penalties on cases filed before June 19, 2024, is  
25 theoretically a disputed issue and they are not expressly disallowed, there is also not express  
26 authority allowing for them to be awarded. We believe that given the update to the law and the  
27 practical reality that a PAGA award is more likely to be reduced as opposed to multiplied, the  
28 \$1,627,000 number is exponentially more than the settlement value of the PAGA claim.

1        56. The \$1,627,000 figure in question was derived by taking the number of pay periods,  
2 3,254, multiplying it by 5 for each claimed Labor Code violation to get 16,270 and then  
3 multiplying that number by a PAGA penalty of \$100 to equate to \$1,627,000. This would be  
4 assuming a penalty proven for 5 different labor code violations in each of the pay periods and  
5 that stacked penalties could be awarded. Effectively, this number relies on \$500 being awarded  
6 for each PAGA pay period. A more realistic assessment of the total potential exposure of the  
7 PAGA claim would be to multiply the number of pay periods by \$100, which would equate to  
8 \$325,400.

9        57. However, even if the value of the exposure on the PAGA claims was assessed to be  
10 \$325,400, this assumes that the Court would award \$100 per penalty in all pay periods. In  
11 *Carrington v. Starbucks Corp.*, 30 Cal. App. 5th 504 (2018), the court affirmed a judgment  
12 which only provided for a PAGA penalty of \$5 per violation. Therefore, at trial, any PAGA  
13 penalties awarded could be significantly less than Plaintiffs' calculation even where Plaintiffs  
14 prevailed on the PAGA claim. This is especially true in this case where the Defendants have  
15 strong defenses to some of the claims and it is possible that some of the claimed violations, if  
16 they even exist, are mere technicalities. If the \$5 per pay period figure from *Carrington* were  
17 used here and penalties were proven in all pay periods, which should not be taken for granted,  
18 that would equate to only \$16,270 in PAGA penalties being awarded.

19        58. The decision in *O'Connor v. Uber*, 201 F.Supp.3d 1110, 1133 (N.D. Cal. 2016), and the  
20 LWDA's response therein is illustrative. The LWDA first states that "when viewing the  
21 monetary relief allocated to PAGA claims under a settlement, the LWDA recognizes that the  
22 PAGA sum need not necessarily be viewed through the same lens as the relief obtained by  
23 absent class members on other claims (i.e., the percentage of recovery-to-exposure on the  
24 PAGA claims need not necessarily equal the percentage of recovery on the other claims)."  
25 (LWDA Response at p.3). The LWDA also indicated that the payment of money to the  
26 aggrieved employees furthers the purposes of PAGA and that the Court considers that primary  
27 consideration. "The LWDA recognizes that this Court does not review the PAGA allocation in  
28 isolation, but rather reviews the settlement as a whole, to determine whether it is fundamentally

1 fair, reasonable and adequate, with primary consideration for the interests of absent class  
2 members." (LWDA Response at p.4).

3 59. In reaching the settlement of the PAGA claim, Class Counsel was also aware of what  
4 allocations other Courts have approved for similar PAGA settlements as compared to the total  
5 settlement amount. A class settlement that allocates approximately 5% of the total settlement  
6 value to resolve the PAGA claims, as this one does, is also supported by what has been  
7 approved in other wage-and-hour class settlements. Indeed, Courts often approve PAGA  
8 settlement amounts in the range of between .27 to 1.7 percent of the total settlement. See *Davis*  
9 *v. Brown Shoe Co.*, 2015 U.S. Dist. LEXIS 149010 (E.D. Cal. 2015)(PAGA Payment of \$5,000  
10 in a \$1.5 million class settlement); *Zamora v. Ryder Integrated Logistics, Inc.*, 2014 U.S. Dist.  
11 LEXIS 184096 (S.D. Cal. 2014) (\$7,500 payment to LWDA for PAGA on a \$1.5 million class  
12 settlement); *Lusby v. Gamestop Inc.*, 2015 U.S. Dist. LEXIS 42637 (N.D. Cal. 2015) (PAGA  
13 Payment of \$5,000 in a \$500,000 class settlement); *Cruz v. Sky Chefs, Inc.*, 2014 U.S. Dist  
14 Lexis 17693 (N.D. Cal. 2014) (approving payment of \$10,000 to the LWDA for PAGA out of  
15 \$1,750,000 class settlement); *Chu v. Wells Fargo Investments, LLC*, 2011 WL 672645, \*1  
16 (N.D. Cal. 2011) (approving PAGA payment of \$7,500 to the LWDA out of \$6.9 million  
17 common-fund settlement); *Franco v. Ruiz Food Products, Inc.*, 2012 WL 5941801, \*13 (E.D.  
18 Cal. 2012) (approving PAGA payment of \$7,500 to the LWDA out of \$2.5 million common  
19 fund settlement); *Hopson v. Hanesbrands Inc.*, 2009 WL 928133, \*9 (N.D. Cal. 2009)  
20 (approving PAGA allocation that was .49% of \$408,420.32 gross settlement); *Garcia v.*  
21 *Gordon Trucking, Inc.*, 10-cv-00324-AWI-SKO, Dkt. 149-3, 165 (E.D. Cal.) (approving a class  
22 settlement of \$3,700,000, with \$10,000 allocated to the PAGA claim); *McKenzie v. Federal*  
23 *Express Corp.*, CV 10-02420 GAF (PLAx), Dkt. 139 & 141 (C.D. Cal.) (court approved a  
24 settlement in an amount of \$8.25 million, with \$82,500 allotted to the PAGA claim); *DeStefan*  
25 *v Frito-Lay*, 8:10-cv-00112-DOC (C.D. Cal.) (court approved a class settlement of \$2 million,  
26 with \$10,000 allocated to PAGA); *Martino v. Ecolab Inc.*, No. 3:14CV04358 (N.D. Cal. 2017)  
27 (\$100,000 allotted as PAGA penalties or 0.48% of \$21,000,000 settlement amount); *East v.*  
28 *Comprehensive Educational Services Inc.*, Fresno Superior Court Case No. 11-CECG-04226

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**DECLARATION OF CHRISTOPHER NICHOLS IN SUPPORT OF MOTION AND  
MOTION FOR FINAL APPROVAL OF CLASS AND PAGA SETTLEMENT**

(2015) (\$10,000 allotted as PAGA penalties or 0.13% of \$7,595,846 settlement amount); *Bararsani v. Coldwell Banker Residential Brokerage Company*, Los Angeles Superior Court Case No. BC495767 (2016)(\$10,000 allotted as PAGA penalties or 0.22% of \$4,500,000 settlement amount); *Moppin v. Los Robles Medical Center*, No. 5:15CV01551 (C.D. Cal. 2017) (\$15,000 allotted as PAGA penalties or 0.40% of \$3,775,000 settlement amount); *Scott-George v. PVH Corporation*. No., 2:13CV00441 (E.D. Cal. 2017) (\$15,000 allotted as PAGA penalties or 0.46% of \$3,250,000 settlement amount); *Nehrlich v. RPM Mortgage Inc.*, Orange County Superior Court Case No. 30-2013-00666783-CU-OE-CXC (2017) (\$10,000 allotted as PAGA penalties or 0.40% of \$2,500,000 settlement amount); *Rubio v. KTI Incorporated*, San Bernardino Superior Court Case No. CIVDS-14-06132 (2015) (\$1,000 allotted as PAGA penalties or 0.18% of \$550,000 settlement amount); *Gray v. Mountain View Child Care Inc.*, San Bernardino Superior Court Case No. CIVDS-14-02285 (2016) (\$2,500 allotted as PAGA penalties or 0.37% of \$675,000 settlement amount); *Perez v. West Coast Liquidators Inc. d/b/a Big Lots*, San Bernardino Superior Court Case No. CIVDS-14-17863 (2016) (\$3,000 allotted as PAGA penalties or 0.33% of \$900,000 settlement amount); *Penaloza vs. PPG Industries Inc.*, Los Angeles Superior Court No. BC471369 (2013)(\$5,000 allotted as PAGA penalties or 0.38% of \$1,300,000 settlement amount); *Mejia v. DHL Express (USA) Inc.*, No. 2:15CV00890 (C.D. Cal. 2017) (\$5,000 allotted as PAGA penalties or 0.34% of \$1,450,000 settlement amount). As a result, the \$14,250 allocation here to PAGA penalties is in line with what other Courts have approved in the past.

60. The risks in this case were quite high from both a certification standpoint, merits standpoint, and collectability standpoint. Certification was the primary concern here, because of the substantial amount of case law favoring a denial of class certification as a result of finding individualized issues in similar situations. This was the primary reason that a substantial reduction was warranted, because we as class counsel had to ensure that all absent class members were going to receive benefits from a resolution of their claims and take that risk into account. Ultimately, I feel confident we came to a fair result to recover compensation for what I and my client believed were substantive violations of the Labor Code which cost employees

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**DECLARATION OF CHRISTOPHER NICHOLS IN SUPPORT OF MOTION AND  
MOTION FOR FINAL APPROVAL OF CLASS AND PAGA SETTLEMENT**

1 money out of pocket. We negotiated as much as we possibly could on this front and used best  
2 efforts and judgment to weigh the risks against the potential of recovery.

3 **FAIRNESS AND ADEQUACY OF SETTLEMENT**

4 61. The Settlement in this case was the result of contested, arm's-length negotiations  
5 following a thorough investigation and evaluation of the claims. Prior to the mediation on  
6 January 7, 2025, Defendant provided Class Counsel with informal discovery and documents,  
7 including payroll data and data concerning the composition of the Settlement Class Members.  
8 We analyzed the data and prepared and submitted a mediation brief and damages valuation to  
9 the Mediator Laurie Saldaña, which ultimately resulted in the settlement of this Action.

10 62. On January 7, 2025, the Parties participated in a full-day mediation session with Ms.  
11 Saldaña, during which material terms of the settlement were negotiated and agreed upon. This  
12 mediation resulted in the drafting of the Memorandum of Understanding, which was  
13 subsequently finalized in the Settlement Agreement and executed by all Parties.

14 63. Throughout the litigation and settlement negotiations, Defendant consistently denied  
15 liability. However, Class Counsel, after evaluating the strengths and weaknesses of the claims  
16 and defenses, the risk and expense of continued litigation, and the benefits of early resolution,  
17 determined that the Settlement was in the best interest of the Class.

18 64. Class Counsel has conducted a thorough investigation into the facts of the class action.  
19 Over the course of over two years, Class Counsel has diligently evaluated the Class Members'  
20 claims against Defendant. Prior to the settlement negotiations, counsel for Defendant provided  
21 Class Counsel with access to necessary information for the Class. In addition, Class Counsel  
22 previously negotiated settlements with other employers in actions involving nearly identical  
23 issues and analogous defenses. Based on the foregoing data, in my experience litigating,  
24 certifying, and resolving wage and hour class actions in both state and federal court, I believe  
25 this outcome is fair and reasonable. Our legal team was well-qualified to assess legal risks,  
26 factual uncertainties, and exposure, and to negotiate a result that provides meaningful relief to  
27 Class Members.  
28

1 65. The Settlement was reached only after sufficient investigation and discovery to allow an  
2 informed evaluation of the claims. The process involved comprehensive factual and legal  
3 analysis, participation in formal mediation, and collaborative efforts to finalize the agreement.

4 66. The \$285,000 Gross Settlement Amount represents a fair and reasonable compromise,  
5 particularly in light of the litigation risks, the difficulty of obtaining and maintaining class  
6 certification, and the uncertainties of trial. At the time of settlement, the Parties faced genuine  
7 disputes concerning liability, damages, and class manageability.

8 67. As of the date of this Declaration, no Class Member has provided a valid objection to  
9 any aspect of the Settlement, including the requested fees, costs, or service award. This lack of  
10 objections following proper notice supports the conclusion that the Class has responded  
11 favorably to the Settlement.

12 68. In my professional opinion, the Settlement falls well within the range of reasonableness  
13 under California law and represents a fair, adequate, and reasonable resolution of a contested  
14 matter.

15 **THE CLASS REPRESENTATIVE SERVICE PAYMENT IS REASONABLE**

16 69. Plaintiff intends to apply to the Court for a Representative Service Payment in the  
17 amount of \$5,000 in recognition of their time, efforts, and the risk they undertook in pursuing  
18 this litigation of behalf of the Class. Plaintiff Veronica Basurto Pimentel deserves and should  
19 be awarded an enhancement for the dedication of her personal time and efforts toward the  
20 protection of the Class.

21 70. Plaintiff Pimentel actively participated in the prosecution of this action, provided  
22 detailed factual information regarding Defendant's employment practices, assisted counsel in  
23 evaluating payroll and policy documents, and remained engaged throughout the litigation and  
24 mediation process. Her efforts were instrumental in achieving a favorable result for the  
25 approximately 980 Class Members.

26 71. Plaintiff Pimentel's efforts and involvement in the case are further detailed in her  
27 Declaration submitted in support of the Motion for Preliminary Approval. Attached hereto as  
28 Exhibit "B" is a true and correct copy of Plaintiff Pimentel's Declaration.

1                   **ATTORNEY’S FEES: JUSTIFICATION, EFFORTS, AND RESULTS**

2           72. From the beginning of this litigation, Class Counsel recognized the significant risks  
3 involved. Nevels Nichols LLP undertook representation of Plaintiff and the Class on a fully  
4 contingent basis, assuming the very real possibility of receiving no compensation or cost  
5 reimbursement. As a small firm with limited capacity, we made a substantial commitment of  
6 time and resources to this matter, foregoing hourly-paying work to represent low-wage workers  
7 in high-risk litigation. The risk of non-recovery, particularly if class certification were denied  
8 or liability not established at trial, was significant and ever-present.

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

12           74. While other courts across the state have approved us for much higher billing rates such  
13 as \$775 in Alameda County just this past year, for this particular matter, my partner Brooke B.  
14 Nevels and I billed at a localized rate of \$475 to adjust for the local rates in the central valley,  
15 until January 1, 2026, at which point we raised our rates to \$495.

16           75. We believe that this rate is eminently reasonable given that other Courts across the state  
17 have approved much higher rates, as well as our experience in the field and that this is complex  
18 litigation.

19           76. Over the course of the litigation, our firm devoted substantial effort to the case,  
20 including conducting discovery, analyzing complex damages data, participating in one  
21 mediation session, interviewing Class Members, reviewing time and payroll records, and  
22 engaging in intensive settlement negotiations. These tasks required legal sophistication and  
23 extensive hours of attorney time, all undertaken in the face of considerable litigation  
24 uncertainty.

25           77. Despite these hurdles, Class Counsel secured a \$285,000 Gross Settlement Amount,  
26 delivering a meaningful monetary recovery to Class Members. The result reflects both our  
27 firm’s litigation skill and dedication to advancing the interests of the Class.  
28

1 78. Given the complexity of the litigation, the contingent nature of the representation, and  
2 the favorable result achieved, the requested attorneys' fees, equal to one-third of the Gross  
3 Settlement Amount, are fair and reasonable. This amount aligns with prevailing market rates  
4 and is consistent with fee awards in comparable wage and hour class actions.

5 **CLASS COUNSEL LODESTAR AND MULTIPLIER**

6 79. Class Counsel's request for attorneys' fees in the amount of \$95,000 representing thirty-  
7 three and one-third percent (33.33%) of the Gross Settlement Amount, is further supported by  
8 their lodestar.

9 80. My firm has spent a total of 110.7 hours on this matter for a total amount of \$41,737.00.  
10 Webb Law Group has spent a total of 131.5 hours on this matter for a total amount of  
11 \$38,919.75. Adding up the fees from Webb Law Group APC with Nevels Nichols, LLP, the  
12 current lodestar is \$80,656.75. This effectively means that we are requesting a 1.17 multiplier  
13 in this case. A true and correct copy of Nevels Nichols LLP's billing time summary is attached  
14 hereto as "Exhibit C"

15 81. A lodestar that equates to a multiplier of 1.17 is well within the acceptable range for  
16 settlements in the state of California and courts routinely grant fee awards in this amount. For  
17 example, in *Laffitte v. Robert Half International Inc.* (2016) 1 Cal.5th 480, 503–505 wherein  
18 the Court discussed cross-checking a common fund award via lodestar at length, the Court  
19 approved a common fund amount that equated to 2.03x. See also *Wershba v. Apple Computer,*  
20 *Inc.*, 91 Cal.App.4th at p. 255 ["multipliers can range from 2 to 4 or even higher"]; *City of*  
21 *Oakland v. Oakland Raiders* (1988) 203 Cal.App.3d 78 [affirming a multiplier of 2.34]; *Chavez*  
22 *v. Netflix, Inc.* (2008) 162 Cal.App.4th 43 [affirming a multiplier of 2.53]. *Vizcaino v.*  
23 *Microsoft Corp.* (9th Cir. 2002) 290 F.3d 1043 [affirming multiplier of 3.65]. *Vasquez v. State*  
24 *of California* (2008) 45 Cal.4th 243 [affirming a multiplier of 1.3].

25 82. Given the risk undertaken by Class Counsel that there could be no recovery in this case  
26 and the fact that class counsel has had to work on this matter for multiple years without any  
27 payment, a relatively modest multiplier of 1.17 is appropriate for the risk undertaken in this  
28 litigation and the excellent results obtained for the class.

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84. Therefore, the actual total of costs incurred by my firm, as well as by my co-counsel, Webb Law Group is **\$7,402.45** in hard costs thus out of the \$10,000 allotted for hard costs and expense reimbursements, we cumulatively seek only is **\$7,402.45** meaning that the remaining \$2,597.55 will be returned to the settlement fund to be distributed among the Class Members.

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**DECLARATION OF CHRISTOPHER NICHOLS IN SUPPORT OF MOTION AND  
MOTION FOR FINAL APPROVAL OF CLASS AND PAGA SETTLEMENT**

1 Plaintiffs and Defendants provides us with insight into case valuation and potential risks that  
2 helped us to do the best that we possibly could for the Class in this matter.

3 88. Our firm has no ties to the Defendant in this matter, and we have no conflicts that would  
4 preclude us being appointed as Class Counsel. This settlement was reached as the result of an  
5 arm's length negotiation. Our only interest in this matter is obtaining as much relief as possible  
6 for the Class Members. Given our absence of conflict and qualifications, we believe it is  
7 appropriate that we be appointed Class Counsel.

8 **SERVICE ON THE LWDA**

9 89. 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 I declare under penalty of perjury under the laws of the State of California that the  
16 foregoing is true and correct. Executed on April 13, 2026, at San Diego, California.

17  
18 

19 CHRISTOPHER E. NICHOLS  
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# **EXHIBIT A**



Reference No. 20250204-PJI-01

February 4, 2025

Morgan Y. Edgar  
WEBB LAW GROUP, APC  
10509 Vista Sorrento Parkway, Suite 450  
San Diego, CA 92121

**RE: *Pimentel v. Madrigal (El Dorado Farms)***

Dear Morgan,

Thank you for this opportunity to provide a quote for your above-captioned settlement. Using the parameters you described, Simpluris' total estimated cost is \$14,419. As a courtesy, we are offering a \$5,419 discount, for a discounted total of \$9,000.

Please let me know if you have questions. I look forward to this opportunity to work together.

Sincerely yours,

A handwritten signature in blue ink, appearing to read "P. Ivie", written over a light blue grid background.

**PATRICK J. IVIE**  
Chief Revenue Officer

m: 310-995-6455  
o: 714-975-5260  
e: [pivie@simpluris.com](mailto:pivie@simpluris.com)



3194-C Airport Loop Drive, Costa Mesa, CA 92626  
[www.simpluris.com](http://www.simpluris.com) | 1 (800) 779 - 2104

|                           |                 |                            |                                                              |
|---------------------------|-----------------|----------------------------|--------------------------------------------------------------|
| Estimate Number:          | 20250204-PJI-01 | Prepared By:               | Patrick J. Ivie                                              |
| Estimate Date:            | 2/4/2025        | Telephone Number (mobile): | 310.995.6455                                                 |
| Estimate Expiration Date: | 5/5/2025        | Email:                     | <a href="mailto:pivie@simpluris.com">pivie@simpluris.com</a> |

**Primary Contact**  
Attorney: **Morgan Y. Edgar**  
Firm: WEBB LAW GROUP, APC  
Email: [medgar@webblawgroup.com](mailto:medgar@webblawgroup.com)

**Opposing Counsel Contact**  
Attorney:  
Firm:  
Email:

**Case Name: *Pimentel v. Madrigal (El Dorado Farms)*  
Class and PAGA Settlement**

## Assumptions

In addition to the assumptions enumerated below, this estimate assumes that

- (1) Simpluris will receive data in a single, complete file; (2) there will be no substantial change to class size or in response rate;
- (3) administration costs will be paid from the QSF, and (4) Simpluris will submit revisions to this estimate to account for any material changes to scope.

|                               |          |                               |           |
|-------------------------------|----------|-------------------------------|-----------|
| Anticipated Class Size:       | 983      | Undeliverable Rate:           | 10%       |
| Claims Rate:                  | N/A      | Mail Skip Trace Success Rate: | 85%       |
| Opt-out Rate:                 | 1%       | Call Rate:                    | 4%        |
| Language(s) for Communication | EN/SP    | Average Call Length:          | 4 Minutes |
| Reminder Mailing:             | N/A      | Fund Distribution:            | Simpluris |
| Unclaimed Funds:              | Cy Pres  | Number of Distributions:      | 1         |
| State(s):                     | CA       | Tax Year(s):                  | 1         |
| Length of Administration:     | 9 Months |                               |           |

## Case Setup

- Undertake postings on Simpluris website of key documents as ordered by the Court (e.g. orders and the Settlement Agreement)
- Data compilation: develop case-specific response tracking

| Category                                 | Unit Value | # of Units | Total           |
|------------------------------------------|------------|------------|-----------------|
| Project Manager - Case Setup             | \$110.00   | 2          | \$220.00        |
| Case Document Web Postings               | \$225.00   | 1          | \$225.00        |
| Database Manager - Initial Data Analysis | \$125.00   | 2          | \$250.00        |
| <b>Total:</b>                            |            |            | <b>\$695.00</b> |

## Notice and Communications

- Spanish Translation of the class Notice
- Assuming 8-page class Notice, sent by First Class US Mail, in English and Spanish

| Category                                        | Unit Value | # of Units | Total             |
|-------------------------------------------------|------------|------------|-------------------|
| Spanish Translations - assuming 4,000 words     | \$0.25     | 4,000      | \$1,000.00        |
| Bilingual Notice Packet - assuming 16 images    | \$3.20     | 983        | \$3,145.60        |
| Postage                                         | \$0.72     | 983        | \$707.76          |
| NCOA/CASS/LACS                                  | \$0.14     | 983        | \$137.62          |
| Undeliverable Processing and Skip Trace         | \$0.32     | 99         | \$31.68           |
| Remail Notice (assuming 85% skip trace success) | \$4.20     | 84         | \$353.43          |
| Remail Postage                                  | \$0.72     | 84         | \$60.59           |
| Mailing Supervisor                              | \$55.00    | 2          | \$110.00          |
| <b>Total:</b>                                   |            |            | <b>\$5,546.68</b> |

## Contact Center

- Establish case-specific toll-free number and 24/7 IVR
- Assuming 4-minute calls

| Category                                | Unit Value | # of Units | Total             |
|-----------------------------------------|------------|------------|-------------------|
| Call Center Set Up                      | \$350.00   | 1          | \$350.00          |
| Toll Free Monthly Maintenance           | \$95.00    | 9 Months   | \$855.00          |
| IVR (includes toll-free number charges) | \$15.00    | 3          | \$45.00           |
| <b>Subtotal</b>                         |            |            | <b>\$1,250.00</b> |

## Administration

- Process incoming class and counsel communications, opt-outs, disputes, and objections

| Category                     | Unit Value | # of Units | Total             |
|------------------------------|------------|------------|-------------------|
| Database Manager             | \$125.00   | 2          | \$250.00          |
| Project Manager              | \$110.00   | 3          | \$330.00          |
| Dispute Processing           | \$1.75     | 49         | \$86.01           |
| Opt-out Processing           | \$1.75     | 10         | \$17.50           |
| Reporting to Counsel (hours) | \$100.00   | 4          | \$400.00          |
| <b>Total:</b>                |            |            | <b>\$1,083.51</b> |

## Award Disbursement

- Establish 26 CFR § 1.468B-1 compliant Qualified Settlement Fund ("QSF")
- Disburse award payments and tax documents
- Conduct regular and annual IRS-mandated QSF reporting and reconciliation (one per calendar year)
- Complete all required filings with state and federal tax authorities

| Category                                     | Unit Value | # of Units | Total             |
|----------------------------------------------|------------|------------|-------------------|
| Disbursement Data Preparation                | \$125.00   | 3          | \$375.00          |
| Disbursement Manager - Data Validation       | \$90.00    | 2          | \$180.00          |
| Setup Banking Account/QSF                    | \$675.00   | 1          | \$675.00          |
| QSF Monthly Reconciliation and Maintenance   | \$125.00   | 9          | \$1,125.00        |
| Print & Mail Distribution Check and Tax Docs | \$0.60     | 983        | \$589.80          |
| Postage                                      | \$0.72     | 983        | \$707.76          |
| Process Returned Checks (assuming 5%)        | \$0.20     | 50         | \$10.00           |
| Skip Trace Search Undeliverable Checks       | \$0.12     | 50         | \$6.00            |
| Remail Checks (includes postage)             | \$1.70     | 50         | \$85.00           |
| QSF Reporting and Final Declaration          | \$500.00   | 1          | \$500.00          |
| QSF Annual Tax Reporting and Reconciliation  | \$850.00   | 1          | \$850.00          |
| Distribution Manager                         | \$90.00    | 2          | \$180.00          |
| <b>Total:</b>                                |            |            | <b>\$5,283.56</b> |

## Case Completion

- Final audit and review
- Send final declaration and reporting to counsel

| Category                             | Unit Value | # of Units | Total           |
|--------------------------------------|------------|------------|-----------------|
| Data Manager-Final Reporting         | \$125.00   | 2          | \$250.00        |
| Clerical-Clean Up Any Misc.          | \$45.00    | 2          | \$90.00         |
| Project Manager-Wrap-up Final Issues | \$110.00   | 2          | \$220.00        |
| <b>Total:</b>                        |            |            | <b>\$560.00</b> |

|                                                |                 |
|------------------------------------------------|-----------------|
| <b>Total Estimated Cost of Administration:</b> | <b>\$14,419</b> |
| <b>Less Client Courtesy Discount:</b>          | <b>-\$5,419</b> |
| <b>Discounted Total:</b>                       | <b>\$9,000</b>  |

# **EXHIBIT B**

Brooke B. Nevels (SBN 302994)  
Christopher E. Nichols (SBN 316417)  
**NEVELS NICHOLS, LLP**  
10650 Treana St., Suite 212  
San Diego, CA 92131  
Telephone: (619) 374-1100  
Email: BNevels@NevelsNichols.com  
Email: CNichols@NevelsNichols.com  
**Please also serve:** Service@NevelsNichols.com

Lenden F. Webb (SBN 236377)  
Katherine E. Cervantes (SBN 333940)  
**WEBB LAW GROUP, APC**  
466 W. Fallbrook Avenue, Suite 102  
Fresno, CA 93711  
Telephone: (559) 431-4888  
Facsimile: (559) 821-4500  
Email: LWebb@WebbLawGroup.com  
Email: KCervantes@WebbLawGroup.com  
**Please also serve:** Service@WebbLawGroup.com

E-FILED  
9/19/2025 1:29 PM  
Superior Court of California  
County of Fresno  
By: Rosa Garza, Deputy

Attorneys for Plaintiff VERONICA BASURTO PIMENTEL,  
Individually and on behalf of other similarly situated.

**SUPERIOR COURT OF CALIFORNIA, COUNTY OF FRESNO**

**CIVIL UNLIMITED DIVISION**

|                                                                                            |   |                                               |
|--------------------------------------------------------------------------------------------|---|-----------------------------------------------|
| VERONICA BASURTO PIMENTEL, an<br>individual and on behalf of others similarly<br>situated, | ) | CASE NO. 24CECG00675                          |
|                                                                                            | ) |                                               |
| Plaintiffs,                                                                                | ) | <b>DECLARATION OF VERONICA</b>                |
|                                                                                            | ) | <b>PIMENTEL IN SUPPORT OF MOTION</b>          |
| vs.                                                                                        | ) | <b>AND MOTION FOR PRELIMINARY</b>             |
|                                                                                            | ) | <b>APPROVAL OF CLASS AND PAGA</b>             |
|                                                                                            | ) | <b>SETTLEMENT</b>                             |
|                                                                                            | ) |                                               |
| 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: October 16, 2025                        |
|                                                                                            | ) | Time: 3:30pm                                  |
|                                                                                            | ) | Dept: 502                                     |

I VERONICA PIMENTEL, hereby state and declare as follows:

1. I am over the age of eighteen, a Plaintiff in both my capacity as an individual, and on behalf of the State of California as a private attorney general. I submit this declaration in support

**DECLARATION OF VERONICA PIMENTEL IN SUPPORT OF MOTION AND  
MOTION FOR PRELIMINARY APPROVAL OF CLASS AND PAGA SETTLEMENT**

of the Motion for Preliminary Approval of Class Settlement, and in support of my application for a representative enhancement award.

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

### **MY EMPLOYMENT**

3. I worked for Defendant AGUSTIN MADRIGAL JR. ("El Dorado Farms") in California from in or around August of 2017 to November of 2023. During my employment with El Dorado Farms, I was classified as a non-exempt employee.

4. During my employment with El Dorado Farms, I experienced multiple wage & hour issues. While I was working with El Dorado Farms, my timecard frequently only reflected eight (8) hours of work despite me working in excess of eight (8) hours. Upon receiving my paystub, it never reflected the overtime I worked. Additionally, I was often required to use my own personal vehicle in furtherance of my job duties but was never reimbursed for mileage. I was also required to have certain tools and supplies to perform our job duties; however, I was never reimbursed for such tools and supplies. I also experienced other issues with meal and rest breaks and reimbursements. My belief was that these issues also impacted other employees.

### **MY ROLE IN THE LITIGATION**

5. Because of the issues explained above, I retained the law firms of Webb Law Group, APC, and Nevels Nichols, LLP, which are all law firms that are experienced in both class action litigation and claims against employers for violations of the California Labor Code. I have no personal relationship or family ties to my attorneys or any officer of the Court. I am not involved in any litigation against another member of the class in this case and my attorneys are not working on my behalf in another capacity other than representing me in this lawsuit.

6. I decided to file this lawsuit for the benefit of myself and other current and former non-exempt employees who worked for El Dorado Farms and be a Representative because I felt that my legal rights as an employee and the rights of others like me had been violated. For example, I feel that El Dorado Farms violated my right to be paid all wages that were due to me for all hours worked and for the correct rates.

7. This case was filed on February 15, 2024. This lawsuit exists because I reached out to counsel to seek legal assistance related to employment with El Dorado Farms. My attorneys have explained to me that my case has a Private Attorney's General Act ("PAGA") component to it, which is based off a PAGA letter sent on my behalf. Thus, I am a PAGA representative and the PAGA claim here exists because of my involvement. Prior to the complaint being filed I spoke with my attorneys regarding the company policies and procedures at El Dorado Farms. I also assisted my attorneys in their investigation into my claims by providing them documents and answering their questions. I would also contact my attorneys from time to time if I had any questions about the case. My attorneys were regularly available when I contacted them, and we had numerous discussions about the case.

8. I understood that being a Plaintiff in a representative capacity in this case meant that I was seeking damages and/or penalties not only for myself but also other current and/or former employees who worked for El Dorado Farms in California. I felt that this group of current and former employees were not aware of their labor rights, and even if they were would probably be apprehensive about speaking up or even simply because of the time, effort, and risk involved in filing a class action lawsuit.

9. During the lawsuit I stayed in touch with my attorneys by phone and email. I and provided my attorneys with the necessary documents and responses that they requested to be able to respond to informal discovery. I expended a significant amount of time on informal discovery related to this case.

10. I made myself available during the mediation on January 7, 2025, with Laurie Saldaña where the Parties agreed to settle the action. I spoke with my attorneys regarding the terms of the Settlement, which was reached between the Parties, and understood that I was representing absent aggrieved employees, and therefore wanted the best possible result to be obtained for the class, and I believe a very positive result was in fact achieved via Settlement. I reviewed and signed the MOU for Settlement which I signed on January 9, 2025. Subsequently, I reviewed and signed the long form Settlement Agreement on June 13, 2025.

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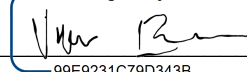
**DECLARATION OF VERONICA PIMENTEL IN SUPPORT OF MOTION AND  
MOTION FOR PRELIMINARY APPROVAL OF CLASS AND PAGA SETTLEMENT**

11. I have been involved in this representative lawsuit performing the duties described above. I was in contact with my attorneys and spent significant hours participating in discovery. While I did not keep an exact time sheet of hours work, I estimate that I spent thirty (30) to forty (40) hours working on this case. My understanding is that future tasks may require additional hours of my time. I believe I have been diligent and have done what is expected of a named Plaintiff in a representative action to date and will continue to do so. I have and always will maintain the best interest of the class.

12. In light of all the time and effort I have spent on this case, the risk I undertook suing a former employer, the reputational risk that future employers may hold this lawsuit against me, the general release, and in light of the size of the Settlement, I believe the request for five thousand dollars (\$5,000.00) as a representative service payment is fair and reasonable.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on 09/18/2025, at 2:50 pm, California.

DocuSigned by:



99E9231C79D343B...

VERONICA PIMENTEL

**DECLARATION OF VERONICA PIMENTEL IN SUPPORT OF MOTION AND  
MOTION FOR PRELIMINARY APPROVAL OF CLASS AND PAGA SETTLEMENT**

# **EXHIBIT C**

# Activities Export

04/13/2026

11:47 AM

| Date ▼     | Type                                                                                | Description                                                                                                                                                                                                                                                                 | Matter                                     | User                | Qty            | Rate (\$) | Non-billable (\$)        | Billable (\$)                 |
|------------|-------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------|---------------------|----------------|-----------|--------------------------|-------------------------------|
| 04/13/2026 |    | Prepare and export activity report from Clio to attach as an exhibit for declaration in support of Motion for Final Approval. Send to Attorney CEN for review.<br> Unbilled                | 00047-El Dorado Farms Pimentel v. Madrigal | Mika Ince           | 0.20h          | \$140.00  | -                        | \$28.00                       |
| 04/13/2026 |    | Telephonic conference between Legal Assistant MSI and Attorney CEN regarding preparing activity report to include as an exhibit in the Motion for Final Approval Declaration.<br> Unbilled | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.10h          | \$495.00  | -                        | \$49.50                       |
| 04/13/2026 |    | Telephonic conference between Legal Assistant MSI and Attorney CEN regarding preparing activity report to include as an exhibit in the Motion for Final Approval Declaration.<br> Unbilled | 00047-El Dorado Farms Pimentel v. Madrigal | Mika Ince           | 0.10h          | \$140.00  | -                        | \$14.00                       |
| 04/13/2026 |   | Draft correspondence to Class Admin Arron regarding change to the net settlement amount based on costs being returned to class.<br> Unbilled                                             | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.20h          | \$495.00  | -                        | \$99.00                       |
| 04/13/2026 |  | Review and revise Proposed Judgment to be submitted with Motion for Final Approval.<br> Unbilled                                                                                         | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.60h          | \$495.00  | -                        | \$297.00                      |
| 04/13/2026 |  | Review and revise Notice of Motion for final approval of class                                                                                                                                                                                                              | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.40h          | \$495.00  | -                        | \$198.00                      |
|            |                                                                                     |                                                                                                                                                                                                                                                                             |                                            |                     | <b>110.70h</b> |           | <b>\$145.00</b><br>0.70h | <b>\$41,737.00</b><br>110.00h |

# Activities Export

04/13/2026

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| Date       | Type                                                                                | Description                                                                                                                                       | Matter                                     | User                | Qty            | Rate (\$) | Non-billable (\$)        | Billable (\$)                 |
|------------|-------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------|---------------------|----------------|-----------|--------------------------|-------------------------------|
|            |                                                                                     | settlement.<br>● Unbilled                                                                                                                         |                                            |                     |                |           |                          |                               |
| 04/13/2026 |    | Review and revise Memorandum of Points and Authorities to finalize motion for final approval.<br>● Unbilled                                       | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 1.40h          | \$495.00  | -                        | \$693.00                      |
| 04/13/2026 |    | Review and revise Declaration of Nichols. Revise numbers for settlement, cost totals, and other changes to finalize.<br>● Unbilled                | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.70h          | \$495.00  | -                        | \$346.50                      |
| 04/13/2026 |    | Receipt and review of correspondence from Class Admin Arron regarding timeline for clarification.<br>● Unbilled                                   | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.10h          | \$495.00  | -                        | \$49.50                       |
| 04/13/2026 |    | Receipt and review of correspondence from Class Admin Arron regarding the draft declaration.<br>● Unbilled                                        | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.10h          | \$495.00  | -                        | \$49.50                       |
| 04/13/2026 |  | Draft correspondence to Class Admin Arron to request that paragraph 6 in the declaration be updated to include the correct numbers.<br>● Unbilled | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.20h          | \$495.00  | -                        | \$99.00                       |
| 04/13/2026 |  | Review of Administrator's declaration. Determine that                                                                                             | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.40h          | \$495.00  | -                        | \$198.00                      |
|            |                                                                                     |                                                                                                                                                   |                                            |                     | <b>110.70h</b> |           | <b>\$145.00</b><br>0.70h | <b>\$41,737.00</b><br>110.00h |

# Activities Export

04/13/2026

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| Date       | Type | Description                                                                                                                                                                                      | Matter                                     | User                | Qty            | Rate (\$) | Non-billable (\$)        | Billable (\$)                 |
|------------|------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------|---------------------|----------------|-----------|--------------------------|-------------------------------|
|            |      | paragraph 6 is off and will need revisions.<br>● Unbilled                                                                                                                                        |                                            |                     |                |           |                          |                               |
| 04/10/2026 | 🕒    | Draft correspondence to Class Admin Arron requesting draft of the declaration from the Admin.<br>● Unbilled                                                                                      | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.10h          | \$495.00  | -                        | \$49.50                       |
| 04/10/2026 | 🕒    | Review correspondence from Simpluris re current draft of Declaration. File save weekly report.<br>● Unbilled                                                                                     | 00047-El Dorado Farms Pimentel v. Madrigal | Noah Adams          | 0.10h          | \$250.00  | -                        | \$25.00                       |
| 04/09/2026 | 🕒    | Brief exchange of correspondence with Co-Counsel Webb about class admin and finalizing numbers for settlement.<br>● Unbilled                                                                     | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.10h          | \$495.00  | -                        | \$49.50                       |
| 04/09/2026 | 🕒    | (PCD .1) Review Simpluris correspondence re deadline to cure defects.<br>● Unbilled                                                                                                              | 00047-El Dorado Farms Pimentel v. Madrigal | Noah Adams          | 0.10h          | \$250.00  | -                        | \$25.00                       |
| 04/09/2026 | 🕒    | Telephonic conference between Legal Assistant MSI and Fresno County Superior Court regarding Case Management Conference. Update Firm calendar to reflect continued hearing status.<br>● Unbilled | 00047-El Dorado Farms Pimentel v. Madrigal | Mika Ince           | 0.10h          | \$140.00  | -                        | \$14.00                       |
| 04/09/2026 | 🕒    | (PCD .1) Review exchange of                                                                                                                                                                      | 00047-El Dorado Farms                      | Noah                | 0.10h          | \$250.00  | -                        | \$25.00                       |
|            |      |                                                                                                                                                                                                  |                                            |                     | <b>110.70h</b> |           | <b>\$145.00</b><br>0.70h | <b>\$41,737.00</b><br>110.00h |

# Activities Export

04/13/2026

11:47 AM

| Date       | Type | Description                                                                                                                                                                                                                        | Matter                                     | User                | Qty            | Rate (\$) | Non-billable (\$)        | Billable (\$)                 |
|------------|------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------|---------------------|----------------|-----------|--------------------------|-------------------------------|
|            |      | correspondences between Attorney CEN, Opposing Counsel, and Simpluris re objections to class settlement.<br>● Unbilled                                                                                                             | Pimentel v. Madrigal                       | Adams               |                |           |                          |                               |
| 04/09/2026 | 🕒    | File save Court recorded version of Joint Case Management Statement.<br>● Unbilled                                                                                                                                                 | 00047-El Dorado Farms Pimentel v. Madrigal | Mika Ince           | 0.10h          | \$140.00  | -                        | \$14.00                       |
| 04/08/2026 | 🕒    | Receipt and review of correspondence from Court with order granting remote appearance. Memo to file regarding same.<br>● Unbilled                                                                                                  | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.20h          | \$495.00  | -                        | \$99.00                       |
| 04/08/2026 | 🕒    | Receipt of email correspondence from Class Admin which indicates that there are 4 invalid responses that selected all options. Review of message from Admin about how he believes that they all want to participate.<br>● Unbilled | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.20h          | \$495.00  | -                        | \$99.00                       |
| 04/08/2026 | 🕒    | Receipt and review of 4 returned packets which are incorrectly filed out.<br>● Unbilled                                                                                                                                            | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.20h          | \$495.00  | -                        | \$99.00                       |
| 04/08/2026 | 🕒    | Receipt and review of correspondence from Opposing Counsel Rachelle with her assessment of the documents provided by the class Admin.                                                                                              | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.20h          | \$495.00  | -                        | \$99.00                       |
|            |      |                                                                                                                                                                                                                                    |                                            |                     | <b>110.70h</b> |           | <b>\$145.00</b><br>0.70h | <b>\$41,737.00</b><br>110.00h |

# Activities Export

04/13/2026

11:47 AM

| Date       | Type | Description                                                                                                                                   | Matter                                     | User                | Qty            | Rate (\$) | Non-billable (\$) | Billable (\$)      |
|------------|------|-----------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------|---------------------|----------------|-----------|-------------------|--------------------|
|            |      | ● Unbilled                                                                                                                                    |                                            |                     |                |           |                   |                    |
| 04/08/2026 | 🕒    | Draft correspondence to Class Admin regarding review of incorrectly filled out documents. explain context of what likely occurred.            | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.20h          | \$495.00  | -                 | \$99.00            |
|            |      | ● Unbilled                                                                                                                                    |                                            |                     |                |           |                   |                    |
| 04/08/2026 | 🕒    | Draft correspondence to Opposing Counsel and Class Admin Arron asking about the time for the clarification to be received from class members. | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.10h          | \$495.00  | -                 | \$49.50            |
|            |      | ● Unbilled                                                                                                                                    |                                            |                     |                |           |                   |                    |
| 04/08/2026 | 🕒    | (PCD .1) Review Fresno County Register of Actions for Tentative Ruling. Internal memo to Attorney CEN.                                        | 00047-El Dorado Farms Pimentel v. Madrigal | Mika Ince           | 0.10h          | \$140.00  | -                 | \$14.00            |
|            |      | ● Unbilled                                                                                                                                    |                                            |                     |                |           |                   |                    |
| 04/08/2026 | 🕒    | File save signed Order Regarding Remote Appearance for Case Management Conference.                                                            | 00047-El Dorado Farms Pimentel v. Madrigal | Mika Ince           | 0.10h          | \$140.00  | -                 | \$14.00            |
|            |      | ● Unbilled                                                                                                                                    |                                            |                     |                |           |                   |                    |
| 04/08/2026 | 🕒    | Update Proof of Service to reflect new handling attorney information for Defendant.                                                           | 00047-El Dorado Farms Pimentel v. Madrigal | Mika Ince           | 0.10h          | \$140.00  | -                 | \$14.00            |
|            |      | ● Unbilled                                                                                                                                    |                                            |                     |                |           |                   |                    |
| 04/08/2026 | 🕒    | File save Defendants Notice of Change of Handling Attorney, Notice of Remote Appearance, and                                                  | 00047-El Dorado Farms Pimentel v. Madrigal | Mika Ince           | 0.20h          | \$140.00  | -                 | \$28.00            |
|            |      |                                                                                                                                               |                                            |                     | <b>110.70h</b> |           | <b>\$145.00</b>   | <b>\$41,737.00</b> |
|            |      |                                                                                                                                               |                                            |                     |                |           | 0.70h             | 110.00h            |

# Activities Export

04/13/2026

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| Date       | Type | Description                                                                                                                                                    | Matter                                     | User                | Qty            | Rate (\$) | Non-billable (\$)        | Billable (\$)                 |
|------------|------|----------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------|---------------------|----------------|-----------|--------------------------|-------------------------------|
|            |      | Order Regarding remote Appearance for upcoming Case Management Conference. Internal memo to Attorney CEN re same.<br>● Unbilled                                |                                            |                     |                |           |                          |                               |
| 04/07/2026 | 🕒    | Receipt and review of Notice of Remote appearance from opposing counsel Rachelle.<br>● Unbilled                                                                | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.10h          | \$495.00  | -                        | \$49.50                       |
| 04/07/2026 | 🕒    | Review exchange of correspondences between Attorney CEN and Simpluris re receiving a declaration re the administration. File save Weekly Report.<br>● Unbilled | 00047-El Dorado Farms Pimentel v. Madrigal | Noah Adams          | 0.10h          | \$250.00  | -                        | \$25.00                       |
| 04/06/2026 | 🕒    | File save Court recorded Notice and Order for Remote Appearance to Client folder. Internal memo to Attorney CEN re same.<br>● Unbilled                         | 00047-El Dorado Farms Pimentel v. Madrigal | Mika Ince           | 0.10h          | \$140.00  | -                        | \$14.00                       |
| 04/03/2026 | 🕒    | Receipt and review of weekly report from administrator.<br>● Unbilled                                                                                          | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.10h          | \$495.00  | -                        | \$49.50                       |
| 04/03/2026 | 🕒    | Draft correspondence to Class Admin about when we will receive the declaration for the administration.<br>● Unbilled                                           | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.20h          | \$495.00  | -                        | \$99.00                       |
|            |      |                                                                                                                                                                |                                            |                     | <b>110.70h</b> |           | <b>\$145.00</b><br>0.70h | <b>\$41,737.00</b><br>110.00h |

# Activities Export

04/13/2026

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| Date ▼     | Type                                                                                | Description                                                                                                                                                                                                                   | Matter                                     | User                | Qty            | Rate (\$) | Non-billable (\$)        | Billable (\$)                 |
|------------|-------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------|---------------------|----------------|-----------|--------------------------|-------------------------------|
| 04/02/2026 |    | Review and approve of Notice of Remote appearance and order granting same.<br> Unbilled                                                      | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.10h          | \$495.00  | -                        | \$49.50                       |
| 04/02/2026 |    | File Notice and Order for Remote Appearance with the Court and serve on Opposing Counsel.<br> Unbilled                                       | 00047-El Dorado Farms Pimentel v. Madrigal | Mika Ince           | 0.10h          | \$140.00  | -                        | \$14.00                       |
| 04/02/2026 |    | Draft Notice of Remote Appearance and Order regarding Remote Appearance. Send to Attorney CEN for review.<br> Unbilled                       | 00047-El Dorado Farms Pimentel v. Madrigal | Mika Ince           | 0.30h          | \$140.00  | -                        | \$42.00                       |
| 03/31/2026 |    | Telephonic conference between Legal Assistant MSI and Eddings Attorney Services regarding payment of invoice for Court Running.<br> Unbilled | 00047-El Dorado Farms Pimentel v. Madrigal | Mika Ince           | 0.10h          | \$140.00  | -                        | \$14.00                       |
| 03/29/2026 |  | Receipt and review of correspondence from Opposing Counsel Rachelle agreeing to CMC Statement.<br> Unbilled                                | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.10h          | \$495.00  | -                        | \$49.50                       |
| 03/27/2026 |  | File save Simpluris Weekly Report. Internal memo to Attorney CEN re aforementioned.<br> Unbilled                                           | 00047-El Dorado Farms Pimentel v. Madrigal | Noah Adams          | 0.10h          | \$250.00  | -                        | \$25.00                       |
| 03/26/2026 |  | Receipt and review of                                                                                                                                                                                                         | 00047-El Dorado Farms                      | Christopher         | 0.10h          | \$495.00  | -                        | \$49.50                       |
|            |                                                                                     |                                                                                                                                                                                                                               |                                            |                     | <b>110.70h</b> |           | <b>\$145.00</b><br>0.70h | <b>\$41,737.00</b><br>110.00h |

# Activities Export

04/13/2026

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| Date       | Type | Description                                                                                                                              | Matter                                     | User                | Qty            | Rate (\$) | Non-billable (\$)        | Billable (\$)                 |
|------------|------|------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------|---------------------|----------------|-----------|--------------------------|-------------------------------|
|            |      | correspondence from Eddings attorney services regarding filing of CMC statement.<br>● Unbilled                                           | Pimentel v. Madrigal                       | Nichols             |                |           |                          |                               |
| 03/26/2026 | 🕒    | Receipt and review of correspondence from Opposing Counsel Rachelle authorizing her /s/ signature on the CMC statement.<br>● Unbilled    | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.10h          | \$495.00  | -                        | \$49.50                       |
| 03/26/2026 | 🕒    | Draft correspondence to follow up on the CMC statement that we jointly drafted to inform court that the CMC is not needed.<br>● Unbilled | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.20h          | \$495.00  | -                        | \$99.00                       |
| 03/26/2026 | 🕒    | Finalize Joint Case Management Statement, attach Proof of Service, and serve on Counsels.<br>● Unbilled                                  | 00047-El Dorado Farms Pimentel v. Madrigal | Mika Ince           | 0.10h          | \$140.00  | -                        | \$14.00                       |
| 03/26/2026 | 🕒    | Telephonic conference between Legal Assistant MSI and Eddings Attorney Services re hiring Court Runner.<br>● Unbilled                    | 00047-El Dorado Farms Pimentel v. Madrigal | Mika Ince           | 0.10h          | \$140.00  | -                        | \$14.00                       |
| 03/25/2026 | 🕒    | Review and Revise Joint Case Management Conference Statement.<br>● Unbilled                                                              | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.20h          | \$495.00  | -                        | \$99.00                       |
| 03/25/2026 | 🕒    | Receipt and review of                                                                                                                    | 00047-El Dorado Farms                      | Christopher         | 0.10h          | \$495.00  | -                        | \$49.50                       |
|            |      |                                                                                                                                          |                                            |                     | <b>110.70h</b> |           | <b>\$145.00</b><br>0.70h | <b>\$41,737.00</b><br>110.00h |

# Activities Export

04/13/2026

11:47 AM

| Date       | Type | Description                                                                                                                      | Matter                                     | User                | Qty            | Rate (\$) | Non-billable (\$)        | Billable (\$)                 |
|------------|------|----------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------|---------------------|----------------|-----------|--------------------------|-------------------------------|
|            |      | correspondence from Attorney LFW regarding approval of CMC statement.<br>● Unbilled                                              | Pimentel v. Madrigal                       | Nichols             |                |           |                          |                               |
| 03/25/2026 | 🕒    | Draft correspondence to Opposing Counsel and Attorney LFW about joint CMC statement and next steps.<br>● Unbilled                | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.20h          | \$495.00  | -                        | \$99.00                       |
| 03/25/2026 | 🕒    | Office conference between Legal Assistant MSI and Attorney CEN regarding drafting Joint Case Management Statement.<br>● Unbilled | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.10h          | \$495.00  | -                        | \$49.50                       |
| 03/25/2026 | 🕒    | Office conference between Legal Assistant MSI and Attorney CEN regarding drafting Joint Case Management Statement.<br>● Unbilled | 00047-El Dorado Farms Pimentel v. Madrigal | Mika Ince           | 0.10h          | \$140.00  | -                        | \$14.00                       |
| 03/25/2026 | 🕒    | (PCD .2) Draft Joint Case Management Statement and send to Attorney CEN for review.<br>● Unbilled                                | 00047-El Dorado Farms Pimentel v. Madrigal | Mika Ince           | 0.80h          | \$140.00  | -                        | \$112.00                      |
| 03/20/2026 | 🕒    | Receipt and review of weekly report from administrator.<br>● Unbilled                                                            | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.10h          | \$495.00  | -                        | \$49.50                       |
| 03/20/2026 | 🕒    | Receipt of correspondence from Simpluris re weekly report. File safe aforementioned.                                             | 00047-El Dorado Farms Pimentel v. Madrigal | Noah Adams          | 0.10h          | \$250.00  | -                        | \$25.00                       |
|            |      |                                                                                                                                  |                                            |                     | <b>110.70h</b> |           | <b>\$145.00</b><br>0.70h | <b>\$41,737.00</b><br>110.00h |

# Activities Export

04/13/2026

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| Date       | Type | Description                                                                                                                                | Matter                                     | User                | Qty            | Rate (\$) | Non-billable (\$)        | Billable (\$)                 |
|------------|------|--------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------|---------------------|----------------|-----------|--------------------------|-------------------------------|
|            |      | ● Unbilled                                                                                                                                 |                                            |                     |                |           |                          |                               |
| 03/17/2026 | 🕒    | Receipt and review of correspondence from Opposing Counsel Rachelle regarding her being the point of contact moving forward.<br>● Unbilled | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.20h          | \$495.00  | -                        | \$99.00                       |
| 03/17/2026 | 🕒    | (PCD .1) Review Opposing Counsel correspondence re removal of Mark Kruthers.<br>● Unbilled                                                 | 00047-El Dorado Farms Pimentel v. Madrigal | Noah Adams          | 0.10h          | \$250.00  | -                        | \$25.00                       |
| 03/17/2026 | 🕒    | Receipt and review of weekly opt out and objection report. Memo to file regarding analysis for final approval papers.<br>● Unbilled        | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.20h          | \$495.00  | -                        | \$99.00                       |
| 03/17/2026 | 🕒    | Review Simpluris correspondence re Weekly Report. File save aforementioned.<br>● Unbilled                                                  | 00047-El Dorado Farms Pimentel v. Madrigal | Noah Adams          | 0.10h          | \$250.00  | -                        | \$25.00                       |
| 03/17/2026 | 🕒    | (PCD .1) Review memo from Law Clerk DSA re drafted Declarations and Proposed Judgment.<br>● Unbilled                                       | 00047-El Dorado Farms Pimentel v. Madrigal | Noah Adams          | 0.10h          | \$250.00  | -                        | \$25.00                       |
| 03/13/2026 | 🕒    | Initial review of the Declarations drafted for me and Attorney LFW as well as the Proposed Judgment.<br>● Unbilled                         | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.60h          | \$495.00  | -                        | \$297.00                      |
|            |      |                                                                                                                                            |                                            |                     | <b>110.70h</b> |           | <b>\$145.00</b><br>0.70h | <b>\$41,737.00</b><br>110.00h |

Activities Export

04/13/2026  
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| Date       | Type                                                                                | Description                                                                                                                                                                                                    | Matter                                     | User         | Qty     | Rate (\$) | Non-billable (\$) | Billable (\$)          |
|------------|-------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------|--------------|---------|-----------|-------------------|------------------------|
| 03/13/2026 |    | (PCD 0.1) Memo to Attorney CEN and Law Clerk NPA re Declaration of Webb and Declaration of Nichols matching Memo<br> Unbilled | 00047-El Dorado Farms Pimentel v. Madrigal | Deenah Abasi | 0.10h   | \$250.00  | -                 | \$25.00                |
| 03/13/2026 |    | Draft Proposed Judgment for El Dorado case<br> Unbilled                                                                       | 00047-El Dorado Farms Pimentel v. Madrigal | Deenah Abasi | 0.60h   | \$250.00  | -                 | \$150.00               |
| 03/13/2026 |    | Review and revise Declaration of Nichols for Final Class Settlement approval in El Dorado case<br> Unbilled                   | 00047-El Dorado Farms Pimentel v. Madrigal | Deenah Abasi | 0.70h   | \$250.00  | -                 | \$175.00               |
| 03/13/2026 |    | Review and revise Declaration of Webb for Final Class Settlement approval in El Dorado case<br> Unbilled                      | 00047-El Dorado Farms Pimentel v. Madrigal | Deenah Abasi | 0.30h   | \$250.00  | -                 | \$75.00                |
| 03/13/2026 |    | Draft Declaration of Webb for Final Class Settlement approval in El Dorado case<br> Unbilled                                | 00047-El Dorado Farms Pimentel v. Madrigal | Deenah Abasi | 0.60h   | \$250.00  | -                 | \$150.00               |
| 03/12/2026 |  | (PCD 0.2) Review Preliminary Declaration of Webb<br> Unbilled                                                               | 00047-El Dorado Farms Pimentel v. Madrigal | Deenah Abasi | 0.20h   | \$250.00  | -                 | \$50.00                |
| 03/12/2026 |  | Draft Declaration of Webb for Final Class Settlement approval in El Dorado case<br> Unbilled                                | 00047-El Dorado Farms Pimentel v. Madrigal | Deenah Abasi | 0.50h   | \$250.00  | -                 | \$125.00               |
| 03/12/2026 |  | Memo to Attorney CEN re                                                                                                                                                                                        | 00047-El Dorado Farms                      | Deenah       | 0.10h   | \$250.00  | -                 | \$25.00                |
|            |                                                                                     |                                                                                                                                                                                                                |                                            |              | 110.70h |           | \$145.00<br>0.70h | \$41,737.00<br>110.00h |

Activities Export

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| Date       | Type | Description                                                                                                                                        | Matter                                     | User                | Qty     | Rate (\$) | Non-billable (\$) | Billable (\$)          |
|------------|------|----------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------|---------------------|---------|-----------|-------------------|------------------------|
|            |      | Declaration of Nichols Damages calculations<br>● Unbilled                                                                                          | Pimentel v. Madrigal                       | Abasi               |         |           |                   |                        |
| 03/12/2026 | 🕒    | Memo to Law Clerk NPA re Damage calculations for Declaration of Nichols<br>● Unbilled                                                              | 00047-El Dorado Farms Pimentel v. Madrigal | Deenah Abasi        | 0.10h   | \$250.00  | -                 | \$25.00                |
| 03/12/2026 | 🕒    | Draft Declaration of Nichols for Final Class Settlement approval in El Dorado case<br>● Unbilled                                                   | 00047-El Dorado Farms Pimentel v. Madrigal | Deenah Abasi        | 2.50h   | \$250.00  | -                 | \$625.00               |
| 03/11/2026 | 🕒    | Draft Declaration of Nichols for Final Class Settlement approval in El Dorado case<br>● Unbilled                                                   | 00047-El Dorado Farms Pimentel v. Madrigal | Deenah Abasi        | 2.40h   | \$250.00  | -                 | \$600.00               |
| 03/10/2026 | 🕒    | File save Simpluris Weekly Report - 3/6.<br>● Unbilled                                                                                             | 00047-El Dorado Farms Pimentel v. Madrigal | Noah Adams          | 0.10h   | \$250.00  | -                 | \$25.00                |
| 03/06/2026 | 🕒    | Receipt and review of weekly opt out and objection report.<br>● Unbilled                                                                           | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.10h   | \$495.00  | -                 | \$49.50                |
| 03/03/2026 | 🕒    | Receipt of correspondence from Simpluris re weekly report. File save weekly report. Internal memo to Attorney CEN re aforementioned.<br>● Unbilled | 00047-El Dorado Farms Pimentel v. Madrigal | Noah Adams          | 0.10h   | \$250.00  | -                 | \$25.00                |
| 02/27/2026 | 🕒    | Receipt and review of weekly opt                                                                                                                   | 00047-El Dorado Farms                      | Christopher         | 0.10h   | \$495.00  | -                 | \$49.50                |
|            |      |                                                                                                                                                    |                                            |                     | 110.70h |           | \$145.00<br>0.70h | \$41,737.00<br>110.00h |

# Activities Export

04/13/2026

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| Date ▼     | Type | Description                                                                                                                        | Matter                                     | User                | Qty            | Rate (\$) | Non-billable (\$)        | Billable (\$)                 |
|------------|------|------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------|---------------------|----------------|-----------|--------------------------|-------------------------------|
|            |      | out and objection report.<br>● Unbilled                                                                                            | Pimentel v. Madrigal                       | Nichols             |                |           |                          |                               |
| 02/26/2026 | 🕒    | (PCD .1) Review correspondence from Co-Counsel re confirmation class member was referred to class administrator.<br>● Unbilled     | 00047-El Dorado Farms Pimentel v. Madrigal | Noah Adams          | 0.10h          | \$250.00  | -                        | \$25.00                       |
| 02/25/2026 | 🕒    | Office conference between Legal Assistant MSI and Attorney CEN regarding case status and Case Management Conference.<br>● Unbilled | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.10h          | \$495.00  | -                        | \$49.50                       |
| 02/25/2026 | 🕒    | Office conference between Legal Assistant MSI and Attorney CEN regarding case status and Case Management Conference.<br>● Unbilled | 00047-El Dorado Farms Pimentel v. Madrigal | Mika Ince           | 0.10h          | \$140.00  | -                        | \$14.00                       |
| 02/25/2026 | 🕒    | Draft Case Management Statement and Proof of Service. Send to Attorney CEN for review.<br>● Unbilled                               | 00047-El Dorado Farms Pimentel v. Madrigal | Mika Ince           | 0.30h          | \$140.00  | -                        | \$42.00                       |
| 02/24/2026 | 🕒    | Review co-counsel correspondence re confirmation of action plan.<br>● Unbilled                                                     | 00047-El Dorado Farms Pimentel v. Madrigal | Noah Adams          | 0.10h          | \$250.00  | -                        | \$25.00                       |
| 02/24/2026 | 🕒    | Review exchange of correspondences between Attorney CEN and Co-Counsel Lenden Webb re source of contact                            | 00047-El Dorado Farms Pimentel v. Madrigal | Noah Adams          | 0.10h          | \$250.00  | -                        | \$25.00                       |
|            |      |                                                                                                                                    |                                            |                     | <b>110.70h</b> |           | <b>\$145.00</b><br>0.70h | <b>\$41,737.00</b><br>110.00h |

# Activities Export

04/13/2026

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| Date       | Type                                                                                | Description                                                                                                                               | Matter                                     | User                | Qty            | Rate (\$) | Non-billable (\$)        | Billable (\$)                 |
|------------|-------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------|---------------------|----------------|-----------|--------------------------|-------------------------------|
|            |                                                                                     | for class members questions.<br>● Unbilled                                                                                                |                                            |                     |                |           |                          |                               |
| 02/20/2026 |    | Receipt and review of weekly opt out and objection report. Memo to file regarding analysis for final approval papers.<br>● Unbilled       | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.20h          | \$495.00  | -                        | \$99.00                       |
| 02/20/2026 |    | (PCD 0.3) Review Motion for Final Approval of Class settlement Memorandum of Points and Authorities<br>● Unbilled                         | 00047-El Dorado Farms Pimentel v. Madrigal | Deenah Abasi        | 0.30h          | \$250.00  | -                        | \$75.00                       |
| 02/20/2026 |    | (PCD 1.1) Review Preliminary documents for Motion for approval of settlement of class action<br>● Unbilled                                | 00047-El Dorado Farms Pimentel v. Madrigal | Deenah Abasi        | 1.10h          | \$250.00  | -                        | \$275.00                      |
| 02/19/2026 |    | Internal memo to Attorney CEN and Law Clerk DSA re finalized Memorandum.<br>● Unbilled                                                    | 00047-El Dorado Farms Pimentel v. Madrigal | Noah Adams          | 0.10h          | \$250.00  | -                        | \$25.00                       |
| 02/19/2026 |  | Finalize Motion for Final Approval - Memo P&A's.<br>● Unbilled                                                                            | 00047-El Dorado Farms Pimentel v. Madrigal | Noah Adams          | 2.00h          | \$250.00  | -                        | \$500.00                      |
| 02/19/2026 |  | Office conference between Law Clerk NPA and Law Clerk DSA re drafting Declarations in Support of Motion for Final Approval.<br>● Unbilled | 00047-El Dorado Farms Pimentel v. Madrigal | Deenah Abasi        | 0.10h          | \$250.00  | -                        | \$25.00                       |
|            |                                                                                     |                                                                                                                                           |                                            |                     | <b>110.70h</b> |           | <b>\$145.00</b><br>0.70h | <b>\$41,737.00</b><br>110.00h |

Activities Export

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| Date       | Type                                                                                | Description                                                                                                                                                                                                                       | Matter                                     | User                | Qty     | Rate (\$) | Non-billable (\$) | Billable (\$)          |
|------------|-------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------|---------------------|---------|-----------|-------------------|------------------------|
| 02/19/2026 |    | Office conference between Law Clerk NPA and Law Clerk DSA re drafting Declarations in Support of Motion for Final Approval.<br> Unbilled         | 00047-El Dorado Farms Pimentel v. Madrigal | Noah Adams          | 0.10h   | \$250.00  | -                 | \$25.00                |
| 02/19/2026 |    | (PCD 0.4) Office conference between Law Clerk DSA and Attorney CEN re Declaration for Motion for final approval of class settlement<br> Unbilled | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.40h   | \$495.00  | -                 | \$198.00               |
| 02/19/2026 |    | (PCD 0.4) Office conference between Law Clerk DSA and Attorney CEN re Declaration for Motion for final approval of class settlement<br> Unbilled | 00047-El Dorado Farms Pimentel v. Madrigal | Deenah Abasi        | 0.40h   | \$250.00  | -                 | \$100.00               |
| 02/19/2026 |    | Office conference between Attorney CEN and Law Clerk NPA re Motion for Final Approval.<br> Unbilled                                             | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.10h   | \$495.00  | -                 | \$49.50                |
| 02/19/2026 |  | Office conference between Attorney CEN and Law Clerk NPA re Motion for Final Approval.<br> Unbilled                                            | 00047-El Dorado Farms Pimentel v. Madrigal | Noah Adams          | 0.10h   | \$250.00  | -                 | \$25.00                |
| 02/17/2026 |  | Begin drafting Motion for Final Approval - Memo P&A.<br> Unbilled                                                                              | 00047-El Dorado Farms Pimentel v. Madrigal | Noah Adams          | 1.60h   | \$250.00  | -                 | \$400.00               |
| 02/12/2026 |  | Receipt and review of Notice of                                                                                                                                                                                                   | 00047-El Dorado Farms                      | Christopher         | 0.20h   | \$495.00  | -                 | \$99.00                |
|            |                                                                                     |                                                                                                                                                                                                                                   |                                            |                     | 110.70h |           | \$145.00<br>0.70h | \$41,737.00<br>110.00h |

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| Date       | Type                                                                                | Description                                                                                                                                                                                                                            | Matter                                        | User                   | Qty            | Rate (\$) | Non-billable (\$)        | Billable (\$)                 |
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|            |                                                                                     | Change of handling attorney.<br>Memo to file regarding same.<br> Unbilled                                                                             | Pimentel v. Madrigal                          | Nichols                |                |           |                          |                               |
| 02/10/2026 |    | Memo to file regarding timing for finalization of class action matter.<br> Unbilled                                                                   | 00047-El Dorado Farms<br>Pimentel v. Madrigal | Christopher<br>Nichols | 0.10h          | \$495.00  | -                        | \$49.50                       |
| 02/05/2026 |    | Receipt and review of correspondence from Admin Arron regarding the class mailing and timeline on the schedule.<br> Unbilled                          | 00047-El Dorado Farms<br>Pimentel v. Madrigal | Christopher<br>Nichols | 0.20h          | \$495.00  | -                        | \$99.00                       |
| 02/05/2026 |    | Review correspondence from Simpluris re final timeline.<br> Unbilled                                                                                  | 00047-El Dorado Farms<br>Pimentel v. Madrigal | Noah<br>Adams          | 0.10h          | \$250.00  | -                        | \$25.00                       |
| 01/20/2026 |    | (PCD .1) Review correspondence from Opposing Counsel re new assignment and any outstanding items.<br> Unbilled                                        | 00047-El Dorado Farms<br>Pimentel v. Madrigal | Noah<br>Adams          | 0.10h          | \$250.00  | -                        | \$25.00                       |
| 01/19/2026 |  | Receipt and review of correspondence from Opposing Counsel Golden regarding request for any information needed to finalize with admin.<br> Unbilled | 00047-El Dorado Farms<br>Pimentel v. Madrigal | Christopher<br>Nichols | 0.10h          | \$495.00  | -                        | \$49.50                       |
| 01/07/2026 |  | Memo to file regarding timing for class admin and motion for final approval plans.<br> Unbilled                                                     | 00047-El Dorado Farms<br>Pimentel v. Madrigal | Christopher<br>Nichols | 0.10h          | \$495.00  | -                        | \$49.50                       |
|            |                                                                                     |                                                                                                                                                                                                                                        |                                               |                        | <b>110.70h</b> |           | <b>\$145.00</b><br>0.70h | <b>\$41,737.00</b><br>110.00h |

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| Date ▼     | Type                                                                                | Description                                                                                                                                                                                                              | Matter                                     | User                | Qty            | Rate (\$) | Non-billable (\$)        | Billable (\$)                 |
|------------|-------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------|---------------------|----------------|-----------|--------------------------|-------------------------------|
| 01/07/2026 |    | Receipt and review of correspondence from Admin regarding the timeline for class data and distribution.<br> Unbilled                    | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.20h          | \$495.00  | -                        | \$99.00                       |
| 01/07/2026 |    | (PCD .1) Review correspondence from Simpluris re class data.<br> Unbilled                                                               | 00047-El Dorado Farms Pimentel v. Madrigal | Noah Adams          | 0.10h          | \$250.00  | -                        | \$25.00                       |
| 01/06/2026 |    | Receipt and review of correspondence from Opposing Counsel Mark about minor changes to notice and updated version of same.<br> Unbilled | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.10h          | \$495.00  | -                        | \$49.50                       |
| 01/06/2026 |    | (PCD .1) Review exchange of correspondences between Counsel and Simpluris re requested changes to Class Action Notice.<br> Unbilled     | 00047-El Dorado Farms Pimentel v. Madrigal | Noah Adams          | 0.10h          | \$250.00  | -                        | \$25.00                       |
| 01/06/2026 |  | (PCD .1) Review Attorney CEN correspondence to Simpluris re approval of notices.<br> Unbilled                                         | 00047-El Dorado Farms Pimentel v. Madrigal | Noah Adams          | 0.10h          | \$250.00  | -                        | \$25.00                       |
| 01/06/2026 |  | Draft correspondence to Simpluris Admin regarding the approval of the updated documents for the mailing.<br> Unbilled                 | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.10h          | \$495.00  | -                        | \$49.50                       |
|            |                                                                                     |                                                                                                                                                                                                                          |                                            |                     | <b>110.70h</b> |           | <b>\$145.00</b><br>0.70h | <b>\$41,737.00</b><br>110.00h |

# Activities Export

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| Date ▼     | Type                                                                                | Description                                                                                                                                                                                                                                  | Matter                                     | User                | Qty            | Rate (\$) | Non-billable (\$)        | Billable (\$)                 |
|------------|-------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------|---------------------|----------------|-----------|--------------------------|-------------------------------|
| 01/05/2026 |    | Receipt and review of correspondence from Webb Law Group containing class action Admin documents.<br> Unbilled                                              | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.10h          | \$495.00  | -                        | \$49.50                       |
| 01/05/2026 |    | Receipt and review of correspondence from Simpluris Admin sending new versions of form documents which have been updated. Review of documents.<br> Unbilled | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.20h          | \$495.00  | -                        | \$99.00                       |
| 01/05/2026 |    | (PCD .1) Review Simpluris correspondence re formatted documents for mailing.<br> Unbilled                                                                   | 00047-El Dorado Farms Pimentel v. Madrigal | Noah Adams          | 0.10h          | \$250.00  | -                        | \$25.00                       |
| 01/02/2026 |    | Begin drafting Motion for Final Approval - Declaration of Attorney CEN.<br> Unbilled                                                                        | 00047-El Dorado Farms Pimentel v. Madrigal | Noah Adams          | 0.40h          | \$250.00  | -                        | \$100.00                      |
| 01/02/2026 |   | Draft Motion for Final Approval - Notice.<br> Unbilled                                                                                                    | 00047-El Dorado Farms Pimentel v. Madrigal | Noah Adams          | 0.40h          | \$250.00  | -                        | \$100.00                      |
| 01/02/2026 |  | (PCD .1) Review Attorney CEN correspondence to Simpluris re formatted notice.<br> Unbilled                                                                | 00047-El Dorado Farms Pimentel v. Madrigal | Noah Adams          | 0.10h          | \$250.00  | -                        | \$25.00                       |
| 12/30/2025 |  | Draft correspondence to Simpluris administrator answering his three questions. Review of documents                                                                                                                                           | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.30h          | \$495.00  | -                        | \$148.50                      |
|            |                                                                                     |                                                                                                                                                                                                                                              |                                            |                     | <b>110.70h</b> |           | <b>\$145.00</b><br>0.70h | <b>\$41,737.00</b><br>110.00h |

# Activities Export

04/13/2026

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| Date ▼     | Type | Description                                                                                                                           | Matter                                     | User                | Qty            | Rate (\$) | Non-billable (\$)        | Billable (\$)                 |
|------------|------|---------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------|---------------------|----------------|-----------|--------------------------|-------------------------------|
|            |      | and send to Simpluris the word versions of the forms which have been prepared.<br>● Unbilled                                          |                                            |                     |                |           |                          |                               |
| 12/30/2025 | 🕒    | Calendar date for Hearing on Motion for Final Approval of the class action settlement.<br>● Unbilled                                  | 00047-El Dorado Farms Pimentel v. Madrigal | Mika Ince           | 0.10h          | \$140.00  | -                        | \$14.00                       |
| 12/30/2025 | 🕒    | Internal memo to Attorney CEN regarding date of Hearing on Motion.<br>● Unbilled                                                      | 00047-El Dorado Farms Pimentel v. Madrigal | Mika Ince           | 0.10h          | \$140.00  | -                        | \$14.00                       |
| 12/30/2025 | 🕒    | Call between Legal Assistant MSI and Fresno Court regarding Hearing on Motion date.<br>● Unbilled                                     | 00047-El Dorado Farms Pimentel v. Madrigal | Mika Ince           | 0.10h          | \$140.00  | -                        | \$14.00                       |
| 12/30/2025 | 🕒    | Call between Legal Assistant MSI and Fresno Court regarding hearing on Motion date.<br>● Unbilled                                     | 00047-El Dorado Farms Pimentel v. Madrigal | Mika Ince           | 0.10h          | \$140.00  | -                        | \$14.00                       |
| 12/23/2025 | 🕒    | Receipt and review of follow up correspondence from Admin Simpluris with additional questions about the administration.<br>● Unbilled | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.20h          | \$495.00  | -                        | \$99.00                       |
| 12/23/2025 | 🕒    | Review correspondence from Simpluris re request for excel spreadsheet.<br>● Non-billable                                              | 00047-El Dorado Farms Pimentel v. Madrigal | Noah Adams          | 0.10h          | \$250.00  | \$25.00                  | -                             |
|            |      |                                                                                                                                       |                                            |                     | <b>110.70h</b> |           | <b>\$145.00</b><br>0.70h | <b>\$41,737.00</b><br>110.00h |

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| Date ▼     | Type                                                                                | Description                                                                                                                                                                                                                                                                                                                                                                                                  | Matter                                     | User                | Qty            | Rate (\$) | Non-billable (\$)        | Billable (\$)                 |
|------------|-------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------|---------------------|----------------|-----------|--------------------------|-------------------------------|
| 12/16/2025 |    | Receipt and review of correspondence from Admin Arron with data and information regarding administration.<br> Unbilled                                                                                                                                                                                                      | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.20h          | \$495.00  | -                        | \$99.00                       |
| 12/16/2025 |    | Review correspondence from Simpluris re timeline, fund breakdown, and class data.<br> Non-billable                                                                                                                                                                                                                          | 00047-El Dorado Farms Pimentel v. Madrigal | Noah Adams          | 0.10h          | \$250.00  | \$25.00                  | -                             |
| 12/15/2025 |    | Review correspondence between Attorney CEN and Simpluris re administration of settlement.<br> Non-billable                                                                                                                                                                                                                  | 00047-El Dorado Farms Pimentel v. Madrigal | Noah Adams          | 0.10h          | \$250.00  | \$25.00                  | -                             |
| 12/12/2025 |    | Receipt and review of correspondence from Class Admin discussing contact through administration process and request for A copy of the signed Order granting preliminary approval. A copy of the fully executed agreement A copy of the approved Notice material in Word format. Memo to file regarding same.<br> Unbilled | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.20h          | \$495.00  | -                        | \$99.00                       |
| 12/12/2025 |  | Receipt and review of correspondence from Admin Patrick with introduction to project manager and discussion of next steps.<br> Unbilled                                                                                                                                                                                   | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.10h          | \$495.00  | -                        | \$49.50                       |
|            |                                                                                     |                                                                                                                                                                                                                                                                                                                                                                                                              |                                            |                     | <b>110.70h</b> |           | <b>\$145.00</b><br>0.70h | <b>\$41,737.00</b><br>110.00h |

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| Date ▼     | Type                                                                                | Description                                                                                                                                                                                                         | Matter                                     | User                | Qty            | Rate (\$) | Non-billable (\$)        | Billable (\$)                 |
|------------|-------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------|---------------------|----------------|-----------|--------------------------|-------------------------------|
| 12/12/2025 |    | Receipt and review of correspondence from Class Admin Arron regarding review of documents sent to him.<br> Unbilled                | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.10h          | \$495.00  | -                        | \$49.50                       |
| 12/11/2025 |    | Draft correspondence to Admin to notify them of approval and next steps towards mailing.<br> Unbilled                              | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.10h          | \$475.00  | -                        | \$47.50                       |
| 11/20/2025 |    | Receipt and review of filed versions of supplemental declarations.<br> Unbilled                                                    | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.10h          | \$495.00  | -                        | \$49.50                       |
| 11/20/2025 |    | File saved court stamped versions of declarations and sent internal memo to Attorney CEN re same.<br> Unbilled                     | 00047-El Dorado Farms Pimentel v. Madrigal | Mika Ince           | 0.10h          | \$140.00  | -                        | \$14.00                       |
| 11/18/2025 |    | Brief exchange of correspondence with Co-Counsel Cervantes regarding the next steps with finalizing the settlement.<br> Unbilled | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.20h          | \$475.00  | -                        | \$95.00                       |
| 11/18/2025 |  | (PCD .1) Review tentative ruling.<br> Unbilled                                                                                   | 00047-El Dorado Farms Pimentel v. Madrigal | Noah Adams          | 0.10h          | \$250.00  | -                        | \$25.00                       |
| 11/17/2025 |  | Receipt and review of correspondence from Co-Counsel regarding tentative ruling granting preliminary approval.<br> Unbilled      | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.10h          | \$495.00  | -                        | \$49.50                       |
|            |                                                                                     |                                                                                                                                                                                                                     |                                            |                     | <b>110.70h</b> |           | <b>\$145.00</b><br>0.70h | <b>\$41,737.00</b><br>110.00h |

# Activities Export

04/13/2026

11:47 AM

| Date ▼     | Type                                                                                | Description                                                                                                                                                                                                                                                             | Matter                                     | User                | Qty            | Rate (\$) | Non-billable (\$)        | Billable (\$)                 |
|------------|-------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------|---------------------|----------------|-----------|--------------------------|-------------------------------|
| 11/17/2025 |    | Receipt and review of Tentative Order Granting Preliminary Approval of Settlement. Determine no need to contest.<br> Unbilled                                                          | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.30h          | \$475.00  | -                        | \$142.50                      |
| 11/17/2025 |    | Receipt and review of Motion for Preliminary Approval - Tentative Ruling - GRANTED.<br> Unbilled                                                                                       | 00047-El Dorado Farms Pimentel v. Madrigal | Brooke Nevels       | 0.20h          | \$475.00  | -                        | \$95.00                       |
| 11/17/2025 |    | Review and file save tentative ruling on Motion for Preliminary Approval of Class and PAGA Settlement. Memo to Attorney BBN, Attorney CEN, and Law Clerk NPA re the same.<br> Unbilled | 00047-El Dorado Farms Pimentel v. Madrigal | Raha Razavi         | 0.10h          | \$225.00  | -                        | \$22.50                       |
| 11/12/2025 |    | Receipt and review of LWDA email confirming receipt of Complaint upload.<br> Unbilled                                                                                                  | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.10h          | \$475.00  | -                        | \$47.50                       |
| 11/12/2025 |  | Draft correspondence to Co-Counsel regarding addressing the LWDA email and explanation of what was submitted to them.<br> Unbilled                                                   | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.10h          | \$475.00  | -                        | \$47.50                       |
| 11/12/2025 |  | Draft email correspondence to the LWDA to confirm that the PAGA Complaint has been submitted to the LWDA. Explain situation.<br> Unbilled                                            | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.20h          | \$475.00  | -                        | \$95.00                       |
|            |                                                                                     |                                                                                                                                                                                                                                                                         |                                            |                     | <b>110.70h</b> |           | <b>\$145.00</b><br>0.70h | <b>\$41,737.00</b><br>110.00h |

Activities Export

04/13/2026  
11:47 AM

| Date       | Type                                                                                                                                                                                | Description                                                                                                                                                                                             | Matter                                     | User                | Qty     | Rate (\$) | Non-billable (\$) | Billable (\$)                   |
|------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------|---------------------|---------|-----------|-------------------|---------------------------------|
| 11/12/2025 | <br> Unbilled     | Receipt and review of PAGA email requesting the Complaint filing.                                                                                                                                       | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.10h   | \$475.00  | -                 | \$47.50                         |
| 11/07/2025 | <br> Unbilled     | Draft correspondence to serve additional papers for Motion for Preliminary Approval.                                                                                                                    | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.20h   | \$475.00  | -                 | \$95.00                         |
| 11/07/2025 | <br> Unbilled     | Receipt and review of Lenden Webb's Supplemental Declaration.                                                                                                                                           | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.10h   | \$475.00  | -                 | \$47.50                         |
| 11/07/2025 | <br> Unbilled     | 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. | 00047-El Dorado Farms Pimentel v. Madrigal | Brooke Nevels       | 0.40h   | \$475.00  | -                 | \$190.00                        |
| 11/07/2025 | <br> Unbilled  | 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. | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.40h   | \$475.00  | -                 | \$190.00                        |
| 11/07/2025 | <br> Unbilled | Telephone conference with Co-Counsel Cervantes regarding the finalization of the declaration for the Motion for Preliminary Approval.                                                                   | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.30h   | \$475.00  | -                 | \$142.50                        |
|            |                                                                                                                                                                                     |                                                                                                                                                                                                         |                                            |                     | 110.70h |           | \$145.00<br>0.70h | \$41,737.00<br>110.00h<br>23/74 |

Activities Export

04/13/2026  
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| Date       | Type | Description                                                                                                                                       | Matter                                     | User                | Qty     | Rate (\$) | Non-billable (\$) | Billable (\$)          |
|------------|------|---------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------|---------------------|---------|-----------|-------------------|------------------------|
|            |      | Unbilled                                                                                                                                          |                                            |                     |         |           |                   |                        |
| 11/07/2025 |      | Review of billing records and compile billing records for the Court to consider on the supplemental declaration of Attorney CEN.<br>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.<br>Unbilled                                               | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 3.40h   | \$475.00  | -                 | \$1,615.00             |
| 11/07/2025 |      | Office conference between Attorney CEN and Attorney BBN regarding plan for supplemental briefing for Motion for Preliminary Approval.<br>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.<br>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.<br>Unbilled                             | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.10h   | \$475.00  | -                 | \$47.50                |
| 11/07/2025 |      | Draft correspondence to Co-                                                                                                                       | 00047-El Dorado Farms                      | Christopher         | 0.20h   | \$475.00  | -                 | \$95.00                |
|            |      |                                                                                                                                                   |                                            |                     | 110.70h |           | \$145.00<br>0.70h | \$41,737.00<br>110.00h |

## Activities Export

04/13/2026

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| Date       | Type                   | Description                                                                                                                                                                                                               | Matter                                     | User                | Qty     | Rate (\$) | Non-billable (\$) | Billable (\$)          |
|------------|------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------|---------------------|---------|-----------|-------------------|------------------------|
|            |                        | Counsel Cervantes regarding the declaration and plan for including their fees in our declaration as a total.<br><div><div></div> Unbilled</div>                                                                           | Pimentel v. Madrigal                       | Nichols             |         |           |                   |                        |
| 11/07/2025 | <div><div></div></div> | Receipt and review of Co-Counsel's Notice and Order for Remote Appearance.<br><div><div></div> Unbilled</div>                                                                                                             | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.10h   | \$475.00  | -                 | \$47.50                |
| 11/05/2025 | <div><div></div></div> | Review of tentative ruling to determine main areas where we need to provide supplemental briefing.<br><div><div></div> Unbilled</div>                                                                                     | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.40h   | \$475.00  | -                 | \$190.00               |
| 10/29/2025 | <div><div></div></div> | 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.<br><div><div></div> Unbilled</div> | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.20h   | \$475.00  | -                 | \$95.00                |
| 10/29/2025 | <div><div></div></div> | Receipt and review of correspondence from co-counsel regarding sample declaration and being in line with the Court's tentative.<br><div><div></div> Unbilled</div>                                                        | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.20h   | \$475.00  | -                 | \$95.00                |
| 10/29/2025 | <div><div></div></div> | Draft correspondence to Co-Counsel Cervantes about the content of the declaration from her firm, focus on fee amount.                                                                                                     | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.20h   | \$475.00  | -                 | \$95.00                |
|            |                        |                                                                                                                                                                                                                           |                                            |                     | 110.70h |           | \$145.00<br>0.70h | \$41,737.00<br>110.00h |

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# Activities Export

04/13/2026

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| Date ▼     | Type | Description                                                                                                                                                   | Matter                                     | User                | Qty            | Rate (\$) | Non-billable (\$)        | Billable (\$)                 |
|------------|------|---------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------|---------------------|----------------|-----------|--------------------------|-------------------------------|
|            |      | ● Unbilled                                                                                                                                                    |                                            |                     |                |           |                          |                               |
| 10/22/2025 | 🕒    | Receipt and review of correspondence from Co-Counsel Cervantes about next steps with filing updated papers for motion for preliminary approval.<br>● 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.<br>● Unbilled                           | 00047-El Dorado Farms Pimentel v. Madrigal | Noah Adams          | 0.10h          | \$250.00  | -                        | \$25.00                       |
| 10/16/2025 | 🕒    | Draft correspondence to Co-Counsel Cervantes to provide declaration from admin and to discuss plan for hearing and filing updated papers.<br>● 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.<br>● 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.<br>● Unbilled                                                   | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.10h          | \$475.00  | -                        | \$47.50                       |
|            |      |                                                                                                                                                               |                                            |                     | <b>110.70h</b> |           | <b>\$145.00</b><br>0.70h | <b>\$41,737.00</b><br>110.00h |

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04/13/2026

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| Date ▼     | Type                                                                                | Description                                                                                                                                                                                                                      | Matter                                     | User                | Qty            | Rate (\$) | Non-billable (\$)        | Billable (\$)                 |
|------------|-------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------|---------------------|----------------|-----------|--------------------------|-------------------------------|
| 10/16/2025 |    | Receipt and review of correspondence to Administrator requesting a declaration for preliminary approval.<br> 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.<br> 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 correspondence regarding same with updated dates for Co-Counsel.<br> Unbilled             | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.30h          | \$475.00  | -                        | \$142.50                      |
| 10/16/2025 |    | Revise Declaration template for Simpluris. Draft correspondence to Simpluris re attached Declaration template.<br> 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.<br> 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.<br> Non-billable                                    | 00047-El Dorado Farms Pimentel v. Madrigal | Raha Razavi         | 0.10h          | \$175.00  | \$17.50                  | -                             |
|            |                                                                                     |                                                                                                                                                                                                                                  |                                            |                     | <b>110.70h</b> |           | <b>\$145.00</b><br>0.70h | <b>\$41,737.00</b><br>110.00h |

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| Date ▼     | Type                                                                                                                                                                    | Description                                                                                                                                                                                   | Matter                                     | User                | Qty            | Rate (\$) | Non-billable (\$)        | Billable (\$)                 |
|------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------|---------------------|----------------|-----------|--------------------------|-------------------------------|
| 10/16/2025 |       | (PCD .1) Review correspondence from Opposing Counsel re tentative ruling.<br>● Unbilled                                                                                                       | 00047-El Dorado Farms Pimentel v. Madrigal | Noah Adams          | 0.10h          | \$250.00  | -                        | \$25.00                       |
| 10/16/2025 |       | Review tentative ruling.<br>● 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 the filing.<br>● Unbilled | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.20h          | \$475.00  | -                        | \$95.00                       |
| 10/15/2025 |       | Office conference between Attorney BBN and Attorney CEN regarding Motion tentative ruling, deficiencies, and areas where we can supplement.<br>● 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.<br>● 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.<br>● Unbilled                                                                                    | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.20h          | \$475.00  | -                        | \$95.00                       |
|            |                                                                                                                                                                         |                                                                                                                                                                                               |                                            |                     | <b>110.70h</b> |           | <b>\$145.00</b><br>0.70h | <b>\$41,737.00</b><br>110.00h |

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| Date ▼     | Type                                                                                | Description                                                                                                                                                                                                                                                                                          | Matter                                     | User                | Qty            | Rate (\$) | Non-billable (\$)        | Billable (\$)                 |
|------------|-------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------|---------------------|----------------|-----------|--------------------------|-------------------------------|
| 10/15/2025 |    | Receipt and review of confirmation from Opposing Counsel Mark that he agrees with the plan of continuing the motion date.<br> 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.<br> Unbilled        | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.20h          | \$475.00  | -                        | \$95.00                       |
| 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.<br> 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.<br> 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.<br> Unbilled                                                                                                                      | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.30h          | \$475.00  | -                        | \$142.50                      |
|            |                                                                                     |                                                                                                                                                                                                                                                                                                      |                                            |                     | <b>110.70h</b> |           | <b>\$145.00</b><br>0.70h | <b>\$41,737.00</b><br>110.00h |

# Activities Export

04/13/2026

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| Date ▼     | Type                                                                                | Description                                                                                                                                                                                          | Matter                                     | User                | Qty            | Rate (\$) | Non-billable (\$)        | Billable (\$)                 |
|------------|-------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------|---------------------|----------------|-----------|--------------------------|-------------------------------|
| 10/15/2025 |    | Receipt and review of consent to E-Service which has been filed.<br> 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.<br> 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.<br> Unbilled                             | 00047-El Dorado Farms Pimentel v. Madrigal | Raha Razavi         | 0.10h          | \$175.00  | -                        | \$17.50                       |
| 10/15/2025 |    | Office conference between Attorney CEN and Legal Assistant RAH re forwarding the tentative ruling.<br> 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.<br> 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.<br> 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<br> Unbilled                     | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.10h          | \$475.00  | -                        | \$47.50                       |
|            |                                                                                     |                                                                                                                                                                                                      |                                            |                     | <b>110.70h</b> |           | <b>\$145.00</b><br>0.70h | <b>\$41,737.00</b><br>110.00h |

# Activities Export

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| Date ▼     | Type                                                                                | Description                                                                                                                                                                                                                      | Matter                                     | User                | Qty            | Rate (\$) | Non-billable (\$)        | Billable (\$)                 |
|------------|-------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------|---------------------|----------------|-----------|--------------------------|-------------------------------|
| 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.<br> 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.<br> 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 regarding attendance at hearing on preliminary approval.<br> Unbilled                | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.10h          | \$475.00  | -                        | \$47.50                       |
| 10/06/2025 |    | File save Notice and Order re Remote Appearance to reflect accepted filing status.<br> 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.<br> 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.<br> 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.<br> Unbilled                                                                            | 00047-El Dorado Farms Pimentel v. Madrigal | Raha Razavi         | 0.10h          | \$175.00  | -                        | \$17.50                       |
|            |                                                                                     |                                                                                                                                                                                                                                  |                                            |                     | <b>110.70h</b> |           | <b>\$145.00</b><br>0.70h | <b>\$41,737.00</b><br>110.00h |

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| Date ▼     | Type                                                                                                                                                                    | Description                                                                                                                                                                                     | Matter                                     | User                | Qty            | Rate (\$) | Non-billable (\$)        | Billable (\$)                 |
|------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------|---------------------|----------------|-----------|--------------------------|-------------------------------|
| 10/01/2025 |       | Draft and prepare Notice and Order re Remote Appearance at Hearing on Motion for Preliminary Approval.<br>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.<br>Non-billable                                        | 00047-El Dorado Farms Pimentel v. Madrigal | Raha Razavi         | 0.10h          | \$175.00  | \$17.50                  | -                             |
| 09/30/2025 |       | Internal correspondence between Attorney CEN, Attorney BBN, and Law Clerk NPA re drafting Motion for Final Approval.<br>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.<br>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.<br>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.<br>Unbilled | 00047-El Dorado Farms Pimentel v. Madrigal | Raha Razavi         | 0.10h          | \$175.00  | -                        | \$17.50                       |
|            |                                                                                                                                                                         |                                                                                                                                                                                                 |                                            |                     | <b>110.70h</b> |           | <b>\$145.00</b><br>0.70h | <b>\$41,737.00</b><br>110.00h |

# Activities Export

04/13/2026

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| Date ▼     | Type                                                                                | Description                                                                                                                                                                                                | Matter                                     | User                | Qty            | Rate (\$) | Non-billable (\$)        | Billable (\$)                 |
|------------|-------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------|---------------------|----------------|-----------|--------------------------|-------------------------------|
| 09/25/2025 |    | Receipt and review of Notice and Order for Remote Appearance from co-counsel.<br> 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.<br> 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 Approval.<br> Unbilled   | 00047-El Dorado Farms Pimentel v. Madrigal | Raha Razavi         | 0.10h          | \$175.00  | -                        | \$17.50                       |
| 09/19/2025 |    | Internal correspondence between Attorney CEN and Law Clerk NPA re filing of motion for preliminary approval.<br> Unbilled | 00047-El Dorado Farms Pimentel v. Madrigal | Noah Adams          | 0.10h          | \$250.00  | -                        | \$25.00                       |
| 09/19/2025 |    | Serve Motion for Preliminary Approval.<br> Unbilled                                                                     | 00047-El Dorado Farms Pimentel v. Madrigal | Noah Adams          | 0.10h          | \$250.00  | -                        | \$25.00                       |
| 09/19/2025 |  | File Motion for Preliminary Approval.<br> 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.<br> 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                                                                                                                                             | 00047-El Dorado Farms Pimentel v. Madrigal | Noah Adams          | 0.10h          | \$250.00  | -                        | \$25.00                       |
|            |                                                                                     |                                                                                                                                                                                                            |                                            |                     | <b>110.70h</b> |           | <b>\$145.00</b><br>0.70h | <b>\$41,737.00</b><br>110.00h |

Activities Export

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| Date       | Type | Description                                                                                                                          | Matter                                     | User                | Qty     | Rate (\$) | Non-billable (\$) | Billable (\$)          |
|------------|------|--------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------|---------------------|---------|-----------|-------------------|------------------------|
|            |      | re finalizing motion for preliminary approval.<br>● Unbilled                                                                         |                                            |                     |         |           |                   |                        |
| 09/19/2025 |      | Finalized Motion for Preliminary Approval. Drafted Proof of Service. Attached all relevant exhibits.<br>● 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.<br>● Unbilled                                                                    | 00047-El Dorado Farms Pimentel v. Madrigal | Noah Adams          | 0.20h   | \$250.00  | -                 | \$50.00                |
| 09/19/2025 |      | Review correspondence from Co-Counsel re finalized declarations.<br>● 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.<br>● 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.<br>● 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.<br>● Unbilled                             | 00047-El Dorado Farms Pimentel v. Madrigal | Noah Adams          | 0.10h   | \$250.00  | -                 | \$25.00                |
| 09/18/2025 |      | Review and revise the Declaration                                                                                                    | 00047-El Dorado Farms                      | Christopher         | 0.20h   | \$475.00  | -                 | \$95.00                |
|            |      |                                                                                                                                      |                                            |                     | 110.70h |           | \$145.00<br>0.70h | \$41,737.00<br>110.00h |

Activities Export

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| Date       | Type | Description                                                                                                                                                                                                                        | Matter                                     | User                | Qty     | Rate (\$) | Non-billable (\$) | Billable (\$)          |
|------------|------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------|---------------------|---------|-----------|-------------------|------------------------|
|            |      | of Webb for Motion for Pre-approval.<br>● Unbilled                                                                                                                                                                                 | Pimentel v. Madrigal                       | Nichols             |         |           |                   |                        |
| 09/18/2025 | 🕒    | Review and revise the Declaration of Pimentel for Motion for Pre-approval.<br>● 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 motion for preliminary approval.<br>● Unbilled                                                             | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.20h   | \$475.00  | -                 | \$95.00                |
| 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.<br>● 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.<br>● 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.<br>● Unbilled                                                                                         | 00047-El Dorado Farms Pimentel v. Madrigal | Noah Adams          | 0.10h   | \$250.00  | -                 | \$25.00                |
|            |      |                                                                                                                                                                                                                                    |                                            |                     | 110.70h |           | \$145.00<br>0.70h | \$41,737.00<br>110.00h |

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| Date ▼     | Type                                                                                | Description                                                                                                                                                                                                                 | Matter                                     | User                | Qty            | Rate (\$) | Non-billable (\$)        | Billable (\$)                 |
|------------|-------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------|---------------------|----------------|-----------|--------------------------|-------------------------------|
| 09/12/2025 |    | Internal correspondence between Attorney CEN and Law Clerk NPA re motion for preliminary deadline.<br> 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.<br> Unbilled | 00047-El Dorado Farms Pimentel v. Madrigal | Raha Razavi         | 0.20h          | \$175.00  | -                        | \$35.00                       |
| 09/10/2025 |    | Receipt and review of Minute Order Continuing CMC. Memo to file regarding same.<br> 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.<br> 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.<br> 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.<br> 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.                                                                                                                             | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.20h          | \$475.00  | -                        | \$95.00                       |
|            |                                                                                     |                                                                                                                                                                                                                             |                                            |                     | <b>110.70h</b> |           | <b>\$145.00</b><br>0.70h | <b>\$41,737.00</b><br>110.00h |

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| Date       | Type | Description                                                                                                                                                                 | Matter                                     | User                | Qty     | Rate (\$) | Non-billable (\$) | Billable (\$)          |
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|            |      | ● Unbilled                                                                                                                                                                  |                                            |                     |         |           |                   |                        |
| 08/15/2025 | 🕒    | Receipt and review of Case Management Statement.<br>● 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.<br>● 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 scheduling hearing then sent Attorney CEN internal memo regarding it.<br>● Unbilled                             | 00047-El Dorado Farms Pimentel v. Madrigal | Mika Ince           | 0.20h   | \$140.00  | -                 | \$28.00                |
| 07/30/2025 | 🕒    | Called and left voicemail for Fresno Court calendar clerk in regards to scheduling hearing.<br>● 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.<br>● 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.<br>● Unbilled | 00047-El Dorado Farms Pimentel v. Madrigal | Noah Adams          | 0.50h   | \$175.00  | -                 | \$87.50                |
|            |      |                                                                                                                                                                             |                                            |                     | 110.70h |           | \$145.00<br>0.70h | \$41,737.00<br>110.00h |

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04/13/2026

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| Date ▼     | Type                                                                                | Description                                                                                                                                                                                                                                                                                       | Matter                                     | User                | Qty            | Rate (\$) | Non-billable (\$)        | Billable (\$)                 |
|------------|-------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------|---------------------|----------------|-----------|--------------------------|-------------------------------|
| 07/23/2025 |    | Draft memo to file regarding revisions to motion for preliminary approval declaration and points and authorities.<br> 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.<br> Unbilled | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.20h          | \$475.00  | -                        | \$95.00                       |
| 07/23/2025 |    | Internal memo between Attorney CEN and Law Clerk NPA re Declaration of Nichols in Support of Motion for Preliminary Approval.<br> 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.<br> 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.<br> 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.<br> 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.                                                                                                                                                                                                                                      | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.20h          | \$475.00  | -                        | \$95.00                       |
|            |                                                                                     |                                                                                                                                                                                                                                                                                                   |                                            |                     | <b>110.70h</b> |           | <b>\$145.00</b><br>0.70h | <b>\$41,737.00</b><br>110.00h |

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| Date       | Type | Description                                                                                                                                                                                                  | Matter                                     | User                | Qty     | Rate (\$) | Non-billable (\$) | Billable (\$)          |
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|            |      | Unbilled                                                                                                                                                                                                     |                                            |                     |         |           |                   |                        |
| 07/23/2025 |      | Telephonic correspondence between Attorney CEN and Law Clerk NPA re Motion for Preliminary Approval<br>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<br>Unbilled                                                                                              | 00047-El Dorado Farms Pimentel v. Madrigal | Noah Adams          | 0.30h   | \$175.00  | -                 | \$52.50                |
| 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.<br>Unbilled | 00047-El Dorado Farms Pimentel v. Madrigal | Noah Adams          | 1.40h   | \$175.00  | -                 | \$245.00               |
| 07/15/2025 |      | Drafted Declaration of Pimentel in Support of Motion for Preliminary Approval.<br>Unbilled                                                                                                                   | 00047-El Dorado Farms Pimentel v. Madrigal | Noah Adams          | 0.70h   | \$175.00  | -                 | \$122.50               |
| 07/14/2025 |      | Drafted Declaration of Pimentel in Support of Motion for Preliminary Approval.<br>Unbilled                                                                                                                   | 00047-El Dorado Farms Pimentel v. Madrigal | Noah Adams          | 0.40h   | \$175.00  | -                 | \$70.00                |
| 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               |
|            |      |                                                                                                                                                                                                              |                                            |                     | 110.70h |           | \$145.00<br>0.70h | \$41,737.00<br>110.00h |

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| Date       | Type | Description                                                                                                                                   | Matter                                     | User                | Qty     | Rate (\$) | Non-billable (\$) | Billable (\$)          |
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| ● Unbilled |      |                                                                                                                                               |                                            |                     |         |           |                   |                        |
| 07/14/2025 | 🕒    | Internal memo between Attorney CEN and Law Clerk NPA re weaknesses to our case<br>● Unbilled                                                  | 00047-El Dorado Farms Pimentel v. Madrigal | Noah Adams          | 0.10h   | \$175.00  | -                 | \$17.50                |
| 07/02/2025 | 🕒    | (PCD .3) Drafted Motion for Preliminary Approval - Memorandum of Points and Authorities.<br>● Unbilled                                        | 00047-El Dorado Farms Pimentel v. Madrigal | Noah Adams          | 1.60h   | \$175.00  | -                 | \$280.00               |
| 07/01/2025 | 🕒    | Drafted Motion for Preliminary Approval - Memo P&A's.<br>● 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<br>● 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.<br>● 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.<br>● Unbilled            | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.20h   | \$475.00  | -                 | \$95.00                |
|            |      |                                                                                                                                               |                                            |                     | 110.70h |           | \$145.00<br>0.70h | \$41,737.00<br>110.00h |

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| 06/27/2025 |    | (PCD .6) Researched and prepared to draft Motion for Preliminary Approval - Memorandum of Points and Authorities.<br> 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.<br> Unbilled | 00047-El Dorado Farms Pimentel v. Madrigal | Noah Adams          | 0.10h          | \$175.00  | -                        | \$17.50                       |
| 06/27/2025 |    | Drafted Motion for Preliminary Approval - Notice.<br> 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.<br> 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.<br> 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.<br> Unbilled                              | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.10h          | \$475.00  | -                        | \$47.50                       |
| 06/13/2025 |  | Draft correspondence to return                                                                                                                                                                                                   | 00047-El Dorado Farms                      | Christopher         | 0.10h          | \$475.00  | -                        | \$47.50                       |
|            |                                                                                     |                                                                                                                                                                                                                                  |                                            |                     | <b>110.70h</b> |           | <b>\$145.00</b><br>0.70h | <b>\$41,737.00</b><br>110.00h |

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| Date       | Type | Description                                                                                                                        | Matter                                     | User                | Qty     | Rate (\$) | Non-billable (\$) | Billable (\$)          |
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|            |      | executed class action settlement agreement.<br>● Unbilled                                                                          | Pimentel v. Madrigal                       | Nichols             |         |           |                   |                        |
| 06/13/2025 | 🕒    | Receipt and review of correspondence containing partially executed settlement agreement.<br>● 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.<br>● Unbilled                                                          | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.20h   | \$475.00  | -                 | \$95.00                |
| 06/12/2025 | 🕒    | Brief exchange of correspondence with co-counsel about plan for drafting motion for preliminary approval.<br>● 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.<br>● 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.<br>● 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                                       | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.10h   | \$475.00  | -                 | \$47.50                |
|            |      |                                                                                                                                    |                                            |                     | 110.70h |           | \$145.00<br>0.70h | \$41,737.00<br>110.00h |

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| Date       | Type | Description                                                                                                                                                                            | Matter                                     | User                | Qty     | Rate (\$) | Non-billable (\$) | Billable (\$)          |
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|            |      | and Co-Counsel Katherine about circulating the agreement for signatures.<br>● Unbilled                                                                                                 |                                            |                     |         |           |                   |                        |
| 05/29/2025 |      | Receipt and review of Order to Continue Case Management Conference.<br>● 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.<br>● Unbilled                                                                       | 00047-El Dorado Farms Pimentel v. Madrigal | Mika Ince           | 0.10h   | \$140.00  | -                 | \$14.00                |
| 05/26/2025 |      | Receipt and review of Stipulation received by the Court.<br>● 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.<br>● 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.<br>● Unbilled | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.30h   | \$475.00  | -                 | \$142.50               |
| 05/20/2025 |      | Receipt and review of                                                                                                                                                                  | 00047-El Dorado Farms                      | Christopher         | 0.40h   | \$475.00  | -                 | \$190.00               |
|            |      |                                                                                                                                                                                        |                                            |                     | 110.70h |           | \$145.00<br>0.70h | \$41,737.00<br>110.00h |

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|------------|------|--------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------|---------------------|---------|-----------|-------------------|------------------------|
|            |      | correspondence from Co-Counsel KEC regarding her revisions and review of settlement agreement.<br>● Unbilled                                                 | Pimentel v. Madrigal                       | Nichols             |         |           |                   |                        |
| 05/16/2025 | 🕒    | File saved Joint Stipulation to Continue Case Management Conference and Proposed Order re the same.<br>● 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.<br>● Unbilled         | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.20h   | \$475.00  | -                 | \$95.00                |
| 05/15/2025 | 🕒    | Draft correspondence to Co-Counsel regarding the stipulation to continue CMC and next steps as it pertains to CMC statement.<br>● 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.<br>● 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.<br>● Unbilled                                                                                                  | 00047-El Dorado Farms Pimentel v. Madrigal | Raha Razavi         | 0.10h   | \$150.00  | -                 | \$15.00                |
| 04/01/2025 | 🕒    | Prepare Notice of Change of                                                                                                                                  | 00047-El Dorado Farms                      | Shelby              | 0.10h   | \$175.00  | -                 | \$17.50                |
|            |      |                                                                                                                                                              |                                            |                     | 110.70h |           | \$145.00<br>0.70h | \$41,737.00<br>110.00h |

Activities Export

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| Date       | Type | Description                                                                                                                   | Matter                                     | User                | Qty     | Rate (\$) | Non-billable (\$) | Billable (\$)          |
|------------|------|-------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------|---------------------|---------|-----------|-------------------|------------------------|
|            |      | Address for filing<br>● Unbilled                                                                                              | Pimentel v. Madrigal                       | Durham              |         |           |                   |                        |
| 03/28/2025 |      | Update the Proof of Service to reflect the Change of Address<br>● 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<br>● 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.<br>● Unbilled                                 | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.10h   | \$475.00  | -                 | \$47.50                |
| 03/03/2025 |      | Receipt and review of correspondence from Simpluris about declaration for purposes of preliminary approval.<br>● 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.<br>● 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.<br>● 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                                                            | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.10h   | \$475.00  | -                 | \$47.50                |
|            |      |                                                                                                                               |                                            |                     | 110.70h |           | \$145.00<br>0.70h | \$41,737.00<br>110.00h |

Activities Export

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| Date       | Type | Description                                                                                                                                                                                                       | Matter                                     | User                | Qty     | Rate (\$) | Non-billable (\$) | Billable (\$)          |
|------------|------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------|---------------------|---------|-----------|-------------------|------------------------|
|            |      | on the status of finalizing obtaining preliminary approval.<br>● Unbilled                                                                                                                                         |                                            |                     |         |           |                   |                        |
| 02/26/2025 |      | Draft correspondence to Opposing Counsel Mark regarding exhibits and timeline for providing them to him.<br>● 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.<br>● 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 Katherine about settlement agreement and bids for administration.<br>● 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.<br>● 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.                                                                                                                          | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.10h   | \$475.00  | -                 | \$47.50                |
|            |      |                                                                                                                                                                                                                   |                                            |                     | 110.70h |           | \$145.00<br>0.70h | \$41,737.00<br>110.00h |

Activities Export

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| Date       | Type | Description                                                                                                                                                  | Matter                                     | User                | Qty     | Rate (\$) | Non-billable (\$) | Billable (\$)          |
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|            |      | ● Unbilled                                                                                                                                                   |                                            |                     |         |           |                   |                        |
| 02/11/2025 | 🕒    | Draft correspondence to co-counsel to provide redlines for Settlement Agreement. Discussion regarding exhibits and drafting of same.<br>● 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.<br>● 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 potential for obtaining additional quote.<br>● Unbilled                                              | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.10h   | \$475.00  | -                 | \$47.50                |
| 02/04/2025 | 🕒    | Receipt and review of correspondence from co-counsels office containing two quotes for the administration. Review of Simpluris and CPT quotes.<br>● 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.<br>● Unbilled                      | 00047-El Dorado Farms Pimentel v. Madrigal | Raha Razavi         | 0.20h   | \$125.00  | -                 | \$25.00                |
| 02/03/2025 | 🕒    | Receipt and review Case                                                                                                                                      | 00047-El Dorado Farms                      | Christopher         | 0.20h   | \$475.00  | -                 | \$95.00                |
|            |      |                                                                                                                                                              |                                            |                     | 110.70h |           | \$145.00<br>0.70h | \$41,737.00<br>110.00h |

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| Date       | Type                                                                                | Description                                                                                                                                                                                                                                                                  | Matter                                     | User                | Qty            | Rate (\$) | Non-billable (\$)        | Billable (\$)                 |
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|            |                                                                                     | Management Conference Minute Order. Memo to file regarding same.<br> Unbilled                                                                                                               | Pimentel v. Madrigal                       | Nichols             |                |           |                          |                               |
| 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,<br> 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.<br> Unbilled                                                         | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.20h          | \$475.00  | -                        | \$95.00                       |
| 01/21/2025 |    | (PCD .1) Receipt and review of Defendant Madrigal Case Management Statement via U.S. Mail.<br> 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.<br> 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.<br> Unbilled                                                                                                        | 00047-El Dorado Farms Pimentel v. Madrigal | Raha Razavi         | 0.10h          | \$125.00  | -                        | \$12.50                       |
|            |                                                                                     |                                                                                                                                                                                                                                                                              |                                            |                     | <b>110.70h</b> |           | <b>\$145.00</b><br>0.70h | <b>\$41,737.00</b><br>110.00h |

Activities Export

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| Date       | Type                                                                                | Description                                                                                                                                                                                                                                                                                                                  | Matter                                     | User                | Qty     | Rate (\$) | Non-billable (\$) | Billable (\$)          |
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| 01/16/2025 |    | File saved Defendant's Case Management Conference Statement.<br> 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.<br> 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.<br> 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 Statement.<br> Unbilled                                                                                                                                                                    | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.10h   | \$475.00  | -                 | \$47.50                |
| 01/13/2025 |    | File saved Pimentel Case Management Statement.<br> 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.<br> 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                                                                                                                                                                                                                                                                         | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.10h   | \$475.00  | -                 | \$47.50                |
|            |                                                                                     |                                                                                                                                                                                                                                                                                                                              |                                            |                     | 110.70h |           | \$145.00<br>0.70h | \$41,737.00<br>110.00h |

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| Date       | Type | Description                                                                                                                                                                          | Matter                                     | User                | Qty            | Rate (\$) | Non-billable (\$)        | Billable (\$)                 |
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|            |      | Katherine about clarification on long form as exhibit and preliminary approval drafting.<br>● Unbilled                                                                               |                                            |                     |                |           |                          |                               |
| 01/10/2025 | 🕒    | Draft correspondence to Co-Counsel regarding draft for longform settlement agreement and samples to refer to.<br>● 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.<br>● Unbilled                                                   | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.10h          | \$475.00  | -                        | \$47.50                       |
| 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.<br>● 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.<br>● 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.<br>● Unbilled                                                                              | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.10h          | \$475.00  | -                        | \$47.50                       |
|            |      |                                                                                                                                                                                      |                                            |                     | <b>110.70h</b> |           | <b>\$145.00</b><br>0.70h | <b>\$41,737.00</b><br>110.00h |

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| 01/08/2025 |    | Receipt and review of correspondence from Opposing Counsel Mark regarding the change being made and sending for signature.<br> 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.<br> 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 regarding percentages and how the pay period count likely wont change.<br> Unbilled | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.10h   | \$475.00  | -                 | \$47.50                |
| 01/08/2025 |    | Draft correspondence to opposing counsel Mark about work at mediation.<br> 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.<br> 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.                                                                                                                                                                                                             | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.10h   | \$475.00  | -                 | \$47.50                |
|            |                                                                                     |                                                                                                                                                                                                                                                                                          |                                            |                     | 110.70h |           | \$145.00<br>0.70h | \$41,737.00<br>110.00h |

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| Date       | Type | Description                                                                                                                                                       | Matter                                     | User                | Qty     | Rate (\$) | Non-billable (\$) | Billable (\$)          |
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|            |      | ● Unbilled                                                                                                                                                        |                                            |                     |         |           |                   |                        |
| 01/07/2025 | 🕒    | Draft correspondence to Opposing Counsel Mark about the MOU draft.<br>● Unbilled                                                                                  | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.10h   | \$475.00  | -                 | \$47.50                |
| 01/07/2025 | 🕒    | Attend Mediation.<br>● 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.<br>● 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 regarding strategy with opening demand for mediation.<br>● Unbilled          | 00047-El Dorado Farms Pimentel v. Madrigal | Brooke Nevels       | 0.20h   | \$475.00  | -                 | \$95.00                |
| 01/04/2025 | 🕒    | Draft correspondence to Co-Counsel Cervantes regarding the unpaid wage claim and need for additional detail and specification from Client Pimental.<br>● 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.<br>● 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                                                                       | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.20h   | \$475.00  | -                 | \$95.00                |
|            |      |                                                                                                                                                                   |                                            |                     | 110.70h |           | \$145.00<br>0.70h | \$41,737.00<br>110.00h |

Activities Export

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| Date       | Type | Description                                                                                                                                              | Matter                                     | User                | Qty     | Rate (\$) | Non-billable (\$) | Billable (\$)          |
|------------|------|----------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------|---------------------|---------|-----------|-------------------|------------------------|
|            |      | we need and client involvement.<br>● Unbilled                                                                                                            |                                            |                     |         |           |                   |                        |
| 01/03/2025 |      | Receipt and review of Invitation and Pre-Mediation Information from mediator on Pimentel v. Madrigal.<br>● 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.<br>● Unbilled                                | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.60h   | \$475.00  | -                 | \$285.00               |
| 01/03/2025 |      | Draft mediation brief.<br>● Unbilled                                                                                                                     | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 3.10h   | \$475.00  | -                 | \$1,472.50             |
| 01/02/2025 |      | Begin draft of mediation brief by outlining damages calculations and determining how to argue certain claims for the context of mediation.<br>● 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.<br>● Unbilled            | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 2.20h   | \$475.00  | -                 | \$1,045.00             |
| 12/11/2024 |      | Review of Pimentel's employment records. Analyze and determine viability of arguments for same.<br>● Unbilled                                            | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.80h   | \$475.00  | -                 | \$380.00               |
|            |      |                                                                                                                                                          |                                            |                     | 110.70h |           | \$145.00<br>0.70h | \$41,737.00<br>110.00h |

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| Date ▼     | Type                                                                                | Description                                                                                                                                                                                                                                                                 | Matter                                     | User                | Qty            | Rate (\$) | Non-billable (\$)        | Billable (\$)                 |
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| 12/10/2024 |    | Receipt and review of correspondence from Opposing Counsel Bell regarding document production and containing download link.<br> 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.<br> Unbilled                                                                     | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.10h          | \$475.00  | -                        | \$47.50                       |
| 12/03/2024 |    | File saved Pimental Payroll Records.<br> Unbilled                                                                                                                                          | 00047-El Dorado Farms Pimentel v. Madrigal | Raha Razavi         | 0.10h          | \$125.00  | -                        | \$12.50                       |
| 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.<br> 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.<br> 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.                                                                                                                                                           | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.10h          | \$475.00  | -                        | \$47.50                       |
|            |                                                                                     |                                                                                                                                                                                                                                                                             |                                            |                     | <b>110.70h</b> |           | <b>\$145.00</b><br>0.70h | <b>\$41,737.00</b><br>110.00h |

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| Date       | Type | Description                                                                                               | Matter                                     | User                | Qty     | Rate (\$) | Non-billable (\$) | Billable (\$)          |
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|            |      | ● Unbilled                                                                                                |                                            |                     |         |           |                   |                        |
| 10/22/2024 | 🕒    | Receipt and review of notice of hearing continued to February. Memo to file regarding same.<br>● 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.<br>● 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.<br>● 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. Add calendar reminders. Memo same.<br>● Unbilled                     | 00047-El Dorado Farms Pimentel v. Madrigal | Raha Razavi         | 0.20h   | \$125.00  | -                 | \$25.00                |
| 10/09/2024 | 🕒    | Upload Defense Case Management Statement and Notice of Remote Appearance. Memo same.<br>● 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<br>● 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                     | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.10h   | \$475.00  | -                 | \$47.50                |
|            |      |                                                                                                           |                                            |                     | 110.70h |           | \$145.00<br>0.70h | \$41,737.00<br>110.00h |

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| Date       | Type | Description                                                                                                                                 | Matter                                     | User                | Qty     | Rate (\$) | Non-billable (\$) | Billable (\$)          |
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|            |      | Mediator Saldaña related to mediation scheudling and the new date of January 7th.<br>● Unbilled                                             |                                            |                     |         |           |                   |                        |
| 10/02/2024 | 🕒    | Draft correspondence to Co-Counsel about plan for Belaire-West discovery and next steps. Discussion regarding Belaire timing.<br>● 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.<br>● Unbilled             | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.10h   | \$475.00  | -                 | \$47.50                |
| 10/02/2024 | 🕒    | Review of multiple emails regarding the rescheduling of mediation.<br>● 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.<br>● 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.<br>● Unbilled          | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.10h   | \$475.00  | -                 | \$47.50                |
|            |      |                                                                                                                                             |                                            |                     | 110.70h |           | \$145.00<br>0.70h | \$41,737.00<br>110.00h |

# Activities Export

04/13/2026

11:47 AM

| Date ▼     | Type                                                                                | Description                                                                                                                                                                                                                                                                                       | Matter                                     | User                | Qty            | Rate (\$) | Non-billable (\$)        | Billable (\$)                 |
|------------|-------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------|---------------------|----------------|-----------|--------------------------|-------------------------------|
| 10/01/2024 |    | File save and upload InfoTrack invoice to Client file. Memo same.<br> 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.<br> 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.<br> Unbilled | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.20h          | \$475.00  | -                        | \$95.00                       |
| 09/30/2024 |    | Brief exchange of correspondence with co-counsel about Case Management Conference attendance.<br> 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.<br> 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.<br> Unbilled                                                                                                | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.10h          | \$475.00  | -                        | \$47.50                       |
|            |                                                                                     |                                                                                                                                                                                                                                                                                                   |                                            |                     | <b>110.70h</b> |           | <b>\$145.00</b><br>0.70h | <b>\$41,737.00</b><br>110.00h |

# Activities Export

04/13/2026

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| Date ▼     | Type                                                                                | Description                                                                                                                                                                                                                                                                      | Matter                                     | User                | Qty            | Rate (\$) | Non-billable (\$)        | Billable (\$)                 |
|------------|-------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------|---------------------|----------------|-----------|--------------------------|-------------------------------|
| 09/30/2024 |    | File save and upload Case Management Statement to Client file. Memo same.<br> 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.<br> 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.<br> 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. Correspondence to co-counsel regarding ADR stip.<br> Unbilled                                                                                  | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.10h          | \$475.00  | -                        | \$47.50                       |
| 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.<br> 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.                                                                               | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.30h          | \$475.00  | -                        | \$142.50                      |
|            |                                                                                     |                                                                                                                                                                                                                                                                                  |                                            |                     | <b>110.70h</b> |           | <b>\$145.00</b><br>0.70h | <b>\$41,737.00</b><br>110.00h |

Activities Export

04/13/2026  
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| Date       | Type | Description                                                                                                                                                                               | Matter                                     | User                | Qty     | Rate (\$) | Non-billable (\$) | Billable (\$)          |
|------------|------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------|---------------------|---------|-----------|-------------------|------------------------|
|            |      | Unbilled                                                                                                                                                                                  |                                            |                     |         |           |                   |                        |
| 09/18/2024 |      | Attend Zoom conference with Opposing Counsel Karuthers, Co-Counsel Webb and Co-Counsel Cervantes. Memo to file regarding same.<br>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.<br>Unbilled                                    | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.10h   | \$475.00  | -                 | \$47.50                |
| 09/13/2024 |      | Receipt and review of correspondence from Opposing Counsel Mark regarding data/ documents neccesary for mediation and numbers related to workweek and PAGA pay period counts.<br>Unbilled | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.20h   | \$475.00  | -                 | \$95.00                |
| 07/18/2024 |      | Receipt and review of correspondence from Co-Counsel with First Amended Complaint.<br>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.<br>Unbilled                                                                                               | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.20h   | \$475.00  | -                 | \$95.00                |
|            |      |                                                                                                                                                                                           |                                            |                     | 110.70h |           | \$145.00<br>0.70h | \$41,737.00<br>110.00h |

# Activities Export

04/13/2026

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| Date ▼     | Type                                                                                | Description                                                                                                                                                                                                                                                                                                         | Matter                                     | User                | Qty     | Rate (\$) | Non-billable (\$) | Billable (\$)          |
|------------|-------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------|---------------------|---------|-----------|-------------------|------------------------|
| 07/12/2024 |    | Receipt and reivew of Complaint, First Amended, which includes PAGA. File save same.<br> 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.<br> 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 update on FAC and addint the PAGA cause of action.<br> Unbilled                                                                                                          | 00047-El Dorado Farms Pimentel v. Madrigal | Brooke Nevels       | 0.10h   | \$475.00  | -                 | \$47.50                |
| 06/26/2024 |    | Receipt and review of co-counsel Cervantes update and information regarding PAGA amendment filing time. Discussion of mediation and amendment timeline.<br> Unbilled                                                             | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.10h   | \$475.00  | -                 | \$47.50                |
| 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.<br> Unbilled | 00047-El Dorado Farms Pimentel v. Madrigal | Brooke Nevels       | 0.20h   | \$475.00  | -                 | \$95.00                |
|            |                                                                                     |                                                                                                                                                                                                                                                                                                                     |                                            |                     | 110.70h |           | \$145.00<br>0.70h | \$41,737.00<br>110.00h |

Activities Export

04/13/2026  
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| Date       | Type                                                                                | Description                                                                                                                                                                                                                        | Matter                                     | User                | Qty     | Rate (\$) | Non-billable (\$) | Billable (\$)          |
|------------|-------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------|---------------------|---------|-----------|-------------------|------------------------|
| 06/14/2024 |    | Receipt and review of Mediation Docs sent by the mediator to prepare us for mediation.<br> Unbilled                                               | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.10h   | \$475.00  | -                 | \$47.50                |
| 06/10/2024 |    | Receipt and review of correspondence from Opposing Counsel Karruthers regarding acceptance of information regarding mediation dates.<br> Unbilled | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.10h   | \$475.00  | -                 | \$47.50                |
| 06/10/2024 |    | Receipt and review of email correspondence regarding Opposing Counsel's availblity for mediation.<br> Unbilled                                    | 00047-El Dorado Farms Pimentel v. Madrigal | Brooke Nevels       | 0.10h   | \$475.00  | -                 | \$47.50                |
| 06/07/2024 |    | Draft correspondence to Opposing Counsel Mark about our mediation availabiltiy.<br> 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.<br> 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.<br> Unbilled                                      | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.10h   | \$475.00  | -                 | \$47.50                |
|            |                                                                                     |                                                                                                                                                                                                                                    |                                            |                     | 110.70h |           | \$145.00<br>0.70h | \$41,737.00<br>110.00h |

Activities Export

04/13/2026  
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| Date       | Type                                                                                | Description                                                                                                                                                                                                                                 | Matter                                     | User                | Qty     | Rate (\$) | Non-billable (\$) | Billable (\$)          |
|------------|-------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------|---------------------|---------|-----------|-------------------|------------------------|
| 06/06/2024 |    | Receipt and review of Order granting continuance of Case Management Conference. Calendar and file save same.<br> 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.<br> 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.<br> Unbilled                    | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.10h   | \$475.00  | -                 | \$47.50                |
| 05/31/2024 |    | Receipt and review of correspondence from Co-Counsel about Answer and POS.<br> 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.<br> 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.<br> 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                                                                                                                                                                                                             | 00047-El Dorado Farms                      | Christopher         | 0.10h   | \$475.00  | -                 | \$47.50                |
|            |                                                                                     |                                                                                                                                                                                                                                             |                                            |                     | 110.70h |           | \$145.00<br>0.70h | \$41,737.00<br>110.00h |

Activities Export

04/13/2026  
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| Date       | Type | Description                                                                                                                                                                                | Matter                                     | User                | Qty     | Rate (\$) | Non-billable (\$) | Billable (\$)          |
|------------|------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------|---------------------|---------|-----------|-------------------|------------------------|
|            |      | Jury Fee Deposit.<br>● Unbilled                                                                                                                                                            | Pimentel v. Madrigal                       | Nichols             |         |           |                   |                        |
| 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.<br>● 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.<br>● 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 Notice of Jury FEe Deposit.<br>● Unbilled                                                                                  | 00047-El Dorado Farms Pimentel v. Madrigal | Brooke Nevels       | 0.20h   | \$475.00  | -                 | \$95.00                |
| 05/28/2024 | 🕒    | Receipt and review of correspondence from Co-Counsel related to jury fee deposit and CMC statement.<br>● 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.<br>● 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                                                                                                                                   | 00047-El Dorado Farms Pimentel v. Madrigal | Brooke Nevels       | 0.20h   | \$475.00  | -                 | \$95.00                |
|            |      |                                                                                                                                                                                            |                                            |                     | 110.70h |           | \$145.00<br>0.70h | \$41,737.00<br>110.00h |

Activities Export

04/13/2026  
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| Date       | Type | Description                                                                                                                                                                                                                                                      | Matter                                     | User                | Qty     | Rate (\$) | Non-billable (\$) | Billable (\$)          |
|------------|------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------|---------------------|---------|-----------|-------------------|------------------------|
|            |      | counts and proposed mediator.<br>Memo to fiel.<br><div>● Unbilled</div>                                                                                                                                                                                          |                                            |                     |         |           |                   |                        |
| 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.<br><div>● Unbilled</div>                                                                                  | 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.<br><div>● Unbilled</div>                                                                                  | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.10h   | \$475.00  | -                 | \$47.50                |
| 05/28/2024 |      | Review of class size and data 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.<br><div>● Unbilled</div> | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.30h   | \$475.00  | -                 | \$142.50               |
| 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.<br><div>● Unbilled</div>                                                                           | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.20h   | \$475.00  | -                 | \$95.00                |
|            |      |                                                                                                                                                                                                                                                                  |                                            |                     | 110.70h |           | \$145.00<br>0.70h | \$41,737.00<br>110.00h |

# Activities Export

04/13/2026

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| Date ▼     | Type                                                                                | Description                                                                                                                                                                                                                                                                                                      | Matter                                     | User                | Qty     | Rate (\$) | Non-billable (\$) | Billable (\$)          |
|------------|-------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------|---------------------|---------|-----------|-------------------|------------------------|
| 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.<br> 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.<br> 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 double-check.<br> Unbilled                                                     | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.10h   | \$475.00  | -                 | \$47.50                |
| 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.<br> 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.<br> Unbilled                                                     | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.10h   | \$475.00  | -                 | \$47.50                |
|            |                                                                                     |                                                                                                                                                                                                                                                                                                                  |                                            |                     | 110.70h |           | \$145.00<br>0.70h | \$41,737.00<br>110.00h |

# Activities Export

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| Date ▼     | Type                                                                                | Description                                                                                                                                                                                                                                                         | Matter                                     | User                | Qty     | Rate (\$) | Non-billable (\$) | Billable (\$)                   |
|------------|-------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------|---------------------|---------|-----------|-------------------|---------------------------------|
| 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.<br> 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.<br> 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.<br> Unbilled               | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.20h   | \$475.00  | -                 | \$95.00                         |
| 05/22/2024 |    | Receipt and review of correspondence from Opposing Counsel Kruthers with Exhibit A attached.<br> 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.<br> 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                                                                                                                                                                   | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.10h   | \$475.00  | -                 | \$47.50                         |
|            |                                                                                     |                                                                                                                                                                                                                                                                     |                                            |                     | 110.70h |           | \$145.00<br>0.70h | \$41,737.00<br>110.00h<br>66/74 |

Activities Export

04/13/2026  
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| Date       | Type | Description                                                                                                                                                                                                                                               | Matter                                     | User                | Qty     | Rate (\$) | Non-billable (\$) | Billable (\$)                   |
|------------|------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------|---------------------|---------|-----------|-------------------|---------------------------------|
|            |      | limited topics makes sense and we can work out the remainder as we proceed to mediation.<br>● Unbilled                                                                                                                                                    |                                            |                     |         |           |                   |                                 |
| 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.<br>● 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. Request update on stipulation.<br>● Unbilled                                                                           | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.10h   | \$475.00  | -                 | \$47.50                         |
| 05/15/2024 | 🕒    | Receipt and review of status correspondence from co-counsel's paralegal. Update calendar accordingly and note upcoming events.<br>● 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.<br>● 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.                                                                                                                                                                                        | 00047-El Dorado Farms Pimentel v. Madrigal | Brooke Nevels       | 0.10h   | \$475.00  | -                 | \$47.50                         |
|            |      |                                                                                                                                                                                                                                                           |                                            |                     | 110.70h |           | \$145.00<br>0.70h | \$41,737.00<br>110.00h<br>67/74 |

## Activities Export

04/13/2026

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| Date       | Type | Description                                                                                                                                                                                              | Matter                                     | User                | Qty     | Rate (\$) | Non-billable (\$) | Billable (\$)          |
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|            |      | Unbilled                                                                                                                                                                                                 |                                            |                     |         |           |                   |                        |
| 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.                             | 00047-El Dorado Farms Pimentel v. Madrigal | Brooke Nevels       | 0.20h   | \$475.00  | -                 | \$95.00                |
|            |      | Unbilled                                                                                                                                                                                                 |                                            |                     |         |           |                   |                        |
| 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.                                 | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.20h   | \$475.00  | -                 | \$95.00                |
|            |      | Unbilled                                                                                                                                                                                                 |                                            |                     |         |           |                   |                        |
| 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. | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.20h   | \$475.00  | -                 | \$95.00                |
|            |      | Unbilled                                                                                                                                                                                                 |                                            |                     |         |           |                   |                        |
| 04/29/2024 | 🕒    | Receipt and review of status email from Ms. Glaze.                                                                                                                                                       | 00047-El Dorado Farms Pimentel v. Madrigal | Brooke Nevels       | 0.10h   | \$475.00  | -                 | \$47.50                |
|            |      | Unbilled                                                                                                                                                                                                 |                                            |                     |         |           |                   |                        |
| 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                                          | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.10h   | \$475.00  | -                 | \$47.50                |
|            |      |                                                                                                                                                                                                          |                                            |                     |         |           |                   |                        |
|            |      |                                                                                                                                                                                                          |                                            |                     | 110.70h |           | \$145.00<br>0.70h | \$41,737.00<br>110.00h |

68/74

Activities Export

| Date       | Type                                                                                | Description                                                                                                                                                                                                      | Matter                                     | User                | Qty     | Rate (\$) | Non-billable (\$) | Billable (\$)                   |
|------------|-------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------|---------------------|---------|-----------|-------------------|---------------------------------|
|            |                                                                                     | the anticipated call.<br>● Unbilled                                                                                                                                                                              |                                            |                     |         |           |                   |                                 |
| 04/26/2024 |    | Reciept and review of correspondence from Co-Counsel about being open to mediation but needing more information before making a decision.<br>● Unbilled                                                          | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.10h   | \$475.00  | -                 | \$47.50                         |
| 04/25/2024 |    | Draft correspodnence to Co-Counsel Cervantes explaining mediator preferences and discussing how we will want to approach in terms of obtaining information related to class size.<br>● Unbilled                  | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.20h   | \$475.00  | -                 | \$95.00                         |
| 04/25/2024 |    | Draft correspondence to Co-Counsel regarding First Amended Complaint. Discussion regarding timing for filing updated Complaint.<br>● 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.<br>● 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.                                                                                                                         | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.20h   | \$475.00  | -                 | \$95.00                         |
|            |                                                                                     |                                                                                                                                                                                                                  |                                            |                     | 110.70h |           | \$145.00<br>0.70h | \$41,737.00<br>110.00h<br>69/74 |

Activities Export

04/13/2026  
11:47 AM

| Date       | Type | Description                                                                                                                                                                                                   | Matter                                     | User                | Qty     | Rate (\$) | Non-billable (\$) | Billable (\$)          |
|------------|------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------|---------------------|---------|-----------|-------------------|------------------------|
|            |      | Discussion about proposed mediators sent from Opposing Counsel, cost, and which we would be agreeable to.<br>● Unbilled                                                                                       |                                            |                     |         |           |                   |                        |
| 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.<br>● 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 draft stipulation.<br>● Unbilled                                                            | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.10h   | \$475.00  | -                 | \$47.50                |
| 04/23/2024 | 🕒    | Receipt and review of PAGA letter filing confirmation.<br>● 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.<br>● 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.                                                                                    | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.10h   | \$475.00  | -                 | \$47.50                |
|            |      |                                                                                                                                                                                                               |                                            |                     | 110.70h |           | \$145.00<br>0.70h | \$41,737.00<br>110.00h |

## Activities Export

04/13/2026

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| Date       | Type | Description                                                                                                                                                                                           | Matter                                     | User                | Qty     | Rate (\$) | Non-billable (\$) | Billable (\$)          |
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|            |      | Unbilled                                                                                                                                                                                              |                                            |                     |         |           |                   |                        |
| 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. | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.10h   | \$475.00  | -                 | \$47.50                |
|            |      | Unbilled                                                                                                                                                                                              |                                            |                     |         |           |                   |                        |
| 04/19/2024 |      | Draft correspondence to co-counsel Cervantes regarding the mediation, reuirements for informal information/documents we need before mediation and thoughts related to mediator selection.             | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.30h   | \$475.00  | -                 | \$142.50               |
|            |      | Unbilled                                                                                                                                                                                              |                                            |                     |         |           |                   |                        |
| 04/19/2024 |      | Receipt of correspondence from Co-counsel Cevantes regarding mediaiton, default set aside and our thoughts on both.                                                                                   | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.10h   | \$475.00  | -                 | \$47.50                |
|            |      | Unbilled                                                                                                                                                                                              |                                            |                     |         |           |                   |                        |
| 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.      | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.20h   | \$475.00  | -                 | \$95.00                |
|            |      | Unbilled                                                                                                                                                                                              |                                            |                     |         |           |                   |                        |
| 04/19/2024 |      | Receipt and review of email exchanges with Attorneys LFW,                                                                                                                                             | 00047-El Dorado Farms Pimentel v. Madrigal | Brooke Nevels       | 0.20h   | \$475.00  | -                 | \$95.00                |
|            |      |                                                                                                                                                                                                       |                                            |                     | 110.70h |           | \$145.00<br>0.70h | \$41,737.00<br>110.00h |

71/74

Activities Export

04/13/2026  
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| Date       | Type | Description                                                                                                                                                                                                                                                                                                            | Matter                                     | User                | Qty     | Rate (\$) | Non-billable (\$) | Billable (\$)          |
|------------|------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------|---------------------|---------|-----------|-------------------|------------------------|
|            |      | KEC and CEN regarding action to get information regarding the class pursuant ot Kullar /Dunk.<br>● Unbilled                                                                                                                                                                                                            |                                            |                     |         |           |                   |                        |
| 04/15/2024 | 🕒    | Receipt and review of email exchanges with Attorney LFW and CEN regarding thoughts on adding PAGA to the Complaint.<br>● 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.<br>● 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 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.<br>● Unbilled | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.30h   | \$475.00  | -                 | \$142.50               |
| 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.<br>● Unbilled                                                                                                                                       | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.10h   | \$475.00  | -                 | \$47.50                |
|            |      |                                                                                                                                                                                                                                                                                                                        |                                            |                     | 110.70h |           | \$145.00<br>0.70h | \$41,737.00<br>110.00h |

Activities Export

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| Date       | Type                                                                                | Description                                                                                                                                                                                                                                                  | Matter                                     | User                | Qty     | Rate (\$) | Non-billable (\$) | Billable (\$)                   |
|------------|-------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------|---------------------|---------|-----------|-------------------|---------------------------------|
| 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.<br> 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.<br> 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 ahout potential default.<br> Unbilled                                                             | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.10h   | \$475.00  | -                 | \$47.50                         |
| 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.<br> 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.<br> 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                                                                                                                                                                                                       | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.10h   | \$475.00  | -                 | \$47.50                         |
|            |                                                                                     |                                                                                                                                                                                                                                                              |                                            |                     | 110.70h |           | \$145.00<br>0.70h | \$41,737.00<br>110.00h<br>73/74 |

# Activities Export

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| Date       | Type | Description                                                       | Matter                                     | User                | Qty     | Rate (\$) | Non-billable (\$) | Billable (\$)          |
|------------|------|-------------------------------------------------------------------|--------------------------------------------|---------------------|---------|-----------|-------------------|------------------------|
|            |      | revisions to Request for Entry of Default.<br>● Unbilled          |                                            |                     |         |           |                   |                        |
| 04/03/2024 | 🕒    | Receipt and review of Request for Entry of Default.<br>● Unbilled | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 0.10h   | \$475.00  | -                 | \$47.50                |
|            |      |                                                                   |                                            |                     | 110.70h |           | \$145.00<br>0.70h | \$41,737.00<br>110.00h |

# **EXHIBIT D**

# Activities Export

04/13/2026

11:47 AM

| Date ▼     | Type | Description                                                                                                                               | Matter                                     | User                | Qty  | Rate (\$) | Non-billable (\$)      | Billable (\$)              |
|------------|------|-------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------|---------------------|------|-----------|------------------------|----------------------------|
| 04/13/2026 | \$   | Motion for Final Approval Filing Fee.<br>● Unbilled                                                                                       | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 1.00 | \$82.89   | -                      | \$82.89                    |
| 04/03/2026 | \$   | CA: File To Existing - #26FR00001578 - Veronica Pimentel vs. Agustin Madrigal, J...: Notice - Remote Appearance (2 filings)<br>● Unbilled | 00047-El Dorado Farms Pimentel v. Madrigal | Mika Ince           | 1.00 | \$22.45   | -                      | \$22.45                    |
| 03/31/2026 | \$   | Edding Court Running Services for Joint Case Management Statement.<br>● Unbilled                                                          | 00047-El Dorado Farms Pimentel v. Madrigal | Mika Ince           | 1.00 | \$49.50   | -                      | \$49.50                    |
| 11/20/2025 | \$   | CA: File To Existing - #21541040 - Veronica Pimentel vs. Agustin Madrigal, JR / COMPLEX / CLASS...: Declaration (3 filings)<br>● Unbilled | 00047-El Dorado Farms Pimentel v. Madrigal | Christopher Nichols | 1.00 | \$22.89   | -                      | \$22.89                    |
| 10/15/2025 | \$   | CA: File To Existing - #21144830 - Veronica Pimentel vs. Agustin Mad...: Designation of Electronic Service Filed (1 filing)<br>● 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)<br>● Unbilled  | 00047-El Dorado Farms Pimentel v. Madrigal | Raha Razavi         | 1.00 | \$22.89   | -                      | \$22.89                    |
| 09/26/2025 | \$   | CA: File To Existing - #20923667 -                                                                                                        | 00047-El Dorado Farms                      | Noah                | 1.00 | \$82.89   | -                      | \$82.89                    |
|            |      |                                                                                                                                           |                                            |                     |      |           | <b>\$0.00</b><br>0.00h | <b>\$2,825.10</b><br>0.00h |

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| Date       | Type | Description                                                                                                                               | Matter                                     | User                | Qty  | Rate (\$)  | Non-billable (\$) | Billable (\$)       |
|------------|------|-------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------|---------------------|------|------------|-------------------|---------------------|
|            |      | Veronica Pimentel vs. Agustin Madrigal, JR / COMPLEX / CLASS ACTION: Motion (5 filings)<br>● Unbilled                                     | Pimentel v. Madrigal                       | Adams               |      |            |                   |                     |
| 01/07/2025 | \$   | Mediation expense.<br>● 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)<br>● Unbilled | 00047-El Dorado Farms Pimentel v. Madrigal | Raha Razavi         | 1.00 | \$18.70    | -                 | \$18.70             |
|            |      |                                                                                                                                           |                                            |                     |      |            | \$0.00<br>0.00h   | \$2,825.10<br>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 Monday, April 13, 2026, I served a copy of the following documents:

- **NOTICE OF MOTION FOR FINAL APPROVAL OF CLASS SETTLEMENT**
- **MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF FINAL APPROVAL OF CLASS SETTLEMENT**
- **DECLARATION OF LENDEN F. WEBB IN SUPPORT OF FINAL APPROVAL OF CLASS SETTLEMENT**
- **DECLARATION OF CHRISTOPHER E. NICHOLS IN SUPPORT OF FINAL APPROVAL OF CLASS SETTLEMENT**
- **DECLARATION OF ARRON WEISEL CLASS ADMINISTRATOR**
- **[PROPOSED] JUDGMENT**

☒ **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.

☐ **By Mail:** I placed the envelope for collection and mailing at the address(es) below, following our ordinary business practices. I am readily familiar with this firm's business practice for collecting and processing correspondence for mailing, on the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service, in a sealed envelope with postage fully prepaid. I am a resident or employed in the county where the mailing occurred. The envelope or package was placed in the mail at San Diego, California.

Rachelle Taylor Golden, Bar No. 295385  
Alexa K. Smith, Bar No. 357360  
Hanna B. Kim, Bar No. 363998  
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Email: [Service@WebbLawGroup.com](mailto:Service@WebbLawGroup.com)  
*Attorneys for Plaintiffs*

Labor and Workforce Development Agency ONLY VIA ONLINE FILING:  
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>

1 I declare under penalty of perjury under the laws of the State of California that the above  
2 is true and correct. Executed on Monday, April 13, 2026, at San Diego, California.  
3

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