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Attorneys for Plaintiffs and the Proposed Class

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN DIEGO**

LANCE TYLER DUNN, DANIEL
CASTRO, JUAN MIGUEL TORRES
VALENZUELA, STEVEN MUIR, and
FREDRICK EARNHART on behalf of
others similarly situated and the State of
California under the Private Attorneys
General Act,

Plaintiffs,

vs.

RAILPROS FIELD SERVICES, INC. and
DOES 1 through 50, inclusive

Defendants.

Case No.: 24CU022030C

Assigned for All Purposes to:
Hon. Blaine K. Bowman Dept. 74

**DECLARATION OF TIFFANY HYUN IN
SUPPORT OF MOTION FOR FINAL
APPROVAL OF CLASS ACTION
SETTLEMENT & PAGA SETTLEMENT**

Hearing Information:

Date: July 17, 2026
Time: 8:30 a.m.
Dept.: 74

DECLARATION OF TIFFANY HYUN

I, Tiffany Hyun, declare as follows:

1. I am an attorney at law duly licensed to practice before all of the courts of the State of California, and I am the Lead Complex Litigation and Class Action Attorney at the Sentinel Firm, APC, (“Class Counsel”) attorneys of record for Plaintiff Juan Miguel Torres Valenzuela (“Plaintiff Valenzuela” or “Class Representative Valenzuela”) and the proposed settlement class (the “Class”) in the above-captioned matter. Except as otherwise indicated, I have personal knowledge of all matters set forth herein and, if called as a witness, could and would competently testify thereto under oath. I submit this declaration in support of Plaintiffs’ Motion for Final Approval of Class Action Settlement (the “Motion”).

2. Our offices are experienced as class action attorneys, specializing in similar cases relating to wage and hour issues. We have been appointed as class counsel in numerous other class actions, and has a successful track record in litigating class actions, both on a contested and settlement basis. Several attorneys at the Sentinel Firm, APC have been actively engaged in litigating this matter since the inception of the case.

3. Our offices fully and actively participated in the litigation of the Action, including, and not limited to, preparing the pleadings, case strategy, undertaking investigation and informal discovery, performing legal research, and conducting claims evaluation and analysis.

4. All members of our firm conducted significant investigation into the claims alleged by Plaintiff Valenzuela before the Parties reached a settlement in this matter. Before initiating the Action on behalf of our respective client, we investigated and researched the facts and circumstances underlying the pertinent factual and legal issues and applicable law, which required thorough discussions and interviews between our offices and Plaintiff, and research into the various legal issues involved in the cases, namely, the current state of the law as it applied to class certification, off-the-clock work, meal and rest periods, wage-and-hour enforcement, Private Attorneys General Act (“PAGA”) claims, Plaintiff’s claims and allegations, and potential defenses. After conducting an initial investigation, we determined that the claims of the Plaintiff were well-suited for class-wide and representative adjudication owing to what appeared to be a common course of conduct affecting

1 a similarly situated group of current and former non-exempt employees of the Defendant. Our offices
2 investigated the veracity, strength, and scope of the claims and were preparing the Action for class
3 certification and trial prior to reaching the Settlement. We analyzed a volume of information,
4 documents, and data obtained from Plaintiff, Defendant, and other sources. The information,
5 documents, and data provided a critical understanding of the nature of the work performed by the
6 Class Members and Aggrieved Employees, as well as Defendant's operations and employment
7 policies, practices, and procedures, and were used in analyzing liability, damages, and valuation
8 issues in connection with all phases of litigation, and ultimately with the mediation and settlement
9 negotiation process.

10 5. Our offices met with Plaintiff Valenzuela, conducted legal research regarding the
11 applicable Labor Code Sections and thoroughly researched Defendant's organization, structure, and
12 employment policies and practices. Prior to reaching a settlement in this matter, the Parties performed
13 significant research, including propounding discovery on Defendant. Our offices actively
14 participated in coordinating the settlement of this matter with co-counsel.

15 6. Including myself, six (6) attorneys who have actively and continuously represented
16 plaintiff in employment class actions and representative actions in Superior Courts throughout the
17 State of California, in the Court of Appeal, and in various Federal courts spent time litigating and
18 prosecuting this matter. Each member of the Sentinel Firm, APC is qualified to evaluate the risks
19 and benefits of both litigation and settlement in this matter and recommend this Settlement as fair
20 and reasonable to the Class. Because of the unique history and nature of our practice, all of the
21 attorneys at the Sentinel Firm, APC have a high level of knowledge and experience in labor and
22 employment law. The following attorneys at Sentinel Firm, APC spent significant time working on
23 this matter:

24 **Seung Yang** – Mr. Yang is the founder and Managing Partner of the Sentinel Firm, APC. Mr.
25 Yang graduated from the University of California, San Diego in 2002 with a Bachelor of Arts
26 degree in Political Science and Minor in Law and Society. Mr. Yang received his Juris Doctor
27 from Loyola Law School in 2006. Mr. Yang obtained his license to practice law from the
28 California State Bar in June 2007. From approximately 2007 to 2010, Mr. Yang began his legal

1 career at the law firm of Lim, Ruger & Kim, LLP (“LRK”), now known as LimNexus LLP, and
2 worked as an associate in the litigation department. At LRK, his practice consisted primarily of
3 commercial litigation and employment defense work. In 2010, Mr. Yang, along with a prior
4 partner, formed Moon & Yang, APC (“Moon & Yang”). Initially, his practice was focused on
5 commercial litigation and employment defense work. In 2014, Moon & Yang stopped taking
6 defense work, and instead became a plaintiff’s firm, representing employees who traditionally did
7 not have the financial means to participate in the legal system. Moon & Yang and its attorneys
8 have tried both bench and jury trials (representing both plaintiff and defendants) relating to
9 employment matters and have been appointed lead or co-lead class counsel in hundreds of federal
10 and state courts in California. From 2010 to 2023, Mr. Yang assumed the role of Managing
11 Partner at Moon & Yang, where his primary duties included managing and growing the firm
12 from 2 attorneys to over 20. During this time, Moon & Yang became one of the largest plaintiff’s
13 firms in California that specialized in wage and hour class action lawsuits. Mr. Yang was either
14 the lead partner or assisted in the litigation and settlement of hundreds of cases including class
15 action and PAGA action cases. In the Summer of 2023, Mr. Yang sold his ownership interest in
16 Moon & Yang to create a new firm, The Sentinel Firm, APC (“The Sentinel Firm”). Since its
17 inception, The Sentinel Firm has focused exclusively on the prosecution of plaintiff-side
18 employment cases as well as personal injury cases. In addition to the present case, The Sentinel
19 Firm are the attorneys of record in over a hundred employment-related putative wage-and-hour
20 class action lawsuits pending in state and federal jurisdictions through the State of California.
21 During this relatively short time, The Sentinel Firm have recovered millions of dollars on behalf
22 of thousands of employees in the State of California. Throughout his career, Mr. Yang has
23 represented thousands of individuals in employment cases under the Fair Employment and
24 Housing Act and those involving wage and hour claims, and in personal injury cases. Mr. Yang
25 has litigated both federal and state employment discrimination cases from intake through the trial,
26 successfully opposed voluminous motions for summary judgment, and has participated in
27 hundreds of highly effective mediations that resulted in six and seven-figure settlements. In
28 recognition of his professional achievements, Mr. Yang was selected by Super Lawyers as a

1 Rising Star from 2018 – 2020 and recognized by The National Trial Lawyers as one of the Top
2 100 Trial Lawyers in California, amongst other achievements. Mr. Yang currently serves as a
3 member of the California Employment Lawyers Association (CELA). CELA is a statewide
4 organization of approximately 1,200 attorneys who devote the majority of their practices to
5 representing employees in individual and class actions, including cases involving unpaid wages,
6 discrimination, harassment, retaliation and whistleblowing. From 2007 to 2016, Mr. Yang also
7 served as a member of the Korean American Bar Association in Southern California (“KABA”).
8 In this capacity, Mr. Yang volunteered numerous hours advancing legal issues affecting the
9 Korean community in Southern California by translating for and assisting members of the Korean
10 immigrant community in pro bono clinics. From 2010 to 2014, Mr. Yang was on the Board of
11 Governors for KABA. Based on Mr. Yang’s almost 19 years in practice, his billing rate has been
12 approved at \$1,100 per hour in similar cases.

13 **Tiffany Hyun** – I serve as Lead Complex Litigation and Class Action Attorney for the
14 Sentinel Firm, APC, and have continuously served in this position at the Sentinel Firm, APC
15 since approximately April of 2024. I currently serve as the lead attorney maintaining
16 oversight of this case at the Sentinel Firm, APC along with the Managing Partner, Seung
17 Yang. I graduated from the University of California, Irvine in 2010 with a Bachelor of Arts
18 degree in Global Cultures and Minor in English. I received my Juris Doctor degree from
19 Loyola Law School in 2015. I obtained my license to practice law from the California State
20 Bar in 2016. From approximately 2017 to 2024, I was employed as an associate attorney by
21 the law firm Lawyers for Justice, PC (“Lawyers for Justice”). At Lawyers for Justice, my
22 practice focused entirely on wage and hour class actions and PAGA actions. During my time
23 at Lawyers for Justice, I was involved in the litigation and settlement of hundreds of class
24 and/or PAGA actions. My practice focuses almost exclusively on wage and hour class
25 actions and PAGA actions. During the course of my career, I have managed hundreds of
26 wage and hour class and PAGA actions, and employment actions under the Fair Employment
27 and Housing Act from inception through resolution. I have experience in various aspects of
28 class action and PAGA action litigation, including, but not limited to: drafting complaints and

1 PAGA notice letters, drafting and arguing motions, taking depositions, working with experts
2 to analyze time and payroll data for purposes of both settlement negotiations and contested
3 class certification motions, drafting mediation briefs and class wide damages analyses, and
4 mediating class action and PAGA action cases. I have participated in hundreds of mediations
5 and have settled hundreds of wage and hour class and/or PAGA actions and have been
6 named Class and/or PAGA counsel in dozens of actions. I am a current member of the
7 California Employment Lawyers Association, and was selected by Super Lawyers as a
8 Southern California Rising Star in 2021, 2022, 2024, and 2025. My billing rate has been
9 previously approved in similar matters at \$950 per hour.

10 **Jeffrey P. Jackson** – Mr. Jackson is an attorney serving as the Lead Law and Motion
11 Attorney at the Sentinel Firm, APC. Mr. Jackson received his Bachelor of Arts degree from
12 the University of California – San Diego, and a Juris Doctor degree (*cum laude*) from the
13 California Western School of Law. He was admitted to practice law in California in June of
14 2013, and has also been admitted to the Southern, Central and Eastern Districts of California.
15 Mr. Jackson has significant experience in representative wage and hour claims, as PAGA
16 Counsel, Class Counsel and in FLSA Collective Actions and has been appointed Class
17 Counsel both conditionally and in contested motions for class certification. Some of the
18 matters in which Mr. Jackson has been appointed Class Counsel are the following cases:
19 *Avilez v. Omnicare*, San Diego Superior Court Case No. 37-2014-00084453; *Gonzalez v.*
20 *Pacific Honda*, San Diego Superior Court Case No. 37-2014-00084068; *Vazquez v.*
21 *International Marine and Industrial Applicators*, San Diego Superior Court Case No. 37-
22 2014-000320431; *Schaffer v. Rady Children's Hospital*, San Diego Superior Court Case No.
23 37-2015-00022978; *Gomez v. La Cantina Doors*, San Diego Superior Court Case No. 37-
24 2015-00037380; *Webb v. Alpha and Omega Services, Inc.*, Central District of California Case
25 No. 16-cv-1609-RGK-KK; *Castro v. Apple American Group*, San Diego Superior Court
26 Case No. 37-2015-00037599; *Dials v. Pritsker, et al.*, San Diego Superior Court Case No.
27 37-2017-00004777, *Diersing v. Sharp-Rees Stealy Medical Group, Inc., et. al.* Case No. 37-
28 2017-00029164-CU-OE-CTL. *George Martinez v. Northwest Exteriors, Inc.*, Sacramento

1 County Superior Court Case No. 34-2022-00318192, *Darrell Alexander v. Farmdale*
2 *Creamery, Inc.*, San Bernardino County Superior Court Case No. CIVSB2205382, *Maritza*
3 *Gutierrez, et al. v. La Clinica de la Raza, Inc.*, Alameda County Superior Court Case
4 No. RG19010781, *Johnson, et. al. v. Weckworth Electric Group, Inc.*, Alameda County
5 Superior Court Case No. 21CV001491; *Jose Ruiz Vidal, et. al. v. Faria Land and Cattle*
6 *Company, LLC*, Tulare County Superior Court Case No. VCU310614; *Rodriguez v. District*
7 *Council of Contra Costa County Society of St. Vincent De Paul, Diocese of Oakland*, Contra
8 Costa County Superior Court Case No. C24-01377, *Angelina Gomez Gonzalez, v. Vege Labs*
9 *LLC*, Los Angeles County Superior Court Case No. 24STCV13232; *Monroe v. Table Bluff*
10 *Brewing, Inc.*; Humboldt County Superior Court Case No. CV2401291. This represents only
11 a fraction of the matters on which Mr. Jackson has been approved as class counsel. Mr.
12 Jackson has also appeared as counsel of record in dozens of standalone PAGA Actions. Mr.
13 Jackson is an active member of the California Employment Lawyers Association (“CELA”)
14 and routinely attends events held by that association. Based on almost 13 years in practice
15 focusing exclusively on employment law, Mr. Jackson’s billing rate has been approved at a
16 rate of \$950 in similar matters.

17 **Diane Le** – Ms. Le is a litigation associate in the Complex Litigation and Class Action
18 Department at The Sentinel Firm. With a focus on prosecuting complex wage-and-hour class
19 actions and Private Attorneys General Act ("PAGA") representative actions. Ms. Le earned her
20 Juris Doctorate from the Pennsylvania State University Law school and was admitted to the
21 California Bar Association in February of 2023. Ms. Le is admitted to practice law in the State of
22 California, as well as the United States District Courts for the Central Districts of California. Ms.
23 Moh has litigated and mediated dozens of wage and hour class action lawsuits and has been
24 appointed Class Counsel in numerous cases.

25 **Andrew Weaver** - Mr. Weaver is a Senior Complex Litigation Attorney in the Complex
26 Litigation and Class Action Department at The Sentinel Firm with a focus on prosecuting
27 complex wage-and-hour class actions and Private Attorneys General Act representative actions.
28 Mr. Weaver received his Juris Doctorate from the University of California College of the Law,

1 San Francisco (formerly University of California, Hastings College of the Law). Mr. Weaver has
2 obtained class certification in numerous class action lawsuits throughout his career, both on a
3 contested and stipulated basis. Mr. Weaver is licensed to practice before all the courts in the state
4 of California and has been admitted pro hac vice in many other states.

5 **Amelia Haney** – Ms. Haney is a Law and Motion Attorney at The Sentinel Firm. Ms. Haney
6 Received her Bachelor of Arts in Anthropology (*summa cum laude*) from Tufts University and
7 her Juris Doctorate from the University of California, Davis, School of Law. She was admitted to
8 practice law In California in November 2021 and has also been admitted to the Eastern and
9 Northern Districts of California. From August 2021 through March 2024, Ms. Haney was
10 employed in the Agricultural Worker Justice Program, first as a Staff Attorney and then as the
11 Central Valley Regional Directing Attorney. Her practice focused on wage and hour litigation,
12 including under the Private Attorney General Act, as well as discrimination, human trafficking,
13 and immigration related matters. Ms. Haney was involved in the litigation and settlement of
14 dozens of cases, including settlements in the six-figures in PAGA and human trafficking actions.
15 Ms. Haney is a current member of the California Employment Lawyers Association.

16 **Emily Platt** – Ms. Platt was a litigation associate in the Complex Litigation and Class Action
17 Department at The Sentinel Firm with a focus on prosecuting complex wage-and-hour class
18 actions and Private Attorneys General Act representative actions. Ms. Platt earned her Juris
19 Doctor from the University of Southern California in 2018, where she graduated with a Public
20 Interest Certificate. She received her B.A. in Law and Society, with a minor in Psychology from
21 American University, graduating cum laude. Ms. Platt was admitted to practice law in the State of
22 California in May of 2019, as well as the United States District Courts for the Central, Eastern,
23 Northern, and Southern Districts of California. Ms. Platt’s billing rate has been approved at \$600
24 per hour in similar matters. Prior to the Sentinel Firm, APC, Ms. Platt worked in employment law
25 as outside general corporate counsel for employers and as a post-graduate fellow for Mayor Eric
26 Garcetti.

27 7. After substantial investigation, it is our offices’ opinion that the settlement is in the
28 best interest of the class as it provides a guaranteed result as opposed to waiting years for the same,

1 or possibly worse result. The experience of myself and my colleagues at the Sentinel Firm, APC, and
2 the extensive investigation, allowed Plaintiffs to enter this Settlement aware of the risks associated
3 with the case and permitted us to negotiate an informed, reasonable, and intelligent Settlement.

4 8. I believe that the lack of objections and full participation in the Settlement by the
5 Class further demonstrate that the proposed settlement is both fair and reasonable.

6 9. I believe that our offices risked substantial economic loss when we took this case on
7 a contingency basis, knowing that there would likely be a long battle with an aggressive defense firm
8 including the very real possibility of potential appeals. As a result of class counsel taking on this risk
9 and the efforts of class counsel, the Class Members will now be able to recover an average of more
10 than one thousand dollars each for these claims. As such, Class Counsel has obtained an excellent
11 recovery for the Class which justifies a fee award based on the percentage of the common fund.

12 10. We have aggressively litigated this case from the initial pleading to the settlement of
13 this action. All members of our offices participated in case strategy and analysis and drafted,
14 reviewed, and revised pleadings, including extensive investigation, analysis, and research prior to
15 filing the lawsuit and during litigation. We spent substantial time reviewing and analyzing documents
16 and discovery in preparation for settlement negotiations. Even after an agreement was reached in
17 principle, we spent numerous hours assisting in finalizing Settlement Agreement, reviewing the
18 motion for preliminary approval, and coordinating the notice process with the settlement
19 administrator. This case consumed many hours of our efforts.

20 11. The Task and Time Chart, which is attached as **Exhibit 1**, sets forth in detail a
21 summary of the hours that the Sentinel Firm, APC has spent performing tasks on behalf of Plaintiff
22 and the Class. Based on this Task and Time Chart, my office has spent at least 53.80 hours
23 performing tasks to obtain a significant recovery on behalf of Plaintiff and the Class. At a blended
24 firm-wide billing rate of \$800.00 per hour, which is reasonable given the professional background
25 experience and work performed on this matter (and which has been approved in other, similar
26 matters), the lodestar for my offices totals more than \$43,040. “[California] cases have ... implicitly
27 approved use of a blended rate.” (*569 East County Boulevard LLC v. Backcountry Against the Dump,*
28 *Inc.* (2016) 6 Cal.App.5th 426, 438-440 fn 16.)

1 12. I believe the fact that this case was litigated on a contingent basis strongly supports
2 the award of attorneys' fees requested. If we had been unsuccessful, we would not have received any
3 fee or recovered any portion of the expenses spent litigating this matter. Class Counsel has borne all
4 of the risks and costs of litigation and will not receive any compensation until recovery is obtained
5 in this case. Economic uncertainty or other unforeseen circumstances can arise swiftly and for
6 reasons beyond any party's control. Accordingly, given the contingent risk incurred by Class
7 Counsel, the difficulty of the questions involved, the benefit conferred on the Class, and the skill
8 displayed by Class Counsel, the application of a multiplier is appropriate.

9 13. In total, \$5,475.00 in litigation costs by our offices were necessary to successfully
10 resolve this case. A true and correct copy of our offices' litigation costs are attached as **Exhibit 2**.

11 14. I believe that the requested Class Representative Enhancement Payment of \$10,000
12 to each named Plaintiff is fair and appropriate based on the substantial time and effort Plaintiffs
13 invested into bringing this suit and assisting counsel with the development of this case. Plaintiffs
14 spent substantial time working on this matter on behalf of the putative class. Plaintiffs extensively
15 discussed the proposed claims with Class Counsel and searched for documents in support of the
16 alleged claims. Plaintiffs spent substantial time speaking with and helping Class Counsel prepare to
17 assist with mediation and actively attempted to obtain information that would benefit the Class.
18 Plaintiffs reviewed the agreement, asked questions, and discussed the settlement with Class Counsel.
19 As a result of Plaintiffs' actions, Plaintiffs helped recover thousands of dollars for fellow class
20 members.

21 15. Additionally, Plaintiffs face actual risks with their future employment and new
22 career by putting themselves on public record in an employment lawsuit. I believe this risk is quite
23 high and underappreciated. Many employees make it known they are unhappy with pay practices,
24 but it is extremely difficult to come forward as a representative due to the fact that serving as a class
25 representative can be seen as a stigma by present and future employers who are loathe to hire or
26 retain someone who has filed a lawsuit relating to such practices. This risk is particularly prevalent
27 in today's information age because as this Court is aware, prospective employers conduct searches
28 on job applicants. One type of search is to learn about an applicant's litigation history. These searches

1 are easy to run and relatively inexpensive. Indeed, such searches can be successfully performed for
2 free from any mobile device or internet-enabled computer. This risk is particularly heightened in
3 cases like these where workers are relatively low wage earners who are often in need or desirous of
4 finding new jobs.

5 16. As a result of Plaintiffs' actions, many other employees have the opportunity to
6 participate in a settlement, reimbursing them for wage violations they may have never known about
7 or been willing to pursue on their own. As such, Plaintiffs did more than simply lend their name for
8 the lawsuit, but instead took on real, material risks that could follow them in the future. Based on
9 these risks, I believe they each deserve the requested Enhancement Award.

10
11 I declare under penalty of perjury under the laws of the United States and the State of
12 California that the foregoing is true and correct. Executed on June 23, 2026, in Los Angeles,
13 California.

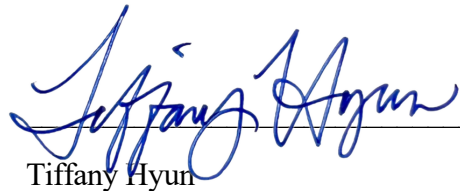
14
15 
16 Tiffany Hyun

EXHIBIT 1

Date	Hours	Attorney	Description
10/9/2024	4.5	SY	Meet with PC Valenzuela re: railpros wage and hour case; sign representation agreement; research into COA and liability, financial issues; discussion with team and TH; initial intake and review of case files and client docs
10/10/2024	2.5	TH	Assignment of Railpros case; review client docs and conduct initial reserach into PAGA/causes of action/ class treatment; research entities and client.
11/5/2024	1.3	TH	Prepare PAGA letter; research into PAGA cases and Railpros;
11/8/2024	2	TH	Draft initial complaint; research into appropriate COA; get filed and reviewed
12/5/2024	0.5	TH	Review of PAGA allegations/separate PAGA complaint
1/13/2025	4.1	EP	Draft FAC; discuss case with client and update our client files; review all client docs re: required docs
1/14/2025	2.1	EP	Discuss status of filing with colleagues; update FAC; research into PAGA letters
2/5/2025	2.5	DL	Research into allegations and discovery plan; PAGA issues; other cases and lexis research
4/15/2025	0.4	TH	Email and discussion with OC re: Railpros; logistics re: answer and initial discussion
5/1/2025	1.8	DL	M&C CALL - Torres Valenzuela v. Railpros Field Services Inc. call with OC re: mediation/other cases; prep for call; prepare call memo
5/16/2025	0.5	DL	Review Answer to Complaint by Def Railpros; research and follow up
7/25/2025	3.5	DL	Prepare SROGs, FROGs and RPDs re: Valenzuela Railpros case; research into COA; serve formal discovery
8/8/2025	1.5	TH	Call with OC re global mediation; research and meet with SY re railpros
8/8/2025	0.8	SY	Discussion re: global mediation with TH and co-counsel; review case status and prepare points of data
9/17/2025	0.7	AW	analysis re discovery and case coordination
9/24/2025	0.7	DL	Appear in SB Court re: railpros case; memo and review Minute Order
9/25/2025	0.1	AW	correspondence with related case counsel
10/10/2025	0.7	AW	TC with co counsel re jpa
10/15/2025	0.2	AW	review draft JPA
10/16/2025	0.2	AW	revise JPA
10/17/2025	0.1	AW	correspondence re JPA
10/23/2025	1.2	AW	review MOU

11/13/2025	0.5 JJ	Review MOU on Railpros; emails with OC re TAC/coordination preparation, waiting time, CMC hearing, appearance memo
11/20/2025	1.2 DL	Prep for CMC and hearing re: PAGA; prepare memo and discussion re: railpros case; waiting time
12/2/2025	1.5 DL	TC with client re MOU
12/5/2025	0.2 AW	correspondence with co counsel re MOU
12/11/2025	0.5 AW	Review TAC and make edits/suggestions
2/3/2026	0.8 TH	review settlement agreement; edits and comments; discussion with TH
2/27/2026	2.2 JJ	decl ISO MPA and review
3/3/2026	2.4 DL	Review MPA and discussion comments with DL
3/3/2026	1.2 JJ	notice of change of address
3/11/2026	0.3 DL	joint statement
3/11/2026	0.8 DL	Discussion with JJ re: Railpros Case and TAC; review and discuss prep, waiting time, further CMC hearing, appearance memo
3/16/2026	0.5 TH	Review Exhibit A notice and prelim approval order
3/18/2026	0.9 DL	review docs re: admin of notice
3/27/2026	1.1 JJ	Prepare updated forms re: opt-out/objection/disputes; emails with counsel re: updates
4/1/2026	0.5 JJ	Email and discussion with JJ re: form issue
4/29/2026	2.1 JJ	Case review re: MFA timelines and consult with co-counsel re: MFA docs
4/30/2026	0.2 SY	Discuss case with client valenzuela and review decl Declaration re: MFA; review MFA paperwork and documents re: MFA from admin, edits and finalizing;
6/18/2026	0.5 JJ	contact client and prepare all docs
6/22/2026	0.4 AH	Discussion with JJ re: Railpros decl; review decl and discuss
6/23/2026	3.5 JJ	
6/23/2026	0.6 TH	

Total 53.8h

EXHIBIT 2

Date	Hours	Description	Rate (\$)
11/8/2024	1	PAGA Letter	75
11/10/2024	1	Admin fee	250
1/9/2025	1	Steno Invoice 1394725	59.95
3/18/2025	1	Steno Invoice 1537579	1997.2
4/23/2025	1	Steno Invoice 1622462	195.95
9/23/2025	1	Steno Invoice 2026675	59.95
11/21/2025	1	Steno Invoice 2196333	59.95
3/25/2026	1	Steno Invoice 2560915	99.95

TOTAL (CLASS): \$2,797.95

Date	Hours	Description	Rate (\$)
3/17/2025	1	Admin fee	250
4/28/2025	1	Steno Invoice 1632948	1997.2
4/28/2025	1	Admin fee	250
6/18/2025	1	Steno Invoice 1766706	59.95
12/30/2025	1	Steno Invoice 2298265	59.95
3/25/2026	1	Steno Invoice 2560903	59.95

TOTAL (PAGA): \$2,677.05

TOTAL (PAGA + CLASS): \$5,475