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**BLUMENTHAL NORDREHAUG BHOWMIK
DE BLOUW LLP**

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Attorneys for Plaintiffs

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

STEPHANIE JONES, an individual, on behalf
of herself and on behalf of all persons similarly
situated,

Plaintiff,

vs.

RADY CHILDREN'S HOSPITAL-SAN
DIEGO, a Corporation; and DOES 1 through
50, inclusive,

Defendants.

[AND CONSOLIDATED MATTERS]

Case No. 37-2023-00027035-CU-OE-CTL
[Consolidated with:
37-2023-00041000-CU-OE-CTL and
37-2024-00018852-CU-OE-CTL]

**DECLARATION OF KYLE
NORDREHAUG IN SUPPORT OF
MOTION FOR FINAL APPROVAL OF
CLASS SETTLEMENT**

Date: September 10, 2025
Time: 1:30 p.m.
Dept: 63
Judge: Hon. Katherine Bacal

Date Action Filed: June 28, 2023
Trial Date: Not set

1 **DECLARATION OF KYLE NORDREHAUG IN SUPPORT OF PLAINTIFF'S**
2 **MOTION FOR FINAL APPROVAL OF CLASS SETTLEMENT**

3 I, Kyle Nordrehaug, declare:

4 1. I am a partner of the law firm of Blumenthal Nordrehaug Bhowmik De Blouw
5 LLP ("BNBD"), counsel for Plaintiffs Stephanie Jones, Juliet Barnia, and Kristin Diane
6 Fleischman ("Plaintiffs"). As such, I am fully familiar with the facts, pleadings and history of
7 this matter. The following facts are within my own personal knowledge, and if called as a
8 witness, I could testify competently to the matters stated herein.

9 2. This declaration is being submitted in support of the Motion for Final Approval
10 of Class Settlement. The settlement reached between Plaintiffs, individually and on behalf of
11 all members of the Class, on the one hand, and Defendant Rady Children's Hospital - San
12 Diego ("Defendant"), on the other hand, is set forth in the Joint Stipulation of Class and PAGA
13 Action Settlement and Release ("Settlement" or "Agreement").
14

15 **Experience of BNBD**

16 3. Over the course of the litigation, my firm has worked actively on this matter.
17 The firm credentials are reflected in the BNBD Resume, a true and correct copy of which is
18 attached hereto as Exhibit #1. Some of the major cases our firm has undertaken are also set
19 forth therein. BNBD has represented hundreds of thousands of employees in hundreds of legal
20 matters, including PAGA lawsuits and hundreds of employment class actions. BNBD's
21 practice is devoted almost entirely to the prosecution of wage and hour class action and PAGA
22 action matters. The attorneys at BNBD have been appointed lead counsel in hundreds of
23 contested motions for class certification including many consolidated wage and hour matters.
24 The attorneys at my firm have extensive experience in cases involving labor code violations
25 and overtime claims. BNBD has litigated similar wage and hour cases against other employers
26 on behalf of employees, including cases against United Airlines, Cigna, Walmart, Legoland,
27 Sharp Healthcare, Securitas, Okta, See's Candies, Walt Disney Resorts, El Pollo Loco, Panda
28

1 Express, Universal Protection, Mattress Firm, Total Renal, Liberty Mutual, Union Bank,
2 Apple, Coventry Health Care, Qualxserv, Union Bank, Marriott, Kaiser / Permanente,
3 Walgreens, and California State Automobile Association. My firm has been approved as class
4 counsel by state and federal courts in California in contested class certification motions,
5 including approvals in this Court. It is this level of experience which enabled the firm to
6 undertake the instant matter and to successfully combat the resources of the defendants and
7 their capable and experienced counsel. On account of the concerted and dedicated effort this
8 case demanded in order to properly handle and prosecute, BNBD was precluded from taking
9 other cases, and in fact, had to turn away other potential fee generating cases.

10 4. Blumenthal Nordrehaug Bhowmik De Blouw LLP was responsible for handling
11 the briefing and argument that resulted in the landmark ruling of *Sakkab v. Luxottica Retail N.*
12 *Am., Inc.*, 803 F.3d 425 (9th Cir. 2015). There, Blumenthal Nordrehaug Bhowmik De Blouw
13 LLP overcame opposition by Littler Mendelson and amici Curiae briefs submitted by Mayer
14 Brown LLP to persuade the Ninth Circuit of the importance of the substantive rights of the
15 State of California under the California Private Attorney General Act of 2004 ("PAGA").
16 BNBD took the lead on this case where the ruling was the reaffirmation of the PAGA statute
17 and the *Iskanian* rule. BNBD also has recently engaged in noted appellate work on the subject
18 of class actions in the California Court of Appeals resulting in the opinions handed down in
19 *Securitas Sec. Services USA, Inc. v. Superior Court*, 234 Cal. App. 4th 1109, 184 Cal. Rptr.
20 3d 568 (2015) (class or representative action waiver in an employment-related arbitration
21 agreement was unenforceable); *Altman v. Solarcity Corp.*, No. D067582, 2016 Cal. App.
22 Unpub. LEXIS 3536 (Ct. App. May 13, 2016) (same). In 2015, Blumenthal Nordrehaug
23 Bhowmik De Blouw LLP received an award from the Daily Journal for Top Appellate
24 Reversal, and I received an award from the Daily Journal as Top Labor & Employment
25 Attorney in 2016.

27 5. District Judge Irma Gonzales in a consolidated class action representing
28 hundreds of armed forces officers held that Blumenthal Nordrehaug Bhowmik De Blouw LLP

1 was "qualified counsel with extensive experience in class action litigation." *McPhail v. First*
2 *Command Fin. Planning, Inc.*, 247 F.R.D. 598, 611 (S.D. Cal. 2007). Examples of other
3 contested actions where class certification was granted Blumenthal Nordrehaug Bhowmik De
4 Blouw LLP and was appointed lead class counsel in wage and hour class actions in Federal
5 Court include *Schulz v. Qualxserv, LLC*, 2012 U.S. Dist. LEXIS 58561 (S.D. Cal. 2012);
6 *Dobrosky v. Arthur J. Gallagher Serv. Co., LLC*, No. EDCV 13-0646 JGB (SPx), 2014 U.S.
7 Dist. LEXIS 106345 (C.D. Cal. July 30, 2014); *Culley v. Lincare Inc.*, No. 2:15-cv-00081-
8 MCE-CMK, 2016 U.S. Dist. LEXIS 105704 (E.D. Cal. Aug. 10, 2016); *Nelson v. Avon Prods.*,
9 No. 13-cv-02276-BLF, 2015 U.S. Dist. LEXIS 51104 (N.D. Cal. Apr. 17, 2015); *Orozco v.*
10 *Illinois Tool Works*, U.S.D.C. Case No. 14-cv-02113-MCE, 2016 U.S. Dist. LEXIS 158115
11 (E.D. Cal. February 17, 2017); *Metrow v. Liberty Mutual*, U.S.D.C. Case No. EDCV 16-1133
12 JGB (C.D. Cal. May 1, 2017). Some examples of heavily contested State Court wage and hour
13 class actions where class certification was obtained and BNBD was appointed lead class
14 counsel include *El Pollo Loco Wage and Hour Cases*, Orange County Superior Court, JCCP
15 Case No. 4957 (July 30, 2018); *Torrento v. Lucile Packard Children's Hospital*, Santa Clara
16 County Superior Court Case No. 2016-1-CV-291035 (July 17, 2018); *Salem v. Alliance*, San
17 Bernardino Superior Court, Case No. CIVRS1401129 (March 8, 2016); *Rivers v. Veolia*,
18 Sonoma County Superior Court Case No. SCV 255350 (March 9, 2016); *Mathies v. Union*
19 *Bank*, San Francisco Superior Court Case No. CGC-10-498077 (Sept. 11, 2013); *Jefferson v.*
20 *Bottling Co, LLC*, Orange County Superior Court Case No. 30-2009-00180102-CU-OE-CXC
21 (Sept. 7, 2010); *Rangel v. Balboa Ambulance Co.*, 37-2008-00095700-CU-BT-CTL (Fe. 11,
22 2010); *Tan v. CSAA*, Orange County Superior Court, Case No. 30-2008-00231219 (Nov. 23,
23 2009).
24

25
26 The Settlement Is Fair, Reasonable and Adequate:

27 6. Plaintiff Jones was a non-exempt employee of Defendant during the relevant
28 time period. On March 27, 2023, Plaintiff Jones filed with the LWDA and served on Defendant

1 a notice under Labor Code section 2699.3 identifying the alleged Labor Code violations to
2 recover civil penalties on behalf of Aggrieved Employees for various Labor Code violations.
3 A true and correct copy of the PAGA Notice by Plaintiff Jones was submitted with the motion
4 for preliminary approval. The PAGA Notice alleged violations of California Labor Code §§
5 201, 202, 203, 204 et seq., 210, 218, 221, 226(a), 226.7, 227.3, 246, 510, 512, 558(a)(1)(2),
6 1194, 1197, 1197.1, 1198, 2802, California Code of Regulations, Title 8, Section 11040,
7 Subdivision 5(A)-(B), California Code of Regulations, Title 8, Section 11070(14) (Failure to
8 Provide Seating), and Violation of the applicable Industrial Welfare Commission Wage
9 Order(s), and attached a copy of the complaint by Plaintiff Del Rio as an exhibit to the PAGA
10 Notice.

11 7. On June 28, 2023, Plaintiff Jones filed a class action Complaint against Defendant
12 in the Superior Court of the State of California, County of San Diego. This class action Complaint
13 asserted class claims against Defendant for: (1) unfair competition in violation of Cal. Bus & Prof.
14 Code §§ 17200, et seq.; (2) failure to to pay minimum wages in violation of California Labor Code
15 §§ 1194, 1197, and 1197.1; (3) failure to pay overtime wages in violation of California Labor Code
16 §§ 510, 1194 & 1198; (4) failure to provide required meal periods in violation of Cal. Labor Code
17 §§ 226.7 and 512; (5) failure to provide required rest periods in violation of Cal. Labor Code §§
18 226.7 and 512; (6) failure to provide accurate itemized wage statements in violation of California
19 Labor Code § 226; (7) failure to reimburse employees for required expenses in violation of
20 California Labor Code § 2802; (8) failure to provide wages when due in violation of California
21 Labor Code §§ 201, 202 and 203; and, (9) failure to pay sick pay wages in violation of California
22 Labor Code §§ 201-204, 233, and 246. In response to a demurrer by the Defendant, on December
23 11, 2023 Plaintiff Jones filed a First Amended Complaint. On August 24, 2023, Plaintiff Jones
24 filed a separate Representative Action Complaint against Defendant (the “Jones PAGA Action”).
25 Based on the Jones PAGA Notice, the Jones PAGA Action complaint asserted one cause of action
26 against Defendant for Civil Penalties Pursuant to Labor Code §§ 2699, et seq. for violations of
27 Labor Code §§ 201, 202, 203, 204 et seq., 210, 218, 221, 226(a), 226.7, 227.3, 246, 510, 512,
28

1 558(a)(1)(2), 1194, 1197, 1197.1, 1198, 2802, California Code of Regulations, Title 8, Section
2 11040, Subdivision 5(A)-(B), California Code of Regulations, Title 8, Section 1 1070(14) (Failure
3 to Provide Seating), and the applicable Wage Order(s). The Jones PAGA Action has since been
4 transferred to the San Diego Superior Court and consolidated with the Jones Class Action.

5 8. On November 13, 2024, the Parties participated in all day mediation with
6 Tripper Ortman. Following the mediation, the Parties agreed to settle the Action based upon
7 a mediator's proposal which was memorialized in the form of a Memorandum of
8 Understanding. The Parties then negotiated the final terms of the settlement as set forth in the
9 Agreement. At all times, the negotiations were arm's length and contentious.

10 9. In this case, the Settlement reached in the total non-reversionary amount of One
11 Million Nine Hundred Thousand Dollars (\$1,900,000) as the Maximum Settlement Amount is
12 the product of substantial effort by the Parties and counsel should be approved as fair,
13 reasonable and adequate. The Settlement was the result of arms-length negotiations during
14 mediation and between experienced counsel. The Settlement was only reached after extensive
15 factual and legal investigation and research, careful evaluation of the respective parties'
16 strengths and weaknesses, and diligent negotiation efforts. The Settlement amount is a
17 negotiated compromise which took into account risks related to liability, damages, and all the
18 defenses asserted by Defendant. The risk that class certification would not be granted was an
19 extremely important consideration, as the denial of class certification would mean that the
20 class would receive nothing. The fear of retaliation and blacklisting makes it unlikely that
21 absent class certification, individuals would come forward to assert their rights individually.
22 Although I am of the opinion that a class can be certified, I also believe in the fairness of the
23 settlement that is based on factoring in the uncertainty and risks to Plaintiffs involved in not
24 prevailing on one or more of the causes of action or theories alleged, the possibility of non-
25 certification and potential for appeals. Based on the foregoing data and our own independent
26 investigation and evaluation, I am of the opinion that the settlement with the Defendant for the
27 consideration and on the terms set forth in the Agreement is fair, reasonable, and adequate and
28

1 is in the best interest of the class in light of all known facts and circumstances, including the
2 risk of significant delay, the defenses asserted by Defendant, and numerous potential appellate
3 issues.

4 10. From the inception of the case, Class Counsel has zealously represented the
5 interests of the Class. The settlement was obtained for the benefit of the Class, as opposed to
6 the individual Plaintiffs. Class Counsel have been approved as class counsel in a number of
7 prior cases, have litigated numerous other class action cases, and are competent to represent
8 the Class.

9 11. Plaintiffs and Class Counsel are adequate representatives in that they have no
10 conflicts with the Class and will adequately represent the class. Plaintiffs and Class Counsel
11 have no relationship or financial connection with the proposed Administrator.
12

13 Lodestar of BNBD
14

15 12. In this case, the Settlement reached in the total non-reversionary Maximum
16 Settlement Amount is the product of substantial effort by the Parties and counsel should be
17 approved as fair, reasonable and adequate. As part of the settlement, the parties agreed to an
18 award of attorneys' fees equal to one-third of the Maximum Settlement Amount. In *Laffitte v.*
19 *Robert Half Int'l*, 1 Cal. 5th 480, 503 (2016), The California Supreme Court both (1) joined
20 the majority of federal and state courts in holding that when class action litigation establishes
21 a monetary fund for the benefit of the class members, the trial court in its equitable powers
22 awards class counsel a fee out of that fund, and (2) expressly approved of one-third as a
23 reasonable percentage in a contingent common fund class settlement. As such, under *Laffitte*,
24 the requested award set forth in the Settlement Agreement is within this range of
25 reasonableness. The Parties have a fee sharing agreement to allocate attorneys' fees as
26 follows: 42.5% to Blumenthal Nordrehaug Bhowmik De Blouw LLP, 42.5% to Sullivan &
27 Yaeckel Law Group, APC, and 15% James Hawkins APLC..

28 13. The contemporaneous billing records for BNBD evidence that through August

1 19, 2025, BNBD's current lodestar is \$155,770.00, with additional fees still to be incurred to
2 complete the approval and settlement process. From March 8, 2023 to August 15, 2025, my
3 firm worked on this matter for over 242 hours, with hourly rates for attorneys ranging from
4 \$450 to \$995, resulting in a current lodestar for BNBD in the amount of \$155,770.00. A
5 breakdown of the tasks performed and the hours of each attorney on this matter is set forth in
6 BNBD's contemporaneous billing statement, a true and correct copy of which is attached
7 hereto as Exhibit #2.

8 14. The rates charged by my firm are in line with the prevailing rates of attorneys
9 in the Southern California legal community for similar work and, if this were a commercial
10 matter, these are the charges that would be made and presented to the client. My firm's hourly
11 rates are based upon the Laffey Matrix with the appropriate 2% increase adjustment for
12 Southern California. A true and correct copy of the current Laffey Matrix is attached hereto
13 as Exhibit #3. This Laffey Matrix provides the following billing rates: (1) paralegals - \$258,
14 (2) attorneys 1 to 3 years - \$473, (2) attorneys 4 to 7 years - \$581, (3) attorneys 8 to 10 years
15 - \$839, (4) attorneys 11 to 19 years - \$948, and (5) attorneys with 20+ years - \$1,141. The
16 rates used are consistent with this Laffey Matrix, and in most instances, below the Laffey
17 Matrix. The Laffey Matrix has been relied upon to establish market rates. See, e.g., *Syers*
18 *Properties III, Inc. v. Rankin*, 226 Cal.App.4th 691, 702 (2014) [finding no abuse of discretion
19 in employing Laffey matrix in San Francisco litigation].) "The Laffey Matrix is a United States
20 Department of Justice billing matrix that provides billing rates for attorneys at various
21 experience levels in the Washington, D.C., area and can be adjusted to establish comparable
22 billing rates in other areas using data from the United States Bureau of Labor Statistics."
23 *Pasternack v. McCullough*, 65 Cal.App.5th 1050, 1057, fn. 5 (2021). There is no specific
24 adjustment provided by the federal government for Sonoma, but for the Los Angeles, Orange
25 and San Diego metro areas, federal schedules adjust the rate higher than the Washington DC
26 area used by the Laffey Matrix. These hourly rates have been approved by Court's throughout
27 California, including the Courts in the Superior Court of California. The reasonableness of
28

1 BNBD's hourly rates is further confirmed by comparing such rates with the rates of
2 comparable counsel practicing complex and class litigation as detailed in the National Law
3 Journal Billing Survey. See e.g. *Zest IP Holdings, LLC v. Implant Direct MFG., LLC*, 2014
4 U.S. Dist. LEXIS 167563 (S.D. Cal. 2014) (finding that "Mayer Brown's \$775 average billing
5 rate for partners" and "Mayer Brown's \$543 average associate billing rate" are reasonable rates
6 when compared within 21 other firms practicing in the Southern District of California.) This
7 example is from ten years ago. Our rates are also comparable to other attorneys practicing
8 similar class action litigation in San Diego. I am knowledgeable about the law practice of
9 Cohelan Khoury & Singer and know that they engage in a similar practice of class action
10 litigation and are located in San Diego. In *Lopez v. Mgmt. & Training Corp.*, 2020 U.S. Dist.
11 LEXIS 70029; 2020 WL 1911571 (S.D. Cal. 2020), the Court found that the rates of Cohelan
12 Khoury & Singer ranging from \$900 to \$500 an hour "have been accepted in other class action
13 cases and are comparable to rates approved previously by this court and other district courts
14 in class action litigation in this community." *Lopez v. Mgmt. & Training Corp.*, 2020 U.S.
15 Dist. LEXIS 70029, at *26. Importantly, this finding was from 2020, over five years ago, thus
16 justifying why my firm's rates are slightly higher in certain respects. Thus, the rates charged
17 by BNBD for comparable work are supported by these examples and are therefore reasonable.

18
19 15. San Diego County Superior Courts have approved attorneys' fees awards equal
20 to one-third of the common fund to BNBD and these awards were supported by BNBD's
21 lodestar with these same hourly rates. The following are specific examples of where these
22 same rates were provided with lodestar and the fee award was approved by the San Diego
23 County Superior Court:

- 24 • *Benitez v. Hyatt Corporation*, San Diego Superior Court Case No. 37-2023-
25 00028524-CU-OE-CTL (Order dated January 31, 2025)
- 26 • *Remington v. Jimbo's Natural Family*, San Diego Superior Court Case No. 37-
27 2023-00038108-CU-OE-CTL (Order dated December 6, 2024)

- *Cranton v. Grossmont Hospital*, San Diego Superior Court Case No. 37-2022-00001574-CU-OE-CTL (Order dated August 9, 2024)
- *Kaluza v. Boeing Aerospace*, San Diego Superior Court Case No. 37-2022-00004602-CU-OE-CTL (Order dated June 26, 2024)
- *Coffey v. Southern California Permanente Medical Group*, San Diego Superior Court Case No. 37-2020-00029409-CU-OE-CTL (Order dated May 28, 2024)
- *In Re; United Airlines Wage and Hour Cases*, San Diego Superior Court, Case No. JCCP 5187 (Order dated May 24, 2024)
- *Guiniling v. Escondido Medical Investors*, San Diego Superior Court Case No. 37-2022-00019520-CU-OE-CTL (Order dated January 12, 2024)
- *Nunez v. Interstate Management Company*, San Diego Superior Court Case No. 37-2021-00023535-CU-OE-CTL (Order dated December 8, 2023)
- *Steele v. Legoland California*, San Diego Superior Court Case No. 37-2021-00052868-CU-OE-CTL (Order dated November 20, 2023)
- *Moran v. Sharp Healthcare*, San Diego Superior Court Case No. 37-2019-00050203-CU-OE-CTL (Order dated September 15, 2023)

In all of the above examples of recent San Diego Superior Court decisions, BNBD's same hourly rates were used in the presentation of a lodestar cross-check. In all case the rates and lodestar were accepted by the Court.

Expenses of BNBD

15. BNBD incurred litigation expenses in the amount of \$32,798.11. These litigation expenses incurred by BNBD include the expenses incurred for filing fees, mediation expenses, expert expenses (DM&A, Berger Consulting), and attorney service charges (One Legal, Knox), all of which are costs normally billed to and paid by the client. The details of the litigation expenses are set forth in BNBD's contemporaneous billing statement, a true and correct copy of which is attached hereto as Exhibit #2

1
2 I declare under the penalty of perjury under the laws of the State of California that the
3 foregoing is true and correct.

4 Executed this 19th day of August, 2025, at South Lake Tahoe, California.

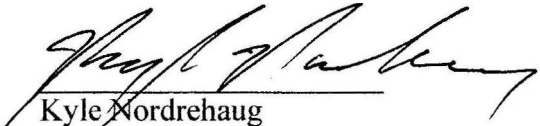
5
6 
7 Kyle Nordrehaug

EXHIBIT #1

Blumenthal Nordrehaug Bhowmik De Blouw LLP

2255 Calle Clara, La Jolla, California 92037

Tel: (858) 551-1223

Fax: (885) 551-1232

FIRM RESUME

Areas of Practice: Employee, Consumer and Securities Class Actions, Wage and Hour Class Actions, Civil Litigation, Business Litigation.

ATTORNEY BIOGRAPHIES

Norman B. Blumenthal

Partner, Blumenthal Nordrehaug Bhowmik De Blouw LLP (2018 to present)

Practice Areas: Consumer and Securities Class Action, Civil Litigation, Wage and Hour Class Actions, Transactional Law

Admitted: 1973, Illinois; 1976, California

Biography: Law Clerk to Justice Thomas J. Moran, Illinois Supreme Court, 1973-1975, while on Illinois Court of Appeals. Instructor, Oil and Gas Law: California Western School of Law, 1981; University of San Diego School of Law, 1983. Sole Practitioner 1976-1987. Partner, Blumenthal & Ostroff, 1988-1995. Partner, Blumenthal, Ostroff & Markham, 1995-2001. Partner, Blumenthal & Markham, 2001-2007. Partner, Blumenthal & Nordrehaug, 2007. Partner, Blumenthal, Nordrehaug & Bhowmik, 2008-2018. Partner, Blumenthal Nordrehaug Bhowmik De Blouw LLP, 2018 - present.

Member: San Diego County, Illinois State and American Bar Associations; State Bar of California.

Educated: University of Wisconsin (B.A., 1970); Loyola University of Chicago (J.D., 1973);

Summer Intern (1971) with Harvard Voluntary Defenders

Kyle R. Nordrehaug

Partner, Blumenthal Nordrehaug Bhowmik De Blouw LLP (2018 to present)

Practice Areas: Consumer and Securities Class Actions, Wage and Hour Class Actions, Civil Litigation

Admitted: 1999, California

Biography: Associate, Blumenthal, Ostroff & Markham, 1999-2001. Associate, Blumenthal & Markham, 2001-2007. Partner, Blumenthal & Nordrehaug, 2007. Partner, Blumenthal, Nordrehaug & Bhowmik, 2008-2017

Member: State Bar of California, Ninth Circuit Court of Appeals, Third Circuit Court of Appeals

Educated: University of California at Berkeley (B.A., 1994); University of San Diego School of Law (J.D. 1999)

Awards: Top Labor & Employment Attorney 2016; Top Appellate Reversal - Daily Journal 2015; Super Lawyer 2015-2018

Aparajit Bhowmik

Partner, Blumenthal Nordrehaug Bhowmik De Blouw LLP (2018 to present)

Practice Areas: Civil Litigation; Consumer Class Actions, Wage and Hour Class Actions

Admitted: 2006, California

Educated: University of California at San Diego (B.A., 2002); University of San Diego School of Law (J.D. 2006)

Biography: Partner, Blumenthal, Nordrehaug & Bhowmik, 2008-2017

Awards: Rising Star 2015

Nicholas J. De Blouw

Partner, Blumenthal Nordrehaug Bhowmik De Blouw LLP (2018 to present)

Practice Areas: Civil Litigation; Consumer Class Actions, Wage and Hour Class Actions

Admitted: 2011, California

Educated: Wayne State University (B.A. 2008); California Western School of Law (J.D. 2011)

Piya Mukherjee

Associate Attorney

Practice Areas: Civil Litigation; Consumer Class Actions, Wage and Hour Class Actions

Admitted: 2010, California

Educated: University of California, San Diego (B.S. 2006); University of Southern California, Gould School of Law (J.D. 2010)

Victoria Rivapalacio

Associate Attorney

Practice Areas: Civil Litigation; Consumer Class Actions, Wage and Hour Class Actions

Admitted: 2011, California

Educated: University of California at San Diego (B.A., 2003); George Washington University Law School (J.D. 2010)

Ricardo Ehmann

Associate Attorney

Practice Areas: Civil Litigation; Wage and Hour Class Actions

Admitted: 2018, California; 2004, Nevada

Educated: University of California, San Diego (B.A. 1998); Loyola Law School (J.D. 2001)

Jeffrey S. Herman

Associate Attorney

Practice Areas: Civil Litigation; Wage and Hour Class Actions

Admitted: 2011, California; 2016 Arizona

Educated: University of Michigan (B.A. 2008); California Western School of Law (J.D. 2011)

Charlotte James

Associate Attorney

Practice Areas: Civil Litigation; Wage and Hour Class Actions

Admitted: 2016, California

Educated: San Diego State University; California Western School of Law

Christine Levu

Associate Attorney

Practice Areas: Civil Litigation; Wage and Hour Class Actions

Admitted: 2012, California

Educated: University of California, Irvine; California Western School of Law

Andrew Ronan

Associate Attorney

Practice Areas: Civil Litigation; Wage and Hour Class Actions

Admitted: 2016, California

Educated: Arizona State University; University of San Diego School of Law

Scott Blumenthal

Associate Attorney

Practice Areas: Civil Litigation; Wage and Hour Class Actions

Admitted: 2020, New Mexico

Educated: University of Southern California; California Western School of Law

Sergio Julian Puche

Associate Attorney

Practice Areas: Civil Litigation; Wage and Hour Class Actions

Admitted: 2013, California

Educated: University of California, Irvine; California Western School of Law

Trevor Moran

Associate Attorney

Practice Areas: Civil Litigation; Wage and Hour Class Actions

Admitted: 2020, California

Educated: University of Rhode Island; California Western School of Law

Adolfo Sanchez Contreras

Associate Attorney

Practice Areas: Civil Litigation; Wage and Hour Class Actions

Admitted: 2024, California; 2014, Mexico

Educated: The Juarez University

Brooke Wilkinson Waldrop

Associate Attorney

Practice Areas: Civil Litigation; Wage and Hour Class Actions

Admitted: 2017, California;

Educated: Westminster University (B.A. 2004); University of Utah (J.D. 2008)

REPORTED CASES

Sakkab v. Luxottica Retail N. Am., Inc., 803 F.3d 425 (9th Cir. 2015) (The panel reversed the district court's order granting Luxottica Retail North America, Inc.'s motion to compel arbitration of claims and dismissing plaintiff's first amended complaint, in a putative class action raising class employment-related claims and a non-class representative claim for civil penalties under the Private Attorney General Act.);

Securitas Security Services USA, Inc. v. Superior Court, 234 Cal. App. 4th 1109 (Cal. Feb. 27, 2015) (Court of Appeal concluded the trial court correctly ruled that *Iskanian* rendered the PAGA waiver within the parties' dispute resolution agreement unenforceable. However, the Court of Appeal then ruled the trial court erred by failing to invalidate the non-severable class action waiver from the agreement and remanded the entire complaint, including class action and PAGA claims, be litigated in the Superior Court);

Sussex v. United States Dist. Court for the Dist. of Nev., 781 F.3d 1065 (9th Cir. 2015) (The panel determined that the district court clearly erred in holding that its decision to intervene mid-arbitration was justified under *Aerojet-General*. Specifically, the panel held that the district court erred in predicting that an award issued by the arbitrator would likely be vacated because of his "evident partiality" under 9 U.S.C. § 10(a)(2).);

Provost v. YourMechanic, Inc., 2020 Cal. App. Lexis 955 (Oct. 15, 2020) (Court of Appeals affirmed denial of arbitration of PAGA claim, and held in a case of first impression, that there was

no additional standing rules for PAGA claim brought by independent contractor); In re Tobacco Cases II, 41 Cal. 4th 1257 (2007); Washington Mutual Bank v. Superior Court, 24 Cal. 4th 906 (2001); Rocker v. KPMG LLP, 148 P.3d 703; 122 Nev. 1185 (2006); PCO, Inc. v. Christensen, Miller, Fink, Jacobs, Glaser, Weil & Shapiro, LLP, 150 Cal. App. 4th 384 (2007); Hall v. County of Los Angeles, 148 Cal. App. 4th 318 (2007); Coshov v. City of Escondido, 132 Cal. App. 4th 687 (2005); Daniels v. Philip Morris, 18 F.Supp 2d 1110 (S.D. Cal.1998); Gibson v. World Savings & Loan Asso., 103 Cal. App. 4th 1291 (2003); Jordan v. Department of Motor Vehicles, 75 Cal. App. 4th 445 (1999); Jordan v. Department of Motor Vehicles, 100 Cal.App. 4th 431 (2002); Norwest Mortgage, Inc. v. Superior Court, 72 Cal.App.4th 214 (1999); Hildago v. Diversified Transp. Sya, 1998 U.S. App. LEXIS 3207 (9th Cir. 1998); Kensington Capital Mgal. v. Oakley, Inc., 1999 U.S. Dist LEXIS 385; Fed.Sec.L.Rep. (CCH) P90, 411 (1999 C.D. Cal.); Lister v. Oakley, Inc., 1999 U.S. Dist. LEXIS 384; Fed. Sec. L. Rep. (CCH) P90,409 (C.D Cal. 1999); Olszewski v. Scripps Health, 30 Cal. 4th 798 (2003); Steroid Hormone Product Cases, 181 Cal. App. 4th 145 (2010); Owen v. Macy's, Inc., 175 Cal. App. 4th 462 (2009); Taiheiyo Cement Corp. v. Superior Court, 117 Cal. App. 4th 380 (2004); Taiheiyo Cement Corp. v. Superior Court, 105 Cal.App. 4th 398 (2003); McMeans v. Scripps Health, Inc., 100 Cal. App. 4th 507 (2002); Ramos v. Countrywide Home Loans, 82 Cal.App. 4th 615 (2000); Tevssier v. City of San Diego, 81 Cal.App. 4th 685 (2000); Washington Mutual Bank v. Superior Court, 70 Cal. App. 4th 299 (1999); Silvas v. E*Trade Mortg. Corp., 514 F.3d 1001 (9th Cir. 2008); Silvas v. E*Trade Mortg. Corp., 421 F. Supp. 2d 1315 (S.D. Cal. 2006); McPhail v. First Command Fin. Planning, Inc., 2009 U.S. Dist. LEXIS 26544 (S.D. Cal. 2009); McPhail v. First Command Fin. Planning, Inc., 251 F.R.D. 514 (S.D. Cal. 2008); McPhail v. First Command Fin. Planning, Inc., 247 F.R.D. 598 (S.D. Cal. 2007); Barcia v. Contain-A-Way, Inc., 2009 U.S. Dist. LEXIS 17118 (S.D. Cal. 2009); Barcia v. Contain-A-Way, Inc., 2008 U.S. Dist. LEXIS 27365 (S.D. Cal. 2008); Wise v. Cubic Def. Applications, Inc., 2009 U.S. Dist. LEXIS 11225 (S.D. Cal. 2009); Gabisan v. Pelican Prods., 2009 U.S. Dist. LEXIS 1391 (S.D. Cal. 2009); La Jolla Friends of the Seals v. Nat'l Oceanic & Atmospheric Admin. Nat'l Marine Fisheries Serv., 630 F. Supp. 2d 1222 (S.D. Cal. 2009); La Jolla Friends of the Seals v. Nat'l Oceanic & Atmospheric Admin. Nat'l Marine Fisheries Serv., 2008 U.S. Dist. LEXIS 102380 (S.D. Cal. 2008); Louie v. Kaiser Found. Health Plan, Inc., 2008 U.S. Dist. LEXIS 78314 (S.D. Cal. 2008); Weltman v. Ortho Mattress, Inc., 2010 U.S. Dist. LEXIS 20521 (S.D. Cal. 2010); Weltman v. Ortho Mattress, Inc., 2008 U.S. Dist. LEXIS 60344 (S.D. Cal. 2008); Curry v. CTB McGraw-Hill, LLC, 2006 U.S. Dist. LEXIS 5920; 97 A.F.T.R.2d (RIA) 1888; 37 Employee Benefits Cas. (BNA) 2390 (N.D. Cal. 2006); Reynov v. ADP Claims Servs. Group, 2006 U.S. Dist. LEXIS 94332 (N.D. Cal. 2006); Kennedy v. Natural Balance Pet Foods, Inc., 2010 U.S. App. LEXIS 248 (9th Cir. 2010); Kennedy v. Natural Balance Pet Foods, Inc., 2008 U.S. Dist. LEXIS 38889 (S.D. Cal. 2008); Kennedy v. Natural Balance Pet Foods, Inc., 2007 U.S. Dist. LEXIS 57766 (S.D. Cal. 2007); Sussex v. Turnberry/MGM Grand Towers, LLC, 2009 U.S. Dist. LEXIS 29503 (D. Nev. 2009); Picus v. Wal-Mart Stores, Inc., 256 F.R.D. 651 (D. Nev. 2009); Tull v. Stewart Title of Cal., Inc., 2009 U.S. Dist. LEXIS 14171 (S.D. Cal. 2009); Keshishzadeh v. Gallagher, 2010 U.S. Dist. LEXIS 46805 (S.D. Cal. 2010); Keshishzadeh v. Arthur J. Gallagher Serv. Co., 2010 U.S. Dist. Lexis 116380 (S.D. Cal. 2010); In re Pet Food Prods. Liab. Litig., MDL Docket No. 1850 (All Cases), 2008 U.S. Dist. LEXIS 94603 (D.N.J. 2008); In re Pet Food Prods. Liab. Litig., 629 F.3d 333 (3rd Cir. 2010); Puentes v. Wells Fargo Home Mortgage, Inc., 160 Cal. App. 4th 638 (2008); Rezec v. Sony Pictures Entertainment, Inc., 116 Cal. App. 4th 135 (2004); Badillo v. Am. Tobacco Co., 202 F.R.D. 261 (D. Nev. 2001); La Jolla Friends of the Seals v. Nat'l Oceanic & Atmospheric Admin., 2010 U.S. App. Lexis 23025 (9th Cir. 2010); Dirienzo v. Dunbar Armored, Inc., 2011 U.S. Dist. Lexis 36650 (S.D. Cal. 2011); Rix v. Lockheed Martin Corp., 2011 U.S. Dist Lexis 25422 (S.D. Cal. 2011); Weitzke v. Costar Realty Info., Inc., 2011 U.S. Dist Lexis 20605 (S.D. Cal. 2011); Goodman v. Platinum Condo. Dev., LLC, 2011 U.S. Dist. LEXIS 36044 (D. Nev. 2011); Sussex v. Turnberry/MGM Grand Towers, LLC, 2011 U.S. Dist. LEXIS 14502 (D. Nev 2011); Smith v. Kaiser Foundation Hospitals, Inc., 2010 U.S. Dist. Lexis 117869 (S.D. Cal. 2010); Dobrosky v. Arthur J. Gallagher Serv. Co.,

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18CV321677; Shahbazian v. Fast Auto Loans, Inc. – U.S. District Court, Central District of California, Case No. 2:18-cv-03076-ODW-KS; Salazar v. Johnson & Johnson Consumer Inc. – Los Angeles County Superior Court, Case No. BC702468; Conti v. L’Oreal USA S/D, Inc. – U.S. District Court, Eastern District of California, Fresno, Case No. 1:19-CV-00769-LJO-SKO; Mercado v. Security Industry Specialists, Inc. – Santa Clara County Superior Court, Case No. 17CV320059; Vikili v. Dignity Health – San Francisco County Superior Court, Case No. CGC-18-569456; Bagby v. Swissport SA, LLC – Los Angeles County Superior Court, Case No. BC691058; Henry v. Motion Entertainment Group, LLC – San Francisco County Superior Court, Case No. CGC18565643; Dandoy v. West Coast Convenience, LLC – Alameda County Superior Court, Case No. HG20051121; Lanuza v. AccentCare, Inc. – San Francisco County Superior Court, Case No. CGC-18-565521; Thomas v. Easy Driving School, LLC – San Diego County Superior Court, Case No. 37-2018-00047639-CU-OE-CTL; Erickson v. Erickson – Contra Costa County Superior Court, Case No. MSC18-00307; Martin v. Menzies Aviation (USA) Inc. – San Francisco County Superior Court, Case No. CGC-18-566072; Mortimer v. Healthsouth Bakersfield Rehabilitation Hospital, LLC – Kern County Superior Court, Case No. BCV-18-102761; Alcaraz v. Red Lion Hotels Corporation – San Francisco County Superior Court, Case No. CGC-18-570310; Calhoun v. Total Transportation and Distribution, Inc. – San Diego County Superior Court, Case No. 37-2018-00058681-CU-OE-CTL; Rataul v. Overton Security Services, Inc. – Alameda County Superior Court, Case No. RG18891882; Beltran v. Compass Bank – San Diego County Superior Court, Case No. 37-2019-00024475-CU-OE-CTL; Kirshner v. Touchstone Golf, LLC – San Diego County Superior Court, Case No. 37-2018-00028865-CU-OE-CTL; Pizarro v. The Home Depot, Inc. – U.S. District Court for the Northern District of Georgia-Atlanta Division; Hatanaka v. Restore Rehabilitation, LLC – San Diego County Superior Court, Case No. 37-2018-00034780-CU-OE-CTL; Faria v. Carriage Funeral Holdings, Inc. – Contra Costa County Superior Court, Case No. MSC18-00606; Ontiveros v. Baker Concrete Construction, Inc. – Santa Clara County Superior Court, Case No. 18CV328679; Morales v. Redlands Automotive Services, Inc. – San Bernardino County Superior Court, Case No. CIVDS1807525; Ramirez v. Carefusion Resources, LLC – U.S. District Court, Southern District of California; Amster v. Starbucks Corporation – San Bernardino Superior Court, Case No. CIVDS1922016; Kutzman v. Derrel’s Mini Storage, Inc. – U.S. District, Eastern District of California, Case No. 1:18-cv-00755-AWI-JLT; Marks v. Universal Propulsion Company, Inc. – Solano County Superior Court, Case No. FCS051608; Martinez v. Geil Enterprises, Inc. – Fresno County Superior Court, Case No. 17CECG01480; Teniente v. Cirrus Asset Management, Inc. – Los Angeles County Superior Court, Case No. 20STCV16302; Blackshear v. California Fine Wine & Spirits LLC – Sacramento County Superior Court, Case No. 34-2018-00245842; Warnick v. Golden Gate America West LLC – Los Angeles County Superior Court, Case No. BC714176; Bennett v. Dnata Aviation USA, Inc. – San Francisco County Superior Court, Case No. CGC-18-566911; George v. PF Stockton Fitness LLC – Sacramento County Superior Court, Case No. 34-2019-00261113-CU-OE-GDS; Oshana v. Farmers and Merchants Bank of Central California – Stanislaus County Superior Court, Case No. CV-19-003427; Vasquez v. Packaging Corporation of America, – U.S. District Court, California Central District, Case No. 2:19-cv-01935-PSG-PLA; Palomino v. Zara USA Inc. – Orange County Superior Court, Case No. 30-2018-00992682-CU-OE-CXC; Simmons v. Joe & The Juice LA, LLC – San Francisco County Superior Court; Pacia v. CIM Group, L.P. – Los Angeles County Superior Court, Case No. BC709666; Flores v. Plastic Express – Los Angeles County Superior Court, Case No. BC71971; Madera v. William Warren Properties, Inc. – Orange County Superior Court, Case No. 30-2019-01055704-CU-OE-CXC; Hernandez v. Quality Custom Distribution – Orange County Superior Court, Case No. 30-2018-01010611-CU-OE-CXC; Arango v. Schlumberger Technology Corporation – Orange County Superior Court, Case No. 30-2019-01056839-CU-OE-CXC; Dandoy v. West Coast Convenience, LLC – Alameda County Superior Court, Case No. HG20051121; Ramirez v. J E H Enterprises, Inc. – San Francisco County Superior Court, Case No. CGC-19-574691; Sullen v. First Service Residential California, LLC – San Francisco County Superior Court, Case No. CGC-19-575131; Valentino v. East Bay Tire Co. –

Solano County Superior Court, Case No. FCS053067; Murphy v. Rockler Retail Group, Inc. – Sacramento Superior Court, Case No. 34-2019-00251220; Shahbazian v. Onewest Bank – Los Angeles County Superior Court, Case No. 19STCV23722; Bruemmer v. Tempur Retail Stores LLC – Marin County Superior Court, Case No. CIV1803646; Antonios v. Interface Rehab, Inc. – Orange County Superior, Case No. 30-2019-01067547-CU-OE-CXC; Tavallodi v. DC Auto, Inc. – San Bernardino, Case No. CIVDS1833598; Miranda v. The Lloyd Pest Control Co. – San Diego County Superior Court, Case No. 37-2018-00052510-CU-OE-CTL; Soenardi v. Magnussen Imports, Inc. – Santa Clara County Superior Court, Case No. 18CV340003; Thai v. Team Industrial Services, Inc. – Los Angeles County Superior Court, Case No. 19STCV21953; Castillo v. A.J. Kirkwood & Associates, Inc. – Los Angeles County Superior Court, Case No. 19STCV04435; Moss v. Jabil Inc. – Alameda County Superior Court, Case No. HG20050536; Billosillo, Jr. v. Crown Energy Services, Inc. – San Diego County Superior Court, Case No. 37-2018-00058254-CU-OE-CTL; Tarkington v. Freetime, Inc. – San Diego County Superior Court, Case No. 37-2019-00011473-CU-OE-CTL; McIntyre v. J.J.R. Enterprises, Inc. – Sacramento County Superior Court, Case No. 34-2019-00251220; Bucur v. Pharmaca Integrative Pharmacy, Inc. – San Diego County Superior Court, Case No. 37-2019-00009409-CU-OE-CTL; Batin v. McGee Air Services, Inc. – Santa Clara County Superior Court, Case No. 19CV347733; Terry v. McGee Air Services, Inc. – King County Superior Court of Washington, Case No. 19-2-3321-5 KNT; Weiss v. Niznik Behavioral Health Resources, Inc. – San Diego County Superior Court, Case No. 37-2019-00039441-CU-OE-CTL; Cavada v. Inter-Continental Hotels Group, Inc. – U.S. District Court, Southern District of California, Case No. 3:19-cv-01675-GPC-AHG; Lesevic v. Spectraforce Technologies, Inc. – U.S. District Court, Northern District of California, Case No. 5:19-cv-03126-LHK; Mutchler v. Circle K Stores, Inc. – San Diego County Superior Court, Case No. 37-2020-00016331-CU-OE-CTL, Azima v. CSI Medical Group, – Santa Clara County Superior Court, Case No. 19CV345450; Porras v. Baypointe Enterprises, LLC – Los Angeles County Superior Court, Case No. 19STCV31015; Mitchell v. Mack Trucking, Inc. – San Bernardino County Superior Court, Case No. CIVDS1928334; Watts v. T.R.L. Systems, Incorporated – Orange County Superior Court, Case No. 30-2019-01102457-CU-OE-CXC; Price v. DMSD Restaurants Inc. – San Diego County Superior Court, Case No. 37-2019-00024062-CU-OE-CTL; Jacobs v. Nortek Security & Control LLC – San Diego County Superior Court, Case No. 37-2019-0019735-CU-OE-CTL; Gonzalez v. Hub International Midwest – San Bernardino County Superior Court, Case No. CIVDS1900463; Cisneros v. Bluepearl California, Inc. – San Mateo Superior Court, Case No. 19-CIV-05707; Garcia v. Gallagher Basset Services – San Bernardino Superior Court, Case No. CIVDS2004140; Callow v. Adventist Health System/West – Placer County Superior Court, Case No. SCV0043607; Dominguez v. Kimco Facility Services, LLC – Los Angeles County Superior Court, Case No. 19STCV37592; Searles v. Robert Heath Trucking, Inc. – Los Angeles County Superior Court, Case No. 19STCV30808; Rangel v. Pioneer Hi-Bred international, Inc. – Yolo County Superior Court, Case No. CV-19-1797; Ivon v. Sinclair Television of California, Humboldt County Superior Court, Case No. DR190699; Williams v. Henkels & McCoy, Inc. – San Bernardino County Superior Court, Case No. CIVDS2003888; Cano v. Larry Green Chrysler Jeep Dodge, Inc. – Riverside County Superior Court, Case No. BLC1900184; Lopez v. Cepheid – Santa Clara County Superior Court, Case No. 19CV358827; Hernandez v. Quick Dispense, Inc. – Los Angeles County Superior Court, Case No. 19STCV29405; Lopez v. Lacoste USA, Inc. – San Bernardino County Superior Court, Case No. CIVDS1914626; Duhe v. Hospital Couriers Nevada, LLC – Contra Costa County Superior Court, Case No. MSC19-01377; Law v. Sequoia Equities, Incorporated – Contra Costa Superior Court, Case No. C19-01925; Dvorak v. Rockwell Collins, Inc. – San Diego County Superior Court, Case No. 37-2019-00064397-CU-OE-CTL; Noguera v. Metal Container Corporation – Riverside County Superior Court, Case No. RIC2003235; Leon v. Miller Event Management, Inc. – San Luis Obispo Superior Court, Case No. 19CV-0435; Leon v. Miller Event Management, Inc. – San Luis Obispo County Superior Court, Case No. 19CV-0435, Camacho-Bias v. Serve U Brands Inc. – Butte County Superior Court, Case No. 20CV00603; La Pietra v. Entertainment Partners Services, LLC – Los Angeles County Superior

Court, Case No. 19STCV39529; Celis v. Theatre Box - San Diego, LLC – San Diego County Superior Court, Case No. _____; Ignacio v. Laboratory Corporation of America – U.S. District Court, California Central District, Case No. 2:19-cv-06079-AB-RAO; Kovnas v. Cahill Contractors LLC – Alameda County Superior Court, Case No. RG19037852; Hersh v. Mrs. Gooch's Natural Food – Los Angeles County Superior Court, Case No. 19STCV10444; Miller v. The Permanente Medical Group – Alameda County Superior Court, Case No. RG19045904; Vasquez v. Autoalert, LLC – Orange County Superior Court, Case No. 30-2019-01114549-CU-OE-CXC; Cavanaugh v. Morton Golf, LLC – Sacramento County Superior Court, Case No. 34-2019-00270176; Coley v. Monroe Operations, LLC – Alameda County Superior Court, Case No. RG20063188; Ramirez v. Sierra Aluminum Company – U.S. District Court, California Central District Court, Case No. 5:20-cv-00417-JGB-KK; Marrero v. Stat Med, P.C. – Alameda County Superior Court, Case No. HG19043214; Enriquez v. Solari Enterprises, Inc. – Los Angeles County Superior Court, Case No. 20STCV11129; Craig v. Hometown Heart – San Francisco County Superior Court, Case No. CGC-20-582454; Lopez v. Hy0Lang Electric California, Inc. – San Diego County Superior Court, Case No. 37-2020-00012543-CU-OE-CTL; Heuklom v. Clara Medical Group, P.C. – San Francisco County Superior Court, Case No. CGC-20-585918; Dominguez v. Lifesafer of Northern California – Monterey County Superior Court, Case No. 20CV002586; Kiseleva v. Totalmed Staffing Inc. – U.S. District Court, California Northern District, Case No. 5:19-cv-06480; Vires v. Sweetgreen, Inc. – Santa Clara County Superior Court, Case No. 20CV365918; Kim v. Wireless Vision, LLC – San Bernardino County Superior Court, Case No. CIVDS2000074; Senoren v. Air Canada Corporation – Los Angeles County Superior Court, Case No. 20STCV13942; Clark v. Quest Diagnostics Incorporated – San Bernardino County Superior Court, Case No. CIVDS2018707; Green v. Shipt, Inc. – Los Angeles County Superior Court, Case No. 20STCV01001; Respass v. The Scion Group LLC – Sacramento County Superior Court, Case No. 34-2020-00285265; Jackson v. Decathlon USA LLC – Alameda County Superior Court, Case No. RG2003024; Avacena v. FTG Aerospace Inc. – Los Angeles County Superior Court, Case No. 20STCV28767; Perez v. Butler America, LLC – Los Angeles County Superior Court, Case No. 20STCV20218; Christensen v. Carter's Retail, Inc. – Orange County Superior Court, Case No. 30-2020-01138792-CU-OE-CXC; Astudillo v. Torrance Health Association, Inc. – Los Angeles County Superior Court, Case No. 20STCV18424; Hansen v. Holiday AI Management Sub LLC – Contra Costa County Superior Court, Case No. CIVMSC20-00779; Almahdi v. Vitamin Shoppe Industries Inc – Santa Clara County Superior Court, Case No. 20CV365150; Krisinda v. Loyal Source Government Services LLC – U.S. District Court, California Southern District, Case No. 3:20-cv-879-LAB-NLS; Ettedgui v. WB Studio Enterprises Inc – U.S. District Court, California Central District, Case No. 2:20-CV-08053-MCS (MAAx); Fernandez v. Nuvision Federal Credit Union – Orange County Superior Court, Case No. 30-2020-01161691-CU-OE-CJC; Aviles v. UPS Supply Chain Solutions, Inc. – Riverside County Superior Court, Case No. RIC2000727; Alcocer v. DSV Solutions, LLC – San Bernardino Superior Court, Case No. CIVDS2010345; Wilson v. Wholesome Harvest Baking, LLC – U.S. District Court, California Northern District, Case No. 4:20-cv-05186-YGR; Gregory v. Verio Healthcare, Inc. – Los Angeles County Superior Court, Case No. 20STCV37254; Rose v. Impact Group, LLC – Orange County Superior Court, Case No. 30-2020-01141107-CU-OE-CXC; Monasterio v. Citibank, N.A. – San Mateo County Superior Court, Case No. 20-CIV-03650; Martinez-Lopez v. Medamerica, Inc. – San Diego County Superior Court, Case No. 37-2020-00034393-CU-OE-CTL; Cox v. PRB Management, LLC – Solano County Superior Court, Case No. FCS055514; Nash v. K. Hovnanian Companies, LLC – Riverside County Superior Court, Case No. RIC2003319; Kyler v. Harbor Freight Tools USA, Inc. – San Diego County Superior Court, Case No. 37-2020-00015828-CU-OE-CTL; Roberts v. Solantic Corporation – Los Angeles County Superior Court, Case No. 20STCV41117; Price v. Mistras Group, Inc. – Los Angeles County Superior Court, Case No. 20STCV22485; Macias v. ABM Electrical & Lighting Solutions, Inc. – San Diego County Superior Court, Case No. 37-2020-00024997-CU-OE-CTL; Basu-Kesselman v. Garuda Labs, Inc. – San Francisco County Superior Court, Case No. CGC-20-585229; Armstrong v. Prometric LLC – Los Angeles County Superior

Court, Case No. 20STCV29967; Ashlock v. Advantis Medical Staffing, LLC – San Diego County Superior Court, Case No. 37-2020-00022305-CU-OE-CTL; Wilson v. WXI Global Solutions, LLC – Los Angeles County Superior Court, Case No. 20STCV25007; Gandhale v. Select Rehabilitation, LLC – Monterey County Superior Court, Case No. 20CV002240; Starvoice v. G4S Secure Solutions (USA) Inc. – San Diego County Superior Court, Case No. 37-2020-00029421-CU-OE-CTL; Mbise v. Axlehire, Inc. – Alameda County Superior Court, Case No. RG20067350; Points v. C&J Services, Inc. – Kern County Superior Court, Case No. BCV-20-102483; Marshall v. PHI Air Medical, LLC – Lassen County Superior Court, Case No. 62973; Jauregui v. Cytotec Engineered Materials, Inc. – Orange County Superior Court, Case No. 30-2020-01164932-CU-OE-CXC

EXHIBIT #2

Blumenthal Nordrehaug Bhowmik DeBlouw LLP

2255 CALLE CLARA
LA JOLLA, CA - California 92037-3107

INVOICE

Invoice # 2
Date: 08/19/2025
Due On: 09/18/2025

Stephanie Jones
4019 Georgia St, Apt B
San Diego, CA 92103

CA2913

Rady Children's Hospital San Diego

Services

Attorney	Date	Notes	Quantity	Rate	Total
NDB	03/08/2023	Review original intake notes. Analyze facts and law. Research related litigation in State and Federal Courts. Analyze previous settlements and overlap of claims. Discuss with Plaintiff.	3.70	\$850.00	\$3,145.00
NDB	03/11/2023	Review and analyze individual claims for retaliation and discrimination. Review off the clock work tasks and rest break claims. Legal research regarding the same.	3.10	\$850.00	\$2,635.00
NDB	03/14/2023	Review entire employment file for legal claims. Analyze all paystubs for wage and hour violations. Review 226(a) claims. Legal research. Obtain background facts for complaint.	4.00	\$850.00	\$3,400.00
NDB	03/21/2023	Review case file. Research PAGA website for related PAGA claims. Draft Complaint.	4.10	\$850.00	\$3,485.00
NDB	03/23/2023	Review and revise complaint.	1.70	\$850.00	\$1,445.00
NDB	03/26/2023	Review and research PAGA claims and penalties. Draft PAGA Notice. Analyze sick pay and 2802 claims.	2.40	\$850.00	\$2,040.00
NDB	03/27/2023	Draft complaint. Review facts and law. Discuss with Plaintiff. Send complaint for approval to file.	1.90	\$850.00	\$1,615.00
NDB	03/28/2023	Review documents. Draft internal case notes memo detailing facts and specific violations.	2.10	\$850.00	\$1,785.00

KN	06/24/2023	Review research and analysis from ND; revise draft complaint; review documents and case noted; analysis of facts and claims; advise RE regarding complaint draft	2.00	\$950.00	\$1,900.00
RE	06/27/2023	Review case notes/damage analysis	0.75	\$675.00	\$506.25
RE	06/27/2023	Review & analyze employment file documents/ 1198.5 response docs	3.00	\$675.00	\$2,025.00
RE	06/28/2023	Review, edit & revise class action complaint; finalize for filing	2.75	\$675.00	\$1,856.25
RE	06/28/2023	Draft summons and civil case cover sheet re class action	0.50	\$675.00	\$337.50
RE	06/28/2023	Review & finalize class action complaint package; file in SD Sup. Ct.	0.75	\$675.00	\$506.25
RE	06/30/2023	Review court-returned documents; review docket; memo to firm re judicial/departments assignment and status of initial case management conference re class action	0.75	\$675.00	\$506.25
KN	07/01/2023	Review final complaint; review documents from Court; review memo from RE	0.50	\$950.00	\$475.00
ASC	07/11/2023	Add case to spreadsheets, add FC, check status of discovery, add to disco list, courtlinks n/a // check Last Day of EE re PAGA	0.30	\$250.00	\$75.00
ASC	07/11/2023	Calendar reminder re file PAGA complaint before SOL (last day of employment)	0.20	\$250.00	\$50.00
SB	07/20/2023	Review complaint for filing, analyze, advise ND	2.60	\$450.00	\$1,170.00
SB	07/31/2023	Revise complaint, advise ND	2.60	\$450.00	\$1,170.00
RE	08/12/2023	Review file; prepare initial documents for service of process re class action; identify reg agent; send out for service of process	0.75	\$675.00	\$506.25
CL	08/16/2023	Emails from/to M. Moriarty re: res judicata and barred claims and conference call re: same.	0.30	\$750.00	\$225.00
RE	08/18/2023	File proof of service of summons re class action; memo to firm re post service written discovery	0.50	\$675.00	\$337.50
CL	08/22/2023	Email from M. Moriarty re Maldonado settlement and complaint; review and analyze Maldonado Final Approval Order in preparation for conference call with M. Moriarty.	0.50	\$750.00	\$375.00
CL	08/22/2023	Conference call with M. Moriarty re Maldonado settlement and complaint; Email to M. Moriarty re: operative complaint and 1198.5 documents.	0.40	\$750.00	\$300.00
RE	08/22/2023	Draft PAGA only representative action complaint	4.50	\$675.00	\$3,037.50

ASC	08/23/2023	Review status of case and SOP, update internal spreadsheets and add case to draft discovery list	0.20	\$250.00	\$50.00
CL	08/23/2023	Receipt and review Maldonado Second Amended Complaint.	0.30	\$750.00	\$225.00
RE	08/24/2023	Draft summons, civil case cover sheet & certificate of counsel re paga action	0.50	\$675.00	\$337.50
RE	08/24/2023	Review & finalize paga only complaint package; file in Riverside Sup. Ct.	0.75	\$675.00	\$506.25
RE	08/28/2023	Review court returned docs re paga action; review notice assignment, review docket; memo to firm re judicial/departement assignment and status of initial case management conference	0.75	\$675.00	\$506.25
RE	08/28/2023	Provide notice to LWDA re PAGA action filing	0.40	\$675.00	\$270.00
ASC	08/30/2023	PAGA - Add case to spreadsheets, courtlinks N/A, add FC, review case status, add to draft discovery list	0.30	\$250.00	\$75.00
KN	09/02/2023	Review PAGA complaint; analysis of alleged violations; review memo from RE and court returned documents	0.50	\$950.00	\$475.00
CL	09/08/2023	Email from/to M. Moriarty re: released claims and extension to file responsive pleading.	0.30	\$750.00	\$225.00
ASC	09/18/2023	PAGA - review status of case and CMO order dated 9/7/23; add CMO order to service folder for service along with SOP; update file re Discovery stayed until initial CMC 10/27/23	0.20	\$250.00	\$50.00
ASC	09/22/2023	Organize, combine and bates stamp docs of Stephanie Jones and send to CTL for review	0.50	\$250.00	\$125.00
CL	09/22/2023	Review and analyze Maldonado settlement; Maldonado Final Approval order; Maldonado Second Amended Complaint; Draft memorandum to file re: overlaps of claims; Emails from/to M. Moriarty re: sick pay claims; Discuss with AJ re: same.	1.60	\$750.00	\$1,200.00
CL	09/22/2023	Review and analyze time and payroll records to forward to E. Lietzow; Emails to E. Lietzow re: damages analysis; Discuss with Andy re: same.	1.30	\$750.00	\$975.00
KN	09/23/2023	Review status; review prior settlement and CL memorandum of prior settlement and claims alleged in this case	0.50	\$950.00	\$475.00
CL	09/29/2023	Receipt and review Demurrer to Complaint.	0.40	\$750.00	\$300.00
CL	10/03/2023	Receipt and review Defendant's Amended Request for Judicial Notice	0.20	\$750.00	\$150.00

CL	10/03/2023	Email form J. McGraw re Defendant's Amended Request for Judicial Notice	0.20	\$750.00	\$150.00
AR	10/05/2023	Teleconference with expert regarding claims; draft and circulate summary.	1.00	\$550.00	\$550.00
RE	10/17/2023	Review file; prep docs for service of process re PAGA action; identify reg. agent; send out for service via knox	0.75	\$675.00	\$506.25
RE	10/18/2023	File proof of service of summons re PAGA action; memo to firm re post service written discovery	0.50	\$675.00	\$337.50
ASC	10/20/2023	PAGA - Verify status of case, confirm Initial CMC 10/27 still on calendar, set up remote appearance	0.30	\$250.00	\$75.00
CL	10/20/2023	Discuss with AJ re: demurrer; Email to A. Kidd re: demurrer and PAGA action filed in Riverside.	0.40	\$750.00	\$300.00
KN	10/21/2023	Review demurrer; analyze issues; review emails with Def; provide input to CL	0.60	\$950.00	\$570.00
ASC	10/23/2023	PAGA-Finalize CMS, draft POS, review status of case and court orders, file via One Legal, ask CJ/ TG to serve via USPS	0.50	\$250.00	\$125.00
CL	10/23/2023	[PAGA] Draft Case Management Conference Statement.	0.80	\$750.00	\$600.00
CL	10/23/2023	Email to A. Kidd re: First Amended Complaint and Demurrer; Discuss with AJ Maldonado action; Draft First Amended Complaint.	0.90	\$750.00	\$675.00
CL	10/23/2023	Email from/to A. Kidd re: meet and confer re: First Amended Complaint.	0.30	\$750.00	\$225.00
ASC	10/24/2023	PAGA - Update file re POS Summons filed, case stayed until initial CMC	0.20	\$250.00	\$50.00
CL	10/27/2023	[PAGA] Prepare and Attend Case Management Conference.	0.60	\$750.00	\$450.00
CL	10/30/2023	Receipt and review Meet and Confer letter from A. Kidd re demurrer re PAGA action.	0.40	\$750.00	\$300.00
CL	10/30/2023	Email to A. Kidd re demurrer re PAGA action and conference call.	0.30	\$750.00	\$225.00
ASC	11/03/2023	Draft stip to file FAC and vacate demurrer	0.50	\$250.00	\$125.00
CL	11/03/2023	Prepare for telephone call with A. Kidd re: meet and confer re: demurrer and request to stay; Conference call with A. Kid re: same; Email to A. Kid re: 15 day extension on responsive pleading.	0.60	\$750.00	\$450.00
CL	11/03/2023	Email to A. Kidd re: stipulation for leave to file FAC; Draft and review Stipulation for Leave to file FAC.	0.70	\$750.00	\$525.00

CL	11/08/2023	Email to A. Kidd re: Stipulation to file FACC [Class]; Review and revise Stipulation to File FACC.	0.40	\$750.00	\$300.00
YS	11/08/2023	Proofread joint stipulation to leave and [proposed] order for leave for Plaintiff to file FAC, review case in the registrar of actions, prepare POS, file through Onelegal, electronically serve OTC via email, circulate to firm, created task in Courtlink.	1.60	\$250.00	\$400.00
KN	11/11/2023	Review draft stipulation and draft FAC; advise staff	0.40	\$950.00	\$380.00
ASC	11/13/2023	Class - Draft case management statement, review status of stip filed re filing FAC and vacate demurrer; stip not signed yet	0.50	\$250.00	\$125.00
YS	11/16/2023	Finalize CMS for service, prepare POS, file via Onelegal. Email to OPC re CMS.	0.50	\$250.00	\$125.00
CL	12/01/2023	Receipt and review Rady's Motion to Transfer to SD; Email from J. McGraw re: same.	0.40	\$750.00	\$300.00
AR	12/01/2023	Review and outline orders and docket for status; draft summary for joint statement.	0.40	\$550.00	\$220.00
AR	12/01/2023	Receive motion to transfer; draft follow up correspondence.	0.30	\$550.00	\$165.00
KN	12/02/2023	Review motion to transfer; advise staff	0.30	\$950.00	\$285.00
AR	12/04/2023	Review file for status; draft joint statement and submit to opposing counsel; revise, finalize, file and serve joint statement.	1.30	\$550.00	\$715.00
AR	12/08/2023	Review file for status in advance of CMC; draft correspondence regarding FAC.	0.60	\$550.00	\$330.00
AR	12/08/2023	Prepare for and attend CMC; draft and circulate summary.	2.50	\$550.00	\$1,375.00
YS	12/11/2023	[Class] Retrieve order granting leave to file FAC to consolidate. Email to Courtlinks for circulation.	0.10	\$250.00	\$25.00
CL	12/11/2023	Receipt and review Order continuing hearing on case management statement	0.20	\$750.00	\$150.00
AR	12/11/2023	Multiple correspondence with Clerk regarding status of stipulation.	0.30	\$550.00	\$165.00
AR	12/11/2023	Retrieve and review order regarding CMC; draft summary correspondence.	0.40	\$550.00	\$220.00
YS	12/11/2023	Finalize FAC for service. Prepare POS and file via Onelegal. Email to OPC re FAC. Email to Courtdocs.	0.60	\$250.00	\$150.00
YS	12/15/2023	Review alert from Courtlinks. Retrieve conformed	0.20	\$250.00	\$50.00

		FAC. Email to CTL/Andy re FAC. Update file with conformed FAC.			
CL	12/26/2023	Receipt and review Notice of hearing of CMC.	0.20	\$750.00	\$150.00
CL	01/02/2024	Review and analyze Answer to FAC.	0.30	\$750.00	\$225.00
CL	01/02/2024	Review and analyze Special Interrogatories, Request for Production and Form Interrogatories General and Special.	0.40	\$750.00	\$300.00
YS	01/03/2024	[Class] Draft discovery requests shells (RFP, SROGS, RFS, FROGS, PMK Depo notice, proposed protective order, belaire notice, POS).	1.50	\$250.00	\$375.00
ASC	01/05/2024	Revise RFP, Srogs, RFA, PMK NOD, Form Rogs, PO, BW, set 1	1.40	\$250.00	\$350.00
CL	01/05/2024	Revise and finalize request for production, one, special interrogatories, set one, request for admissions, set one; employment interrogatories, set one; and plaintiff's notice of deposition of defendant; review and analyze wage statements and payroll documents in preparation for same.	0.90	\$750.00	\$675.00
AB	01/05/2024	Prep and appear for call w/ cocounsel. Analyze overlap issues/mediator selection issues/claims.	2.00	\$895.00	\$1,790.00
KN	01/06/2024	Review status and prior emails; review answer to FAC	0.30	\$950.00	\$285.00
CL	01/09/2024	Email to E. Yaeckel re: First Amended Complaint in preparation for mediation.	0.30	\$750.00	\$225.00
ASC	01/15/2024	Email OPC requesting extension for discovery responses in light of mediation talks	0.30	\$250.00	\$75.00
ASC	01/17/2024	Confirm extension to respond to defendant's disco from 2/5 to 3/21/24 with OPC, update calendar	0.30	\$250.00	\$75.00
CL	01/30/2024	Email from A. Kidd re: meet and confer re: MTC discovery deadline.	0.20	\$750.00	\$150.00
ASC	01/30/2024	Review correspondence from OPC re confirmation of extensions to respond to discovery, no action needed	0.20	\$250.00	\$50.00
CL	02/01/2024	Finalize Notice of Non-Opposition to Motion to Transfer.	0.20	\$750.00	\$150.00
ASC	02/01/2024	Review status of case, discuss with team, Draft notice of non -oppo to motion to transfer venue, file and serve	0.50	\$250.00	\$125.00
CL	02/05/2024	Review and analyze Proposed Order re Motion to Transfer Venue.	0.30	\$750.00	\$225.00

ASC	02/05/2024	Email exchange with OPC re consolidation with related matter in anticipation of mediation	0.20	\$250.00	\$50.00
AR	02/08/2024	Multiple correspondence regarding status; review and revise joint statement; submit for circulation.	0.60	\$550.00	\$330.00
ASC	02/08/2024	PAGA - Draft Joint CMS for AGR's review	0.50	\$250.00	\$125.00
ASC	02/08/2024	Email draft Joint CMS to OPC for review and signature	0.20	\$250.00	\$50.00
ASC	02/08/2024	Revise and finalize and file CMC statement via one legal, serve via email	0.40	\$250.00	\$100.00
ASC	02/09/2024	Review court's docket to confirm CMC/Hearinre motion to transfer still on calendar, no tentative, set up remote appearance	0.30	\$250.00	\$75.00
AR	02/13/2024	Retrieve and review order; draft multiple correspondence regarding updated joint statement and opposition timeline.	0.50	\$550.00	\$275.00
CL	02/19/2024	Receipt and review Order continuing hearings re status conference.	0.20	\$750.00	\$150.00
AR	02/23/2024	Review docket for status; multiple correspondence regarding pending motion.	0.50	\$550.00	\$275.00
YS	02/23/2024	Review status of case, Confirm 2/29 CMC hearing still on calendar, circulate zoom link to appear remotely.	0.20	\$250.00	\$50.00
AR	02/29/2024	Review file and docket in advance of CMC and motion to transfer; draft summary.	0.50	\$550.00	\$275.00
AR	02/29/2024	Prepare for and attend CMC and motion to transfer hearing; draft and circulate summary.	2.20	\$550.00	\$1,210.00
CL	03/04/2024	Receipt and review RCHSD's Objections to Plaintiff's Notice of Deposition of Defendant Rady Children's Hospital-San Diego	0.20	\$750.00	\$150.00
CL	03/04/2024	Draft JPA with SULLIVAN & YAECKEL LAW GROUP, APC.	0.70	\$750.00	\$525.00
CL	03/06/2024	Receipt and review Notice of Order to Show Cause Hearing.	0.30	\$750.00	\$225.00
CL	03/14/2024	Review and analyze damages analysis for named plaintiff; Conference call with Lietzow re: same.	0.40	\$750.00	\$300.00
CL	03/18/2024	Email from A. Kidd re: meet and confer re: 4 week extension to discovery.	0.30	\$750.00	\$225.00
AR	03/18/2024	Multiple correspondence regarding mediation and status of discovery; draft follow up correspondence.	0.40	\$550.00	\$220.00

CL	03/20/2024	Email from A. Kidd re: client authorization for mediation.	0.20	\$750.00	\$150.00
CL	03/20/2024	Email from E. Yaeckel re: Ortman mediation; Email to A. Kidd re: same.	0.20	\$750.00	\$150.00
CL	03/22/2024	Email from A. Kidd re: mediation with Ortman.	0.20	\$750.00	\$150.00
ASC	03/25/2024	Submit request to Knox for payment of Transfer of Venue fees	0.50	\$450.00	\$225.00
YS	03/25/2024	Telephone call to court re Transfer of Venue fees	0.30	\$250.00	\$75.00
ASC	03/26/2024	Receive email from mediator, gather caption pages and put together a service list, email to mediator in connection with 11/13/24 tentative mediation date	0.50	\$450.00	\$225.00
YS	03/27/2024	[Class] Draft shell for stipulation to stay pending mediation.	0.50	\$250.00	\$125.00
YS	03/28/2024	[Class] Finalize Plaintiff's Case Management Statement for service. Prepare POS. File via Onelegal. Email to OPC re CMS. Email to Court Docs for circulation.	0.50	\$250.00	\$125.00
ASC	03/28/2024	Draft and finalize Plaintiff's Case Management Statement; Email to Y. Silva for filing	0.50	\$450.00	\$225.00
CL	04/01/2024	Receipt and review Stipulation to Consolidate and Stay Pending Mediation; Discuss with Adolfo in preparation for call with opposing counsel.	0.30	\$750.00	\$225.00
CL	04/01/2024	Email from A. Kidd re: stipulation to consolidate.	0.20	\$750.00	\$150.00
ASC	04/01/2024	Revise defendant's draft stipulation to stay	0.50	\$450.00	\$225.00
ASC	04/02/2024	Review and revise Defendant's proposed stipulation to consolidate cases, email edits to A. Kidd for review	0.80	\$450.00	\$360.00
ASC	04/02/2024	Revise draft stipulation to stay pending mediation, email to A. Kidd and E. Yaeckel for review	0.80	\$450.00	\$360.00
ASC	04/02/2024	Update and send draft JPA to E. Yaeckel for review and signature	0.30	\$450.00	\$135.00
YS	04/05/2024	[Class] Review status of case, Confirm 4/12 CMC/ OSC hearing off calendar, no need to set appearance	0.20	\$250.00	\$50.00
ASC	04/05/2024	Email to/from E. Yaeckel re draft Joint Prosecution Agreement follow up	0.20	\$450.00	\$90.00
ASC	04/05/2024	Confirm hearing re OSC re Failure to Pay Transfer Fees vacated, review court's website, case transferred to San Diego	0.30	\$450.00	\$135.00

KN	04/06/2024	Review status; review prior week emails; review JPA	0.40	\$950.00	\$380.00
ASC	04/10/2024	Email to E. Yaeckel re Joint Prosecution Agreement	0.20	\$450.00	\$90.00
ASC	04/10/2024	Finalize and execute stipulation to consolidate // calendar new deadline to responde to Defendant's discovery	0.50	\$450.00	\$225.00
ASC	04/11/2024	Confirm Status Conference on calendar for 4/12	0.30	\$450.00	\$135.00
ASC	04/12/2024	Prepare for CMC	0.50	\$450.00	\$225.00
ASC	04/12/2024	Appear at CMC	1.20	\$450.00	\$540.00
ASC	04/15/2024	Email to E. Yaeckel re Joint Prosecution Agreement	0.20	\$450.00	\$90.00
ASC	04/23/2024	Email to E. Yaeckel re Joint Prosecution Agreement	0.20	\$450.00	\$90.00
YS	04/24/2024	Review Courtlinks alert. Retrieve minutes from 4/12 Status Conference. Update file with minutes. Confirmed continued CMC was calendared.	0.30	\$250.00	\$75.00
ASC	04/24/2024	Review email from Courtlink re cross complaint filed	0.30	\$450.00	\$135.00
ASC	04/24/2024	Download and review cross complaint	0.50	\$450.00	\$225.00
ASC	04/24/2024	Email to A. Kidd re number of class members and aggrieved employees	0.30	\$450.00	\$135.00
YS	04/25/2024	Update internal spreadsheet re class info.	0.10	\$250.00	\$25.00
ASC	04/25/2024	Receive and review email from A. Kidd re number of nonexempt employees	0.30	\$450.00	\$135.00
ASC	04/25/2024	Follow up with E. Yaeckel re JPA	0.30	\$450.00	\$135.00
ASC	04/26/2024	Review email from E. Yaeckel re status conference set in related Barnia case; calendar	0.40	\$450.00	\$180.00
ASC	04/26/2024	Review email from E. Yaeckel re JPA agreement signed	0.30	\$450.00	\$135.00
NDB	04/26/2024	Review related case and overlap of claims. Review and revise JPA. Send to Plaintiff for approval. Discuss terms with Plaintiff and obtain signature.	1.30	\$850.00	\$1,105.00
YS	04/29/2024	Review Courtlinks alert re 4/20 Status Conference on calendar. Confirm internal calendar has been updated.	0.10	\$250.00	\$25.00
YS	04/29/2024	[PAGA] Review of Notice of Case Assignment and CMC for newly-transferred case. Review	0.30	\$250.00	\$75.00

		court docket, confirm 10/4 CMC. Update internal spreadsheets re discovery and master list.			
ASC	04/30/2024	Prepare for appearance at status conference	0.50	\$450.00	\$225.00
ASC	04/30/2024	Appear at status conference	1.00	\$450.00	\$450.00
ASC	05/07/2024	Check court's website re status of CMC for PAGA matter in San Diego; CMC taken of calendar due to consolidation, update calendar	0.60	\$450.00	\$270.00
ASC	05/07/2024	Revise stip to stay consolidated cases pending mediation	0.50	\$450.00	\$225.00
ASC	05/07/2024	Email to Shante re confirm mediation date has been reserved for 11/13 with mediator	0.30	\$450.00	\$135.00
ASC	05/13/2024	Email A. Kidd re mutual extension for discovery responses	0.30	\$450.00	\$135.00
ASC	06/26/2024	Revise stipulation to stay pending mediation, email to A. Kidd and E. Yaeckel for review	0.60	\$450.00	\$270.00
ASC	06/26/2024	Finalize stipulation to stay, file via one legal, serve via email	0.60	\$450.00	\$270.00
ASC	07/03/2024	Draft mediation data request	1.00	\$450.00	\$450.00
ASC	07/08/2024	Finalize and send draft mediation data request to co-Plaintiff for comments via email	0.30	\$450.00	\$135.00
ASC	07/08/2024	Review Court's ROA, confirm stip to stay pending mediation granted, download and save in the file, calendar dates re: post mediation status report, discovery responses due deadline, and status conference in Dept c-71	0.60	\$450.00	\$270.00
NB	07/11/2024	Review docs, analyze re settlement issues.	3.00	\$995.00	\$2,985.00
ASC	07/11/2024	Review comments from CO-Plaintiff re Mediation data request; revise, finalize and serve via email	0.50	\$450.00	\$225.00
ASC	07/12/2024	Email exchange with A. Wintz and co-Plaintiff re telephone conference to discuss Mediation Data Request	0.40	\$450.00	\$180.00
KN	07/13/2024	Review stip; review mediation request and analyze issues; review comments from co-counsel	0.30	\$950.00	\$285.00
ASC	07/17/2024	Prepare for call with A. Wintz	1.00	\$450.00	\$450.00
ASC	07/17/2024	Call with A. Wintz re mediation data request, Class and PAGA period, sampling and Plaintiff's records	0.50	\$450.00	\$225.00
CL	07/25/2024	Receipt and review Declaration of Inadvertent filing.	0.30	\$750.00	\$225.00

YS	08/13/2024	Review courtlinks alert re 8/12 Notice of Case Reassignment. Unable to retrieve. Review court docket, unavailable to download	0.30	\$250.00	\$75.00
YS	08/20/2024	Review courtlinks alert re upcoming events: 12/20 CMC. Confirm it is calendared	0.20	\$250.00	\$50.00
CL	08/22/2024	Receipt and review Notice of Hearing re CMC.	0.20	\$750.00	\$150.00
YS	08/27/2024	Review production of documents from Defs. Create Box folder for experts. Add bates stamps to Defs documents. Upload to Box. Email to experts re new case.	1.50	\$250.00	\$375.00
ASC	08/27/2024	Review and respond to email from A. Wintz re mediation data meet and confer and request for discovery and documents produced in the Barnia matter	0.50	\$450.00	\$225.00
ASC	08/27/2024	Review documents produced by defendant in connection with mediation; confer with Y. Silva re sending to expert for analysis	1.00	\$450.00	\$450.00
ASC	08/29/2024	Review email from A. Wintz re Defendant's responses to co-Plaintiff (Form Rogs, Srogs, RFA)	0.60	\$450.00	\$270.00
ASC	09/19/2024	Review RCHSD MEDIATION_000001-108 re personnel file	1.00	\$450.00	\$450.00
CL	10/14/2024	Receipt and review production: RCHSD_Paystubs_000001-RCHSD_Paystubs_069981.	0.40	\$750.00	\$300.00
YS	10/15/2024	Review correspondence from Defs re production of documents. Attempt to download - documents unavailable. Email to Viola at OPC's office.	0.40	\$250.00	\$100.00
YS	10/16/2024	Review paystubs produced by Defs for mediation. Download and update file. Update exhibit book. Update Box folder. Email to expert.	0.60	\$250.00	\$150.00
ASC	10/21/2024	Review status of mediation data production	0.30	\$450.00	\$135.00
CL	10/23/2024	Receipt and review discovery re: RCHSD_Timecards_000001-RCHSD_Timecards_244916	0.30	\$750.00	\$225.00
ASC	10/24/2024	Review RCHSD MEDIATION_000109-592	2.00	\$450.00	\$900.00
ASC	10/24/2024	Review RCHSD MEDIATION_000593-958	1.50	\$450.00	\$675.00
ASC	10/24/2024	Review RCHSD0126-360	1.00	\$450.00	\$450.00
ASC	10/24/2024	Review RCHSD_Timecards_000001-RCHSD_Timecards_244916	2.00	\$450.00	\$900.00
ASC	10/24/2024	Review RCHSD-000001-000486, confirm receipt from expert for case analysis	1.00	\$450.00	\$450.00

ASC	10/24/2024	Review RPCPaystubs_10.15.2024, confirm receipt from expert for case analysis	1.00	\$450.00	\$450.00
KN	10/26/2024	Analysis of documents production; review Team notes and analysis of documents; review and analyze claims for mediation	1.00	\$950.00	\$950.00
ASC	10/28/2024	Email to Expert re ETA for analysis for mediation	0.30	\$450.00	\$135.00
ASC	10/28/2024	Email to A. Wintz re number of workweeks for mediation	0.30	\$450.00	\$135.00
ASC	10/28/2024	Review RCHSD0126-360 re policies	2.00	\$450.00	\$900.00
ASC	10/28/2024	RCHSD-000001-000120 - Jones Wage Statements	0.50	\$450.00	\$225.00
ASC	10/28/2024	RCHSD-000121-000486 - Time Card Reports	0.50	\$450.00	\$225.00
ASC	10/28/2024	Draft Harass daily chart	0.50	\$450.00	\$225.00
ASC	10/28/2024	Update Case intake notes	0.50	\$450.00	\$225.00
YS	10/29/2024	Review, organize and add bates stamps to Plaintiff's documents. Review, organize and add bates stamps to Def's documents. Review, organize and add bates stamps to 1198.5 response documents. Update exhibit book with Plaintiff, Def's, and 1198.5 documents.	1.30	\$250.00	\$325.00
ASC	10/30/2024	Email to Bennett re data points for expert analysis; review correspondence from A. Wintz; discuss brief with AJ	0.60	\$450.00	\$270.00
NDB	10/30/2024	Review and analyze data produced for mediation purposes. Analyze court docket and case file. Legal research. Prepare for mediation.	4.10	\$850.00	\$3,485.00
NDB	10/31/2024	Review pay stubs and time punch data for wage and hour claims. Research recent court opinions. Review Defendant's written policy documents. Analyze previous settlements.	3.10	\$850.00	\$2,635.00
SB	11/01/2024	Speak with client in advance of mediation, analyze claims, advise AJB	2.80	\$450.00	\$1,260.00
NDB	11/02/2024	Review and research vacation pay and late payment of wage claims under Sections 204 and 210. Review and revise mediation brief. Prepare for mediation.	2.90	\$850.00	\$2,465.00
KN	11/02/2024	Review research and work from ND; analyze issues and claims; provide input for mediation prep	1.00	\$950.00	\$950.00
ASC	11/04/2024	Finalize mediation harass sheet with updated workweeks and pay periods figures provided by Defendant	0.40	\$450.00	\$180.00

ASC	11/04/2024	Finalize mediation case notes	0.40	\$450.00	\$180.00
SB	11/04/2024	Calculate individual damages, add those to case notes, advise ND	2.60	\$450.00	\$1,170.00
ASC	11/05/2024	Email to E. Yaeckel re mediation brief; email to A. Wintz re call to discuss mediation data	0.30	\$450.00	\$135.00
ASC	11/06/2024	Review and respond to correspondence from Eric re off the clock issues for Jones and mediation brief draft	0.50	\$450.00	\$225.00
ASC	11/07/2024	Review correspondence from A. Wintz re pay codes and waivers	0.50	\$450.00	\$225.00
ASC	11/08/2024	Review correspondence from K. Chapa re Defendant's objection to P's NOD and follow up email from E. Yaeckel	0.40	\$450.00	\$180.00
SB	11/11/2024	Prepare for mediation, review and analyze mediation brief, advise AJB	2.80	\$450.00	\$1,260.00
KN	11/11/2024	Review mediation brief and materials; provide input to AJ for mediation	0.50	\$950.00	\$475.00
AB	11/13/2024	Prep and appear for mediation.	5.00	\$895.00	\$4,475.00
SB	11/13/2024	Attend mediation	8.00	\$450.00	\$3,600.00
ASC	11/18/2024	Review correspondence from K. Chapa re Defendant's objection to P's NOD and follow up email from E. Yaeckel	0.40	\$450.00	\$180.00
CL	11/21/2024	Email from C. Struckmeyer re: Special Interrogatories, Set Three; Receipt and review Special Interrogatories, Set Three.	0.40	\$750.00	\$300.00
CL	11/21/2024	Email form K. Richmond re: Objections to Amended PMK deposition notice; Receipt and review Objections to Amended PMK deposition notice	0.30	\$750.00	\$225.00
VR	11/25/2024	Draft: draft joint CMC statement; review correspondence between parties; correspondence to Def; review discovery	1.10	\$750.00	\$825.00
YS	11/26/2024	Finalize Joint Status Report Re: Mediation for service. Prepare POS. File via Onelegal. Email to OPC/Co-counsel re report. Email to Court Docs for circulation.	0.60	\$250.00	\$150.00
VR	11/26/2024	Review and Revise: review and revise joint CMC statement; review correspondence between parties; advise YS	0.70	\$750.00	\$525.00
ASC	12/02/2024	Review srogs, rfp, frogs-g and frogs-EL propounded by defendant' advise Y. Silva to prepare shells for responses	1.00	\$450.00	\$450.00

ASC	12/02/2024	Update draft protective order and draft belaire west notice	0.50	\$450.00	\$225.00
ASC	12/02/2024	Email to A. Wintz re request for PMK depo date and reminder of Defendant's responses due	0.50	\$450.00	\$225.00
ASC	12/05/2024	Review proposed PMK deposition dates and discuss with CTL/VBR	0.40	\$450.00	\$180.00
VR	12/06/2024	Review and Analyze: review court's orders and docket; review def's CMC statement; review mediation outcomes and brief; draft CMC statement; review discovery and stipulation; advise YS	1.50	\$750.00	\$1,125.00
YS	12/06/2024	Finalize P's CMS for service. Prepare POS. File via Onelegal. Email to OPC/Co-counsel re CMS. Email to Court Docs for circulation.	0.60	\$250.00	\$150.00
ASC	12/10/2024	Follow up with Y. Silva re shells for discovery responses	0.20	\$450.00	\$90.00
YS	12/10/2024	Prepare shells for P's responses to Sp rogs, RPD, Fr rogs - general and employment.	1.50	\$250.00	\$375.00
ASC	12/11/2024	Follow up with VBR and CTL re proposed for PMK deposition	0.30	\$450.00	\$135.00
ASC	12/11/2024	Prepare draft responses to Defendant's special interrogatories	1.50	\$450.00	\$675.00
ASC	12/11/2024	Prepare draft responses to Defendant's Form interrogatories - General	1.50	\$450.00	\$675.00
ASC	12/11/2024	Review Plaintiff's documents and prepare draft responses to Defendant's Form interrogatories	1.50	\$450.00	\$675.00
ASC	12/12/2024	Prepare draft responses to Defendant's Form interrogatories - Employment Law	1.50	\$450.00	\$675.00
ASC	12/12/2024	Revise draft responses to Defendant's Form interrogatories - General	1.00	\$450.00	\$450.00
ASC	12/12/2024	Email Client re request for phone call to discuss and review discovery	0.30	\$450.00	\$135.00
ASC	12/13/2024	Discuss Discovery responses with Plaintiff, provide status update of the case	1.00	\$450.00	\$450.00
ASC	12/13/2024	Revise and finalize Responses to Srogs	0.50	\$450.00	\$225.00
ASC	12/13/2024	Revise and finalize Responses to EL Frogs	0.50	\$450.00	\$225.00
ASC	12/13/2024	Revise and finalize Responses to G Frogs	0.50	\$450.00	\$225.00
ASC	12/13/2024	Revise and finalize Responses to RFP	0.50	\$450.00	\$225.00
ASC	12/13/2024	Prepare verification and POS	0.50	\$450.00	\$225.00

ASC	12/13/2024	Review and organize Plaintiff's responsive documents to D's request for production	1.00	\$450.00	\$450.00
ASC	12/13/2024	Finalize and Plaintiff's serve discovery responses via email	0.50	\$450.00	\$225.00
ASC	12/13/2024	Review discovery responses and email A. Wintz re revisions to BW notice and proposal to use ILYM with fee split	0.50	\$450.00	\$225.00
VR	12/16/2024	Receipt and Review of Correspondence: review correspondence between parties; review discovery; correspondence to Def	0.60	\$750.00	\$450.00
YS	12/17/2024	Prepare notice of depo for C. Delgado and T. Koza.	0.70	\$250.00	\$175.00
AB	12/18/2024	Draft MOU. Draft/send corr to mediator re MOU. Discuss MOU w/ cocounsel.	3.00	\$895.00	\$2,685.00
ASC	12/18/2024	Follow up with A. Wintz re proposed revisions to BW notice	0.30	\$450.00	\$135.00
KN	12/18/2024	Review emails and draft MOU; discuss MOU terms and analyze for compliance; advise AJ	0.75	\$950.00	\$712.50
NDB	12/19/2024	Review and analyze mediation notes and results. Review MOU terms. Send MOU to Plaintiff. Call and email to explain terms and obtain signature.	1.30	\$850.00	\$1,105.00
CL	12/20/2024	Prepare for CMC; review and analyze memorandum of understanding; Discuss with Adolfo re: same.	0.40	\$750.00	\$300.00
CL	12/20/2024	Appear at CMC; revise memorandum to file re: CMC.	0.40	\$750.00	\$300.00
CL	12/20/2024	Email to E. Yaekel re: special appearance and CMC hearing.	0.40	\$750.00	\$300.00
YS	12/20/2024	Review Def's production of documents. Organize and update exhibit book.	0.60	\$250.00	\$150.00
VR	01/02/2025	Receipt and Review of Correspondence: review correspondence between parties; review related case complaint	1.20	\$750.00	\$900.00
VR	01/27/2025	Review and Analyze: review MOU; review settlement agreement; review correspondence between parties; telephonic conference with Def; correspondence with Def	0.50	\$750.00	\$375.00
VR	01/28/2025	Review and Revise: review and revise settlement agreement; review MOU; review correspondence between parties; review mediation brief and complaints of related actions; correspondence to co-counsel	2.70	\$750.00	\$2,025.00

KN	01/28/2025	Review draft settlement agreement; compare with MOU to ensure compliance; analysis for approval issues; advise VR	1.00	\$950.00	\$950.00
CL	02/14/2025	Email to E. Yaekel re: stipulation to consolidate and consolidation order; Discuss with Tori re amending pleadings for approval of settlement.	0.50	\$750.00	\$375.00
YS	02/14/2025	Review court docket for order consolidating actions. Purchase and download minutes from 4.30 Status Conf. Update file and email to Team C.	0.20	\$250.00	\$50.00
KN	02/21/2025	Review draft Agreement; review issues raised by VR; respond to issues	1.00	\$950.00	\$950.00
CL	03/07/2025	Email from E. Yaekel re: estimates for administration.	0.20	\$750.00	\$150.00
CL	03/07/2025	Email from M. Moriartyre: estimates for administration.	0.10	\$750.00	\$75.00
KN	03/31/2025	Review status and agreement; advise co-counsel; draft proposed order; work on motion.	3.50	\$950.00	\$3,325.00
KN	04/01/2025	Draft memorandum ISP MPA; revise Notice; analysis of settlement issues and Kullar valuation; review final agreement; revised proposed order to track final agreement; email counsel; review decs; file and serve Notice of Motion and decs.	4.75	\$950.00	\$4,512.50
ASC	04/01/2025	Draft Plaintiff's declaration iso of Motion for Approval of PAGA settlement	1.00	\$450.00	\$450.00
NDB	04/01/2025	Review and analyze settlement agreement terms for conformity with MOU. Review court docket and case file. Discuss terms and approval process with Plaintiff. Follow up to obtain signature.	1.10	\$850.00	\$935.00
KN	04/10/2025	Draft declaration ISO motion; organize exhibits	3.90	\$950.00	\$3,705.00
KN	04/10/2025	Prepare final Memorandum; prepare declarations for filing; prepare final class notice and signed agreement; file and serve documents; serve LWDA.	2.50	\$950.00	\$2,375.00
KN	04/25/2025	Court appearance - motion for prelim approval; emails with Def; review tentative; prepare for hearing	1.00	\$950.00	\$950.00
KN	04/30/2025	Review status and docket; email co-counsel; memo to CAC admin with documents	0.50	\$950.00	\$475.00
KN	05/01/2025	Review status and docket; download order; review Admin email and respond	0.50	\$950.00	\$475.00
CL	06/13/2025	Email from J. Johnson re: Rady's Status Report.	0.30	\$750.00	\$225.00

KN	06/14/2025	Review Admin email and weekly report	0.20	\$950.00	\$190.00
KN	06/21/2025	Review Admin email and weekly report	0.20	\$950.00	\$190.00
KN	06/28/2025	Review Admin email and weekly report	0.20	\$950.00	\$190.00
CL	08/06/2025	Email from/to E. Yaekel re: Final Approval Motion and drafting.	0.30	\$750.00	\$225.00
KN	08/09/2025	Review status; review emails; review draft Admin declaration; email staff	0.50	\$950.00	\$475.00
CL	08/15/2025	Email from E. Yaekel re: lodestar declaration.	0.20	\$750.00	\$150.00
KN	08/15/2025	Review billing; correct issues and check costs; review revised billing; emails with co-counsel	0.75	\$950.00	\$712.50
CL	08/15/2025	Email from G. Mauro re: James Hawkins lodestar declaration	0.20	\$750.00	\$150.00
CL	08/15/2025	Email from M. Calvo re: James Hawkins lodestar declaration; receipt and review same.	0.20	\$750.00	\$150.00
KN	08/15/2025	Draft declaration ISO final approval; review next steps and advise staff; email co-counsel	2.00	\$950.00	\$1,900.00
KN	08/19/2025	Revise and finalize declaration; email co-counsel	0.50	\$950.00	\$475.00

Quantity Subtotal 242.65

Services Subtotal \$155,770.00

Expenses

Type	Date	Notes	Quantity	Rate	Total
Expense	03/27/2023	PAGA Filing Fee	1.00	\$75.00	\$75.00
Expense	06/29/2023	Onelegal/Court Fee	1.00	\$1,490.66	\$1,490.66
Expense	08/18/2023	Onelegal/Court Fees	1.00	\$13.33	\$13.33
Expense	08/22/2023	Onelegal/Court Fees	1.00	\$51.48	\$51.48
Expense	08/28/2023	Onelegal/Court Fees	1.00	\$1,510.02	\$1,510.02
Expense	08/31/2023	KNOX filing and messenger service	1.00	\$228.90	\$228.90
Expense	10/06/2023	Expert Fees - DM&A.	1.00	\$2,175.00	\$2,175.00
Expense	10/17/2023	Onelegal/Court Fee	1.00	\$6.00	\$6.00
Expense	10/19/2023	Onelegal/Court Fees	1.00	\$51.48	\$51.48
Expense	10/20/2023	Onelegal/Court Fees	1.00	\$17.24	\$17.24
Expense	10/24/2023	OneLegal filing fee	1.00	\$17.24	\$17.24

Expense	11/15/2023	KNOX Filing and Messenger Service	1.00	\$293.30	\$293.30
Expense	11/15/2023	One Legal Filing	1.00	\$17.24	\$17.24
Expense	11/17/2023	One Legal Filing	1.00	\$13.33	\$13.33
Expense	12/04/2023	OneLegal filing fee.	1.00	\$17.24	\$17.24
Expense	12/15/2023	One Legal Filing	1.00	\$13.33	\$13.33
Expense	01/31/2024	Expert Fees - DM&A.	1.00	\$4,925.00	\$4,925.00
Expense	02/02/2024	Onelegal filing	1.00	\$19.30	\$19.30
Expense	02/08/2024	OneLegal filing fee.	1.00	\$19.30	\$19.30
Expense	03/28/2024	One Legal - Plaintiff's Case Management Statement	1.00	\$15.39	\$15.39
Expense	03/29/2024	KNOX Filing and Messenger Service	1.00	\$654.25	\$654.25
Expense	04/15/2024	Expert Fees - DM&A	1.00	\$1,000.00	\$1,000.00
Expense	06/26/2024	One Legal - stipulation to stay	1.00	\$35.98	\$35.98
Expense	07/01/2024	Mediation Fees - Ortman	1.00	\$7,500.00	\$7,500.00
Expense	08/28/2024	Document retrieval fee	1.00	\$3.00	\$3.00
Expense	11/07/2024	Berger Consulting Fees.	1.00	\$12,420.00	\$12,420.00
Expense	11/26/2024	One Legal Filing Fees	1.00	\$19.31	\$19.31
Expense	12/06/2024	One Legal Filing Fees	1.00	\$19.31	\$19.31
Expense	02/14/2025	Document retrieval fee	1.00	\$1.00	\$1.00
Expense	04/01/2025	Filing fee - motion; one legal filing charge	1.00	\$84.36	\$84.36
Expense	04/02/2025	One legal charge	1.00	\$61.95	\$61.95
Expense	04/14/2025	One legal filing charge	1.00	\$21.37	\$21.37
Expense	05/01/2025	Copies of orders from Court website docket	1.00	\$7.80	\$7.80
Expenses Subtotal				\$32,798.11	

Time Keeper	Quantity	Rate	Total
AJ Bhowmik	10.0	\$895.00	\$8,950.00
Norm Blumenthal	3.0	\$995.00	\$2,985.00
Scott Blumenthal	21.4	\$450.00	\$9,630.00
Nicholas De Blouw	36.8	\$850.00	\$31,280.00
Ricardo Ehmann	17.9	\$675.00	\$12,082.50

Christine LeVu	22.6	\$750.00	\$16,950.00
Kyle Nordrehaug	32.05	\$950.00	\$30,447.50
Victoria Rivapalacio	8.3	\$750.00	\$6,225.00
Andrew Ronan	11.5	\$550.00	\$6,325.00
Adolfo Sanchez Contreras	55.6	\$450.00	\$25,020.00
Adolfo Sanchez Contreras	8.0	\$250.00	\$2,000.00
Yesenia Silva	15.5	\$250.00	\$3,875.00
Quantity Total			242.65
Subtotal			\$188,568.11
Total			\$188,568.11

Detailed Statement of Account

Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
2	09/18/2025	\$188,568.11	\$0.00	\$188,568.11
Outstanding Balance				\$188,568.11
Total Amount Outstanding				\$188,568.11

Please make all amounts payable to: Blumenthal Nordrehaug Bhowmik DeBlouw LLP

Please pay within 30 days.

EXHIBIT #3

LAFFEY MATRIX

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			Years Out of Law School *				
Year	Adjustmt Factor**	Paralegal/ Law Clerk	1-3	4-7	8-10	11-19	20 +
6/01/24- 5/31/25	1.080182	\$258	\$473	\$581	\$839	\$948	\$1141
6/01/23- 5/31/24	1.059295	\$239	\$437	\$538	\$777	\$878	\$1057
6/01/22- 5/31/23	1.085091	\$225	\$413	\$508	\$733	\$829	\$997
6/01/21- 5/31/22	1.006053	\$208	\$381	\$468	\$676	\$764	\$919
6/01/20- 5/31/21	1.015894	\$206	\$378	\$465	\$672	\$759	\$914
6/01/19- 5/31/20	1.0049	\$203	\$372	\$458	\$661	\$747	\$899
6/01/18- 5/31/19	1.0350	\$202	\$371	\$455	\$658	\$742	\$894
6/01/17- 5/31/18	1.0463	\$196	\$359	\$440	\$636	\$717	\$864
6/01/16- 5/31/17	1.0369	\$187	\$343	\$421	\$608	\$685	\$826
6/01/15- 5/31/16	1.0089	\$180	\$331	\$406	\$586	\$661	\$796
6/01/14- 5/31/15	1.0235	\$179	\$328	\$402	\$581	\$655	\$789
6/01/13- 5/31/14	1.0244	\$175	\$320	\$393	\$567	\$640	\$771
6/01/12- 5/31/13	1.0258	\$170	\$312	\$383	\$554	\$625	\$753
6/01/11- 5/31/12	1.0352	\$166	\$305	\$374	\$540	\$609	\$734
6/01/10- 5/31/11	1.0337	\$161	\$294	\$361	\$522	\$589	\$709
6/01/09- 5/31/10	1.0220	\$155	\$285	\$349	\$505	\$569	\$686
6/01/08- 5/31/09	1.0399	\$152	\$279	\$342	\$494	\$557	\$671
6/01/07-5/31/08	1.0516	\$146	\$268	\$329	\$475	\$536	\$645
6/01/06-5/31/07	1.0256	\$139	\$255	\$313	\$452	\$509	\$614
6/1/05-5/31/06	1.0427	\$136	\$249	\$305	\$441	\$497	\$598
6/1/04-5/31/05	1.0455	\$130	\$239	\$293	\$423	\$476	\$574
6/1/03-6/1/04	1.0507	\$124	\$228	\$280	\$405	\$456	\$549
6/1/02-5/31/03	1.0727	\$118	\$217	\$267	\$385	\$434	\$522
6/1/01-5/31/02	1.0407	\$110	\$203	\$249	\$359	\$404	\$487
6/1/00-5/31/01	1.0529	\$106	\$195	\$239	\$345	\$388	\$468
6/1/99-5/31/00	1.0491	\$101	\$185	\$227	\$328	\$369	\$444
6/1/98-5/31/99	1.0439	\$96	\$176	\$216	\$312	\$352	\$424
6/1/97-5/31/98	1.0419	\$92	\$169	\$207	\$299	\$337	\$406
6/1/96-5/31/97	1.0396	\$88	\$162	\$198	\$287	\$323	\$389

6/1/95-5/31/96	1.032	\$85	\$155	\$191	\$276	\$311	\$375
6/1/94-5/31/95	1.0237	\$82	\$151	\$185	\$267	\$301	\$363

The methodology of calculation and benchmarking for this Updated Laffey Matrix has been approved in a number of cases. See, e.g., *DL v. District of Columbia*, 267 F.Supp.3d 55, 69 (D.D.C. 2017)

* $i_{\frac{1}{2}}$ Years Out of Law School $i_{\frac{1}{2}}$ is calculated from June 1 of each year, when most law students graduate. $i_{\frac{1}{2}}1-3$ " includes an attorney in his 1st, 2nd and 3rd years of practice, measured from date of graduation (June 1). $i_{\frac{1}{2}}4-7$ " applies to attorneys in their 4th, 5th, 6th and 7th years of practice. An attorney who graduated in May 1996 would be in tier $i_{\frac{1}{2}}1-3$ " from June 1, 1996 until May 31, 1999, would move into tier $i_{\frac{1}{2}}4-7$ " on June 1, 1999, and tier $i_{\frac{1}{2}}8-10$ " on June 1, 2003.

** The Adjustment Factor refers to the nation-wide Legal Services Component of the Consumer Price Index produced by the Bureau of Labor Statistics of the United States Department of Labor.