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on behalf of himself and others similarly situated

**SUPERIOR COURT OF THE STATE OF CALIFORNIA**

**FOR THE COUNTY OF LOS ANGELES**

SCOTT VINCENT BRADLEY, on behalf of  
himself and all others similarly situated,

Plaintiff,

vs.

AVMC, LLC d/b/a TOYOTA OF  
LANCASTER, a California Limited Liability  
Company; and DOES 1 through 10, inclusive,

Defendants.

Case No. 24STCV09858

Assigned for All Purposes To:

Hon. Timothy P. Dillon

Dept.: 15

**DECLARATION OF ALVIN B. LINDSAY IN  
SUPPORT OF PLAINTIFF'S UNOPPOSED  
MOTION TO APPROVE THE PRIVATE  
ATTORNEYS GENERAL ACT  
SETTLEMENT AND RELEASE UNDER  
CALIFORNIA LABOR CODE §§ 2698 *et*  
*seq.***

*[filed concurrently with Notice of Motion and  
Motion to Approve PAGA Settlement;  
Declarations of William Tran and Michael  
Sutherland; and [Proposed] Order and  
Judgment]*

Hearing Date: October 2, 2025

Time: 11:00 a.m.

Department: 15

Original Complaint Filed: April 18, 2024

First Amended Complaint: June 25, 2024

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1 work that they have already done and for all the work they will continue to do in carrying out and  
2 overseeing the notification to the Aggrieved Employees, communicating with Aggrieved  
3 Employees regarding their claims, and assisting in the administration of the Settlement if and when  
4 it is approved.

5 6. Throughout this case, PAGA Counsel have borne, and continue to bear, the entire  
6 risk and cost of litigation associated with this Action on a purely contingency basis. As a result,  
7 PAGA Counsel have yet to receive any compensation for the amount of time and money invested  
8 in the case to date.

9 7. Contingent-fee cases present the very real risk of working hundreds if not thousands  
10 of hours that may never be entirely compensated. Moreover, while the case is being litigated,  
11 counsel must pay overhead (salaries, rent, etc.), provide for their own expenses, and in most cases  
12 pay the out-of-pocket expenses incurred on the plaintiff's behalf. And the prospect of a court-  
13 awarded fee does not greatly reduce the risk posed by these cases. In many cases, the prospect is  
14 nothing more than a potential that never materializes. First, you must win the case to get a court-  
15 awarded fee; even those cases that seem strongest at the onset can be lost and sometimes are lost.  
16 Second, there are always the pitfalls and unforeseen obstacles that arise along the way, such as  
17 settlement offers that the client may accept without ensuring that we receive a reasonable fee or  
18 changes in the law that substantially affect the merits of the case, or other uncertainties involving  
19 the client. Finally, there is the great risk inherent in advancing tens if not hundreds of thousands of  
20 dollars in out-of-pocket expenses. If that money were to be invested in some sort of financial  
21 investment, one would expect a reasonable rate of return on that investment. Here, however, the  
22 best we can hope to recover is our money, and then only if we are substantially successful; if we  
23 are not, all or part of this "investment" can be lost.

24 8. PAGA Counsel is well acquainted with the contingent-fee market throughout  
25 California, particularly as it pertains to PAGA and class-action litigation. PAGA Counsel has  
26 negotiated numerous contingency-fee agreements with plaintiffs, both as individuals and as  
27 representatives in class-action and PAGA suits. Many of those agreements required that counsel  
28 receive a fee under certain scenarios that exceeds one-third of the recovery. Moreover, courts in

1 this county and others have approved attorneys' fees awards in other PAGA settlements on a  
2 common fund basis at a commensurate percentage to what Plaintiff and PAGA Counsel are  
3 requesting here.

4 9. PAGA counsel in contingency-fee cases typically receive attorneys' fees equal to or  
5 greater than forty percent of the gross settlement amount. *See Crandall v. U-Haul* (Los Angeles  
6 County Super. Ct., Case No. BC178775), the Honorable Steven Czuleger awarded a 40% attorney  
7 fee request in an overtime-exemption class action; the Honorable Donald E. Smallwood awarded  
8 attorneys' fees in the amount of 38%; in *Abzug v. Kerkorian* CA000981 (Los Angeles County  
9 Super. Ct., November 1990), the Honorable R. William Schoettler awarded a 45% fee; in *Elliott v.*  
10 *Clothestime* (Orange County Super. Ct., Case No. 01-CC00333) the Honorable Jonathan Cannon  
11 awarded a 40% fee in a wage-and-hour class action which had not yet proceeded to the class  
12 certification stage; in both *Rippee v. Boston Market Corporation*, Case No.: 05 CV 1359 BTM  
13 (JMA) and *Barile v. Boston Market Corporation*, Case No.: 05 CV 1360 BTM (JMA), the  
14 Honorable Judge Barry T. Moskowitz awarded a 40% fee to plaintiffs' counsel in wage-and-hour  
15 class actions that had not proceeded to the class-certification stage.

16 10. Moreover, PAGA Counsel's fee request is also reasonable when considered under a  
17 lodestar cross-check, where a base fee amount is calculated from a compilation of time reasonably  
18 spent on the case and the reasonable hourly compensation of the attorney. *Serrano v. Priest* (1977)  
19 20 Cal.3d 25, 48. The court then may enhance this lodestar figure by a "multiplier" to account for  
20 a range of factors, such as the novelty and difficulty of the case, its contingent nature, and the degree  
21 of success achieved. *Id.* at 49; *see also Ketchum v. Moses* (2001) 24 Cal.4th 1122, 1132-36; *Thayer*  
22 *v. Wells Fargo Bank* (2001) 92 Cal. App. 4th 819, 834, ("[t]here is no...rule limiting the factors  
23 that may justify an exercise of judicial discretion to [adjust the] lodestar").

24 11. Here, PAGA Counsel spent substantial time on this matter, and the lodestar cross  
25 check establishes that the fees requested will require only a modest modifier under the lodestar  
26 analysis, which is justified. Aside from drafting the initial complaint, PAGA Counsel conducted  
27 informal discovery, reviewed and analyzed time and pay records, employment handbooks,  
28 Plaintiff's personnel file, relevant policies and other documentation, researched the applicable law

1 and potential defenses, constructed damage models based on interpretations of California law,  
2 reviewed information provided by Defendants at the mediation, engaged in meet and confer efforts  
3 with Defendants, drafted and revised the settlement agreement, and drafted this Motion.

4 12. More specifically, PAGA Counsel from D.Law, Inc. also conservatively estimates  
5 that it has invested at least 91 hours of attorney time in this matter. Attorney Alvin B. Lindsay spent  
6 approximately 46.6 hours on this matter, and his current billing rate is \$1,260.00 (20+ years out of  
7 law school, Laffey Matrix rate of \$1,141). Attorney William Tran spent approximately 19.8 hours  
8 on this matter, and his current billing rate is \$585.00 (4-7 years out of law school, Laffey Matrix  
9 rate of \$581.00). Attorney Jean Hopkins Power spent approximately 23.5 hours on this matter, and  
10 her current billing rate is \$585.00 (4-7 years out of law school, Laffey Matrix rate of \$581.00).  
11 Attorney Emma Geesaman spent approximately 1.1 hours on this matter, and her current billing  
12 rate is \$475 (1-3 years out of law school, Laffey Matrix rate of \$473). *See Exhibit 2 – 5* (Attorneys’  
13 Time Sheets.) These records were compiled from the firm’s timekeeping system into which  
14 attorney’s input their contemporaneous timekeeping entries for billable hours. These hours also do  
15 not include the many additional hours invested by our administrative and paralegal staff.

| Attorney         | Hourly Rate | Billable Hours | Total Lodestar Fees |
|------------------|-------------|----------------|---------------------|
| Alvin B. Lindsay | \$1,260     | 46.6           | \$58,716.00         |
| Jean H. Power    | \$585       | 23.5           | \$13,747.50         |
| William Tran     | \$585       | 19.8           | \$11,583.00         |
| Emma Geesaman    | \$475       | 1.1            | \$522.50            |
| Totals           |             | <b>91.0</b>    | <b>\$84,569.00</b>  |

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23 13. The total billable hours for lodestar cross-check purposes for PAGA Counsel from  
24 D.Law, Inc. at the time of filing this motion result in fees of \$84,569.00 (\$58,716.00 for Attorney  
25 Alvin B. Lindsay’s time on the case, \$11,583.00 for Attorney William Tran’s time on the case, and  
26 \$13,747.50 for Attorney Jean Hopkins Power’s time on the case; and \$522.50 for Emma  
27 Geesaman’s time on the case). In light of the lodestar analysis, PAGA Counsel respectfully requests  
28 that the Court award \$80,333.33 in attorneys’ fees, which based on \$84,569.00 total billables

1 requires only a modest 0.95 multiplier. The additional hours PAGA counsel have and will invest in  
2 taking this action through settlement approval and administration and funding and distribution will  
3 result in no required multiplier.

4 14. Attorneys' Costs: PAGA Counsel has incurred \$21,674.77 in costs in prosecuting  
5 this action to date and through approval. *See Exhibit 1* (D. Law's Costs Invoice). PAGA Counsel  
6 notes the lion's share of the Costs were reasonably incurred in connection with mediation and  
7 attendant expert analysis and the like. The remaining costs are standard to any complex action,  
8 including complex fees and filing fees, etc. PAGA Counsel respectfully requests reimbursement  
9 and an award of **\$21,674.77** for their costs incurred in connection with this Action.

10 15. In light of the foregoing, the fee request in an amount equal to one-third of the  
11 settlement in this case is well within the bounds that have been established by the above-cited  
12 authority.

#### 13 **QUALIFICATIONS AND ADEQUACY OF PAGA COUNSEL**

14 16. D.Law (formerly known as Davtyan Law Firm) prosecutes wage and hour cases,  
15 including class actions and PAGA actions on behalf of employees and others who have had their  
16 rights violated. D.Law, either on its own or with co-counsel, is currently serving as plaintiffs'  
17 counsel of record in numerous wage and hour and employment class action and PAGA action cases  
18 pending in both state and federal court.

19 17. D.Law is well-qualified and has ample experience, knowledge, and resources to act  
20 as counsel and represent Plaintiff and the Aggrieved Employees in this action. Our practice is  
21 exclusively focused on employment matters and representing plaintiffs in wage and hour actions  
22 with the same or similar causes of actions brought forth in the matter pending before this Court.

23 18. D.Law has litigated and successfully resolved many wage and hour class action  
24 cases involving failure to pay wages and derivative Labor Code claims and penalties, including,  
25 among others, the following:

- 26 a. *Bacerra v. Hugo Boss Retail, Inc.* (Superior Court of California in San Diego, 37-  
27 2021-00002933-CU-OE-CTL),
- 28 b. *Barajas v. Mancha Development Company LLC* (Superior Court of California in

Orange County, 30-2018-00974707-CU-OE-CXC),

- c. *Barrera et al. v. Exclusive Wireless, Inc.* (Superior Court of California in Stanislaus, 9000687),
- d. *De La Rosa v. The Coca Cola Company et al.* (Superior Court of California in Napa, 17CV000787),
- e. *Ferraro v. USC Verdugo Hill s Hospital, et al.* (Superior Court of California in Los Angeles, 18STCV09463),
- f. *Ford v. Account Control Technology, Inc., et al.* (Superior Court of California in Los Angeles, 19STCV09369),
- g. *Hargrave v. Antelope Valley Hospital* (Superior Court of California in Los Angeles, BC663252),
- h. *Harvey v. Bed Bath & Beyond of California Limited Liability Company* (Superior Court of California in Alameda, RG17885153),
- i. *Hawkins v. AvalonBay Communities* (Superior Court of California in Santa Clara, 17CV316492),
- j. *Jones Tharpe et al. v. Sprint Corporation et al.* (Superior Court of California in Los Angeles, BC644645),
- k. *Juarez v. ISL Employees, Inc.* (Superior Court of California in Madera, MCV074787),
- l. *Leach v. The Claremont Colleges, Inc.* (Superior Court of California in Los Angeles, BC686451),
- m. *Marchbanks v. Torrid Administration, Inc.* (Superior Court of California in San Diego, 37-2020-00008179-CU-OE-NC)
- n. *Orr v. Petvet Care Centers (California) Inc.* (Superior Court of California in Santa Clara, 19CV354063),
- o. *Ortega et al. v. Nestle Waters North America, Inc. et al.* (Superior Court of California in Los Angeles, BC623610),
- p. *Prado v. IMAX Corporation dba IMAC Worldwide Home* (Superior Court of

1 California in San Bernardino, CIVDS1820265),

2 q. *Puerta-Gildardo v. Real Time Staffing Services LLC et. al.* (Superior Court of  
3 California in Los Angeles, BC565445),

4 r. *Quizon v. CF Watsonville East, LLC, et al.* (Superior Court of California in Santa  
5 Cruz, 20CV01868),

6 s. *Raj v. First Transit, Inc.* (Superior Court of California in Sacramento, 34-2021-  
7 00295895-CU-OE-GDS),

8 t. *Rodriguez v. ND Industries, Inc.* (Superior Court of California in Los Angeles,  
9 19STCV38096),

10 u. *Singletary v. Motel 6 Operating LP, et al.* (Southern District of California, 3:20-  
11 cv-0270-LAB-AHG),

12 v. *Stephenson v. Bakersfield Dodge, Inc.* (Superior Court of California in Kern, BCV-  
13 20-102693),

14 w. *Terry v. TF Louderback, Inc. dba Bay Area Beverage Company* (Superior Court of  
15 the State of California, County of Contra Costa, MSC18-00859),

16 x. *Vaesau v. PCT Enterprises, Inc. dba Precision Cabinets* (Superior Court of  
17 California, County of Contra Costa MSC18-02404),

18 y. *Viridi v. Absolute Security International* (Superior Court of California in San  
19 Bernardino, CIVDS 1909589),

20 z. *Walker v. Ariat International, Inc.* (Superior Court of California in Alameda,  
21 HG19026439).

22 19. Attorney David Yeremian is Managing Attorney at D.Law and counsel of record for  
23 Plaintiff. Mr. Yeremian has been practicing law since 2003. Mr. Yeremian has been honored as a  
24 Super Lawyers Rising Star in 2009, 2010, 2012-2015 and has been named and honored as a Super  
25 Lawyer. Since 2007, Mr. Yeremian has focused exclusively on representing employees, including  
26 in wage-and-hour class actions. During his career, Mr. Yeremian has represented employees in  
27 hundreds of wage-and-hour class action lawsuits as lead or co-lead counsel (including in the  
28 Central, Southern, Eastern, and Northern Districts of California) and has obtained six and seven-

1 figure settlements against a range of defendants, including Fortune 500 companies.

2       20. I have litigated complex civil actions for twenty-three years, focusing on intellectual  
3 property litigation and employment wage and hour class actions. I have the requisite knowledge of  
4 class and representative proceedings, applicable class action and employment law, and federal and  
5 state court procedures, to represent Plaintiffs and the Aggrieved Employees and the State in this  
6 action. For the past fourteen years, I primarily focused my practice on litigating complex California  
7 wage and hour class actions, first with the firm of James Hawkins, APLC, next with Quintilone &  
8 Associates, then with David Yeremian & Associates, Inc., and now with D.Law, Inc. In the course  
9 of representing class and representative plaintiffs, I have litigated and settled hundreds of class and  
10 representative PAGA actions in California state and federal courts on behalf of hundreds of  
11 thousands of employees.

12       21. I graduated from Whittier Law School and have been practicing in California for  
13 over twenty years. I was Executive Editor of the Whittier Law Review, a Scribes Award winner,  
14 and a judicial extern to the Honorable David G. Sills, presiding justice of the California Court of  
15 Appeal, 4th District, Division 3. During my second year in law school, I began clerking full-time  
16 for the well-respected intellectual property boutique firm, Fulwider Patton, in Los Angeles,  
17 California. When I graduated, I became an attorney with the firm and served there for five years,  
18 and I was active in the Inns of Court. My practice focused on intellectual property prosecution and  
19 litigation, and I spent the majority of my time representing clients in patent infringement litigation.  
20 I also served in a similar capacity for the San Francisco firm, King & Kelleher, for three years, and  
21 appeared predominantly in the Central and Northern District of California Courts prosecuting and  
22 defending patent infringement actions.

23       22. Prior to attending law school, I graduated from the United States Military Academy  
24 at West Point. I then served as an Army Officer for 10 years in the Corps of Engineers, in various  
25 stateside and overseas postings. I was a combat engineer company commander, was stationed in  
26 Germany when the Berlin Wall fell, and am a veteran of Operation Desert Shield/Desert Storm. I  
27 also served in the Reserves and advanced to the rank of Major.

1           23.     Since 2010, I have been the senior attorney responsible for the day-to-day litigation  
2 of numerous wage and hour class and representative actions on behalf of employee Class members  
3 and aggrieved employees. I have been successful in getting many contested class action cases  
4 certified and have secured settlements for many millions of dollars for our clients. I am experienced  
5 and qualified to evaluate the class and representative claims, to evaluate settlement versus trial on  
6 a fully informed basis, and to evaluate the viability of the defenses. I enjoy being an attorney,  
7 especially being a complex civil litigator focusing on class and representative action proceedings.  
8 I value the fact that what we do is a profession, and I value the professional relationships I have  
9 developed with my fellow plaintiffs' counsel and the attorneys from the well-respected corporate  
10 defense firms we litigate against on a daily basis.

11           24.     My participation in wage and hour class and representative action litigations in  
12 California has included extensive preparation, the development of a thorough knowledge of the  
13 legal issues related to certification and liability, and full immersion and participation in the  
14 mediation, settlement negotiation, and approval process. I am therefore experienced in the type of  
15 class and representative action litigation involving violations of California's wage and hour laws  
16 which are the subject of this action. To that end, for example, I was asked by the California  
17 Employment Lawyers Association to draft an amicus brief, which contributed to the California  
18 Supreme Court's decision in *Alvarado v Dart Container Corp. of California*, 4 Cal. 5th 542 (2018).

19           25.     The following are examples of some of my cases that have resulted in favorable  
20 settlements for the employee Class members and aggrieved employees I have represented:

- 21           a.     *Batres v. HMS Host USA, Inc. et al.*, CD Cal Case No. SACV 10-01458 CJC  
22                 (AJWx) (Hon. Cormac J. Carney);
- 23           b.     *Barrera v Sodexo, Inc.*, CD Cal Case No. SACV 13-0817 AG (MANx) (Hon.  
24                 Andrew J. Guilford);
- 25           c.     *Mojica v Compass Group, et al.*, CD Cal Case No. 8:13-cv-01754 DSF (AGR)  
26                 (Hon. Dale S. Fischer);
- 27           d.     *Aguilar v 7-Eleven*, Orange County Superior Court, Case No. 30-2009-00268714-  
28                 CU-OE-CXC (Hon. Kim G. Dunning);

- 1 e. *Pedro M. Guerrero v. E-Recycling of California*, Orange County Superior Court  
2 Case No. 30-2012-00552453-CU-OE-CXC (Hon. Gail A. Andler);
- 3 f. *Virginia Rodriguez v Exel Inc.*, San Bernardino County Superior Court, Case No.  
4 CIVDS 1104594 (Hon. Bryan F. Foster);
- 5 g. *Palacios v LKQ Lakenor Auto & Truck Salvage, Inc., et al.*, Orange County  
6 Superior Court, Case No. 30-2012-00552979-CU-OE-CXC (Hon. Steven L. Perk);
- 7 h. *Ayala et al. v Park Anaheim Health Care, LLC*, Orange County Superior Court,  
8 Case No. 30-2013-00649442-CU-OE-CXC (Hon. Gail A. Andler);
- 9 i. *Daniel v Xerxes Corporation*, Orange County Superior Court, Case No. 30-2010-  
10 00418048-CU-OE-CXC (Hon. Gail A. Andler);
- 11 j. *Magana v HVM L.L.C. et al.*, Orange County Superior Court Case No. 30-2011-  
12 00468712-CU-OE-CXC (Hon. Gail A. Andler);
- 13 k. *Vo v Express Manufacturing, Inc.*, Orange County Case No. 30-2012-00552641-  
14 CU-OE-CXC (Hon. Gail A. Andler);
- 15 l. *Yac v Paper Source Converting & Manufacturing*, Los Angeles Superior Court,  
16 Case No. BC 472113 (Hon. Michael L. Stern);
- 17 m. *Bui v Sprint Corporation*, ED Cal Case No. 2:14-CV-02461-TLN-AC (Hon. Troy  
18 L. Nunley);
- 19 n. *Munoz v Stine CC Inc (Chevron)*, (Hon. Lorna H. Brumfield), Kern County  
20 Superior Court, S-1500-CV-283104-LHB;
- 21 o. *Alcaraz v County of San Bernardino*, San Bernardino County Superior Court, Case  
22 No. CIVDS 1013508 (Hon. John M. Pacheco);
- 23 p. *Andrews v Stoneledge Furniture, LLC*, San Bernardino County Superior Court,  
24 Case No. CIVDS 1706865 (Hon. David Cohn);
- 25 q. *Burson v Best Western All Suite, LLC*, Santa Cruz County Superior Court, Case No.  
26 CV179684 (Hon. Paul M. Marigonda);
- 27 r. *Fernandez v Comforcare Senior Services, et al.*, San Diego County Superior Court,  
28 Case No. 37-2015-00032396-CU-OE-CTL (Hon. Gregory W. Pollack);

- 1 s. *Quiroz, Haslett v SWH Corporation, dba Mimi's Café*, Orange County Superior  
2 Court, Case No. 30-2011-00493645-CU-OE-CXC (Hon. William Claster);
- 3 t. *Wells Fargo Bank Wage and Hour Cases*, Los Angeles County Superior Court,  
4 Case No. JCCP No. 4702 (Hon. Kenneth R. Freeman);
- 5 u. *Loeza v JP Morgan Chase Bank NA*, SD Cal. Case No. 13-cv-00095-L-BGS (Hon.  
6 M. James Lorenz);
- 7 v. *Cunningham v Leslie's Poolmart, Inc.*, CD Cal. Case NO. 13-cv-02122-CAS-CWx  
8 (Hon. Christina A. Synder);
- 9 w. *Perez et al v. Irvine Capital Restaurant dba Capital Seafood Restaurant*, Orange  
10 County Superior Court, Case No. 30-2016-00834023-CU-OE-CXC (Hon. Thierry  
11 Patrick Colaw);
- 12 x. *Robarge et al. v DCOR, LLC*, Los Angeles County Superior Court, Case No.  
13 BC630278 (Hon. Kenneth R. Freeman);
- 14 y. *Rubio v Sprint Corporation*, CD Cal. Case No. 2:17-cv-02231-SVW-GJS, (Hon.  
15 Stephen V. Wilson);
- 16 z. *Tapia v Sterling Jewelers Inc.*, ND Cal. Case No. 5:14-cv-00624-EJD (Hon.  
17 Edward J. Davila);
- 18 aa. *Thompson v The Standard Hotel*, Los Angeles County Superior Court, Case No.  
19 BC597152 (Hon. Kenneth R. Freeman);
- 20 bb. *Ward v. JetSuite, Inc. et al.*, CD Cal. Case No. 8:16-cv-00584-AG-AS (Hon.  
21 Andrew J. Guilford);
- 22 cc. *Rowser v. Trunk Club, Inc.*, CD Cal. Case No. 2:17-cv-05064-DSF-RAO (Hon.  
23 Dale S. Fischer);
- 24 dd. *Rodriguez v PD Products, Inc.*, Los Angeles County Superior Court, Case No.  
25 BC696710 (Hon. Mauren E. Nelson);
- 26 ee. *Basilioli v Allegiant Air, LLC*, CD Cal. Case No. 2:18-cv-3888 RGK (MRWx)  
27 (Hon. R. Gary Klausner);
- 28 ff. *Hernandez v Fedex Ground Package System, Inc.*, ND Cal. Case No. 3:17-cv-

02074-VC (Hon. Vince G. Chhabria);

gg. *Savinovich v Starbucks Corporation, Evolution Fresh, Inc. et al.*, Santa Cruz County Superior Court, Case No. 17CV02050 (Hon. Paul Burdick);

hh. *Verdugo v Denali Water Solutions, LLC*, CD Cal Case No. 5:18-cv-00170-ODW (SHK) (Hon. Otis D. Wright II);

ii. *Zepeda v MasTec Network Solutions, LLC, et al.*, CD Cal. Case No. 5:18-cv-00749-VAP-SHK (Hon. Virginia A. Phillips);

jj. *Sanchez v Pacific Southwest Container, Inc.*, Stanislaus County Superior Court, Case No. 2028679 (Hon. Marie Sovey Silveira);

kk. *Danelian v Medix Staffing Solutions, Inc. and City of Hope National Medical Center*, Los Angeles County Superior Court, Case No. BC649846 (Hon. Kenneth R. Freeman);

ll. *Sanchez v AM Retail Group*, ND Cal. Case No. 3:18-cv-00287-JCS (Hon. Joseph C. Spero);

mm. *Orr v PetVet Care Centers (California), Inc. et al.*, Santa Clara County Case No. 19CV354063 (Hon. Patricia M. Lucas);

nn. *Williams, Baldwin v Staff Pro, Inc.*, Orange County Superior Court, Case No. 30-2016-00890905-CU-OE-CXC (Hon. Randall J. Sherman);

oo. *Rangel v W.W. Grainger, Inc.*, Stanislaus County Superior Court, Case No. CV-18-0030341 (Hon. John D. Freeland);

pp. *Cardiel v MillerCoors LLC*, Los Angeles County Superior Court, Case No. 19STCV02979 (Hon. Rupert A. Byrdsong);

qq. *California Forensic Medical Group Wage and Hour Cases*, JCCP4999, Monterey County Superior Court (Hon. Lydia M. Villarreal);

rr. *Cervantes v RGW Construction, Inc.*, Alameda County Superior Court, Case No. RG16826895 (Hon. Stephen Pulido);

ss. *Cooks v Reliant Real Estate Management, Inc.*, Los Angeles County Superior Court, Case No. 18STCV05531 (Hon. Amy D. Hogue);

- 1 tt. *Ornelas v National Storage Affiliates Trust, et al.*, San Francisco County Superior  
2 Court, Case No. CGC-18-571421 (Hon. Curtis E.A. Karnow);
- 3 uu. *Jiminez, Carrera v Lancaster Burns Construction, Inc.*, Sonoma County Superior  
4 Court Case No. SCV-265708 (Hon. Patrick Broderick);
- 5 vv. *Moises Cuevas Miranda v. Compass Group USA, Inc. et al.*, Orange County  
6 Superior Court, Case No. 30-2019-01110951-CU-OE-CXC (Hon. William  
7 Claster);
- 8 ww. *Maldonado v. K&R Corporation*, Los Angeles County Superior Court, Case No.  
9 20-STCV-27934 (Hon. Elihu M. Berle);
- 10 xx. *Ovidio Gramajo Rodas v. Andrew Chekene Enterprises, Inc.*, Alameda County  
11 Case No. RG20057424 (Hon. Stephen Kaus);
- 12 yy. *Eduardo Diaz Galan v. Elite Comfort Solutions, LLC*, Los Angeles County Case  
13 No. 20STCV35875 (Hon. Carolyn B. Kuhl);
- 14 zz. *Richard Amato v Layton Construction Company, LLC*, Santa Clara County Case  
15 No. 20CV371023 (Hon. Sunil R. Kulkarni);
- 16 aaa. *Estela, Daniels, Williams et al. v Pacific Dental Services, LLC*, San Diego County  
17 Superior Court Case No. 37-2020-00010251-CU-OE-NC (Hon. Robert P.  
18 Dahlquist).

19 26. The above matters are not exhaustive but provide samples of the types of class and  
20 representative action litigations I have successfully resolved. D.Law is presently prosecuting class  
21 and representative action litigations in state and federal courts across California. We also have  
22 several actions that are in the stages of preliminary and final and PAGA settlement approval.

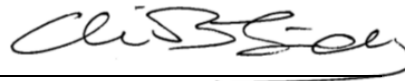
23 27. My experience in litigating employment wage and hour matters has been integral in  
24 identifying legal issues, evaluating the strengths and weaknesses of a case, and generally  
25 negotiating fair and reasonable class and representative action settlements. Practice in the narrow  
26 field of wage and hour litigation requires skill and knowledge concerning the constantly evolving  
27 substantive law (state and federal), as well as the procedural law of class and representative action  
28 litigation. In this action, I am fully equipped to use the skills and knowledge I have developed

1 through fifteen years of prosecuting and defending wage and hour class and PAGA actions to fairly  
2 and adequately represent the interests of the aggrieved employees. Therefore, based on my  
3 resources, experience, and knowledge, I am well-qualified to act as PAGA Counsel and represent  
4 the Plaintiffs and the State and aggrieved employees in this action.

5 28. As a result of my prior experience as class and PAGA counsel in other wage and  
6 hour class and representative actions, I am fully aware of the responsibilities I would owe as counsel  
7 to the aggrieved employees I represent. I have thoroughly investigated the claims asserted in this  
8 action, and I and our firm have remained committed to dedicating the resources necessary to  
9 represent the aggrieved employees and vigorously pursue their claims. Based upon my experience  
10 and understanding of the claims and defenses in this action, I believe the Settlement is fair,  
11 adequate, and reasonable for the aggrieved employees and all involved, and that the Settlement is  
12 well within the range of reasonableness that would permit it to be approved. I am not aware of any  
13 conflict of interest between myself and Plaintiff or any other individuals that would interfere with  
14 my duties as PAGA Counsel or impede my representation.

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

17 Executed this August 28, 2025, at Glendale, California.

18 

19 Alvin B. Lindsay  
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# EXHIBIT 1

## Bradley v. AVMC, LLC, dba Toyota of Lancaster

### Litigation Costs

| Details                                                 | Provider                | Service | Amount       |
|---------------------------------------------------------|-------------------------|---------|--------------|
| LWDA Letter                                             | LWDA                    | 4/18/24 | \$ 75.00     |
| LWDA Letter Postage                                     | Stamps.com              | 4/18/24 | \$ 15.00     |
| Summons and Complaint                                   | Rapid Legal             | 4/19/24 | \$ 1,493.71  |
| Process of Service - Toyota of Lancaster                | Rapid Legal             | 5/2/24  | \$ 141.11    |
| POS of Summons                                          | Rapid Legal             | 5/3/24  | \$ 15.66     |
| Ntc of ISC & Order (8.16.24) & Ntc of Posting Jury Fees | Rapid Legal             | 6/7/24  | \$ 170.16    |
| FAC                                                     | Rapid Legal             | 6/25/24 | \$ 15.66     |
| Joint CMS (8.16.24)                                     | Rapid Legal             | 8/12/24 | \$ 15.66     |
| Document Retrieval                                      | LA Court                | 8/21/24 | \$ 2.00      |
| Document Retrieval                                      | LA Court                | 8/29/24 | \$ 9.80      |
| Notice of Change of Address                             | Rapid Legal             | 9/19/24 | \$ 15.66     |
| System Access Fee (Sept-Oct 24)                         | Case Anywhere LLC       | 11/5/24 | \$ 99.96     |
| Mediation Fees                                          | McKelvey, Brandon       | 1/28/25 | \$ 12,500.00 |
| System Access Fee (Nov 24 - Jan 25)                     | Case Anywhere LLC       | 2/3/25  | \$ 147.00    |
| Disassociation of Attorney                              | Rapid Legal             | 2/24/25 | \$ 17.25     |
| System Access Fee (Feb 25)                              | Case Anywhere LLC       | 3/5/25  | \$ 49.00     |
| Joint Stip to Continue MTC Arb Hearing (3.26.25)        | Rapid Legal             | 3/13/25 | \$ 37.85     |
| Ntc of Cont Hearing on MTC Arb (6.25.25)                | Rapid Legal             | 4/2/25  | \$ 17.25     |
| System Access Fee (March 25)                            | Case Anywhere LLC       | 4/4/25  | \$ 61.00     |
| System Access Fee (April 25)                            | Case Anywhere LLC       | 5/2/25  | \$ 55.00     |
| Expert Analysis                                         | Berger Consulting Group | 5/15/25 | \$ 6,110.00  |
| System Access Fee (May 25)                              | Case Anywhere LLC       | 6/2/25  | \$ 49.00     |
| Joint Stip to Vacate Def MTC Arb & Class Cert Deadline  | Rapid Legal             | 6/16/25 | \$ 38.04     |
| System Access Fee (June 25)                             | Case Anywhere LLC       | 7/1/25  | \$ 61.00     |
| System Access Fee (July 25)                             | Case Anywhere LLC       | 8/1/25  | \$ 49.00     |
| PAGA Settlement Approval Motion                         | Rapid Legal             |         | \$ 80.00     |
| Notice of Entry of Order                                | Rapid Legal             |         | \$ 20.00     |
| System Access Fee (Aug 25 - Jan 26)                     | Case Anywhere LLC       |         | \$ 294.00    |
| Decl re Final Accounting                                | Rapid Legal             |         | \$ 20.00     |

**Total      \$ 21,674.77**

# EXHIBIT 2

| Case Number | Case Title                                    | Entry Date | Billable Time | Staff Name - (Full) | Note                                                                                                                                                                                                                                                                                                                                                                       |
|-------------|-----------------------------------------------|------------|---------------|---------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 208396      | Bradley v. AVMC, LLC, dba Toyota of Lancaster | 4/18/24    | 2.3           | Alvin Lindsay       | Review case file and docs and summary of issues and intake notes and wage statements and review class action complaint. Draft revisions and confer and correspond with SZ and JP regarding finalizing and filing. Confer with JP on revisions to LWDA letter and review and further revise and confer with SZ for finalizing and submitting to LWDA and certified mailing. |
| 208396      | Bradley v. AVMC, LLC, dba Toyota of Lancaster | 4/19/24    | 0.4           | Alvin Lindsay       | Review complaint as filed and conformed and LWDA letter to confirm submission and confer with JP regarding next steps and SZ regarding service.                                                                                                                                                                                                                            |
| 208396      | Bradley v. AVMC, LLC, dba Toyota of Lancaster | 5/31/24    | 0.3           | Alvin Lindsay       | Review Defendant's notice of appearance and correspondence regarding same and confer with JP regarding response.                                                                                                                                                                                                                                                           |
| 208396      | Bradley v. AVMC, LLC, dba Toyota of Lancaster | 6/7/24     | 0.3           | Alvin Lindsay       | Review Notice of ISC and posting jury fees and correspondence with OC regarding electronic service.                                                                                                                                                                                                                                                                        |
| 208396      | Bradley v. AVMC, LLC, dba Toyota of Lancaster | 6/24/24    | 0.4           | Alvin Lindsay       | Review FAC and draft revisions. Confer with JP regarding same and SZ regarding finalizing and filing.                                                                                                                                                                                                                                                                      |
| 208396      | Bradley v. AVMC, LLC, dba Toyota of Lancaster | 6/25/24    | 0.4           | Alvin Lindsay       | Review FAC and Notice of ISC and ISC Order and correspondence from OC regarding filing before FAC and confer with JP regarding same and LASC procedures and actions to remedy                                                                                                                                                                                              |
| 208396      | Bradley v. AVMC, LLC, dba Toyota of Lancaster | 6/26/24    | 0.4           | Alvin Lindsay       | Review correspondence with OC regarding FAC and whether to withdraw and review TF Response and confer with TF regarding same and upcoming ISC.                                                                                                                                                                                                                             |
| 208396      | Bradley v. AVMC, LLC, dba Toyota of Lancaster | 8/9/24     | 0.5           | Alvin Lindsay       | Prepare for and conduct teleconference with OC regarding ISC and Joint Statement and other PAGA action and settlement. Correspond and confer with JP and SZ regarding same and review joint report and draft revision and correspond with SZ regarding finalizing and signatures.                                                                                          |
| 208396      | Bradley v. AVMC, LLC, dba Toyota of Lancaster | 8/12/24    | 0.4           | Alvin Lindsay       | Review joint CMC Statement and correspondence regarding same and confer and correspond with JP regarding same and next steps and status of FAC and PAGA ripeness.                                                                                                                                                                                                          |
| 208396      | Bradley v. AVMC, LLC, dba Toyota of Lancaster | 8/16/24    | 0.4           | Alvin Lindsay       | Review correspondence from JP regarding ISC and results. Review Case Management Order and confer and correspond with JP regarding same and addressing incorrect cert filing date.                                                                                                                                                                                          |
| 208396      | Bradley v. AVMC, LLC, dba Toyota of Lancaster | 8/19/24    | 0.4           | Alvin Lindsay       | Confer and correspond with JP regarding status and CMO from ISC and setting up Case Anywhere and address any arb agreements, mediation possibilities, and timing for filing FAC adding PAGA.                                                                                                                                                                               |
| 208396      | Bradley v. AVMC, LLC, dba Toyota of Lancaster | 8/30/24    | 0.3           | Alvin Lindsay       | Review file docs and correspondence and ISC order and correspondence regarding setting up cases anywhere account and confer with JP and SZ regarding same.                                                                                                                                                                                                                 |
| 208396      | Bradley v. AVMC, LLC, dba Toyota of Lancaster | 9/13/24    | 0.4           | Alvin Lindsay       | Review correspondence from OC regarding arbitration agreement and implications. Confer and correspond with JP regarding same and potential issues with e-signature and authentication and address mediation possibilities.                                                                                                                                                 |
| 208396      | Bradley v. AVMC, LLC, dba Toyota of Lancaster | 9/18/24    | 0.5           | Alvin Lindsay       | Confer and correspond with JP regarding conference with OC and arbitration agreement and arguments against enforceability. Address MTC Arbitration and review docs and confer regarding opposition or stipulating to arbitration after attempting to mediate. Address due diligence with client and unenforceability and possibilities of settling on PAGA only basis.     |
| 208396      | Bradley v. AVMC, LLC, dba Toyota of Lancaster | 9/23/24    | 0.4           | Alvin Lindsay       | Review motion to compel arbitration documents and correspondence and confer and correspond with JP regarding same and status of agreement and mediation and scope.                                                                                                                                                                                                         |
| 208396      | Bradley v. AVMC, LLC, dba Toyota of Lancaster | 10/3/24    | 0.4           | Alvin Lindsay       | Review motion to compel arbitration docs and correspondence and confer with JP regarding same and continued hearing date and status of PAGA claim mediation.                                                                                                                                                                                                               |
| 208396      | Bradley v. AVMC, LLC, dba Toyota of Lancaster | 10/8/24    | 0.4           | Alvin Lindsay       | Review correspondence from OC and JP regarding mediation and mediators and addressing continued hearing date on motion. Confer with JP regarding same and proposed mediators and following up with OC.                                                                                                                                                                     |
| 208396      | Bradley v. AVMC, LLC, dba Toyota of Lancaster | 10/16/24   | 0.4           | Alvin Lindsay       | Review correspondence with OC regarding mediators and agreed upon ones and dates and review correspondence with mediator regarding request to reserve April 2025 date. Review mediator's procedures for requesting a date. Confer with JP regarding same.                                                                                                                  |
| 208396      | Bradley v. AVMC, LLC, dba Toyota of Lancaster | 10/28/24   | 0.4           | Alvin Lindsay       | Review correspondence with OC regarding mediation and proposed mediators and draft correspondence responding and proposing new mediators and offer to consider others. Confer with JP regarding same.                                                                                                                                                                      |
| 208396      | Bradley v. AVMC, LLC, dba Toyota of Lancaster | 11/4/24    | 0.4           | Alvin Lindsay       | Review correspondence from OC to mediator regarding status of reserved date and confer with JP regarding same and status of case management and other dates.                                                                                                                                                                                                               |
| 208396      | Bradley v. AVMC, LLC, dba Toyota of Lancaster | 11/20/24   | 0.4           | Alvin Lindsay       | Review correspondence from mediator regarding confirming date for upcoming mediation and review and respond to correspondence regarding conflict with other case mediation on same day. Confer and agree to schedule both.                                                                                                                                                 |
| 208396      | Bradley v. AVMC, LLC, dba Toyota of Lancaster | 11/21/24   | 0.4           | Alvin Lindsay       | Review correspondence with OC and mediator getting mediation scheduled and reserved and review informal discovery requests e-mail from JP. Confer with JP regarding same and corrected date and next steps in case and mediation preparation.                                                                                                                              |

| Case Number | Case Title                                    | Entry Date | Billable Time | Staff Name - (Full) | Note                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|-------------|-----------------------------------------------|------------|---------------|---------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 208396      | Bradley v. AVMC, LLC, dba Toyota of Lancaster | 1/2/25     | 0.4           | Alvin Lindsay       | Review correspondence from mediator regarding mediation and confirming details. Confer with JP and SZ regarding reasons for not including them and including others that shouldn't be on service and other docs.                                                                                                                                                                                                                                                                                                                       |
| 208396      | Bradley v. AVMC, LLC, dba Toyota of Lancaster | 3/10/25    | 0.9           | Alvin Lindsay       | Review case file docs and status of mediation and case management dates. Address MTC arb and scheduled hearing date and opposition and correspond with OC regarding same and scope of mediation and continuing hearing date. Confer with SZ regarding same and calendaring. Further mediation preparation.                                                                                                                                                                                                                             |
| 208396      | Bradley v. AVMC, LLC, dba Toyota of Lancaster | 3/11/25    | 1.2           | Alvin Lindsay       | Confer and correspond with OC regarding MTC arbitration and upcoming hearing and opposition and requesting to continue or stay hearing to post-mediation. Address sampling percentage and informal discovery. Draft joint stipulation to continue or stay hearing to post-mediation and confer with OC and SZ regarding finalizing and filing. Review case file docs and research ROA for status and dates.                                                                                                                            |
| 208396      | Bradley v. AVMC, LLC, dba Toyota of Lancaster | 3/12/25    | 0.4           | Alvin Lindsay       | Review correspondence to OC and draft joint stipulation to continue CMC and confer regarding status of finalizing and signature and with SZ regarding filing and serving.                                                                                                                                                                                                                                                                                                                                                              |
| 208396      | Bradley v. AVMC, LLC, dba Toyota of Lancaster | 3/19/25    | 0.4           | Alvin Lindsay       | Confer and correspond with SZ regarding status of stip to continue class cert filing deadline and why not showing on the ROA yet and regarding call with clerk and discussion re: Court being dark.                                                                                                                                                                                                                                                                                                                                    |
| 208396      | Bradley v. AVMC, LLC, dba Toyota of Lancaster | 3/21/25    | 0.4           | Alvin Lindsay       | Review status of Joint Stipulation to continue MTC Arb Hearing and research ROA and review correspondence regarding same. Confer with SZ regarding submitting asap and contacting courtroom to inform of continued hearing request. Address status of mediation preparation.                                                                                                                                                                                                                                                           |
| 208396      | Bradley v. AVMC, LLC, dba Toyota of Lancaster | 4/1/25     | 0.4           | Alvin Lindsay       | Review correspondence and Notice from Court continuing Hearing on MTC Arb to June 25th after mediation. Confer with SZ regarding same and calendaring and status of mediation confirmation with mediator and payment.                                                                                                                                                                                                                                                                                                                  |
| 208396      | Bradley v. AVMC, LLC, dba Toyota of Lancaster | 4/8/25     | 0.4           | Alvin Lindsay       | Review case file docs and correspondence and status of mediation preparation and informal discovery. Draft update e-mail to Plaintiff and draft wrongful termination case declination letter and confer with SZ regarding finalizing and sending to Plaintiff.                                                                                                                                                                                                                                                                         |
| 208396      | Bradley v. AVMC, LLC, dba Toyota of Lancaster | 4/17/25    | 0.4           | Alvin Lindsay       | Review correspondence and pleadings and status of mediation and mediation preparation. Confer with SZ regarding same and starting drafting informal requests.                                                                                                                                                                                                                                                                                                                                                                          |
| 208396      | Bradley v. AVMC, LLC, dba Toyota of Lancaster | 4/18/25    | 1.2           | Alvin Lindsay       | Review case file docs and correspondence. Confer with SZ regarding same and status of informal discovery requests. Draft detailed listing and executive summary of claims and correspond with OC regarding sending same and scope of mediation and timing for production of documents and data and numbers. Confer with SZ regarding same and calendaring and further mediation prep.                                                                                                                                                  |
| 208396      | Bradley v. AVMC, LLC, dba Toyota of Lancaster | 5/2/25     | 1.7           | Alvin Lindsay       | Review correspondence from OC regarding informal production items and case and claim summary. Review docs produced. Correspond and confer with expert regarding same and summary and assumptions for analysis. Begin drafting mediation brief and further mediation preparation.                                                                                                                                                                                                                                                       |
| 208396      | Bradley v. AVMC, LLC, dba Toyota of Lancaster | 5/5/25     | 2.8           | Alvin Lindsay       | Review case file docs and correspondence and pleadings and confer and correspond with mediator regarding finalizing expert analysis and creating for PAGA only scope. Draft mediation brief and summary of claims and numbers from expert analysis. Draft correspondence to mediator sending Brief and analysis and other exhibits and confer regarding conduct of mediation and scope and logistics. Confer with DY regarding mediation logistics and timing and coverage and key arguments.                                          |
| 208396      | Bradley v. AVMC, LLC, dba Toyota of Lancaster | 5/6/25     | 8.2           | Alvin Lindsay       | Review case file docs and correspondence and notes and mediation brief and expert analysis and compile further exhibits as sample violations. Prepare for and participate in mediation and confer with mediator and OC regarding facts and law and potential liability exposure and settlement ranges. Research case law and Confer regarding final numbers and settlement terms and MOU with OC and mediator and confer with SZ regarding client update. Correspond with mediator regarding proposed resolution and final acceptance. |
| 208396      | Bradley v. AVMC, LLC, dba Toyota of Lancaster | 5/7/25     | 0.4           | Alvin Lindsay       | Confer and correspond with OC regarding settlement terms and responsibility for drafting Settlement Agreements for both PAGA only and individual agreements. Confer regarding using LASC Model.                                                                                                                                                                                                                                                                                                                                        |
| 208396      | Bradley v. AVMC, LLC, dba Toyota of Lancaster | 5/19/25    | 0.2           | Alvin Lindsay       | Review settlement terms and workweek and pay period count and add to listing compiled to report settlements under \$20/ww or pay period and further confer regarding status of                                                                                                                                                                                                                                                                                                                                                         |
| 208396      | Bradley v. AVMC, LLC, dba Toyota of Lancaster | 5/22/25    | 1.3           | Alvin Lindsay       | Review correspondence from OC regarding individual and PAGA only settlement agreement. Confer and correspond with OC regarding same and draft revisions and confer with SZ regarding same. Correspond with administrator on quotation and draft revisions and correspond with OC regarding same for both PAGA and individual.                                                                                                                                                                                                          |

| Case Number | Case Title                                    | Entry Date | Billable Time | Staff Name - (Full) | Note                                                                                                                                                                                                                                                                                                                                                                                   |
|-------------|-----------------------------------------------|------------|---------------|---------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 208396      | Bradley v. AVMC, LLC, dba Toyota of Lancaster | 6/4/25     | 0.5           | Alvin Lindsay       | Review settlement agreement and confer and conduct teleconference with OC regarding revisions and finalizing for signature and addressing disposition of class claims and dismissal. Confer with SZ regarding same and correspondence.                                                                                                                                                 |
| 208396      | Bradley v. AVMC, LLC, dba Toyota of Lancaster | 6/9/25     | 1.1           | Alvin Lindsay       | Review paga settlement agreement and individual agreement. Draft revisions to PAGA and finalize for signature. Review Individual agreement and draft revisions - address issues with dismissal of action paragraph language and timing and timing of sending payment for individual agreement to Plaintiff. Correspond with OC regarding same and reasons for recommendations.         |
| 208396      | Bradley v. AVMC, LLC, dba Toyota of Lancaster | 6/11/25    | 1.2           | Alvin Lindsay       | Review correspondence regarding settlement agreements and revisions and confer with OC and SZ regarding hearing on MTC arbitration and opposition status. Draft stipulation to vacate the MTC arbitration hearing and vacate motion for class certification filing deadline and proposed order granting. Correspond with OC and SZ regarding same and further review.                  |
| 208396      | Bradley v. AVMC, LLC, dba Toyota of Lancaster | 6/13/25    | 0.5           | Alvin Lindsay       | Review joint stipulation to continue CMC and proposed order and correspond with OC to follow up and finalizing and with SZ regarding finalizing and filing. Address status of settlement agreements and revisions and procedure for approval and timing.                                                                                                                               |
| 208396      | Bradley v. AVMC, LLC, dba Toyota of Lancaster | 6/30/25    | 0.4           | Alvin Lindsay       | Confer and correspond with OC regarding finalizing settlement agreement and items agreed upon and ongoing issue with timing of payment of individual settlement and release and draft correspondence to OC regarding same.                                                                                                                                                             |
| 208396      | Bradley v. AVMC, LLC, dba Toyota of Lancaster | 7/15/25    | 0.5           | Alvin Lindsay       | Confer and correspond with mediator regarding availability for conference to address timing of individual payments and issues from Defendant's standpoint. Confer with SZ regarding same and next steps. Review draft agreements and language at issue and consider proposed revisions to compromise.                                                                                  |
| 208396      | Bradley v. AVMC, LLC, dba Toyota of Lancaster | 7/17/25    | 0.6           | Alvin Lindsay       | Confer and correspond with mediator and OC regarding individual settlement payment and timing and confer with SZ regarding same. Conduct teleconference with mediator and                                                                                                                                                                                                              |
| 208396      | Bradley v. AVMC, LLC, dba Toyota of Lancaster | 7/24/25    | 1.2           | Alvin Lindsay       | Review correspondence from mediator regarding agreement to timing on individual payment and draft revisions to individual agreement and track changes. Review PAGA settlement agreement and draft final revisions. Confer and correspond with OC regarding same and final revisions and finalizing for signature. Correspond and confer with SZ and OC and address sending to clients. |
| 208396      | Bradley v. AVMC, LLC, dba Toyota of Lancaster | 7/25/25    | 0.4           | Alvin Lindsay       | Review correspondence from OC regarding joint stip and order and finalizing and approval for filing and confer with SZ regarding same.                                                                                                                                                                                                                                                 |
| 208396      | Bradley v. AVMC, LLC, dba Toyota of Lancaster | 7/31/25    | 0.4           | Alvin Lindsay       | Review correspondence from OC regarding settlement agreement and status of Plaintiff's signature and confer and correspond with OC and SZ regarding same.                                                                                                                                                                                                                              |
| 208396      | Bradley v. AVMC, LLC, dba Toyota of Lancaster | 8/4/25     | 0.4           | Alvin Lindsay       | Review correspondence with OC regarding PAGA and individual settlement agreements and status of signatures and sending from Plaintiff and counsel.                                                                                                                                                                                                                                     |
| 208396      | Bradley v. AVMC, LLC, dba Toyota of Lancaster | 8/5/25     | 0.5           | Alvin Lindsay       | Review stipulation and proposed order and Order entered by Court vacating class cert filing and MTC arb hearing dates. Correspond with WT regarding taking case over and confer with SZ and EK regarding format for settlement approval. Research venue and judge and requirements for approvals. Confirm individual settlement number and terms.                                      |
| 208396      | Bradley v. AVMC, LLC, dba Toyota of Lancaster | 8/7/25     | 0.9           | Alvin Lindsay       | Review correspondence from SZ and Court order setting filing deadline for approval motion. Draft posting to Court requesting continued filing deadline and hearing date setting. Correspond with SZ regarding same and OC regarding plan for dismissal and individual settlement.                                                                                                      |
| 208396      | Bradley v. AVMC, LLC, dba Toyota of Lancaster | 8/7/25     | 0.9           | Alvin Lindsay       | Review correspondence with OC and from Court regarding case and draft correspondence and posting to Case Anywhere requesting the Court vacate the pending class cert deadline and confirming October hearing date and motion filing timing. Review Court response and correspondence from OC regarding same and agreement.                                                             |
| 208396      | Bradley v. AVMC, LLC, dba Toyota of Lancaster | 8/13/25    | 0.4           | Alvin Lindsay       | Review correspondence to OC regarding sending W4 and W9 forms for Plaintiff and addressing status of agreement signatures. Confer with WT regarding same and drafting approval motion and request for dismissal.                                                                                                                                                                       |
| 208396      | Bradley v. AVMC, LLC, dba Toyota of Lancaster | 8/25/25    | 3.6           | Alvin Lindsay       | Review case correspondence and pleadings. Review motion for PAGA settlement approval documents. Draft revisions to Motion and Memorandum and address lodestar cross-check and confer with WT on other changes and reorganization of declarations. Review Neos and compile timekeeping records and draft lodestar summary.                                                              |
| 208396      | Bradley v. AVMC, LLC, dba Toyota of Lancaster | 8/26/25    | 0.9           | Alvin Lindsay       | Review approval motion docs and confer with WT regarding reorganization and revisions to the declarations and Order for review. Address attorney hours and costs and correspond with Administrator regarding providing Admin Declaration in support of settlement approval. Confer with SZ regarding same and timing for finalizing and filing documents.                              |
| 208396      | Bradley v. AVMC, LLC, dba Toyota of Lancaster | 8/27/25    | 0.9           | Alvin Lindsay       | Review ABL and WT Declarations in support of approval and draft revisions. Confer and correspond with WT regarding same and further revisions to Memorandum and Proposed Order and Judgment. Address attorney time and costs and compile exhibits.                                                                                                                                     |

**Total**                      **46.6**

# EXHIBIT 3

| Case Number | Case Title                                    | Entry Date | Billable Time | Staff Name - (Full) | Note                                                                                        |
|-------------|-----------------------------------------------|------------|---------------|---------------------|---------------------------------------------------------------------------------------------|
| 208396      | Bradley v. AVMC, LLC, dba Toyota of Lancaster | 8/7/25     | 1.2           | William Tran        | Review file. Confer with AB re settlement documents.                                        |
| 208396      | Bradley v. AVMC, LLC, dba Toyota of Lancaster | 8/13/25    | 2.1           | William Tran        | Draft PAGA Approval Motion papers, review case file, and settlement documents.              |
| 208396      | Bradley v. AVMC, LLC, dba Toyota of Lancaster | 8/15/25    | 2.6           | William Tran        | Drafting PAGA Approval Motion and corresponding docs.                                       |
| 208396      | Bradley v. AVMC, LLC, dba Toyota of Lancaster | 8/18/25    | 6.9           | William Tran        | Draft PAGA Approval Motion and corresponding documents.                                     |
| 208396      | Bradley v. AVMC, LLC, dba Toyota of Lancaster | 8/19/25    | 2.2           | William Tran        | Review and Finalize drafts of PAGA approval motion and moving papers.                       |
| 208396      | Bradley v. AVMC, LLC, dba Toyota of Lancaster | 8/25/25    | 0.5           | William Tran        | Review and confer with ABL re revisions to draft Approval motion for PAGA settlement        |
| 208396      | Bradley v. AVMC, LLC, dba Toyota of Lancaster | 8/27/25    | 4.3           | William Tran        | Review and revise Motion for PAGA approval and moving papers. Confer with ABL re revisions. |
| Total       |                                               |            | 19.8          |                     |                                                                                             |

# EXHIBIT 4

| Case Number | Case Title                                    | Entry Date | Billable Time | Staff Name - (Full) | Note                                                                                                                                                                                                                         |
|-------------|-----------------------------------------------|------------|---------------|---------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 208396      | Bradley v. AVMC, LLC, dba Toyota of Lancaster | 4/10/24    | 0.5           | Jean Power          | Reviewed case file and summary of data                                                                                                                                                                                       |
| 208396      | Bradley v. AVMC, LLC, dba Toyota of Lancaster | 4/10/24    | 0.3           | Jean Power          | Discussed with AL - update on status and possible filing date.                                                                                                                                                               |
| 208396      | Bradley v. AVMC, LLC, dba Toyota of Lancaster | 4/15/24    | 0.3           | Jean Power          | Call to client. He is currently on SDI and is applying for Social Security Disability. Agrees that he is not pursuing WT. Confirmed COAs and confirmed that his commission rate was .9% (point nine) of sales of auto parts. |
| 208396      | Bradley v. AVMC, LLC, dba Toyota of Lancaster | 4/15/24    | 0.3           | Jean Power          | Email to client re: scope of representation.                                                                                                                                                                                 |
| 208396      | Bradley v. AVMC, LLC, dba Toyota of Lancaster | 4/15/24    | 1             | Jean Power          | Researched templates for the complaint and LWDA letter. Reviewed redlined complaint from previous complaint                                                                                                                  |
| 208396      | Bradley v. AVMC, LLC, dba Toyota of Lancaster | 4/15/24    | 2             | Jean Power          | Begin drafting of Class complaint                                                                                                                                                                                            |
| 208396      | Bradley v. AVMC, LLC, dba Toyota of Lancaster | 4/16/24    | 2             | Jean Power          | Completed drafting Class complaint and emailed to AL for review.                                                                                                                                                             |
| 208396      | Bradley v. AVMC, LLC, dba Toyota of Lancaster | 4/17/24    | 2.5           | Jean Power          | Drafted LWDA notice letter. Revised Complaint. Emailed to AL.                                                                                                                                                                |
| 208396      | Bradley v. AVMC, LLC, dba Toyota of Lancaster | 4/18/24    | 1.5           | Jean Power          | Reviewed and revised LWDA letter. Discussed Commission pay with AL.                                                                                                                                                          |
| 208396      | Bradley v. AVMC, LLC, dba Toyota of Lancaster | 6/10/24    | 0.2           | Jean Power          | Received and reviewed email from Rapidlegal re filing of the POS                                                                                                                                                             |
| 208396      | Bradley v. AVMC, LLC, dba Toyota of Lancaster | 6/11/24    | 0.3           | Jean Power          | Received and reviewed email from court along with ISC Order and reviewed calendar deadlines.                                                                                                                                 |
| 208396      | Bradley v. AVMC, LLC, dba Toyota of Lancaster | 6/24/24    | 0.8           | Jean Power          | Drafted FAC and emailed to AL for review.                                                                                                                                                                                    |
| 208396      | Bradley v. AVMC, LLC, dba Toyota of Lancaster | 6/25/24    | 0.3           | Jean Power          | Received and reviewed email from OC re: FAC. Email to AL to discuss - re: filing FAC to add PAGA as a matter of right.                                                                                                       |
| 208396      | Bradley v. AVMC, LLC, dba Toyota of Lancaster | 6/26/24    | 0.4           | Jean Power          | Discussed FAC filing with AL. Responded to email from OC.                                                                                                                                                                    |
| 208396      | Bradley v. AVMC, LLC, dba Toyota of Lancaster | 7/22/24    | 0.4           | Jean Power          | Returned call to OC Citadelle.                                                                                                                                                                                               |
| 208396      | Bradley v. AVMC, LLC, dba Toyota of Lancaster | 8/9/24     | 0.4           | Jean Power          | Revised joint statement and sent to OC for her portions. Discussed with AL.                                                                                                                                                  |
| 208396      | Bradley v. AVMC, LLC, dba Toyota of Lancaster | 8/9/24     | 0.3           | Jean Power          | Received and reviewed email from OC with her contributions to the joint report. Email to Sasha for filing.                                                                                                                   |
| 208396      | Bradley v. AVMC, LLC, dba Toyota of Lancaster | 8/15/24    | 0.3           | Jean Power          | Preparation for ISC scheduled for tomorrow.                                                                                                                                                                                  |
| 208396      | Bradley v. AVMC, LLC, dba Toyota of Lancaster | 8/16/24    | 2.3           | Jean Power          | Attended ISC hearing.                                                                                                                                                                                                        |
| 208396      | Bradley v. AVMC, LLC, dba Toyota of Lancaster | 8/16/24    | 0.3           | Jean Power          | Email to AL - Hearing memo for ISC                                                                                                                                                                                           |
| 208396      | Bradley v. AVMC, LLC, dba Toyota of Lancaster | 8/19/24    | 0.2           | Jean Power          | Received and reviewed email from OC re: status of Case Anywhere and signed court CMO order. Fwd to Sasha                                                                                                                     |
| 208396      | Bradley v. AVMC, LLC, dba Toyota of Lancaster | 8/19/24    | 0.2           | Jean Power          | Responded to email to OC re: status of signed CMO and CaseAnywhere.                                                                                                                                                          |
| 208396      | Bradley v. AVMC, LLC, dba Toyota of Lancaster | 8/20/24    | 0.2           | Jean Power          | Received and reviewed email from OC confirming that we are waiting for court to initiate the Case Anywhere Order and we do not have a signed copy of the CMO.                                                                |
| 208396      | Bradley v. AVMC, LLC, dba Toyota of Lancaster | 9/5/24     | 0.3           | Jean Power          | Email to/from CaseAnywhere and Sasha - re: setting it up - ready to launch.                                                                                                                                                  |
| 208396      | Bradley v. AVMC, LLC, dba Toyota of Lancaster | 9/11/24    | 0.4           | Jean Power          | Case Review. Updated ABL Open Case list.                                                                                                                                                                                     |
| 208396      | Bradley v. AVMC, LLC, dba Toyota of Lancaster | 9/13/24    | 0.5           | Jean Power          | Received and reviewed email and letter from OC - Meet and Confer re: arbitration. Discussed with AL and fwd to Sasha for dropbox and Neos.                                                                                   |
| 208396      | Bradley v. AVMC, LLC, dba Toyota of Lancaster | 9/17/24    | 0.4           | Jean Power          | Received, reviewed, and responded to email from OC re: purported arbitration agreement.                                                                                                                                      |
| 208396      | Bradley v. AVMC, LLC, dba Toyota of Lancaster | 9/17/24    | 0.4           | Jean Power          | Call with OC. Advised AL and SZ of same.                                                                                                                                                                                     |
| 208396      | Bradley v. AVMC, LLC, dba Toyota of Lancaster | 9/23/24    | 0.4           | Jean Power          | Discussed case with AL - gave update on status of mediation.                                                                                                                                                                 |
| 208396      | Bradley v. AVMC, LLC, dba Toyota of Lancaster | 10/1/24    | 0.4           | Jean Power          | Updated ABL case list and email to OC - see below - f/u on mediation - scheduled a task to f/u on response.                                                                                                                  |
| 208396      | Bradley v. AVMC, LLC, dba Toyota of Lancaster | 10/3/24    | 0.4           | Jean Power          | Email to/from OC and discussed with SZ. Researched docket and confirmed new date. Email from OC with confirmation of amended moving papers.                                                                                  |
| 208396      | Bradley v. AVMC, LLC, dba Toyota of Lancaster | 10/8/24    | 0.5           | Jean Power          | Conferred with AL re: status of mediation. Email to OC with list of proposed mediators for PAGA only mediation. Tasked to follow up.                                                                                         |
| 208396      | Bradley v. AVMC, LLC, dba Toyota of Lancaster | 10/25/24   | 0.2           | Jean Power          | Email to/from OC, Ciatadelle, re: scheduling mediation with Todd Smith.                                                                                                                                                      |
| 208396      | Bradley v. AVMC, LLC, dba Toyota of Lancaster | 11/20/24   | 0.5           | Jean Power          | Email to/from OC and Emalee from McKelvey's office. Discussed dates with AL. Agreed to May 6 mediation date.                                                                                                                 |
| 208396      | Bradley v. AVMC, LLC, dba Toyota of Lancaster | 11/20/24   | 1             | Jean Power          | Drafted and emailed informal discovery request to OC.                                                                                                                                                                        |
| 208396      | Bradley v. AVMC, LLC, dba Toyota of Lancaster | 1/24/25    | 0.5           | Jean Power          | Case and calendar review. Updated case sheet and reviewed mediation docs.                                                                                                                                                    |
| 208396      | Bradley v. AVMC, LLC, dba Toyota of Lancaster | 3/12/25    | 0.4           | Jean Power          | Received and reviewed message from court - fwd to AL and SZ.                                                                                                                                                                 |
| 208396      | Bradley v. AVMC, LLC, dba Toyota of Lancaster | 5/5/25     | 0.2           | Jean Power          | Received and reviewed email from mediator. Fwd to SZ.                                                                                                                                                                        |

Total

23.5

# EXHIBIT 5

| Case   |                                               | Staff Name - |               |               |                    |
|--------|-----------------------------------------------|--------------|---------------|---------------|--------------------|
| Number | Case Title                                    | Entry Date   | Billable Time | (Full)        | Note               |
| 208396 | Bradley v. AVMC, LLC, dba Toyota of Lancaster | 8/6/24       | 1.1           | Emma Geesaman | drafting joint ISC |
| Total  |                                               |              | 1.1           |               |                    |