

Janelle Carney, Esq. (Bar No. 201570)
JANELLE CARNEY – ATTORNEY AT LAW, APC
14758 Pipeline Ave., Suite E, 2nd Fl.
Chino Hills, CA 91709
Tel.: (909) 521-9609; Fax: (909) 393-0471
Email: Janelle@JanelleCarneyLaw.com

Attorneys for Plaintiff MICHAEL BOONE, an individual
on behalf of himself and the general public

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF ORANGE

MICHAEL BOONE, an individual, on
behalf of himself and the general public,

Plaintiff,

vs.

SEDGWICK CLAIMS
MANAGEMENT SERVICES, INC., an
Illinois Corporation; and DOES 1
through 100, inclusive,

Defendants.

) Case No.: 30-2022-01268269-CU-OE-CXC
) Hon. Melissa McCormick
) Dept.: CX-104

) CLASS ACTION

) **SECOND SUPPLEMENTAL**
) **DECLARATION OF JANELLE CARNEY**
) **IN SUPPORT OF PLAINTIFF’S MOTION**
) **FOR COURT APPROVAL OF PAGA**
) **SETTLEMENT**

) Date: July 18, 2024
) Time: 2:00 p.m.
) Dept. CX-104

) Reservation No.: 74177449

) Action Filed: July 1, 2022

1 I, Janelle Carney, declare:

2 1. I am an attorney duly licensed to practice law before all courts in the State of
3 California. I am the managing partner at Janelle Carney – Attorney at Law, APC (JCAL). I am
4 counsel of record herein and I have personal knowledge of the facts herein. If called as a
5 witness, I could and would competently testify herein. I submit this Second Supplemental
6 Declaration to response to the court’s March 21, 2024, order.

7 2. On or about March 19, 2024, my assistant uploaded the Motion for Court
8 Approval of PAGA Settlement consisting of the Notice of Motion, Memorandum of Points and
9 Authorities, Declaration of Janelle Carney, and Proposed Order to the LWDA, pursuant to Labor
10 Code § 2699 (l)(2). A true and correct copy of the proof of submission email is attached hereto
11 as **Exhibit 5**. Previously, the settlement agreement was uploaded to the LWDA on or about
12 December 7, 2023. (See **Carney Decl. Exhibit 4**). Out of an abundance of caution, in response
13 to the Court’s Ruling, my assistant is concurrently filing a declaration of service.

14 3. Plaintiff provides the following information in response to the Court’s order:

15 4. *“Plaintiff should provide the estimated high, low and average payment to the*
16 *Aggrieved Employees, and a description of all consideration being received by plaintiff,*
17 *including for plaintiff’s individual claims and PAGA claims.”*

18 a. The proposed PAGA settlement results in the following payment of
19 PAGA penalties:

- 20 • Highest: \$281.40
- 21 • Average: \$173.25
- 22 • Lowest: \$37.80

23 b. Plaintiff will lodge under seal his individual settlement for unpaid wages and
24 §1542 waiver.

25 5. *“Plaintiff seeks \$22,000 in costs, but the costs invoice attached to plaintiff’s*
26 *counsel’s declaration (Carney Decl. (ROA 121) Ex. 2) reflects \$24,467.85 in costs. Which costs*
27 *is plaintiff not seeking?”*

1 a. Plaintiff apportioned \$2,467.00 of the \$24,467.85 total costs to Mr.
2 Boone's individual settlement. (See confidential individual settlement agreement filed
3 under seal.)

4 *"In addition, each of the costs on Exhibit 2 must be substantiated: (i) What is the \$17.00*
5 *"bank charges & fees" charge for? (ii) What are the costs described as "Janney & Janney" for?*
6 *(iii) What document(s) was filed for each "filing costs" charge? (iv) Invoices should be*
7 *submitted for each expert costs charge. (v) Plaintiff should provide legal authority for the award*
8 *of postage costs. (vi) What is the \$75.00 "LWDA" cost for? (vii) What is the \$1,663.30 "US*
9 *legal" cost for? (viii) Plaintiff's counsel's declaration indicates one deposition was taken*
10 *(Carney Decl. (ROA 121) ¶ 10). Why are there two deposition charges?"*

- 11 i. Bank charge for \$17.00 is wire transfer fee for payment made to Plaintiff's expert,
12 Econ One.
- 13 ii. Janney & Janney costs are the costs paid to Plaintiff's attorney service. Attached
14 hereto as **Exhibit 6** are the invoices associated with such. In my prior declaration
15 there is an error in the cost sheet for an entry on 3/5/22 for 12.25. It is an entry
16 for a different case and has now been adjusted. There is an additional invoice for
17 \$61.80 which reflects the filing of the settlement approval motion, bringing the
18 total costs for Janney & Janney filing service to \$2,050.42.
- 19 iii. Document filing charges same as above – see **Exhibit 6**
- 20 iv. Attached hereto as **Exhibit 7** are true and correct copies of Plaintiff's expert Econ
21 One's invoices.
- 22 v. The certified postage costs relate to the certificated copy of the PAGA notice to
23 Defendant, pursuant to Labor Code § 2699.3(a)(1)(A), which states: "the
24 Aggrieved Employee or representative shall give written notice by online filing
25 with the Labor and Workforce Development Agency and by certified mail to the
26 employer of the specific provisions of this code alleged to have been violated."
27 This is an administrative requirement to fulfill prior to filing a lawsuit (akin to
28 service of a summons.)

vi. LWDA is the Labor and Workforce Development Agency, which requires a \$75.00 filing fee. See Labor Code § 2699.3 a(1)(B). (akin to initial filing fee)

vii. There are two deposition charges:

- Deposition of Defendant's Person Most Knowledgeable. Attached hereto as **Exhibit 8** is a true and correct copy of said invoices.
- Plaintiff was deposed and Plaintiff ordered a certified copy of the deposition transcript. The \$1,663.30 U.S. Legal charge is for the certified transcript of the Deposition of Michael Boone. A true and correct copy of said invoice is attached hereto as **Exhibit 9**.

6. *"The settlement administrator seeks \$1,500 for "annual filing of tax return." Carney Decl. (ROA 121) Ex. 3. The settlement administrator should confirm that this is the charge for this service related to the 8 Aggrieved Employees in this case.*

a. Plaintiff is submitting the Declaration of Lisa Mullins to explain the \$1,500 annual tax filing cost item, that is specifically related to the aggrieved employee settlement in this case. This declaration is being filed concurrently herewith.

7. *Neither the settlement agreement (Carney Decl. (ROA 121) Ex. 1) nor the proposed order and judgment (ROA 113) includes an enhancement award to plaintiff, but plaintiff's counsel's declaration (Carney Decl. (ROA 121) ¶ 18) states an award for "representative enhancement" will be deduced from the Gross Settlement Amount. Is plaintiff requesting an enhancement award and, if so, in what amount and why is an enhancement award appropriate?"*

a. Reference to such was in error as Plaintiff is not seeking an enhancement in light of his individual settlement for unpaid wages.

8. *"Paragraph 5 of the settlement agreement (Carney Decl. (ROA 121) Ex. 1) states the releases will become effective on the date defendant fully funds the Gross Settlement Amount. Paragraph 5.2 states the Aggrieved Employees will be "deemed to release" their claims "upon approval of the settlement." The phrase "upon approval of the settlement" should be removed. It*

1 *contradicts paragraph 5 and, in any event, the court will not require the Aggrieved Employees to*
2 *release their claims before defendant fully funds the settlement.”*

3 a. The parties agree to strike the language per the attached Amendment to
4 Settlement Agreement, attached hereto as **Exhibit 10**.

5 9. *“The release in paragraph 5.2 appears to contain redundant language, i.e.,*
6 *“including all PAGA claims pled or that could have been pled in the Operative Complaint*
7 *pursuant to PAGA, California Labor Code §§ 2698, et seq., deriving from and/or based on the*
8 *facts alleged in the Operative Complaint and/or Plaintiff’s PAGA Notice, arising out of or*
9 *related to services to or work performed for Sedgwick during the PAGA Period upon approval of*
10 *the settlement.” The settlement agreement should be amended to remove this language.”*

11 a. The parties agree to strike the language per the attached Amendment to
12 Settlement Agreement, attached hereto as **Exhibit 10**.

13 10. *“Will the Aggrieved Employees be able to dispute the number of pay periods? If*
14 *so, the settlement agreement should be amended to address the procedure for disputes.”*

15 a. See the Amendment to the Settlement Agreement (**Exhibit 10**.)

16 11. *“As to the notice: The parties should provide a notice to the Aggrieved Employees*
17 *that will accompany the payment to them. A copy of the notice should be provided to the court*
18 *for approval along with the approval motion. The notice should be consistent with the above.*
19 *The notice should also (i) provide an explanation of PAGA; (ii) describe the factual allegations*
20 *of the operative complaint; (iii) describe the scope of the released claims; (iv) state the gross*
21 *settlement amount, the net settlement amount, and the portions allocated to the LWDA and the*
22 *Aggrieved Employees; (v) explain how the individual payments will be calculated; (vi) describe*
23 *the recipient’s responsibility for any taxes payable on the amount received; and (vii) notify the*
24 *Aggrieved Employees that they cannot opt out of the settlement and that, even if they do not cash*
25 *their checks, they will be bound by the release.”*

26 a. See attached Notice to the Aggrieved Employees, attached hereto as
27 **Exhibit 11**.

28 12. *“Should the notice be translated into any other languages?”*

a. No. All employees speak and read English.

13. *“The notice should advise the Aggrieved Employees not to contact the court with questions.”*

a. See **Exhibit 11**.

14. *“As to the proposed order and judgment (ROA 113): The proposed order and judgment should be revised consistent with the above. The counsel information should be removed from the caption page of the proposed order and judgment. The proposed order and judgment should describe all consideration being received by plaintiff, including for plaintiff’s individual claims and PAGA claims. The proposed order and judgment should include an explanation of how the amount payable to each aggrieved employee will be calculated. Paragraph 2 of the proposed order and judgment should be revised to be consistent with the settlement agreement, i.e., “Released PAGA Claims” in the settlement agreement does not include the LWDA. The proposed order and judgment should identify the settlement administrator, state that the court approves the appointment of the third-party settlement administrator, and order the settlement administrator to effectuate the settlement in accordance with the settlement agreement and any amendments thereto.*

The parties should propose a date for the final accounting hearing. Should the motion for approval be granted, the court will hold a final accounting hearing on a Thursday at 9:00 a.m. Counsel shall submit a final administrator’s report at least 9 court days before the hearing addressing the status of the settlement administration, including the actual amounts paid to the Aggrieved Employees and the other amounts distributed under the settlement, including any uncashed checks.”

a. The parties are submitting a revised Proposed Order concurrently herewith. A true and correct copy of the redline of which is attached hereto as **Exhibit 12** for ease of reference.

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15. *“The settlement agreement and any amendments thereto and the notice (in English and any other languages) should be attached to the proposed order and judgment as exhibits.”*

a. See revised Proposed Order filed concurrently herewith.

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

Executed at Chino Hills, California on this 5th day of July 2024.


Janelle Carney

Exhibit 5

Jerin Wilkinson

From: DIR PAGA Unit <lwdadonotreply@dir.ca.gov>
Sent: Tuesday, March 19, 2024 11:00 AM
To: Janelle Carney
Subject: Thank you for your Proposed Settlement Submission

03/19/2024 08:59:16 AM

Thank you for your submission to the Labor and Workforce Development Agency.

Item submitted: Proposed Settlement

If you have questions or concerns regarding this submission or your case, please send an email to pagainfo@dir.ca.gov.

DIR PAGA Unit on behalf of
Labor and Workforce Development Agency

Website: http://labor.ca.gov/Private_Attorneys_General_Act.htm

Exhibit 6

Janney and Janney Legal Support

840 N. Birch St.

Santa Ana, CA 92701

(714) 953-9451

Invoice**BILL TO**

Janelle Carney - Attorney at Law, APC

14758 Pipeline Ave Suite E

Chino Hills, CA 91709

Attn: Jerin Wilkinson

Billing Code: Boone

Order Requested by: Janelle Carney

INVOICE #	DATE	TOTAL DUE		TERMS	ENCLOSED
6112281	07/06/2022	\$0.00		Due on receipt	

ACCOUNT #

JJ142992

ROUTE

E-Route

DATE	DESCRIPTION	AMOUNT
07/06/2022	eFiling Accepted - Documents E-Filed with the clerk of the court Please login into to the portal to view/print/download your conformed copies 07/06/2022 Civil Complex Center 751 W Santa Ana Blvd, Santa Ana, CA, 92701 Complaint, Summons Issued And Filed, Civil Case Cover Sheet	10.00
07/06/2022	Court Fees Advanced to Complete Assignment	1,435.00
07/06/2022	Payment Processing Fee (formerly Convenience Fees)	50.22
07/06/2022	EFM Fees	2.25

BILLING CODE: Boone

CASE #: 30-2022-01268269-CU-OE-CXC

CASE NAME: Michael Boone vs. Sedgwick Claims

Mangement Services, Inc.

PAYMENT

1,497.47

BALANCE DUE

\$0.00

Janney and Janney Legal Support

840 N. Birch St.

Santa Ana, CA 92701

(714) 953-9451

Invoice**BILL TO**

Janelle Carney - Attorney at Law, APC

14758 Pipeline Ave Suite E

Chino Hills, CA 91709

Attn: Jerin Wilkinson

Billing Code: Boone

Order Requested by: Janelle Carney

INVOICE #	DATE	TOTAL DUE		TERMS	ENCLOSED
6134790	07/08/2022	\$0.00		Due on receipt	

ACCOUNT #

JJ142992

ROUTE

E-Route

DATE	DESCRIPTION	AMOUNT
07/08/2022	eFiling Accepted - Documents E-Filed with the clerk of the court Please login into to the portal to view/print/download your conformed copies. 07/08/2022 Civil Complex Center 751 W Santa Ana Blvd, Santa Ana, CA, 92701 Peremptory Challenge Pursuant To 170.6 Ccp	10.00
07/08/2022	EFM Fees	2.25

BILLING CODE: Boone

PAYMENT

12.25

CASE #: 30-2022-01268269-CU-OE-CXC

BALANCE DUE

\$0.00

CASE NAME: Michael Boone vs. Sedgwick Claims

Mangement Services, Inc.

Janney and Janney Legal Support

1000 Corporate Center Dr Ste 110

Monterey Park, CA 91754

2136286338

Invoice**BILL TO**

Janelle Carney - Attorney at Law, APC

14758 Pipeline Ave Suite E

Chino Hills, CA 91709

Attn: Jerin Wilkinson

Billing Code: Boone

Order Requested by: Janelle Carney

INVOICE #	DATE	TOTAL DUE		TERMS	ENCLOSED
6313256	08/19/2022	\$0.00		Due on receipt	

ACCOUNT #

JJ142992

ROUTE

E-Route

DATE	DESCRIPTION	AMOUNT
08/17/2022	Service of Process, Routine, Suburban Area Personally Served/Agent, 08/17/2022. Csc Lawyers Registered Agent By Leaving With Koy Saechao, Person Authorized To Accept PARTY TO SERVE: Sedgewick Claims Management Services, Inc., An Illinois Corporation (Registered Agent: CSC Lawyers Incorporating Service) 2710 Gateway Oaks Dr 150 N, Sacramento, CA 95833 Summons, Complaint, Civil Case Cover Sheet, Peremptory Challenge, Notice Of Case Reassignment	90.00

BILLING CODE: Boone

PAYMENT

90.00

CASE #: 30-2022-01268269-CU-OE-CXC

BALANCE DUE

\$0.00

CASE NAME: Michael Boone vs. Sedgwick Claims

Mangement Services, Inc.

Janney and Janney Legal Support

840 N. Birch St.

Santa Ana, CA 92701

(714) 953-9451

Invoice**BILL TO**

Janelle Carney - Attorney at Law, APC

14758 Pipeline Ave Suite E

Chino Hills, CA 91709

Attn: Jerin Wilkinson

Billing Code: Boone

Order Requested by: Janelle Carney

INVOICE #	DATE	TOTAL DUE		TERMS	ENCLOSED
6413137	09/09/2022	\$0.00		Due on receipt	

ACCOUNT #

JJ142992

ROUTE

E-Route

DATE	DESCRIPTION	AMOUNT
09/09/2022	eFiling Accepted - Documents E-Filed with the clerk of the court Please login into to the portal to view/print/download your conformed copies 09/09/2022 Civil Complex Center 751 W Santa Ana Blvd, Santa Ana, CA, 92701 Amended Complaint, Notice - Other - Complex	10.00
09/09/2022	EFM Fees	2.25

BILLING CODE: Boone

CASE #: 30-2022-01268269-CU-OE-CXC

CASE NAME: Michael Boone vs. Sedgwick Claims

Mangement Services, Inc.

PAYMENT

12.25

BALANCE DUE

\$0.00

Janney and Janney Legal Support

840 N. Birch St.

Santa Ana, CA 92701

(714) 953-9451

Invoice**BILL TO**

Janelle Carney - Attorney at Law, APC

14758 Pipeline Ave Suite E

Chino Hills, CA 91709

Attn: Jerin Wilkinson

Billing Code: Boone

Order Requested by: Janelle Carney

INVOICE #	DATE	TOTAL DUE		TERMS	ENCLOSED
6651904	11/01/2022	\$0.00		Due on receipt	

ACCOUNT #

JJ142992

ROUTE

E-Route

DATE	DESCRIPTION	AMOUNT
11/01/2022	eFiling Accepted - Documents E-Filed with the clerk of the court Please login into to the portal to view/print/download your conformed copies 11/01/2022 Civil Complex Center 751 W Santa Ana Blvd, Santa Ana, CA, 92701 Proposed Order Cover Sheet Electronic Filing, Proposed Order Cover Sheet Electronic Filing, Proposed Stipulation And Order, Proposed Stipulation And Order	10.00
11/01/2022	Payment Processing Fee	0.37
11/01/2022	EFM Fees	2.25

BILLING CODE: Boone

PAYMENT

12.62

CASE #: 30-2022-01268269-CU-OE-CXC

BALANCE DUE

\$0.00

CASE NAME: Michael Boone vs. Sedgwick Claims

Mangement Services, Inc.

Janney and Janney Legal Support

840 N. Birch St.

Santa Ana, CA 92701

(714) 953-9451

Invoice**BILL TO**

Janelle Carney - Attorney at Law, APC

14758 Pipeline Ave Suite E

Chino Hills, CA 91709

Attn: Jerin Wilkinson

Billing Code: Boone

Order Requested by: Janelle Carney

INVOICE #	DATE	TOTAL DUE		TERMS	ENCLOSED
6682841-01	11/09/2022	\$0.00		Due on receipt	

ACCOUNT #

JJ142992

ROUTE

E-Route

DATE	DESCRIPTION	AMOUNT
11/09/2022	eFiling Accepted - Documents E-Filed with the clerk of the court Please login into to the portal to view/print/download your conformed copies 11/09/2022 Civil Complex Center 751 W Santa Ana Blvd, Santa Ana, CA, 92701 Notice - Other - Complex, Amended Complaint	10.00
11/09/2022	Payment Processing Fee	0.37
11/09/2022	EFM Fees	2.25

BILLING CODE: Boone

PAYMENT

12.62

CASE #: 30-2022-01268269-CU-OE-CXC

BALANCE DUE

\$0.00

CASE NAME: Michael Boone vs. Sedgwick Claims

Mangement Services, Inc.

Janney and Janney Legal Support

840 N. Birch St.

Santa Ana, CA 92701

(714) 953-9451

Accounting@JanneyandJanney.com

Invoice**BILL TO**

Janelle Carney - Attorney at Law, APC

14758 Pipeline Ave Suite E

Chino Hills, CA 91709

Attn: Jerin Wilkinson

Billing Code: Boone

Order Requested by: Janelle Carney

INVOICE #	DATE	TOTAL DUE		TERMS	ENCLOSED
6899230	12/28/2022	\$0.00		Due on receipt	

ACCOUNT #

JJ142992

ROUTE

E-Route

DATE	DESCRIPTION	AMOUNT
12/28/2022	eFiling Accepted - Documents E-Filed with the clerk of the court Please login into to the portal to view/print/download your conformed copies, 12/28/2022 Civil Complex Center 751 W Santa Ana Blvd, Santa Ana, CA, 92701 Case Management Statement	10.00
12/28/2022	Payment Processing Fee	0.37
12/28/2022	EFM Fees	2.25

BILLING CODE: Boone

CASE #: 30-2022-01268269-CU-OE-CXC

CASE NAME: Michael Boone vs. Sedgwick Claims

Mangement Services, Inc.

PAYMENT

12.62

BALANCE DUE

\$0.00

Janney and Janney Legal Support

840 N. Birch St.

Santa Ana, CA 92701

(714) 953-9451

Accounting@JanneyandJanney.com

Invoice**BILL TO**

Janelle Carney - Attorney at Law, APC

14758 Pipeline Ave Suite E

Chino Hills, CA 91709

Attn: Jerin Wilkinson

Billing Code: Boone

Order Requested by: Janelle Carney

INVOICE #	DATE	TOTAL DUE		TERMS	ENCLOSED
7194332	03/01/2023	\$12.62		Due on receipt	

ACCOUNT #

JJ142992

ROUTE

E-Route

DATE	DESCRIPTION	AMOUNT
03/01/2023	eFiling Accepted - Documents E-Filed with the clerk of the court Please login into to the portal to view/print/download your conformed copies, 03/01/2023 Civil Complex Center 751 W Santa Ana Blvd, Santa Ana, CA, 92701 Proposed Order Cover Sheet Electronic Filing, Proposed Order Cover Sheet Electronic Filing, Proposed Order, Proposed Order	10.00
03/01/2023	Payment Processing Fee	0.37
03/01/2023	EFM Fees	2.25

BILLING CODE: Boone

BALANCE DUE

\$12.62

CASE #: 30-2022-01268269-CU-OE-CXC

CASE NAME: Michael Boone vs. Sedgwick Claims

Mangement Services, Inc.

Janney and Janney Legal Support

840 N. Birch St.

Santa Ana, CA 92701

(714) 953-9451

Accounting@JanneyandJanney.com

Invoice**BILL TO**

Janelle Carney - Attorney at Law, APC

14758 Pipeline Ave Suite E

Chino Hills, CA 91709

Attn: Jerin Wilkinson

Billing Code: Boone

Order Requested by: Janelle Carney

INVOICE #	DATE	TOTAL DUE		TERMS	ENCLOSED
7202608	03/03/2023	\$0.00		Due on receipt	

ACCOUNT #

JJ142992

ROUTE

E-Route

DATE	DESCRIPTION	AMOUNT
03/02/2023	eFiling Accepted - Documents E-Filed with the clerk of the court Please login into to the portal to view/print/download your conformed copies, 03/02/2023 Civil Complex Center 751 W Santa Ana Blvd, Santa Ana, CA, 92701 Notice - Other - Complex	10.00
03/02/2023	Payment Processing Fee	0.37
03/02/2023	EFM Fees	2.25

BILLING CODE: Boone

CASE #: 30-2022-01268269-CU-OE-CXC

CASE NAME: Michael Boone vs. Sedgwick Claims

Mangement Services, Inc.

PAYMENT

12.62

BALANCE DUE

\$0.00

Janney and Janney Legal Support

840 N. Birch St.

Santa Ana, CA 92701

(714) 953-9451

Accounting@JanneyandJanney.com

Invoice**BILL TO**

Janelle Carney - Attorney at Law, APC

14758 Pipeline Ave Suite E

Chino Hills, CA 91709

Attn: Jerin Wilkinson

Billing Code: Boone

Order Requested by: Janelle Carney

INVOICE #	DATE	TOTAL DUE		TERMS	ENCLOSED
7352484	04/03/2023	\$0.00		Due on receipt	

ACCOUNT #

JJ142992

ROUTE

E-Route

DATE	DESCRIPTION	AMOUNT
04/03/2023	eFiling Accepted - Documents E-Filed with the clerk of the court Please login into to the portal to view/print/download your conformed copies, 04/03/2023 Civil Complex Center 751 W Santa Ana Blvd, Santa Ana, CA, 92701 Joint Statement	10.00
04/03/2023	EFM Fees	2.25
04/03/2023	Credit Card or ACH Processing Fee	0.37

BILLING CODE: Boone

CASE #: 30-2022-01268269-CU-OE-CXC

CASE NAME: Michael Boone vs. Sedgwick Claims
Mangement Services, Inc.

PAYMENT

12.62

BALANCE DUE

\$0.00

Janney and Janney Legal Support

840 N. Birch St.

Santa Ana, CA 92701

(714) 953-9451

Accounting@JanneyandJanney.com

Invoice**BILL TO**

Janelle Carney - Attorney at Law, APC

14758 Pipeline Ave Suite E

Chino Hills, CA 91709

Attn: Jerin Wilkinson

Billing Code: Boone

Order Requested by: Janelle Carney

INVOICE #	DATE	TOTAL DUE		TERMS	ENCLOSED
7392333	04/10/2023	\$0.00		Due on receipt	

ACCOUNT #

JJ142992

ROUTE

E-Route

DATE	DESCRIPTION	AMOUNT
04/10/2023	eFiling Accepted - Documents E-Filed with the clerk of the court Please login into to the portal to view/print/download your conformed copies, 04/10/2023 Civil Complex Center 751 W Santa Ana Blvd, Santa Ana, CA, 92701 Notice Of Ruling - Complex	10.00
04/10/2023	EFM Fees	2.25
04/10/2023	Credit Card or ACH Processing Fee	0.37

BILLING CODE: Boone

CASE #: 30-2022-01268269-CU-OE-CXC

CASE NAME: Michael Boone vs. Sedgwick Claims

Mangement Services, Inc.

PAYMENT

12.62

BALANCE DUE

\$0.00

Janney and Janney Legal Support

840 N. Birch St.

Santa Ana, CA 92701

(714) 953-9451

Accounting@JanneyandJanney.com

Invoice**BILL TO**

Janelle Carney - Attorney at Law, APC

14758 Pipeline Ave Suite E

Chino Hills, CA 91709

Attn: Jerin Wilkinson

Billing Code: Boone

Order Requested by: Janelle Carney

INVOICE #	DATE	TOTAL DUE		TERMS	ENCLOSED
7530367	05/05/2023	\$0.00		Due on receipt	

ACCOUNT #

JJ142992

ROUTE

E-Route

DATE	DESCRIPTION	AMOUNT
05/05/2023	eFiling Accepted - Documents E-Filed with the clerk of the court Please login into to the portal to view/print/download your conformed copies, 05/05/2023 Civil Complex Center 751 W Santa Ana Blvd, Santa Ana, CA, 92701 Proposed Order Cover Sheet Electronic Filing, Proposed Order, Proposed Order	10.00
05/05/2023	EFM Fees	2.25
05/05/2023	Credit Card or ACH Processing Fee	0.37

BILLING CODE: Boone

CASE #: 30-2022-01268269-CU-OE-CXC

CASE NAME: Michael Boone vs. Sedgwick Claims

Mangement Services, Inc.

PAYMENT

12.62

BALANCE DUE

\$0.00

Janney and Janney Legal Support

840 N. Birch St.

Santa Ana, CA 92701

(714) 953-9451

Accounting@JanneyandJanney.com

Invoice**BILL TO**

Janelle Carney - Attorney at Law, APC

14758 Pipeline Ave Suite E

Chino Hills, CA 91709

Attn: Jerin Wilkinson

Billing Code: Boone

Order Requested by: Janelle Carney

INVOICE #	DATE	TOTAL DUE		TERMS	ENCLOSED
7539640	05/09/2023	\$0.00		Due on receipt	

ACCOUNT #

JJ142992

ROUTE

E-Route

DATE	DESCRIPTION	AMOUNT
05/09/2023	eFiling Accepted - Documents E-Filed with the clerk of the court Please login into to the portal to view/print/download your conformed copies, 05/09/2023 Civil Complex Center 751 W Santa Ana Blvd, Santa Ana, CA, 92701 Proposed Stipulation And Order, Proposed Stipulation And Order	10.00
05/09/2023	Court Fees Advanced to Complete Assignment	20.00
05/09/2023	EFM Fees	2.25
05/09/2023	Credit Card or ACH Processing Fee	0.97

BILLING CODE: Boone

CASE #: 30-2022-01268269-CU-OE-CXC

CASE NAME: Michael Boone vs. Sedgwick Claims

Mangement Services, Inc.

PAYMENT

33.22

BALANCE DUE

\$0.00

Janney and Janney Legal Support

840 N. Birch St.

Santa Ana, CA 92701

(714) 953-9451

Accounting@JanneyandJanney.com

Invoice**BILL TO**

Janelle Carney - Attorney at Law, APC

14758 Pipeline Ave Suite E

Chino Hills, CA 91709

Attn: Jerin Wilkinson

Billing Code: Boone

Order Requested by: Janelle Carney

INVOICE #	DATE	TOTAL DUE		TERMS	ENCLOSED
7554440	05/10/2023	\$0.00		Due on receipt	

ACCOUNT #

JJ142992

ROUTE

E-Route

DATE	DESCRIPTION	AMOUNT
05/10/2023	eFiling Accepted - Documents E-Filed with the clerk of the court Please login into to the portal to view/print/download your conformed copies, 05/10/2023 Civil Complex Center 751 W Santa Ana Blvd, Santa Ana, CA, 92701 Notice - Other - Complex, Amended Complaint	10.00
05/10/2023	EFM Fees	2.25
05/10/2023	Credit Card or ACH Processing Fee	0.37

BILLING CODE: Boone

CASE #: 30-2022-01268269-CU-OE-CXC

CASE NAME: Michael Boone vs. Sedgwick Claims

Mangement Services, Inc.

PAYMENT

12.62

BALANCE DUE

\$0.00

Janney and Janney Legal Support

840 N. Birch St.

Santa Ana, CA 92701

(714) 953-9451

Accounting@JanneyandJanney.com

Invoice**BILL TO**

Janelle Carney - Attorney at Law, APC

14758 Pipeline Ave Suite E

Chino Hills, CA 91709

Attn: Jerin Wilkinson

Billing Code: Boone

Order Requested by: Janelle Carney

INVOICE #	DATE	TOTAL DUE		TERMS	ENCLOSED
7766502	06/23/2023	\$0.00		Due on receipt	

ACCOUNT #

JJ142992

ROUTE

E-Route

DATE	DESCRIPTION	AMOUNT
06/23/2023	eFiling Accepted - Documents E-Filed with the clerk of the court Please login into to the portal to view/print/download your conformed copies, 06/23/2023 Civil Complex Center 751 W Santa Ana Blvd, Santa Ana, CA, 92701 Notice Of Posting Jury Fees	10.00
06/23/2023	Court Fees Advanced to Complete Assignment	150.00
06/23/2023	EFM Fees	2.25
06/23/2023	Credit Card or ACH Processing Fee	4.87

BILLING CODE: Boone

CASE #: 30-2022-01268269-CU-OE-CXC

CASE NAME: Michael Boone vs. Sedgwick Claims

Mangement Services, Inc.

PAYMENT

167.12

BALANCE DUE

\$0.00

Janney and Janney Legal Support

840 N. Birch St.

Santa Ana, CA 92701

(714) 953-9451

Accounting@JanneyandJanney.com

Invoice**BILL TO**

Janelle Carney - Attorney at Law, APC

14758 Pipeline Ave Suite E

Chino Hills, CA 91709

Attn: Jerin Wilkinson

Billing Code: Boone

Order Requested by: Janelle Carney

INVOICE #	DATE	TOTAL DUE		TERMS	ENCLOSED
8447464	10/20/2023	\$0.00		Due on receipt	

ACCOUNT #

JJ142992

ROUTE

E-Route

DATE	DESCRIPTION	AMOUNT
10/20/2023	eFiling Accepted - Documents E-Filed with the clerk of the court Please login into to the portal to view/print/download your conformed copies, 10/20/2023 Civil Complex Center 751 W Santa Ana Blvd, Santa Ana, CA, 92701 Proposed Order Cover Sheet Electronic Filing, Proposed Stipulation And Order, Proposed Stipulation And Order	10.00
10/20/2023	EFM Fees	2.25
10/20/2023	Payment Processing Fee	0.37

BILLING CODE: Boone

CASE #: 30-2022-01268269-CU-OE-CXC

CASE NAME: Michael Boone vs. Sedgwick Claims

Mangement Services, Inc.

PAYMENT

12.62

BALANCE DUE

\$0.00

Janney and Janney Legal Support

840 N. Birch St.

Santa Ana, CA 92701

(714) 953-9451

Accounting@JanneyandJanney.com

Invoice**BILL TO**

Janelle Carney - Attorney at Law, APC

14758 Pipeline Ave Suite E

Chino Hills, CA 91709

Attn: Jerin Wilkinson

Billing Code: Boone

Order Requested by: Janelle Carney

INVOICE #	DATE	TOTAL DUE		TERMS	ENCLOSED
8629509	11/27/2023	\$0.00		Due on receipt	

ACCOUNT #

JJ142992

ROUTE

E-Route

DATE	DESCRIPTION	AMOUNT
11/21/2023	eFiling Accepted - Documents E-Filed with the clerk of the court Please login into to the portal to view/print/download your conformed copies, 11/21/2023 Civil Complex Center 751 W Santa Ana Blvd, Santa Ana, CA, 92701 Status Conference Statement	10.00
11/21/2023	EFM Fees	2.25
11/21/2023	Payment Processing Fee	0.37

BILLING CODE: Boone

CASE #: 30-2022-01268269-CU-OE-CXC

CASE NAME: Michael Boone vs. Sedgwick Claims
Mangement Services, Inc.

PAYMENT

12.62

BALANCE DUE

\$0.00

Janney and Janney Legal Support

840 N. Birch St.

Santa Ana, CA 92701

(714) 953-9451

Accounting@JanneyandJanney.com

Invoice**BILL TO**

Janelle Carney - Attorney at Law, APC

14758 Pipeline Ave Suite E

Chino Hills, CA 91709

Attn: Jerin Wilkinson

Billing Code: Boone

Order Requested by: Janelle Carney

INVOICE #	DATE	TOTAL DUE		TERMS	ENCLOSED
8800883	12/22/2023	\$0.00		Due on receipt	

ACCOUNT #

JJ142992

ROUTE

E-Route

DATE	DESCRIPTION	AMOUNT
12/22/2023	eFiling Accepted - Documents E-Filed with the clerk of the court Please login into to the portal to view/print/download your conformed copies, 12/22/2023 Civil Complex Center 751 W Santa Ana Blvd, Santa Ana, CA, 92701 Notice Of Motion, Memorandum Of Points And Authorities, Declaration In Support, Proposed Order Cover Sheet Electronic Filing, Proposed Order, Proposed Order, Proof Of Service	10.00
12/22/2023	EFM Fees	2.25
12/22/2023	Payment Processing Fee	0.37

BILLING CODE: Boone

CASE #: 30-2022-01268269-CU-OE-CXC

CASE NAME: Michael Boone vs. Sedgwick Claims

Mangement Services, Inc.

Order Requested by: Janelle Carney

PAYMENT

12.62

BALANCE DUE

\$0.00

Janney and Janney Legal Support

840 N. Birch St.

Santa Ana, CA 92701

(714) 953-9451

Accounting@JanneyandJanney.com

Invoice**BILL TO**

Janelle Carney - Attorney at Law, APC

14758 Pipeline Ave Suite E

Chino Hills, CA 91709

Attn: Jerin Wilkinson

Billing Code: Boone

Order Requested by: Janelle Carney

INVOICE #	DATE	TOTAL DUE		TERMS	ENCLOSED
8800883A	01/03/2024	\$0.00		Due on receipt	

ACCOUNT #

JJ142992

ROUTE

E-Route

DATE	DESCRIPTION	AMOUNT
01/03/2024	Court Fees Advanced to Complete Assignment	60.00
01/03/2024	Payment Processing Fee	1.80

BILLING CODE: Boone

PAYMENT

61.80

CASE #: 30-2022-01268269-CU-OE-CXC

BALANCE DUE

\$0.00

CASE NAME: Michael Boone vs. Sedgwick Claims

Mangement Services, Inc.

Order Requested by: Janelle Carney

Exhibit 7

INVOICE #
24163
Issue Date

6/30/2023

Billing Period

6/1/2023 - 6/30/2023

To

Janelle C. Carney, Esq.
Law Office of Janelle Carney
14758 Pipeline Ave.
Suite E
Chino Hills, CA 91709

Via Email

janelle@janellecarneylaw.com

IN RE:

Page 1 of 2

Michael Boone vs. Sedgwick Claims Management Services, Inc.

Professional Services		Total
Data Processing/Programming	\$	3,613.50
Project Supervision/Management		1,397.50
Review/Analysis of Discovery Materials		124.00
Communication with Client/Counsel		97.50
Subtotal for Professional Services		\$ 5,232.50
Total Due		\$ 5,232.50
If Paid Within 30 Days, Total Due		\$ 4,970.88

PLEASE REMIT PAYMENT VIA WIRE OR ACH PER INSTRUCTIONS BELOW*
Payment information:

Pacific Western Bank
ABA Routing # 122238200
SWIFT Code: FNSDUS6D
Account # 1001729969
Beneficiary: Econ One Research

If wire and ACH not possible, please remit check to:

Econ One Research
550 South Hope Street, Suite 800
Los Angeles, CA 90071

Federal Taxpayer ID # 95-4639689

**When paying via Wire or ACH, please also email receivables@econone.com indicating amount being transferred and the invoice(s) being paid.*

IN RE:

Michael Boone vs. Sedgwick Claims Management Services, Inc.



Name	Title		Rate	Hours	Description
Data Processing/Programming					
Alberto, I.	Analyst	\$	170	8.4	STATA data import and cleaning
Landon, A.	Analyst		155	1.0	SAS data handling/preparation for analysis
Landon, A.	Analyst		155	13.1	SAS data import and cleaning
Project Supervision/Management					
Daniel, M.	Senior Consultant		325	4.3	Project management/research supervision
Review/Analysis of Discovery Materials					
Landon, A.	Analyst		155	0.8	Organization/logging of case materials
Communication with Client/Counsel					
Daniel, M.	Senior Consultant		325	0.3	Telephone call with counsel/client

INVOICE #
24247
Issue Date

7/31/2023

Billing Period

7/1/2023 - 7/31/2023

To

Janelle C. Carney, Esq.
Law Office of Janelle Carney
14758 Pipeline Ave.
Suite E
Chino Hills, CA 91709

Via Email

janelle@janellecarneylaw.com

IN RE:

Page 1 of 2

Michael Boone vs. Sedgwick Claims Management Services, Inc.

Professional Services	Total	
Project Supervision/Management	\$	487.50
Data Processing/Programming		439.50
Communication with Client/Counsel		130.00
Subtotal for Professional Services	\$	1,057.00

Out-of-pocket Expenses	Total	
Data Expenses	\$	323.48
Subtotal for Out-of-pocket Expenses	\$	323.48

Total Due \$ 1,380.48
If Paid Within 30 Days, Total Due \$ 1,327.63
PLEASE REMIT PAYMENT VIA WIRE OR ACH PER INSTRUCTIONS BELOW*
Payment information:

Pacific Western Bank
ABA Routing # 122238200
SWIFT Code: FNSDUS6D
Account # 1001729969
Beneficiary: Econ One Research

If wire and ACH not possible, please remit check to:

Econ One Research
550 South Hope Street, Suite 800
Los Angeles, CA 90071

Federal Taxpayer ID # 95-4639689

**When paying via Wire or ACH, please also email receivables@econone.com indicating amount being transferred and the invoice(s) being paid.*

IN RE:

Michael Boone vs. Sedgwick Claims Management Services, Inc.



Name	Title		Rate	Hours	Description
Project Supervision/Management					
Daniel, M.	Senior Consultant	\$	325	1.5	Project management/research supervision
Data Processing/Programming					
Daniel, M.	Senior Consultant		325	1.3	STATA data handling/preparation for analysis
Alberto, I.	Analyst		170	0.1	STATA data import and cleaning
Communication with Client/Counsel					
Daniel, M.	Senior Consultant		325	0.4	Telephone call with counsel/client

INVOICE #
24471
IN RE:
Page 1 of 2
Michael Boone vs. Sedgwick Claims Management Services, Inc.
Issue Date

8/31/2023

Billing Period

8/1/2023 - 8/31/2023

To

Janelle C. Carney, Esq.
Law Office of Janelle Carney
14758 Pipeline Ave.
Suite E
Chino Hills, CA 91709

Via Email

janelle@janellecarneylaw.com

Professional Services
Total

Data Processing/Programming	\$	1,751.00
Project Supervision/Management		877.50
Data Entry		132.00

Subtotal for Professional Services \$ 2,760.50

Total Due \$ 2,760.50

If Paid Within 30 Days, Total Due \$ 2,622.48

PLEASE REMIT PAYMENT VIA WIRE OR ACH PER INSTRUCTIONS BELOW*
Payment information:

Pacific Western Bank
ABA Routing # 122238200
SWIFT Code: FNSDUS6D
Account # 1001729969
Beneficiary: Econ One Research

If wire and ACH not possible, please remit check to:

Econ One Research
550 South Hope Street, Suite 800
Los Angeles, CA 90071

Federal Taxpayer ID # 95-4639689

**When paying via Wire or ACH, please also email receivables@econone.com indicating amount being transferred and the invoice(s) being paid.*

IN RE:

Michael Boone vs. Sedgwick Claims Management Services, Inc.



Name	Title		Rate	Hours	Description
Data Processing/Programming					
Alberto, I.	Analyst	\$	170	3.7	STATA data import and cleaning
Lin, E.	Analyst		165	6.8	STATA data handling/preparation for analysis
Project Supervision/Management					
Daniel, M.	Senior Consultant		325	2.7	Project management/research supervision
Data Entry					
Karuppusamy, R.	Principal Economist		165	0.8	Data entry

INVOICE #
24599
Issue Date

9/30/2023

Billing Period

9/1/2023 - 9/30/2023

To

Janelle C. Carney, Esq.
Law Office of Janelle Carney
14758 Pipeline Ave.
Suite E
Chino Hills, CA 91709

Via Email

janelle@janellecarneylaw.com

IN RE:

Page 1 of 2

Michael Boone vs. Sedgwick Claims Management Services, Inc.

Professional Services	Total	
Data Processing/Programming	\$	247.50
Issue Research/Analysis		162.50
Project Supervision/Management		97.50
Subtotal for Professional Services	\$	507.50

Out-of-pocket Expenses	Total	
Research	\$	477.33
Subtotal for Out-of-pocket Expenses	\$	477.33

Total Due \$ 984.83
If Paid Within 30 Days, Total Due \$ 959.46
PLEASE REMIT PAYMENT VIA WIRE OR ACH PER INSTRUCTIONS BELOW*
Payment information:

Pacific Western Bank
ABA Routing # 122238200
SWIFT Code: FNSDUS6D
Account # 1001729969
Beneficiary: Econ One Research

If wire and ACH not possible, please remit check to:

Econ One Research
550 South Hope Street, Suite 800
Los Angeles, CA 90071

Federal Taxpayer ID # 95-4639689

**When paying via Wire or ACH, please also email receivables@econone.com indicating amount being transferred and the invoice(s) being paid.*

IN RE:

Michael Boone vs. Sedgwick Claims Management Services, Inc.



Name	Title		Rate	Hours	Description
Data Processing/Programming					
Lin, E.	Analyst	\$	165	1.5	STATA data handling/preparation for analysis
Issue Research/Analysis					
Daniel, M.	Senior Consultant		325	0.5	STATA data analysis/programming
Project Supervision/Management					
Daniel, M.	Senior Consultant		325	0.3	Project management/research supervision

INVOICE #
24870
Issue Date

11/10/2023

Billing Period

11/1/2023 - 11/10/2023

To

Janelle C. Carney, Esq.
Law Office of Janelle Carney
14758 Pipeline Ave.
Suite E
Chino Hills, CA 91709

Via Email

janelle@janellecarneylaw.com

IN RE:

Page 1 of 2

Michael Boone vs. Sedgwick Claims Management Services, Inc.
Professional Services
Total

Communication with Client/Counsel	\$	195.00
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Subtotal for Professional Services	\$	195.00
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Total Due	\$	195.00
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If Paid Within 30 Days, Total Due	\$	185.25
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PLEASE REMIT PAYMENT VIA WIRE OR ACH PER INSTRUCTIONS BELOW*
Payment information:

Pacific Western Bank
ABA Routing # 122238200
SWIFT Code: FNSDUS6D
Account # 1001729969
Beneficiary: Econ One Research

If wire and ACH not possible, please remit check to:

Econ One Research
550 South Hope Street, Suite 800
Los Angeles, CA 90071

Federal Taxpayer ID # 95-4639689

**When paying via Wire or ACH, please also email receivables@econone.com indicating amount being transferred and the invoice(s) being paid.*

IN RE:

Michael Boone vs. Sedgwick Claims Management Services, Inc.



Name	Title		Rate	Hours	Description
Communication with Client/Counsel					
Daniel, M.	Senior Consultant	\$	325	0.6	Responded to request by counsel/client

Exhibit 8

California Deposition Reporters, Inc.

448 E. Foothill Blvd Suite 101
San Dimas, CA 91773
Phone: 626-915-1996



Janelle Carney Law
Janelle Carney, Esq
14758 Pipeline Ave
Suite E
Chino Hills, CA 91709

Invoice #27816

Date	Terms
05/03/2023	Net 30

Job #225167 on 04/25/2023 at 9:00 AM PT

Client Case#: 30-2022-01268269-CU-OE-CX
Case: Boone vs. Sedgwick Claims Management
Services, Inc.

Court Docket#:

Location: All parties appearing remotely via Zoom
Remote, CA

Original Transcript Deposition of Michael Anderson

Amount Due: \$ 1,072.00
Paid: \$ 0.00

Balance Due:	\$ 1,072.00
Payment Due:	06/02/2023

Tax ID: 95-4168477

Failure to pay invoice in full by the due date will add late fees and interest at 1.5% a month. You will be responsible for any collection and court cost associated with collecting on this invoice. Any special rates and discounts are only valid if paid within terms, if not paid within terms normal rates and late fees will be applied. No changes, discounts or adjustments will be made after 30 days of the date of the invoice. We do not bill your clients directly, attorney/law firm is responsible for the payment of their invoices. Amount shown is discounted for payments by check. If you prefer to pay via credit card for your convenience we will accept all major credit cards with a 5% surcharge.

California Deposition Reporters, Inc.

448 E. Foothill Blvd Suite 101
San Dimas, CA 91773
Phone: 626-915-1996



Janelle Carney Law
Janelle Carney, Esq
14758 Pipeline Ave
Suite E
Chino Hills, CA 91709

Invoice #27981

Date	Terms
05/10/2023	Net 30

Job #225168 on 04/26/2023 at 9:00 AM PT

Client Case#: 30-2022-01268269-CU-OE-CX

Case: Boone vs. Sedgwick Claims Management
Services, Inc.

Court Docket#:

Location: All parties appearing remotely via Zoom
Remote, CA

Original Transcript Deposition of Amy Johnson

Amount Due: \$ 1,075.75
Paid: \$ 0.00

Balance Due:	\$ 1,075.75
Payment Due:	06/09/2023

Tax ID: 95-4168477

Failure to pay invoice in full by the due date will add late fees and interest at 1.5% a month. You will be responsible for any collection and court cost associated with collecting on this invoice. Any special rates and discounts are only valid if paid within terms, if not paid within terms normal rates and late fees will be applied. No changes, discounts or adjustments will be made after 30 days of the date of the invoice. We do not bill your clients directly, attorney/law firm is responsible for the payment of their invoices. Amount shown is discounted for payments by check. If you prefer to pay via credit card for your convenience we will accept all major credit cards with a 5% surcharge.

California Deposition Reporters, Inc.

448 E. Foothill Blvd Suite 101
San Dimas, CA 91773
Phone: 626-915-1996



Janelle Carney Law
Janelle Carney, Esq
14758 Pipeline Ave
Suite E
Chino Hills, CA 91709

Invoice #27805

Date	Terms
05/03/2023	Net 30

Job #225280 on 04/24/2023 at 9:00 AM PT**Client Case#:** 30-2022-01268269-CU-OE-CX**Case:** Boone vs. Sedgwick Claims Management
Services, Inc.**Court Docket#:****Location:** All parties appearing remotely via Zoom
Remote, CA**Original Transcript Deposition of Haley Miller**

Amount Due:	\$ 1,060.00
If paid after 06/02/2023:	\$ 15.90
Paid:	\$ 0.00

Balance Due:	\$ 1,075.90
Payment Due:	06/02/2023

Tax ID: 95-4168477

Failure to pay invoice in full by the due date will add late fees and interest at 1.5% a month. You will be responsible for any collection and court cost associated with collecting on this invoice. Any special rates and discounts are only valid if paid within terms, if not paid within terms normal rates and late fees will be applied. No changes, discounts or adjustments will be made after 30 days of the date of the invoice. We do not bill your clients directly, attorney/law firm is responsible for the payment of their invoices. Amount shown is discounted for payments by check. If you prefer to pay via credit card for your convenience we will accept all major credit cards with a 5% surcharge.

Exhibit 9



INVOICE

W - SAN DIEGO
16825 Northchase Drive Suite 900
Houston TX 77060
Phone: 619-573-4883 Fax: 619-535-7033

Janelle Carney, Esquire
Janelle Carney, Attorney at Law, APC
14758 Pipeline Avneue Suite E, 2nd Floor
Chino Hills CA 91709

Invoice No.	Invoice Date	Payment Terms
20230422349-11	5/12/2023	Net 30
Job No.	Job Date	Balance
6364467	4/27/2023	\$1663.30
Case Name		
Michael Boone v. Sedgwick Claims Management Services, Inc		
Case No.		
30202201268269CUOECXC		

Job Location	Ordered By	Reference Info.
U.S. Legal Support - Remote VideoConference	Janelle Carney, Esquire Janelle Carney, Attorney at Law, APC 14758 Pipeline Avneue Suite E, 2nd Floor Chino Hills CA 91709	Client Matter No: Claim No: Insured: D/O/L:

1 CERTIFIED COPY OF TRANSCRIPT OF: Michael James Boone

Online bill pay available at https://corporatebillpay.uslegalsupport.com/ Thank you for your business!	Total Due	\$1,663.30
	AFTER 6/26/2023 PAY	\$1,912.80
	(-) Payments/Credits	\$0.00
	(+) Finance Charges/Late Fees	\$0.00
	(=) New Balance	\$1,663.30

Tax ID : 76-0523238 Nevada Firm Registration # 067F

Phone: 9095219609

Invoice not paid by due date is subject to interest of 1.5% per month. We will make reasonable efforts to allocate payments properly. U.S. Legal Support may recover any fees and costs it incurs in collecting any unpaid amounts. Any rights regarding allocations, refunds or adjustments after 90 days from payment shall be waived by payer.
Review our Terms & Conditions for additional information at our website www.uslegalsupport.com.

"Please detach bottom portion and return with payment."

Janelle Carney, Esquire
Janelle Carney, Attorney at Law, APC
14758 Pipeline Avneue Suite E, 2nd Floor
Chino Hills CA 91709

Invoice No.	20230422349-11	Invoice Date	5/12/2023
Job No.	6364467	Case No.	30202201268269CUOECXC
Total Due	\$1663.30		

Remit To: **U.S. Legal Support, Inc.**
P.O. Box 4772
Houston, TX 77210

PAY BY CREDIT CARD



Cardholder's Name:	
Card Number:	
Exp. Date:	Phone:
Billing Address:	
Zip:	Card Security Code:
Amount to Charge:	
Cardholder's Signature:	

Exhibit 10

Boone v. Sedgwick Claims Management Services, Inc.

AMENDMENT TO THE PAGA SETTLEMENT AGREEMENT

Pursuant to the Court's March 21, 2024 Order: the Parties enter into this Amendment to the PAGA Settlement Agreement executed on or about December 2, 2023 ("Agreement"). Only sections modified are included herein and should be read in conjunction with the full Agreement dated December 2, 2023.

Section 4.4.1 of the Agreement is modified to include language as follows:

4.4.1 The Administrator will issue checks for the Individual PAGA Payments and send them to the Aggrieved Employees via First Class U.S. Mail, postage prepaid. The face of each check shall prominently state the date (not less than 180 days after the date of mailing) when the check will be voided. The Administrator will cancel all checks not cashed by the void date. Before mailing any checks, the Settlement Administrator must update the recipients' mailing addresses using the National Change of Address Database.

The Aggrieved Employees will have an opportunity to dispute the number of pay periods as detailed in the Proposed Notice to attached hereto as Exhibit 1.

Section 5.2 of the Agreement, "Release by Aggrieved Employees" is modified to strike language as follows:

All Aggrieved Employees are deemed to release, on behalf of themselves and their respective former and present representatives, agents, attorneys, heirs, administrators, successors and assigns, the Released Parties from all claims for PAGA penalties during the PAGA Period that were alleged, or reasonably could have been alleged, based on the facts stated in the Operative Complaint, and the PAGA Notice, including all PAGA claims pled or that could have been pled in the Operative Complaint pursuant to PAGA, California Labor Code §§ 2698, *et seq.*, ~~deriving from and/or based on the facts alleged in the Operative Complaint and/or Plaintiff's PAGA Notice,~~ arising out of or related to services to or work performed for Sedgwick during the PAGA Period ~~upon approval of the settlement,~~ including claims for penalties, interest, attorneys' fees and/or costs. The release shall encompass all claims, causes of action or liability pursuant to PAGA, including any penalties based on alleged violations of the IWC Wage Orders or California Labor Code sections 558, 1197.1, 510, 1194, 226.7, 203, and 226. The release shall include Sedgwick and all of its parent, subsidiary, related companies and entities, as well as its/their officers, directors, investors, owners, shareholders, employees, partners, agents, and attorneys, and any entities or partnerships.

AGREED AND EXECUTED ON THIS 3rd DAY OF July 2024.

Plaintiff:

DocuSigned by:

Michael Boone

D3G09805101844E...

Michael Boone

Defendant:

By: _____

Its: _____

AGREED AND EXECUTED ON THIS ³___ DAY OF JULY 2024.

Plaintiff:

Michael Boone

Defendant:

DocuSigned by:

Doug Foster

0D72BB9F56CF498...

By: Doug Foster

Its: Senior Vice President Managing Counsel

Exhibit 11

July 2, 2024

[NAME]
[ADDRESS]

Re: *Boone v. Sedgwick Claims Management Services, Inc.*

As the Settlement Administrator in the above-referenced lawsuit, we are writing to inform you that you are entitled to payment pursuant to the settlement of this lawsuit.

On July 1, 2022, Michael Boone (“Boone”) filed a lawsuit against his former employer, Sedgwick Claims Management Services, Inc., seeking civil penalties under the California Labor Code Private Attorneys General Act (“PAGA”). PAGA authorizes aggrieved employees to file lawsuits to recover civil penalties on behalf of themselves, other employees, and the State of California for Labor Code violations.

Boone alleges Sedgwick violated several provisions of the California Labor Code. He claims Sedgwick failed to pay for all time worked, including travel time to the first location, and return from last location assigned. Sedgwick denies that it violated any laws and maintains that it consistently paid employees all wages due.

The settlement covers the following individuals:

- All current and former non-exempt SIU field investigator employees who have worked for Defendant in California during the period of July 1, 2021, through December 31, 2023.

You are receiving this letter because you worked for Sedgwick during this time frame.

To avoid the expense and uncertainty of further litigation, the parties reached an agreement to settle the lawsuit for all civil penalties. On _____, the settlement was approved by the Orange County Superior Court.

Under the settlement, all allegedly aggrieved employees will receive a payment representing Labor Code penalties in an amount according to the number of pay periods they worked for Sedgwick between July 1, 2021 and December 31, 2023. Your settlement check is enclosed. It is based on the number of pay periods you worked during this time. You are responsible for any taxes payable on any amounts received.

The total settlement for the PAGA penalties is \$45,000.00. The settlement is broken down as follows:

- \$15,000.00 for Attorneys' Fees
- \$22,000.00 for costs, including the cost of Boone's expert
- \$2,450.00 for ILYM Group, Inc. (neutral administrator)
- Under the Labor Code, 75% of the net settlement of penalties is payable to the California Labor and Workforce Development Agency ("LWDA"). The amount payable to the LWDA is \$4,162.50.
- The remaining 25% of the settlement of penalties is distributed to the aggrieved employees: \$1,387.50.

The release that accompanies this settlement check is as follows:

All Aggrieved Employees are deemed to release, on behalf of themselves and their respective former and present representatives, agents, attorneys, heirs, administrators, successors and assigns, the Released Parties from all claims for PAGA penalties during the PAGA Period that were alleged, or reasonably could have been alleged, based on the facts stated in the Operative Complaint, and the PAGA Notice, including all PAGA claims pled or that could have been pled in the Operative Complaint pursuant to PAGA, California Labor Code §§ 2698, et seq. arising out of or related to services to or work performed for Sedgwick during the PAGA Period, including claims for penalties, interest, attorneys' fees and/or costs. The release shall encompass all claims, causes of action or liability pursuant to PAGA, including any penalties based on alleged violations of the IWC Wage Orders or California Labor Code sections 558, 1197.1, 510, 1194, 226.7, 203, and 226. The release shall include Sedgwick and all of its parent, subsidiary, related companies and entities, as well as its/their officers, directors, investors, owners, shareholders, employees, partners, agents, and attorneys, and any entities or partnerships.

You are not able to exclude yourself from this settlement, and you will be bound by the above release even if you refuse to cash your settlement check). However, you are not releasing any individual wage claims you may have against Sedgwick.

The Court did not make any merit determinations. Please do not contact the Court. If you have any questions, please direct them to us at the following number: _____

Exhibit 12

Janelle Carney, Esq. (Bar No. 201570)
JANELLE CARNEY—ATTORNEY AT LAW, APC
14758 Pipeline Ave., Suite E, 2nd Fl.
Chino Hills, CA 91709
Tel.: (909) 521-9609; Fax: (909) 393-0471
Email: Janelle@JanelleCarneyLaw.com
Attorneys for Plaintiff MICHAEL BOONE, an individual
on behalf of himself and the general public

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF ORANGE

MICHAEL BOONE, an individual, on
behalf of himself and the general public,

Plaintiff,

vs.

SEDGWICK CLAIMS
MANAGEMENT SERVICES, INC., an
Illinois Corporation; and DOES 1
through 100, inclusive,

Defendants.

Case No.: 30-2022-01268269-CU-OE-CXC
Hon. Melissa McCormick
Dept.: CX-104

CLASS ACTION

**REVISED [PROPOSED] ORDER
GRANTING PLAINTIFF'S MOTION FOR
COURT APPROVAL OF PAGA
SETTLEMENT AND ENTERING
JUDGMENT**

Date: ~~March 21~~ July 18, 2024
Time: 2:00 p.m.
Dept. CX-104

Reservation No.: 74177449

Action Filed: July 1, 2022

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**REVISED [PROPOSED] ORDER GRANTING PLAINTIFF'S MOTION FOR COURT
APPROVAL OF PAGA SETTLEMENT AND ENTERING JUDGMENT**

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1 This matter came on for hearing before the Honorable Melissa R. McCormick, Dept.
2 CX-104 on _____, at 2:00 p.m., in the above-entitled Court located at Orange County
3 Superior Court–Civil Complex Center, 751 West Santa Ana Blvd., Santa Ana, CA 92701 on
4 Plaintiff, Michael Boone’s, (“Plaintiff”) Motion for Court Approval of PAGA Settlement
5 (“PAGA Approval Motion”). Having considered the papers filed in support of the motion;
6 arguments of counsel; and all files, records, and other matters properly before the Court, the
7 Court hereby determines as follows:

8 (A) The settlement was entered into in good faith, and the terms of the settlement are
9 fair, reasonable and adequate and comply with the requirements of Labor Code § 2699, after
10 considering the maximum potential recovery, the merits of Plaintiff’s claims, and the means by
11 which the parties arrived at the settlement;

12 (B) The fees requested by Plaintiff’s counsel are reasonable given: (a) the hours
13 worked by Plaintiff’s counsel; (b) the results achieved; (c) the risks of litigation; (d) the skill
14 required and the quality of work; and (e) the contingent nature of the fee.

15 (C) The litigation costs and settlement administration expenses requested by
16 Plaintiff’s counsel are also reasonable.

17 (D) Plaintiff exhausted all administrative remedies required to bring the PAGA
18 claims asserted in this action and was authorized to act as private attorney general with respect
19 to the PAGA claims being released under the terms of the PAGA Settlement Agreement. The
20 California Labor Workforce Development Agency (“LWDA”) was provided with notice of the
21 Settlement and the motion for approval of the PAGA settlement via its online process and no
22 objection has been received to the settlement or the motion from the LWDA.

23 The Court, having considered the proposed PAGA Settlement Agreement (“Settlement
24 Agreement” or “PAGA Settlement Agreement²³” and Amended PAGA Settlement Agreement
25 (true and correct copies of which are attached hereto as Exhibit 1 and 2, respectively) between
26 Plaintiff and Defendant pursuant to Labor Code § 2699(1):

27 ///

28 ///

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**REVISED [PROPOSED] ORDER GRANTING PLAINTIFF’S MOTION FOR COURT
APPROVAL OF PAGA SETTLEMENT**

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1 **GOOD CAUSE APPEARING, IT IS HEREBY ORDERED, ADJUDGED AND**
2 **DECREED AS FOLLOWS:**

3 (1) Plaintiff's PAGA Approval Motion is **GRANTED**.

4 In accordance with the PAGA Settlement Agreement, the Gross Settlement Amount of
5 \$45,000 shall be distributed as follows:

- 6 a. Plaintiff's counsel is awarded attorney's fees in the amount of \$15,000.00 and
7 litigation costs in the amount of \$22,000.00.
- 8 b. Settlement administration expenses are approved in the amount of \$2,450.00.
- 9 c. The Net Settlement Amount/PAGA Penalties -in the amount of \$5,550.00
10 shall be distributed 75% to the LWDA, in the amount of \$4,162.50, and 25%
11 to the eight Aggrieved Employees, in the amount of \$1,387.50. Aggrieved
12 Employees are defined as all current and former non-exempt SIU field
13 investigator employees who have worked for Defendant in California during
14 the period of July 1, 2021, through December 31, 2023.

15 (2) Effective on the date when Defendant fully funds the Gross Settlement Amount,
16 Plaintiff, the Aggrieved Employees, ~~the LWDA,~~ and Plaintiff's counsel are bound by the release
17 of claims set forth in the PAGA Settlement Agreement and set forth below. ~~The LWDA,~~
18 Plaintiff, the Aggrieved Employees, and Plaintiff's counsel are deemed to have conclusively
19 released and forever discharged the Released Parties (as defined in the PAGA Settlement
20 Agreement) from any and all Released PAGA Claims set forth in the PAGA Settlement
21 Agreement and are hereby permanently barred and enjoined from the institution or prosecution
22 of any and all Released PAGA Claims against the Released Parties.

23 **a. Plaintiff's Release:**

24 Plaintiff and his respective former and present spouses, representatives, agents,
25 attorneys (including PAGA Counsel), heirs, administrators, successors and assigns generally,
26 release and discharge Released Parties from all claims, transactions or occurrences, including,
27 but not limited to: all claims that were, or reasonably could have been, alleged, based on the
28 facts contained in the Operative Complaint and the PAGA Notice ("Plaintiff's Release").

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**REVISED [PROPOSED] ORDER GRANTING PLAINTIFF'S MOTION FOR COURT
APPROVAL OF PAGA SETTLEMENT**

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Plaintiff's Release does not extend to any claims or actions to enforce this Agreement, or to any claims for vested benefits, unemployment benefits, disability benefits, social security benefits, workers' compensation benefits that arose at any time or based on occurrences outside the PAGA Period. Plaintiff acknowledges that Plaintiff may discover facts or law different from, or in addition to, the facts or law that Plaintiff now knows or believes to be true but agrees, nonetheless, that Plaintiff's Release shall be and remain effective in all respects, notwithstanding such different or additional facts or Plaintiff's discovery of them.

b. Plaintiff's Waiver of Rights Under Civil Code Section 1542:

For purposes of Plaintiff's Release, Plaintiff expressly waives and relinquishes the provisions, rights, and benefits, if any, of section 1542 of the California Civil Code, which reads:

A general release does not extend to claims that the creditor or releasing party does not know or suspect to exist in his or her favor at the time of executing the release, and that if known by him or her would have materially affected his or her settlement with the debtor or Released Party.

c. Release by Aggrieved Employees:

All Aggrieved Employees are deemed to release, on behalf of themselves and their respective former and present representatives, agents, attorneys, heirs, administrators, successors and assigns, the Released Parties from all claims for PAGA penalties during the PAGA Period that were alleged, or reasonably could have been alleged, based on the facts stated in the Operative Complaint, and the PAGA Notice, including all PAGA claims pled or that could have been pled in the Operative Complaint pursuant to PAGA, California Labor Code §§ 2698, *et seq.*, ~~deriving from and/or based on the facts alleged in the Operative Complaint and/or Plaintiff's PAGA Notice~~, arising out of or related to services to or work performed for Sedgwick during the PAGA Period ~~upon approval of the settlement~~, including claims for penalties, interest, attorneys' fees and/or costs. The release shall encompass all claims, causes of action or liability pursuant to PAGA, including any penalties based on alleged violations of the IWC Wage Orders or California Labor Code sections 558, 1197.1, 510, 1194, 226.7, 203, and 226. The release shall include Sedgwick and all of its parent, subsidiary, related companies and entities, as well as

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- 3 -

REVISED [PROPOSED] ORDER GRANTING PLAINTIFF'S MOTION FOR COURT APPROVAL OF PAGA SETTLEMENT

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its/their officers, directors, investors, owners, shareholders, employees, partners, agents, and attorneys, and any entities or partnerships.

////

d. Release by PAGA Counsel:

PAGA Counsel release on behalf of their present and former attorneys, employees, agents, successors and assigns the Released Parties from all claims for PAGA Fees incurred in connection with the Operative Complaint and the facts stated in the Operative Complaint and the PAGA Notice during the PAGA Period.

(3) The appointment of ILYM Group, Inc. as third-party settlement administrator is approved, and ILYM Group, Inc. is ORDERED to effectuate the settlement of this action in accordance with the PAGA Settlement Agreement and any amendments thereto, including payments to allegedly aggrieved employees representing Labor Code penalties in an amount according to the number of pay periods they worked for Sedgwick between July 1, 2021 through December 31, 2023.

(4) A true and correct copy of the Notice to accompany the settlement payments issued by third-party administrator ILYM Group, Inc. to the Aggrieved Employees is attached hereto as Exhibit 3.

(3)(5) Plaintiff shall provide Notice of this Order to the LWDA within 10 calendar days after its entry.

(4)(6) Neither the Settlement Agreement, nor any terms of the Settlement Agreement, are an admission of liability by the Released Parties, nor is the Court's instant Order a finding of the validity of any claims in the lawsuit or of any wrongdoing by any Released Parties.

(5)(7) Without affecting the finality of this Order or the dismissal referenced below, in accordance with California law, including, but not limited to Code of Civil Procedure §664.6, the Court retains jurisdiction of all matters relating to the interpretation, administration, implementation, effectuation and enforcement of this Order and Judgment and the PAGA Settlement Agreement.

(6)(8) The case, and all claims therein, are hereby dismissed with prejudice against all

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REVISED [PROPOSED] ORDER GRANTING PLAINTIFF'S MOTION FOR COURT APPROVAL OF PAGA SETTLEMENT

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1 parties.

2 ~~(7)~~(9) This Order and Judgment is intended to be a final disposition of the action in its
3 entirety, and it is intended to be immediately appealable.

4 ~~(8)~~(10) The parties are ordered to carry out the terms of the settlement in accordance
5 with the terms of the PAGA Settlement Agreement.

6 ~~(9)~~(11) The Court sets a non-appearance final accounting hearing for _____,
7 ~~2024~~February 27, 2025 at 9:00 a.m. with a compliance status report to be filed at least ~~five~~nine
8 (9) Court days before the hearing.

9 ###

10 ###

11 ###

12 ###

13 ###

14 JUDGMENT

15 Judgment shall be entered through the filing of this Order and Judgment. (Code Civ.
16 Proc., § 668.5.) Plaintiff shall take from the operative complaint in this action only the relief set
17 forth in the PAGA Settlement Agreement and this Order and Judgment.

18
19 IT IS SO ORDERED.

20
21 Date: _____

22 Honorable Melissa R. McCormick
23 Judge of the Superior Court
24
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**REVISED [PROPOSED] ORDER GRANTING PLAINTIFF'S MOTION FOR COURT
APPROVAL OF PAGA SETTLEMENT**

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