Thomas A. Rist (SBN 238090)
RIST LAW OFFICE, LC
2221 Camino Del Rio South, Suite 300
San Diego, CA 92108
(619) 377-4660
tom@sdvictimlaw.com

Attorney for Plaintiff Freddie Bunch

(Continued Next Page)

SUPERIOR COURT FOR THE STATE OF CALIFORNIA

COUNTY OF SAN DIEGO

FREDDIE BUNCH, ARNULFO LABIOS, and ASHLEY NICOLE ELLIOTT on behalf of themselves and all others similarly situated,

Plaintiffs,

vs.

NAPHCARE U.S., INC., an Alabama corporation; NAPHCARE OF SAN DIEGO LLC, a California limited liability company; NAPHCARE PHARMACY, LLC, an Alabama limited liability company, NAPHCARE US DE, LLC, a Delaware limited liability company; NAPHCARE WHOLESALE DISTRIBUTION, LLC, an Alabama limited liability company; NAPHCARE, INC., an Alabama corporation; and DOES 1 through 10, inclusive,

Defendants.

Case No.: 37-2024-00002535-CU-NP-CTL
Assigned to Hon. Judge Matthew C. Braner, Dept. C-60

Complaint filed: January 19, 2024
Trial date: Not Set

CLASS & REPRESENTATIVE ACTION

DECLARATION OF THOMAS A. RIST IN SUPPORT OF PLAINTIFFS' MOTION FOR FINAL APPROVAL OF CLASS ACTION AND PAGA SETTLEMENT

[*Filed concurrently with*: Plaintiffs' Notice of Motion and Motion for Preliminary Approval of Class Action and PAGA Settlement]

FINAL APPROVAL HEARING
Date: December 4, 2026
Time: 9:00 a.m.
Dept: C-60

Tyler J. Woods, Esq. (SBN 232464)
Tyler.woods@wilshirelawfirm.com
James Yoo, Esq. (SBN 310680)
james.yoo@wilshirelawfirm.com
Heriberto Ponce, Esq. (SBN 339713)
Eddie.ponce@wilshirelawfirm.com
Ruby Carrera, Esq. (SBN 343745)
ruby.carrera@wilshirelawfirm.com

WILSHIRE LAW FIRM
3055 Wilshire Blvd., 12th Floor
Los Angeles, California 90010
Telephone: (213) 381-9988
Facsimile: (213) 381-9989

Attorneys for Plaintiff Arnulfo Labios

Roman Otkupman, CSBN 249423
Roman@OLFLA.com
Nidah Farishta, CSBN 312360
Nidah@OLFLA.com
OTKUPMAN LAW FIRM, A LAW CORPORATION
5743 Corsa Ave., Suite 123,
Westlake Village, CA 91362
Telephone: (818) 293-5623
Facsimile: (888) 850-1310

Attorneys for Plaintiff Ashley Nicole Elliott

I, THOMAS A. RIST, declare as follows:

1. I am an attorney at law licensed to practice law before all of the courts of the State of California. I have personal knowledge of all the matters set forth herein, unless otherwise specifically stated, and if called as a witness I could and would competently testify to the following.

2. I graduated from West Virginia University in 1999 with a Bachelor of Science in Business Administration degree in Accounting. I received my Juris Doctor from the West Virginia University College of Law in 2002.

3. For the last twenty years I have operated my own law practice with offices in two states and have handled cases throughout the United States and California, including class action and other complex litigation from pre-filing investigation through trial and appeal.

4. I have successfully litigated cases involving numerous alleged violations of various employment laws and practices, including failure to provide meal and rest periods, failure to timely pay final wages, and failure to provide accurate wage statements, similar to the primary claims made in this case.

5. I have collectively taken in excess of one hundred (100) cases to a final verdict in civil, environmental and criminal cases in front of a judge or jury in both State and Federal Courts and have recovered tens of millions of dollars for clients in civil cases.

6. The plaintiff side employment class action cases that I have either been involved in or directly handled include:

a. **Ramos v. Cedar Fair,** Orange County Superior Court. Co-counsel in an alleged class action claiming meal and rest break violations and off-the-clock violations for time spent undergoing security checks. Final Approval of $4.2 million settlement granted.

b. **Williams v. Chevron Stations, Inc.,** Los Angeles County Superior Court. Co-counsel in an alleged class action claiming failure to pay overtime, failure to provide meal breaks, failure to provide accurate wage statements, and unfair business practices. Final Approval of $3.275 million settlement granted.

c. **Pitshikyan v. Dependable Highway Express, Inc.**, Sacramento Superior Court. Co-counsel in an alleged class action claiming mis-classification of truck drivers classified as independent contractors. Final Approval of $2.5 million settlement granted.

d. **Takrouri v. Core-Mark International, Inc.,** Los Angeles County Superior Court. Co-counsel in an alleged class action claiming failure to reimburse business expenses, failure to provide meal and rest breaks, failure to pay overtime, and failure to provide accurate itemized wages statements. Final Approval of $1.0 million settlement granted.

e. **Rehkopf v. Big Lots Stores, Inc.** San Diego County Superior Court. Co-counsel in alleged class action claiming failure to reimburse business expenses and unfair business practices. Final Approval of $225,000 settlement granted.

f. **Soriano v. Hornblower Yachts, LLC.** San Francisco Superior Court. Lead counsel in alleged class action claiming failure to reimburse business expenses and unfair business practices. Final Approval of $210,000 settlement granted.

g. **Le v. Mile Square Surgery Center, Inc.** Orange County Superior Court. Lead counsel in alleged class action claiming failure to provide meal and rest breaks. Final Approval of $179,475 settlement granted.

h. **Waterman v. Ameritech Financial.** Sonoma County Superior Court. Lead counsel in alleged class action claiming failure to pay wages, failure to provide accurate wage statements, and failure to pay wages owed at termination. Final Approval of $155,000 settlement granted.

7. I have also provided thousands of hours of *pro bono* legal work in environmental cases throughout the United States involving mountaintop removal coal mining, flooding, water quality, and other cases involving the environment. I have represented the Sierra Club, the Natural Resources Defense Council, and Coal River Mountain Watch in environmental matters.

8. My firm concentrates its efforts on areas of litigation, with a great emphasis on Plaintiff class action and complex litigation.

9. My current hourly billing rate is $950.00 per hour. This hourly rate is reasonable and appropriate, given my background and experience. I am generally familiar with hourly rates charged by attorneys in both Southern and Northern California whose training and experience are similar, and I believe this rate is competitive in both markets for attorneys.

10. Based on my investigation and evaluation of this matter, I am of the opinion that the Settlement, its allocation among Class Members, and the recovery for each Class Member, is fair and reasonable.

Settlement Negotiations and Due Diligence

11. After engaging in discussions about the case, exchanging discovery and obtaining additional information in order to mediate this matter, the Parties agreed to engage in private mediation.

12. On January 14, 2026, the Parties participated in an all-day mediation session with mediator Abe Melamed, a respected mediator with experience in wage and hour class actions, which led to the settlement. The Parties' settlement is outlined in the Class Action and PAGA Settlement Agreement ("Settlement Agreement").

13. Discussions between counsel for the Parties, informal discovery, as well as the investigation and evaluation of the claims of Plaintiffs by the Parties, have permitted each side to assess the relative merits of the claims and the defenses to those claims. At all times, the Parties' settlement negotiations have been non-collusive, adversarial and at arm's length. The parties agree that the above-described investigation and evaluation, and the information exchanged during settlement negotiations and mediation, are more than sufficient to assess the merits of the respective Parties' positions and to compromise the issues on a fair and equitable basis. Based on our independent investigation and evaluation, I am of the opinion that the consideration and terms of the Settlement, considering the risk inherent in asserting and prevailing on the representative and the class claims, and the risk of loss on the merits, is fair, reasonable, and adequate in light of all known facts and circumstances, and is in the best interest of the Class. I am also of the opinion that the total consideration and payment outlined in the Settlement Agreement is adequate in light of the uncertainties surrounding the risk of further litigation, and the possible defenses that Defendants have asserted and could assert.

Class Counsel's Attorneys' Fees and Costs

14. The Parties have agreed that Class Counsel will seek no more than $857,500.00 (i.e., 35% of the Gross Settlement Amount) in attorneys' fees. This agreement is fully disclosed in the Settlement Agreement. Rist Law Office's time records for services performed in this case are attached hereto as **Exhibit "A"**. The current hourly rate for Thomas Rist is as follows:

Attorney	**Hours**	**Rate**	**Lodestar**
Thomas Rist	86.5	$950.00	$82,175.00

15. There are additional hours devoted by my office to this litigation that are not reflected in Class Counsel's request for attorney's fees.

16. Class Counsel risked significant time and expense to ensure the successful settlement in the face of significant risks, including Defendant's defenses on the merits.

17. Class Counsel has significant experience in wage and hour litigation and the skill and expertise required for the issues presented in this case. Class Counsel is qualified to handle this litigation because Class Counsel is experienced in litigating Labor Code violations on both a class and individual basis. Class Counsel has also frequently received fee awards of the requested percentage from the gross recovery for the class and Class Counsel's experience in wage and hour litigation was crucial in evaluating both the strengths and weaknesses of the case and the reasonableness of the settlement.

18. Class Counsel has expended a significant amount of time litigating this case to achieve an excellent result on behalf of the Class Members. In the event that the Court grants final approval of the settlement, Class Counsel will spend additional time monitoring administration of the settlement. The number of hours that Class Counsel has devoted to this case is reasonable. Here, Class Counsel was required to expend considerable time and resources to investigate, litigate, and successfully settle these claims for the benefit of the Class.

19. While I work exclusively on a contingency fee basis, I charge a rate of $950.00 per hour when the award of fees is considered. My charge rate is commensurate with the market rates in California for attorneys of comparable experience and skill handling complex litigation, based on my 24 years of experience, qualifications, and expertise. Moreover, this rate has been approved by other courts.

20. Class Counsel's hourly rates are reasonable in light of the significant experience, expertise, and skill of Class Counsel.

21. Class Counsel achieved a result whereby each Participating Class Member will receive a payment without having to submit a claim form. The amount requested here will fairly compensate Class Counsel for their successful vindication of Class Members' rights, taking into account the quality, nature and extent of counsel's efforts, the results achieved and the fact that the amount of fees is sought is consonant with legal precedent. Counsel's diligent, efficient and creative pursuit of this matter positioned Plaintiffs to settle this action successfully, affording redress to the entire class and avoiding the inevitable expense and risk attendant to protracted litigation. In sum, it was through the efforts of Plaintiffs and Counsel that the settlement was obtained.

22. Additional time will be required by Class Counsel to obtain final approval of the settlement and requested awards, monitor the settlement and respond to Class Member inquiries, and oversee the administration of the settlement. Given the time Class Counsel has spent on this case, and the positive reaction by the Class Members, the requested fee award is reasonable and fair and should be awarded.

23. The total litigation expenses utilized in the prosecution of this matter for Rist Law Office is $7,606.74. The expenses were reasonably incurred by Rist Law Office. Attached as **Exhibit "B"** is a true and correct copy of the Expense Statement for Rist Law Office.

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

Executed on November 19, 2026 in San Diego, California.

By: _____
Thomas A. Rist
Attorney for Plaintiff

Exhibit A

Activities Export

11/19/2026
9:56 AM

Date	Type	Description	Matter	Client	User	Qty	Rate ($)	Non-billable ($)	Billable ($)
11/18/2026		Prepare declaration supporting final approval motion Unbilled	Bunch v. Naphcare of San Diego Bunch v. Naphcare of San Diego	Freddie Bunch	Thomas Rist	1.80h	$950.00	-	$1,710.00
11/04/2026		Review and respond to email re: increase in cost and new filing Unbilled	Bunch v. Naphcare of San Diego Bunch v. Naphcare of San Diego	Freddie Bunch	Thomas Rist	0.20h	$950.00	-	$190.00
10/05/2026		Review and analyze weekly report from Phoenix Unbilled	Bunch v. Naphcare of San Diego Bunch v. Naphcare of San Diego	Freddie Bunch	Thomas Rist	0.10h	$950.00	-	$95.00
09/29/2026		Review and analyze email from defense counsel re: status conference and cost for supplemental notices Unbilled	Bunch v. Naphcare of San Diego Bunch v. Naphcare of San Diego	Freddie Bunch	Thomas Rist	0.10h	$950.00	-	$95.00
09/24/2026		Review and respond to emails from defense counsel re: objections and revised notice; review email from Phoenix re: data on PAGA variance Unbilled	Bunch v. Naphcare of San Diego Bunch v. Naphcare of San Diego	Freddie Bunch	Thomas Rist	0.60h	$950.00	-	$570.00
09/23/2026		Review and respond to email from defense counsel re: status of notices and possible new notice to PAGA class Unbilled	Bunch v. Naphcare of San Diego Bunch v. Naphcare of San Diego	Freddie Bunch	Thomas Rist	0.20h	$950.00	-	$190.00
						86.50h		**$0.00** 0.00h	**$82,175.00** 86.50h

Activities Export

11/19/2026
9:56 AM

Date	Type	Description	Matter	Client	User	Qty	Rate ($)	Non-billable ($)	Billable ($)
09/22/2026		Review and analyze weekly summary report from Phoenix group Unbilled	Bunch v. Naphcare of San Diego Bunch v. Naphcare of San Diego	Freddie Bunch	Thomas Rist	0.10h	$950.00	-	$95.00
09/14/2026		Review and analyze weekly report from Phoenix Unbilled	Bunch v. Naphcare of San Diego Bunch v. Naphcare of San Diego	Freddie Bunch	Thomas Rist	0.20h	$950.00	-	$190.00
09/04/2026		Review weekly update from Phoenix Unbilled	Bunch v. Naphcare of San Diego Bunch v. Naphcare of San Diego	Freddie Bunch	Thomas Rist	0.20h	$950.00	-	$190.00
08/31/2026		Review and analyze weekly summary from Phoenix Unbilled	Bunch v. Naphcare of San Diego Bunch v. Naphcare of San Diego	Freddie Bunch	Thomas Rist	0.20h	$950.00	-	$190.00
08/18/2026		Review and respond to email from settlement administrator re: notice packets Unbilled	Bunch v. Naphcare of San Diego Bunch v. Naphcare of San Diego	Freddie Bunch	Thomas Rist	0.30h	$950.00	-	$285.00
08/17/2026		Review and analyze notice packet from Phoenix; review emails from defense counsel re: same Unbilled	Bunch v. Naphcare of San Diego Bunch v. Naphcare of San Diego	Freddie Bunch	Thomas Rist	1.10h	$950.00	-	$1,045.00
07/24/2026		Prepare for and attend hearing Unbilled	Bunch v. Naphcare of San Diego Bunch v. Naphcare of San Diego	Freddie Bunch	Thomas Rist	1.40h	$950.00	-	$1,330.00
						86.50h		**$0.00** 0.00h	**$82,175.00** 86.50h

Activities Export

11/19/2026
9:56 AM

Date	Type	Description	Matter	Client	User	Qty	Rate ($)	Non-billable ($)	Billable ($)
07/24/2026		Review and analyze tentative ruling Unbilled	Bunch v. Naphcare of San Diego Bunch v. Naphcare of San Diego	Freddie Bunch	Thomas Rist	0.20h	$950.00	-	$190.00
05/19/2026		Prepare declaration in support of motion for preliminary approval; circulate to counsel; circulate to client for signature; file with court Unbilled	Bunch v. Naphcare of San Diego Bunch v. Naphcare of San Diego	Freddie Bunch	Thomas Rist	1.30h	$950.00	-	$1,235.00
03/26/2026		Prepare declaration supporting motion for preliminary approval; review and analyze draft motion for preliminary approval and supporting declarations from co-counsel Unbilled	Bunch v. Naphcare of San Diego Bunch v. Naphcare of San Diego	Freddie Bunch	Thomas Rist	1.90h	$950.00	-	$1,805.00
03/26/2026		Finalize second amended complaint and proof of service; file with Court and serve counsel with entered stipulation Unbilled	Bunch v. Naphcare of San Diego Bunch v. Naphcare of San Diego	Freddie Bunch	Thomas Rist	0.60h	$950.00	-	$570.00
03/09/2026		Review of final signed agreement and class notice Unbilled	Bunch v. Naphcare of San Diego Bunch v. Naphcare of San Diego	Freddie Bunch	Thomas Rist	0.60h	$950.00	-	$570.00
02/27/2026		Review and respond to	Bunch v. Naphcare	Freddie	Thomas	0.70h	$950.00	-	$665.00
						86.50h		**$0.00** 0.00h	**$82,175.00** 86.50h

Activities Export

11/19/2026
9:56 AM

Date	Type	Description	Matter	Client	User	Qty	Rate ($)	Non-billable ($)	Billable ($)
		email from counsel re: amended complaint; prepare second amended complaint with changes and circulate Unbilled	of San Diego Bunch v. Naphcare of San Diego	Bunch	Rist				
02/25/2026		Review and analyze proposed long form settlement agreement Unbilled	Bunch v. Naphcare of San Diego Bunch v. Naphcare of San Diego	Freddie Bunch	Thomas Rist	1.10h	$950.00	-	$1,045.00
02/25/2026		Prepare stipulation to amend complaint and draft second amended complaint Unbilled	Bunch v. Naphcare of San Diego Bunch v. Naphcare of San Diego	Freddie Bunch	Thomas Rist	3.20h	$950.00	-	$3,040.00
01/26/2026		Telephone call with Freddie Bunch re: settlement and terms of MOU; telephone call with other employees re: settlement of case Unbilled	Bunch v. Naphcare of San Diego Bunch v. Naphcare of San Diego	Freddie Bunch	Thomas Rist	0.70h	$950.00	-	$665.00
01/21/2026		Review and analyze MOU and redline changes of defense counsel; review and analyze our proposed edits Unbilled	Bunch v. Naphcare of San Diego Bunch v. Naphcare of San Diego	Freddie Bunch	Thomas Rist	0.80h	$950.00	-	$760.00
01/15/2026		Telephone call with class member re: status of case Unbilled	Bunch v. Naphcare of San Diego Bunch v. Naphcare of San Diego	Freddie Bunch	Thomas Rist	0.30h	$950.00	-	$285.00
						86.50h		**$0.00** 0.00h	**$82,175.00** 86.50h

Activities Export

11/19/2026
9:56 AM

Date	Type	Description	Matter	Client	User	Qty	Rate ($)	Non-billable ($)	Billable ($)
01/14/2026		Prepare for and attend mediation Unbilled	Bunch v. Naphcare of San Diego Bunch v. Naphcare of San Diego	Freddie Bunch	Thomas Rist	8.50h	$950.00	-	$8,075.00
01/13/2026		Prepare for mediation; review of data produced by defense counsel; and review mediation brief and MOU by co-counsel Unbilled	Bunch v. Naphcare of San Diego Bunch v. Naphcare of San Diego	Freddie Bunch	Thomas Rist	4.10h	$950.00	-	$3,895.00
12/09/2025		Prepare for and attend mediation conference call Unbilled	Bunch v. Naphcare of San Diego Bunch v. Naphcare of San Diego	Freddie Bunch	Thomas Rist	0.80h	$950.00	-	$760.00
11/03/2025		Prepare mediation data demand letter to Defendant Unbilled	Bunch v. Naphcare of San Diego Bunch v. Naphcare of San Diego	Freddie Bunch	Thomas Rist	1.10h	$950.00	-	$1,045.00
07/21/2025		Telephone call with witness re: facts of case Unbilled	Bunch v. Naphcare of San Diego Bunch v. Naphcare of San Diego	Freddie Bunch	Thomas Rist	0.60h	$950.00	-	$570.00
06/18/2025		Review and analyze order staying case; remove associated deadlines; research ROA re: notice of case assignment Unbilled	Bunch v. Naphcare of San Diego Bunch v. Naphcare of San Diego	Freddie Bunch	Thomas Rist	0.90h	$950.00	-	$855.00
06/02/2025		Review and analyze stipulation to continue	Bunch v. Naphcare of San Diego	Freddie Bunch	Thomas Rist	0.50h	$950.00	-	$475.00
						86.50h		**$0.00** 0.00h	**$82,175.00** 86.50h

Activities Export

11/19/2026
9:56 AM

Date	Type	Description	Matter	Client	User	Qty	Rate ($)	Non-billable ($)	Billable ($)
		case; respond to email from counsel re: same Unbilled	Bunch v. Naphcare of San Diego						
05/01/2025		Review and analyze data being requested for mediation; respond to email from co-counsel re: same Unbilled	Bunch v. Naphcare of San Diego Bunch v. Naphcare of San Diego	Freddie Bunch	Thomas Rist	0.50h	$950.00	-	$475.00
04/25/2025		Prepare confirming email to defendant re: call on motion to amend and motion to compel Unbilled	Bunch v. Naphcare of San Diego Bunch v. Naphcare of San Diego	Freddie Bunch	Thomas Rist	0.70h	$950.00	-	$665.00
04/11/2025		Telephone call with defense counsel re: meet and confer on discovery Unbilled	Bunch v. Naphcare of San Diego Bunch v. Naphcare of San Diego	Freddie Bunch	Thomas Rist	0.50h	$950.00	-	$475.00
04/07/2025		Research new entities and motion to amend complaint Unbilled	Bunch v. Naphcare of San Diego Bunch v. Naphcare of San Diego	Freddie Bunch	Thomas Rist	2.40h	$950.00	-	$2,280.00
04/04/2025		Telephone call with client re: status of case and meal/ rest breaks Unbilled	Bunch v. Naphcare of San Diego Bunch v. Naphcare of San Diego	Freddie Bunch	Thomas Rist	0.60h	$950.00	-	$570.00
03/20/2025		Review supplemental discovery responses; prepare meet and confer letter	Bunch v. Naphcare of San Diego Bunch v. Naphcare of San Diego	Freddie Bunch	Thomas Rist	1.90h	$950.00	-	$1,805.00
						86.50h		**$0.00** 0.00h	**$82,175.00** 86.50h

Activities Export

11/19/2026
9:56 AM

Date	Type	Description	Matter	Client	User	Qty	Rate ($)	Non-billable ($)	Billable ($)
		Unbilled							
03/05/2025		Continue preparing motion for preliminary approval; memorandum in support of motion; declaration of Thomas Rist and proposed order Unbilled	Bunch v. Naphcare of San Diego Bunch v. Naphcare of San Diego	Freddie Bunch	Thomas Rist	2.30h	$950.00	-	$2,185.00
03/04/2025		Continue preparing motion for preliminary approval; memorandum in support of motion; declaration and proposed order Unbilled	Bunch v. Naphcare of San Diego Bunch v. Naphcare of San Diego	Freddie Bunch	Thomas Rist	4.90h	$950.00	-	$4,655.00
03/03/2025		Prepare motion for preliminary approval; memorandum in support of motion; and proposed order Unbilled	Bunch v. Naphcare of San Diego Bunch v. Naphcare of San Diego	Freddie Bunch	Thomas Rist	4.80h	$950.00	-	$4,560.00
02/28/2025		Prepare for and attend Case Management Conference; calendar dates Unbilled	Bunch v. Naphcare of San Diego Bunch v. Naphcare of San Diego	Freddie Bunch	Thomas Rist	1.30h	$950.00	-	$1,235.00
02/27/2025		Prepare and file notice of jury fee deposit Unbilled	Bunch v. Naphcare of San Diego Bunch v. Naphcare of San Diego	Freddie Bunch	Thomas Rist	0.60h	$950.00	-	$570.00
02/27/2025		Review and revise joint prosecution and fee sharing agreement; emails	Bunch v. Naphcare of San Diego Bunch v. Naphcare	Freddie Bunch	Thomas Rist	0.30h	$950.00	-	$285.00
						86.50h		**$0.00** 0.00h	**$82,175.00** 86.50h

Activities Export

11/19/2026
9:56 AM

Date	Type	Description	Matter	Client	User	Qty	Rate ($)	Non-billable ($)	Billable ($)
		to/from counsel re: same; emails to/from client re: same Unbilled	of San Diego						
02/27/2025		Telephone call with co-counsel re: joint prosecution and fee sharing agreement Unbilled	Bunch v. Naphcare of San Diego Bunch v. Naphcare of San Diego	Freddie Bunch	Thomas Rist	0.20h	$950.00	-	$190.00
02/14/2025		Review and analyze email from defendant re: protective order; respond to same Unbilled	Bunch v. Naphcare of San Diego Bunch v. Naphcare of San Diego	Freddie Bunch	Thomas Rist	0.20h	$950.00	-	$190.00
02/13/2025		Telephone call with co-counsel re: new case being filed in California Unbilled	Bunch v. Naphcare of San Diego Bunch v. Naphcare of San Diego	Freddie Bunch	Thomas Rist	0.40h	$950.00	-	$380.00
02/12/2025		Prepare case management statement and proof of service; review of Register of Actions re: continued CMC; email to counsel re: CMC Statement Unbilled	Bunch v. Naphcare of San Diego Bunch v. Naphcare of San Diego	Freddie Bunch	Thomas Rist	0.70h	$950.00	-	$665.00
01/21/2025		Review and analyze updated class list Unbilled	Bunch v. Naphcare of San Diego Bunch v. Naphcare of San Diego	Freddie Bunch	Thomas Rist	0.60h	$950.00	-	$570.00
						86.50h		**$0.00** 0.00h	**$82,175.00** 86.50h

Activities Export

11/19/2026
9:56 AM

Date	Type	Description	Matter	Client	User	Qty	Rate ($)	Non-billable ($)	Billable ($)
11/20/2024		Review and analyze stipulated protective order Unbilled	Bunch v. Naphcare of San Diego Bunch v. Naphcare of San Diego	Freddie Bunch	Thomas Rist	0.70h	$950.00	-	$665.00
08/23/2024		Review and revise Belaire West notice Unbilled	Bunch v. Naphcare of San Diego Bunch v. Naphcare of San Diego	Freddie Bunch	Thomas Rist	0.90h	$950.00	-	$855.00
08/05/2024		Review and analyze Defendant's Case Management Statement Unbilled	Bunch v. Naphcare of San Diego Bunch v. Naphcare of San Diego	Freddie Bunch	Thomas Rist	0.30h	$950.00	-	$285.00
08/05/2024		Review and respond to emails from counsel re: extension on discovery Unbilled	Bunch v. Naphcare of San Diego Bunch v. Naphcare of San Diego	Freddie Bunch	Thomas Rist	0.20h	$950.00	-	$190.00
07/12/2024		Prepare CMC Statement Unbilled	Bunch v. Naphcare of San Diego Bunch v. Naphcare of San Diego	Freddie Bunch	Thomas Rist	1.20h	$950.00	-	$1,140.00
07/11/2024		Prepare meet and confer letter Unbilled	Bunch v. Naphcare of San Diego Bunch v. Naphcare of San Diego	Freddie Bunch	Thomas Rist	2.30h	$950.00	-	$2,185.00
07/10/2024		Prepare discovery responses Unbilled	Bunch v. Naphcare of San Diego Bunch v. Naphcare of San Diego	Freddie Bunch	Thomas Rist	5.30h	$950.00	-	$5,035.00
06/21/2024		Emails to/from defense	Bunch v. Naphcare	Freddie	Thomas	0.20h	$950.00	-	$190.00
						86.50h		**$0.00** 0.00h	**$82,175.00** 86.50h

Activities Export

11/19/2026
9:56 AM

Date	Type	Description	Matter	Client	User	Qty	Rate ($)	Non-billable ($)	Billable ($)
		counsel re: discovery extension and initial disclosures Unbilled	of San Diego Bunch v. Naphcare of San Diego	Bunch	Rist				
06/20/2024		Telephone call with defense counsel re: discovery extension Unbilled	Bunch v. Naphcare of San Diego Bunch v. Naphcare of San Diego	Freddie Bunch	Thomas Rist	0.20h	$950.00	-	$190.00
05/30/2024		Telephone call with client re: discovery requests Unbilled	Bunch v. Naphcare of San Diego Bunch v. Naphcare of San Diego	Freddie Bunch	Thomas Rist	1.20h	$950.00	-	$1,140.00
05/08/2024		Telephone call with witnesses re: events occurring at work still Unbilled	Bunch v. Naphcare of San Diego Bunch v. Naphcare of San Diego	Freddie Bunch	Thomas Rist	0.70h	$950.00	-	$665.00
05/03/2024		Review and analyze answer; prepare demand for initial disclosures Unbilled	Bunch v. Naphcare of San Diego Bunch v. Naphcare of San Diego	Freddie Bunch	Thomas Rist	1.30h	$950.00	-	$1,235.00
01/19/2024		Finish drafting class action complaint and file; emails to clients re: same Unbilled	Bunch v. Naphcare of San Diego Bunch v. Naphcare of San Diego	Freddie Bunch	Thomas Rist	2.50h	$950.00	-	$2,375.00
01/18/2024		Draft LWDA notice and class action complaint Unbilled	Bunch v. Naphcare of San Diego Bunch v. Naphcare of San Diego	Freddie Bunch	Thomas Rist	5.80h	$950.00	-	$5,510.00
						86.50h		**$0.00** 0.00h	**$82,175.00** 86.50h

Activities Export

11/19/2026
9:56 AM

Date	Type	Description	Matter	Client	User	Qty	Rate ($)	Non-billable ($)	Billable ($)
01/11/2024		Interviews of employees and plaintiff re: case facts; research company and claims Unbilled	Bunch v. Naphcare of San Diego Bunch v. Naphcare of San Diego	Freddie Bunch	Thomas Rist	3.40h	$950.00	-	$3,230.00
12/06/2023		Draft initial employment records authorization and fee agreement; emails to clients re: same Unbilled	Bunch v. Naphcare of San Diego Bunch v. Naphcare of San Diego	Freddie Bunch	Thomas Rist	1.60h	$950.00	-	$1,520.00
12/06/2023		Telephone call with witnesses and potential clients re: case Unbilled	Bunch v. Naphcare of San Diego Bunch v. Naphcare of San Diego	Freddie Bunch	Thomas Rist	1.40h	$950.00	-	$1,330.00
						86.50h		**$0.00** 0.00h	**$82,175.00** 86.50h

Exhibit B

Expenses

11/19/2026
9:43 AM

Date	Type	Description	Matter	Client	User	Qty	Rate ($)	Non-billable ($)	Billable ($)
05/19/2026	$	One Legal - filing fee Unbilled	Bunch v. Naphcare of San Diego Bunch v. Naphcare of San Diego	Freddie Bunch	Thomas Rist	1.00	$24.73	-	$24.73
03/27/2026	$	On Legal - Filing Fee Unbilled	Bunch v. Naphcare of San Diego Bunch v. Naphcare of San Diego	Freddie Bunch	Thomas Rist	1.00	$24.73	-	$24.73
03/26/2026	$	SD Superior Court - filing fee Unbilled	Bunch v. Naphcare of San Diego Bunch v. Naphcare of San Diego	Freddie Bunch	Thomas Rist	1.00	$18.20	-	$18.20
03/24/2026	$	One Legal - Filing Fee Unbilled	Bunch v. Naphcare of San Diego Bunch v. Naphcare of San Diego	Freddie Bunch	Thomas Rist	1.00	$24.73	-	$24.73
01/14/2026	$	Signature Resolution - Mediation Fee Unbilled	Bunch v. Naphcare of San Diego Bunch v. Naphcare of San Diego	Freddie Bunch	Thomas Rist	1.00	$5,430.25	-	$5,430.25
02/27/2025	$	One Legal - Jury Fee Deposit Unbilled	Bunch v. Naphcare of San Diego Bunch v. Naphcare of San Diego	Freddie Bunch	Thomas Rist	1.00	$177.28	-	$177.28
02/12/2025	$	One Legal - Filing Fee Unbilled	Bunch v. Naphcare of San Diego Bunch v. Naphcare of San Diego	Freddie Bunch	Thomas Rist	1.00	$21.37	-	$21.37
01/05/2025	$	ILYM Group - Belaire West Mailing	Bunch v. Naphcare of San Diego	Freddie Bunch	Thomas Rist	1.00	$157.21	-	$157.21
								$0.00 0.00h	**$7,606.74** 0.00h

Date	Type	Description	Matter	Client	User	Qty	Rate ($)	Non-billable ($)	Billable ($)
		Unbilled	Bunch v. Naphcare of San Diego						
08/12/2024	$	One Legal - Filing Fee Unbilled	Bunch v. Naphcare of San Diego Bunch v. Naphcare of San Diego	Freddie Bunch	Thomas Rist	1.00	$18.99	-	$18.99
04/08/2024	$	One Legal - Filing Fee - Proof of service Unbilled	Bunch v. Naphcare of San Diego Bunch v. Naphcare of San Diego	Freddie Bunch	Thomas Rist	1.00	$15.39	-	$15.39
04/08/2024	$	Proof - Service of Process Unbilled	Bunch v. Naphcare of San Diego Bunch v. Naphcare of San Diego	Freddie Bunch	Thomas Rist	1.00	$85.00	-	$85.00
03/26/2024	$	One Legal - Amended Complaint Filing Unbilled	Bunch v. Naphcare of San Diego Bunch v. Naphcare of San Diego	Freddie Bunch	Thomas Rist	1.00	$15.39	-	$15.39
03/14/2024	$	Certified Mail - LWDA Unbilled	Bunch v. Naphcare of San Diego Bunch v. Naphcare of San Diego	Freddie Bunch	Thomas Rist	1.00	$8.69	-	$8.69
01/22/2024	$	Filing Fee - One Legal Unbilled	Bunch v. Naphcare of San Diego Bunch v. Naphcare of San Diego	Freddie Bunch	Thomas Rist	1.00	$1,492.72	-	$1,492.72
01/19/2024	$	Postage Unbilled	Bunch v. Naphcare of San Diego Bunch v. Naphcare of San Diego	Freddie Bunch	Thomas Rist	1.00	$8.53	-	$8.53
								$0.00 0.00h	**$7,606.74** 0.00h

Date	Type	Description	Matter	Client	User	Qty	Rate ($)	Non-billable ($)	Billable ($)
01/18/2024	$	LWDA Unbilled	Bunch v. Naphcare of San Diego Bunch v. Naphcare of San Diego	Freddie Bunch	Thomas Rist	1.00	$75.00	-	$75.00
12/06/2023	$	Certified mail Unbilled	Bunch v. Naphcare of San Diego Bunch v. Naphcare of San Diego	Freddie Bunch	Thomas Rist	1.00	$8.53	-	$8.53
								$0.00 0.00h	**$7,606.74** 0.00h