

MATERN LAW GROUP, PC
MATTHEW J. MATERN (SBN 159798)
LAUNA ADOLPH (SBN 227743)
KAYVON SABOURIAN (SBN 310863)
2101 E. El Segundo Blvd., Suite 403
El Segundo, CA 90245
Tel: (310) 531-1900
Facsimile: (310) 531-1901

Attorneys for Plaintiff MARIA CEBALLOS

SUPERIOR COURT OF THE STATE OF CALIFORNIA
THE COUNTY OF MERCED

CONSUELO VAZQUEZ, as an individual
and on behalf of all similarly situated
employees,

Plaintiff,

v.

CALIFORNIA FRESH FARMS LLC; and
DOES 1 through 50, inclusive,

Defendants.

Case No.: 24CV-03339

Consolidated Case Nos.: 24CV-04490 and
25CV-00518

CLASS ACTION

**DECLARATION OF KAYVON
SABOURIAN IN SUPPORT OF
PLAINTIFFS' MOTION FOR FINAL
APPROVAL OF CLASS ACTION
SETTLEMENT**

Assigned for all purposes to:
Hon. Mark V. Bacciarini, Dept.: CR 8

Complaint filed: June 28, 2024
Trial Date: No Trial Date Set

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25
- 26
- 27
- 28

2

3
4
5

6
7
8
9

10
11

12

13
14
15

16
17
18

19
20
21
22
23
24
25
26
27
28

1 *ABM Industries Inc.* (2012) 212 Cal.App.4th 258; *Franco v. Arakelian Enters., Inc.* (2012) 211
2 Cal.App.4th 314; *Fuentes v. AutoZone, Inc.* (2011) 200 Cal.App.4th 1221; *Gutierrez v. California*
3 *Commerce Club* (2010) 187 Cal.App.4th 969; and *Franco v. Athens Disposal Co., Inc.* (2009) 171
4 Cal.App.4th 1277. Unreported appellate victories include, inter alia, *Miranda v. Guess Retail, Inc.*
5 (Cal. Ct. App., June 25, 2024, No. B323439) 2024 WL 3158208; *Fredeen v. California Cemetery*
6 *and Funeral Services, LLC* (Cal. Ct. App., June 11, 2024, No. B326031) 2024 WL 2930024;
7 *Morales v. Garfield Beach CVS, LLC* (Cal. Ct. App., Jan. 31, 2024, No. B312212) 2024 WL 356877
8 (affirming approval of class action and PAGA settlement); *Gabourel v. Luxottica of America, Inc.*
9 (9th Cir., Jan. 24, 2024, No. 23-55185) 2024 WL 260963 (affirming order denying motion to
10 compel arbitration); *Brown v. Cedars-Sinai Medical Center* (Cal. Ct. App., Dec. 6, 2023, No.
11 B324446) 2023 WL 8442072 (affirming order denying petition to compel arbitration); *Schwade v.*
12 *South Pasadena Rehabilitation Center, LLC* (Cal. Ct. App., Dec. 5, 2023, No. B318644) 2023 WL
13 8414880 (reversing costs award to defendants in Labor Code action); *Mendocino Farms Wage and*
14 *Hour Cases* (Cal. Ct. App., Dec. 4, 2023, No. C096869) 2023 WL 8376119 (affirming approval of
15 class action settlement); *Haaverson v. Tavistock Freebirds, LLC* (Cal. Ct. App., Aug. 18, 2023, No.
16 A164043) 2023 WL 5318401 (affirming attorney fee award in PAGA case); *Madeira v. Converse,*
17 *Inc.* (9th Cir., Aug. 16, 2023, No. 22-55161) 2023 WL 5275011 (reversing denial of class
18 certification for regular rate of pay subclass); *Rojas v. Glenair, Inc.* (Cal. Ct. App. Aug. 3, 2020)
19 No. B302402, 2020 WL 4435156 (reversing order sustaining demurrer without leave to amend
20 under relation-back theory); *Navarro v. 4 Earth Farms, Inc.* (Cal. Ct. App. Feb. 8, 2019) No.
21 B284853, 2019 WL 493781 (affirming judgment in sexual harassment jury trial); *Soto v. Superior*
22 *Court of San Bernardino Cty.* (Cal. Ct. App. Sept. 9, 2019) No. E071920, 2019 WL 4254631 (writ
23 issued); *Pauley v. CF Entertainment* (9th Cir. 2019) 773 F. App'x 357 (reversing order dismissing
24 comedy writers' claims against their employer for violation of the Labor Code and against their
25 union for breach of duty of fair representation); *Pauley v. CF Entertainment* (9th Cir. 2016) 646 F.
26 App'x 498 (same); *Olivares v. Fountain Valley Regional Hospital and Medical Center* (Cal. Ct.
27 App., Jan. 9, 2018) 2018 WL 330134 (affirming order denying motion to compel arbitration); and
28

1 *Christman v. Apple Am. Grp. II, LLC* (Cal. Ct. App. Oct. 4, 2017) No. B271937, 2017 WL 4402124
2 (affirming denial of motion to compel arbitration of PAGA claim).

3 7. MLG has also been appointed class counsel (lead or co-lead counsel) in over 40
4 contested wage and hour class action certification proceedings, including, *Beltran v. Overhill*
5 *Farms, Inc.*, Case No. 19STCV10854 (Los Angeles County Superior Court); *Maldonado v. World*
6 *Class Distribution Inc.*, Case No. BC680208 (Los Angeles County Superior Court); *Benitez v.*
7 *Marromac, Inc.*, Case No. 20STCV19312 (Los Angeles County Superior Court); *Dzul May v. HWA*
8 *May Market, Inc.*, Case No. CGC-21-594169 (San Francisco Superior Court); *Padilla v. Walt*
9 *Disney Parks and Resorts U.S., Inc.*, Case No. 30-2019-01077209-CU (Orange County Superior
10 Court); *Wilson v. RockTenn*, Case No. BC488456 (Los Angeles County Superior Court); *Gutierrez*
11 *v. California Commerce Club, Inc.*, Case No. BC360704 (Los Angeles County Superior Court);
12 *Gutierrez v. Dynaflex Products*, Case No. BC368749; *Garmendia v. Fortune Fashions Industries,*
13 *LLC*, Case No. BC389960 (Los Angeles County Superior Court); *Mendoza v. National Gypsum*
14 *Services Company*, Case No. BC366877 (Los Angeles County Superior Court); *Hall v. K S World,*
15 *Inc.*, Case No. BC615646 (Los Angeles County Superior Court); *Barajas v. WHM, LLC, et al.*,
16 Case No. BC491045 (Los Angeles County Superior Court); *Chhan v. Southern California Gas*
17 *Company*, Case No. BC522049 (Los Angeles County Superior Court); *Ibarra v. Artisan Screen*
18 *Printing*, Case No. BC644708 (Los Angeles County Superior Court); *Sanchez v. McDonald's*
19 *Restaurants of California, Inc.*, Case No. BC499888 (Los Angeles County Superior Court); *Soto v.*
20 *Envision, et al.*, Case No. CIVDS1414104 (San Bernardino Superior Court); *Del Taco Wage and*
21 *Hour Cases*, Case No. JCCP4904 (Alameda Superior Court); *Shuff v. Stevens Creek Quarry*, Case
22 No. 18CV322077 (Santa Clara County Superior Court) *ABM Industries Overtime Cases*, Case No.
23 CJC-07-004502 (San Francisco Superior Court); and cases in California federal courts, such as
24 *McCollum v. TGI Fridays Inc.*, U.S. District Court for the Central District of California, Case No.
25 8:22-cv-00392-FWS-JD; *Hines v. KFC U.S. Properties, Inc.*, U.S. District Court for the Southern
26 District of California, Case No. 3:09-cv-02422; *Negrete v. ConAgra Foods, Inc., et al.*, U.S. District
27 Court for the Central District of California, Case No. 2:16-cv-631-FMO-AJW; *Lopez v. Delta Air*
28 *Lines, Inc.*, U.S. District Court for the Central District of California, Case No. BC586813; *Bowen*

1 *v. Target Corporation*, U.S. District Court for the Central District of California, Case No. 216-cv-
2 02587-RGK-FFM; *Richardson v. Interstate*, U.S. District Court for the Northern District of
3 California, Case No. 3:16-cv-6772-WHA; *Goldstein v. ExxonMobil*, U.S. District Court for the
4 Central District of California, Case No. 2:17-cv-02477-DSF; and *Shiferaw v. Sunrise*, U.S. District
5 Court for the Central District of California, Case No. 2:13-cv-02171-JAK-PLA

6 8. I am a senior associate at MLG. I graduated from Cornell University in 2006 and
7 received my J.D. from University of Texas, School of Law in 2010. I have been licensed to practice
8 law in Texas since 2011 and in California since 2016. Prior to joining MLG, I was an attorney for
9 the Equal Justice Center, a Texas-based non-profit law firm, where I represented the most
10 vulnerable low-income and immigrant workers. While at the Equal Justice Center, I represented
11 victims of human trafficking, including serving as lead counsel in *Kambala v. Signal International*
12 *LLC*, which The Nation magazine called a part of “one of the largest human trafficking cases in
13 U.S. history.” I have also presented lectures on laws affecting low-income to non-lawyer labor
14 conferences and legal seminars. I was recognized as a Texas Rising Star in 2017 and a Southern
15 California Rising Star from 2019-2021.

16 **ATTORNEYS’ FEES AND COSTS**

17 9. My 2025 hourly billing rate is \$950.00, which I believe is consistent with other
18 attorneys of my tenure and specialized employment law experience in Los Angeles County. My
19 hourly rate has been approved in numerous cases, most recently in the following matters:

20 a. In the arbitration of a single plaintiff PAGA case, *Guerrero v. HASA, Inc.*,
21 the Honorable Terry A. Green (Ret.) awarded MLG its hourly rates including my \$950.00 rate,
22 stating that MLG’s hourly rates “are appropriate considering the (high-priced) Los Angeles legal
23 market and the experience, skill, and reputation of Claimant’s counsel.” The Arbitrator also
24 found that the rates of MLG’s legal assistants ,which were \$325.00, to be reasonable.

25 b. In *Morgan v. Rohr, Inc.*, United States District Court for the Southern
26 District of California, Case No. 3:20-CV-00574, the Honorable Gonzalo P. Curiel approved
27 MLG’s hourly rates, which included my 2025 hourly rate of \$950.00, stating that “Plaintiffs’
28 counsel’s hourly rates are reasonable and in line with rates prevailing in the community for

attorneys of comparable skill, experience, and reputation.

10. Shareholder Launa Adolph graduated from the University of California, Los Angeles in 2000 and received her J.D. from Loyola Law School in 2003. Ms. Adolph has been an active member of the California State Bar in good standing since December 2003. She is also admitted to practice in Illinois. Ms. Adolph has over 20 years of experience handling wage-and-hour and consumer class actions, and has been appointed class counsel in over 40 cases in state and federal courts in both California and New York, including over a dozen certified wage and hour class action cases which involved contested certification proceedings. Ms. Adolph was part of the trial team in a certified wage and hour class action trial alleging claims for failure to pay overtime wages, which settled post-trial for \$26 million. She is a Fellow in the Litigation Counsel of America. Ms. Adolph has also been recognized as a Southern California Rising Star in 2013 and a Southern California Super Lawyer every year since 2014

11. Over my career, I have become familiar with the fees charged by attorneys in employment wage-and-hour actions throughout California, with comparable experience to mine, as well as the MLG attorneys who worked on this matter. I have obtained this familiarity in several ways: (1) by reviewing attorney fee applications and awards received by plaintiffs' attorneys; (2) by reviewing declarations regarding prevailing market rates and other factors filed in other employment discrimination and class action cases in southern California; (3) by reviewing surveys and articles on attorney's fees in legal newspapers, journals, and treatises; and (4) by discussing fees in employment discrimination and class action cases with other attorneys. Based on this information, I believe that MLG's current rates are consistent with the market rate for attorneys with comparable expertise, experience, and qualifications in Los Angeles County.

12. As of December 1, 2025, MLG has spent at least 21.2 hours litigating this Action for a lodestar of \$21,380.00. Attached hereto as **Exhibit 1** is a true and correct copy of a printout of hours logged by my office for this consolidated action.

13. To date, MLG has incurred actual costs in the amount of \$1,696.74. These costs were reasonably incurred in prosecuting the case on behalf of the Class Members. A true and correct copy of MLG's cost report is attached hereto as **Exhibit 2**.

14. Based on my experience, I believe the fees and costs requested is reasonable. The fee percentage requested is less than that charged by MLG for other employment cases.

ENHANCEMENT PAYMENT

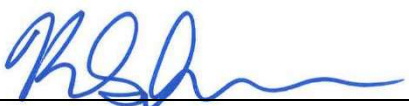
15. The Settlement provides for a \$10,000.00 enhancement payment to each Plaintiff. This payment is intended to recognize Plaintiffs' substantial effort and risks in assisting with the prosecution of this Action on behalf of the class. Plaintiffs have cooperated with their counsel and taken actions to protect the interests of the class. Plaintiffs provided valuable information regarding missed meal and rest periods. Plaintiffs kept informed of the developments in the Action, informed my office of relevant information, provided the names of witnesses, and participated in decisions concerning the Action. The information provided by Plaintiffs was instrumental in establishing the wage and hour violations alleged in this action, and the recovery provided for in the Settlement Agreement would not have been possible to obtain without their participation.

16. Plaintiffs faced many risks in bringing this case as a class action. Because of Plaintiffs' efforts, approximately 61 Class Members will now have the opportunity to participate in a settlement and recover payment for wage violations they may have never known about on their own or been willing to pursue on their own. If each Class Member attempted to pursue his or her legal remedies individually, each person would have been required to expend a significant amount of their own time and monetary resources.

17. The Action would not have been possible without the aid of Plaintiffs, who put their own time and effort into the litigation and placed themselves at risk for the sake of the other Class Members. The requested enhancement award of \$10,000.00 to each Plaintiff is therefore reasonable to compensate Plaintiffs for their active participation in this lawsuit.

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

Executed on May 8, 2026, at Santa Monica, California.



Kayvon Sabourian

Matern Law Group, PC

MLG Hours (Lodestar) Report

Date	Prof	Matter ID/Client Sort Matter Description Narrative	Units	Price	Value
Professional: Adolph, Launa					
04/15/2025	LA	2273-001/ Ceballos, Maria Ceballos, Maria vs. Mann Packing Company, Inc. Email from and TC with K. Wooley re: related case, extension of time to respond to complaint; email to KS re: same	0.20	1,150.00	230.00
05/30/2025	LA	2273-001/ Ceballos, Maria Ceballos, Maria vs. Mann Packing Company, Inc. Emails with J. Young re: outcome of mediation	0.10	1,150.00	115.00
07/07/2025	LA	2273-001/ Ceballos, Maria Ceballos, Maria vs. Mann Packing Company, Inc. Confer with KS re: MOU, scope of release	0.40	1,150.00	460.00
08/01/2025	LA	2273-001/ Ceballos, Maria Ceballos, Maria vs. Mann Packing Company, Inc. Review draft notice; emails with OC re: same	0.20	1,150.00	230.00
04/24/2026	LA	2273-001/ Ceballos, Maria Ceballos, Maria vs. Mann Packing Company, Inc. Review file; confer, emails, and texts with KS costs for motion for final approval	0.30	1,150.00	345.00
Professional: Adolph, Launa			1.20		1,380.00
Professional: Sabourian, Kayvon					
09/13/2024	KS	2273-001/ Ceballos, Maria Ceballos, Maria vs. Mann Packing Company, Inc. Draft list of witnesses, draft list of questions for witnesses	3.80	1,000.00	3,800.00
09/13/2024	KS	2273-001/ Ceballos, Maria Ceballos, Maria vs. Mann Packing Company, Inc. Emails to legal assistants regarding witness interview project	0.20	1,000.00	200.00
09/13/2024	KS	2273-001/ Ceballos, Maria Ceballos, Maria vs. Mann Packing Company, Inc. Email to co counsel regarding witness interview project	0.20	1,000.00	200.00
09/17/2024	KS	2273-001/ Ceballos, Maria Ceballos, Maria vs. Mann Packing Company, Inc. Email to legal assistant regarding draft complaint	0.10	1,000.00	100.00
09/23/2024	KS	2273-001/ Ceballos, Maria Ceballos, Maria vs. Mann Packing Company, Inc. Email to legal assistant regarding draft complaint	0.10	1,000.00	100.00
10/11/2024	KS	2273-001/ Ceballos, Maria Ceballos, Maria vs. Mann Packing Company, Inc. Review email regarding client records, email legal assistant regarding the same	0.10	1,000.00	100.00
11/11/2024	KS	2273-001/ Ceballos, Maria Ceballos, Maria vs. Mann Packing Company, Inc. Email to opposing counsel	0.10	1,000.00	100.00
11/12/2024	KS	2273-001/ Ceballos, Maria Ceballos, Maria vs. Mann Packing Company, Inc. Call with opposing counsel	0.30	1,000.00	300.00
11/12/2024	KS	2273-001/ Ceballos, Maria Ceballos, Maria vs. Mann Packing Company, Inc. Email to OC	0.10	1,000.00	100.00

Matern Law Group, PC

MLG Hours (Lodestar) Report

Date	Prof	Matter ID/Client Sort Matter Description Narrative	Units	Price	Value
11/12/2024	KS	2273-001/ Ceballos, Maria Ceballos, Maria vs. Mann Packing Company, Inc. Email to legal assistant	0.10	1,000.00	100.00
01/17/2025	KS	2273-001/ Ceballos, Maria Ceballos, Maria vs. Mann Packing Company, Inc. Revise complaint, call with co counsel regarding the same	2.70	1,000.00	2,700.00
02/12/2025	KS	2273-001/ Ceballos, Maria Ceballos, Maria vs. Mann Packing Company, Inc. Email to legal assistant regarding trial rating	0.10	1,000.00	100.00
04/21/2025	KS	2273-001/ Ceballos, Maria Ceballos, Maria vs. Mann Packing Company, Inc. Email to OC	0.10	1,000.00	100.00
05/30/2025	KS	2273-001/ Ceballos, Maria Ceballos, Maria vs. Mann Packing Company, Inc. Email to counsel for other plaintiff	0.10	1,000.00	100.00
05/30/2025	KS	2273-001/ Ceballos, Maria Ceballos, Maria vs. Mann Packing Company, Inc. Call with counsel for other plaintiff, email regarding the same	0.50	1,000.00	500.00
06/06/2025	KS	2273-001/ Ceballos, Maria Ceballos, Maria vs. Mann Packing Company, Inc. Call with co counsel about settlement, email to co counsel regarding the same	0.80	1,000.00	800.00
06/06/2025	KS	2273-001/ Ceballos, Maria Ceballos, Maria vs. Mann Packing Company, Inc. Email to and from co counsel regarding settlement	0.10	1,000.00	100.00
06/18/2025	KS	2273-001/ Ceballos, Maria Ceballos, Maria vs. Mann Packing Company, Inc. Call with John Young	0.20	1,000.00	200.00
06/18/2025	KS	2273-001/ Ceballos, Maria Ceballos, Maria vs. Mann Packing Company, Inc. Call with John Young	0.10	1,000.00	100.00
06/25/2025	KS	2273-001/ Ceballos, Maria Ceballos, Maria vs. Mann Packing Company, Inc. REvise stipulation, email OC	0.40	1,000.00	400.00
06/25/2025	KS	2273-001/ Ceballos, Maria Ceballos, Maria vs. Mann Packing Company, Inc. REview defendnat's revisions to stipulation, email OC	0.10	1,000.00	100.00
07/03/2025	KS	2273-001/ Ceballos, Maria Ceballos, Maria vs. Mann Packing Company, Inc. Review email regarding Del Monte bankruptcy, review MOU, email thoughts on MOU to co counsel	1.30	1,000.00	1,300.00
07/07/2025	KS	2273-001/ Ceballos, Maria Ceballos, Maria vs. Mann Packing Company, Inc. Call with co counsel regarding MOU	0.40	1,000.00	400.00
07/07/2025	KS	2273-001/ Ceballos, Maria Ceballos, Maria vs. Mann Packing Company, Inc. Email to co counsel regarding MOU	0.10	1,000.00	100.00
07/07/2025	KS	2273-001/ Ceballos, Maria Ceballos, Maria vs. Mann Packing Company, Inc. Email to opposing counsel regarding MOU	0.10	1,000.00	100.00

Matern Law Group, PC

MLG Hours (Lodestar) Report

Date	Prof	Matter ID/Client Sort Matter Description Narrative	Units	Price	Value
07/08/2025	KS	2273-001/ Ceballos, Maria Ceballos, Maria vs. Mann Packing Company, Inc. Revise MOU, emial OC	0.50	1,000.00	500.00
07/14/2025	KS	2273-001/ Ceballos, Maria Ceballos, Maria vs. Mann Packing Company, Inc. Email to opposing counsel regarding MOU	0.20	1,000.00	200.00
07/15/2025	KS	2273-001/ Ceballos, Maria Ceballos, Maria vs. Mann Packing Company, Inc. Email regarding MOU	0.10	1,000.00	100.00
07/15/2025	KS	2273-001/ Ceballos, Maria Ceballos, Maria vs. Mann Packing Company, Inc. Email to staff regarding signing MOU, emailing OC	0.10	1,000.00	100.00
07/18/2025	KS	2273-001/ Ceballos, Maria Ceballos, Maria vs. Mann Packing Company, Inc. Email OC	0.10	1,000.00	100.00
07/18/2025	KS	2273-001/ Ceballos, Maria Ceballos, Maria vs. Mann Packing Company, Inc. Email staff regarding client signature	0.10	1,000.00	100.00
07/22/2025	KS	2273-001/ Ceballos, Maria Ceballos, Maria vs. Mann Packing Company, Inc. Email to staff regarding cleint call	0.10	1,000.00	100.00
07/22/2025	KS	2273-001/ Ceballos, Maria Ceballos, Maria vs. Mann Packing Company, Inc. Email staff regarding correct version	0.10	1,000.00	100.00
07/22/2025	KS	2273-001/ Ceballos, Maria Ceballos, Maria vs. Mann Packing Company, Inc. Email to staff regarding client quesitons	0.30	1,000.00	300.00
07/28/2025	KS	2273-001/ Ceballos, Maria Ceballos, Maria vs. Mann Packing Company, Inc. Email legal assistant regarding JPA	0.10	1,000.00	100.00
07/29/2025	KS	2273-001/ Ceballos, Maria Ceballos, Maria vs. Mann Packing Company, Inc. Email staff regarding fully executed MOU	0.10	1,000.00	100.00
08/14/2025	KS	2273-001/ Ceballos, Maria Ceballos, Maria vs. Mann Packing Company, Inc. Revise consolidated complaint, email OC	0.80	1,000.00	800.00
09/02/2025	KS	2273-001/ Ceballos, Maria Ceballos, Maria vs. Mann Packing Company, Inc. REview stipulation to consolidate, email John Young regarding the same	0.10	1,000.00	100.00
10/01/2025	KS	2273-001/ Ceballos, Maria Ceballos, Maria vs. Mann Packing Company, Inc. Email opposing counsel regarding escalator clause	0.10	1,000.00	100.00
10/01/2025	KS	2273-001/ Ceballos, Maria Ceballos, Maria vs. Mann Packing Company, Inc. Review, email OC	0.20	1,000.00	200.00
10/02/2025	KS	2273-001/ Ceballos, Maria Ceballos, Maria vs. Mann Packing Company, Inc. Review changes, email OC	0.30	1,000.00	300.00

Matern Law Group, PC

MLG Hours (Lodestar) Report

Date	Prof	Matter ID/Client Sort Matter Description Narrative	Units	Price	Value
10/07/2025	KS	2273-001/ Ceballos, Maria Ceballos, Maria vs. Mann Packing Company, Inc. Email to staff regarding client signature	0.10	1,000.00	100.00
10/07/2025	KS	2273-001/ Ceballos, Maria Ceballos, Maria vs. Mann Packing Company, Inc. Email signed agreement	0.10	1,000.00	100.00
10/17/2025	KS	2273-001/ Ceballos, Maria Ceballos, Maria vs. Mann Packing Company, Inc. Draft declaration in support of motion	0.50	1,000.00	500.00
10/17/2025	KS	2273-001/ Ceballos, Maria Ceballos, Maria vs. Mann Packing Company, Inc. Draft attorney declaration in support of motion for preliminary approval, revise MPA	1.10	1,000.00	1,100.00
10/17/2025	KS	2273-001/ Ceballos, Maria Ceballos, Maria vs. Mann Packing Company, Inc. Email other plaintiff's counsel copies of declarations for MPA	0.10	1,000.00	100.00
10/31/2025	KS	2273-001/ Ceballos, Maria Ceballos, Maria vs. Mann Packing Company, Inc. Review defendant's revisions to my declaration	1.20	1,000.00	1,200.00
10/31/2025	KS	2273-001/ Ceballos, Maria Ceballos, Maria vs. Mann Packing Company, Inc. Review responses to OSC	0.10	1,000.00	100.00
12/04/2025	KS	2273-001/ Ceballos, Maria Ceballos, Maria vs. Mann Packing Company, Inc. Review tentative, email other plaintiff's counsel	0.30	1,000.00	300.00
01/07/2026	KS	2273-001/ Ceballos, Maria Ceballos, Maria vs. Mann Packing Company, Inc. REview amended order, calendar deadlines, email staff	0.30	1,000.00	300.00
02/18/2026	KS	2273-001/ Ceballos, Maria Ceballos, Maria vs. Mann Packing Company, Inc. Email John Young	0.10	1,000.00	100.00
04/23/2026	KS	2273-001/ Ceballos, Maria Ceballos, Maria vs. Mann Packing Company, Inc. Email John Young	0.10	1,000.00	100.00
04/24/2026	KS	2273-001/ Ceballos, Maria Ceballos, Maria vs. Mann Packing Company, Inc. REview cost report, email John Young	0.40	1,000.00	400.00
04/28/2026	KS	2273-001/ Ceballos, Maria Ceballos, Maria vs. Mann Packing Company, Inc. Email John Young	0.10	1,000.00	100.00
Professional: Sabourian, Kayvon			20.00		20,000.00
Grand Total:			21.20		\$21,380.00

Matern Law Group, PC
MLG Client Cost Report

Trans No	Date	Matter ID/Client Sort Matter Description	Inv No	Trans Desc	Price
Document Service					
875848	11/13/2024	2273-001/ Ceballos, Maria Ceballos, Maria vs. Mann Packing Company, Inc.	Ramp - 10/21/24 - 11/20/24	RAMP Mercedcounty Epay Fee Matter ID 2273-001 - Court Processing Payment Fee	0.19
981620	10/31/2025	2273-001/ Ceballos, Maria Ceballos, Maria vs. Mann Packing Company, Inc.	16992467	One Legal LLC #26681193 - Notice	18.65
875849	11/13/2024	2273-001/ Ceballos, Maria Ceballos, Maria vs. Mann Packing Company, Inc.	Ramp - 10/21/24 - 11/20/24	RAMP Mercedcounty Epay Fee "Matter ID 2273-001 filing payment processing"	0.17
875846	11/13/2024	2273-001/ Ceballos, Maria Ceballos, Maria vs. Mann Packing Company, Inc.	Ramp - 10/21/24 - 11/20/24	RAMP Cntyofmerced E Pay Matter ID 2273-001 - Ceballos v. California Farm Fresh	18.00
899952	01/30/2025	2273-001/ Ceballos, Maria Ceballos, Maria vs. Mann Packing Company, Inc.	16264955	One Legal LLC #24535048 - Complaint, Summons, Civil Case Cover Sheet	18.91
Initial Filing Fees					\$55.92
899951	01/30/2025	2273-001/ Ceballos, Maria Ceballos, Maria vs. Mann Packing Company, Inc.	16264955	One Legal LLC #24535048 - Complaint, Summons, Civil Case Cover Sheet	1,435.00
Process Service					\$1,435.00
919056	03/28/2025	2273-001/ Ceballos, Maria Ceballos, Maria vs. Mann Packing Company, Inc.	16413060	One Legal LLC #25003196 - Complaint, Summons, Civil Case Cover Sheet, Notice of Hearing	71.25
919051	03/27/2025	2273-001/ Ceballos, Maria Ceballos, Maria vs. Mann Packing Company, Inc.	16412764	One Legal LLC #25003194 - Complaint, Summons, Civil Case Cover Sheet, Notice of Hearing	37.50
919062	03/28/2025	2273-001/ Ceballos, Maria Ceballos, Maria vs. Mann Packing Company, Inc.	16415377	One Legal LLC #25003195 - Complaint, Summons, Civil Case Cover Sheet, Notice of Hearing	37.50

4/24/2026 3:22:22 PM

Page 1 of 2

Matter ID = ask user ('Matter ID') and transactions costs

Matern Law Group, PC
MLG Client Cost Report

Trans No	Date	Matter ID/Client Sort Matter Description	Inv No	Trans Desc	Price
Process Service					\$146.25
Research Services					
888641	12/01/2024	2273-001/ Ceballos, Maria Ceballos, Maria vs. Mann Packing Company, Inc.	851189453	Thomson Reuters-West	30.26
906051	02/01/2025	2273-001/ Ceballos, Maria Ceballos, Maria vs. Mann Packing Company, Inc.	851432941	Thomson Reuters-West	29.31
Research Services					\$59.57
TOTAL COSTS					1,696.74

PROOF OF SERVICE

Code of Civ. Proc. § 1013a, subd. (3)

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action. My business address is 249 East Ocean Boulevard, Suite 814, Long Beach, California, 90802.

On **May 21, 2026**, I served [X] true copies [] originals of the following document(s): **[PROPOSED] FINAL APPROVAL ORDER AND JUDGMENT**. I served the document(s) on the person(s) below as follows:

Koree B. Wooley Esq. Cindi Ritchey, Esq. Elizabeth Mcree Katelyn Nicasio JONES DAY 4655 Executive Drive, Suite 1500 San Diego, CA 92121	Attorneys for Defendant California Fresh Farms, LLC Telephone: (858) 314-1200 Facsimile: (844) 345-3178 Email: kbwooley@jonesday.com critchey@jonesday.com emcree@jonesday.com knicasio@jonesday.com
---	---

The document(s) were served by the following means:

☒ **By e-mail:** Based upon court order or an agreement of the parties to accept service by e-mail, I caused the document(s) to be sent to the persons at the electronic service addresses listed above from the email address nguyen@mahoney-law.net. Within a reasonable time after the transmission, no error, electronic message or any other indication that the transmission was unsuccessful was received.

☒ **(State):** I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on **May 21, 2026**, at Long Beach, California.



Tuan Nguyen