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Attorneys for Plaintiff Karla Godinez,
individually, and on behalf of all other
similarly situated employees

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

KARLA GODINEZ, as an individual
and on behalf of other similarly
situated employees,

Plaintiff,

v.

MERRITT HOSPITALITY, LLC, a
Delaware limited liability company,
and DOES 1-50, inclusive,

Defendant.

Case No.: 8:20-cv-00941-JWH-KES

*Assigned for all purposes to the
Honorable John W. Holcomb &
Magistrate Judge Karen E. Scott*

**DECLARATION OF ARMOND M.
JACKSON IN SUPPORT OF THE
MOTION FOR ATTORNEYS'
FEES, COSTS, AND EXPENSES,
AND A CLASS REPRESENTATIVE
INCENTIVE AWARD**

Date: January 19, 2024

Time: 9:00 a.m.

Place: Courtroom 9D

Action Filed: January 29, 2020
(Orange County Superior Court, Case
No. 30-2020-01127848-CU-OE-CXC)
Trial Date: None

1 **DECLARATION OF ARMOND M. JACKSON**

2 I, Armond M. Jackson, hereby declare as follows:

3 1. I am an attorney licensed to practice before all courts of the State of
4 California. I am an attorney for Jackson Law, APC, counsel of record for Plaintiff
5 Karla Godinez (“Plaintiff”) in the above-captioned action. My knowledge of the
6 information provided herein is based on a combination of personal knowledge and
7 my review of the case file and conferences with counsel. I make this declaration in
8 support of the Motion for Attorneys’ Fees, Costs and Expenses, and a Class
9 Representative Incentive Award.

10 **QUALIFICATIONS AND EXPERIENCE**

11 2. I have been a California licensed attorney since November 2011. I
12 began my career in law while still in law school when in I served as a law clerk for
13 the Pedersen Law & Dispute and Resolution Corporation (“PLDRC”) handling
14 employment related litigation matters. While clerking for PLDRC I analyzed and
15 organized discovery documents and researched employment litigation issues such
16 as Sexual Harassment, Race Discrimination and Wrongful Termination. I worked
17 as an associate attorney at Pedersen McQueen between March 2013 through
18 January 2017 almost exclusively engaging in employment matters representing
19 employees. I have litigated several wage and hour case to trial and currently
20 litigating or have litigated cases valued in the six and seven figure dollar range,
21 including representative actions. I had primary responsibility for approximately 20
22 litigation matters on average throughout my employment at PLDRC and Pedersen
23 McQueen and Pedersen Law. I regularly practiced in state court and sometimes
24 federal court. As an associate, my responsibilities included carrying primary case
25 responsibility which includes tasks like taking depositions, conducting damages
26 analysis, analyzing discovery documents, conducting client intake, developing
27 discovery and litigation strategies, participating in mediations and arbitrations,
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engaging in settlement negotiations, trial preparation and trial work, as well as other responsibilities that commonly coincide with managing cases from start to finish. I have been a member of local bar associations, including the Orange County Bar Association, as well as the State Bar of California and American Bar Association and served in a number of leadership roles at all levels. Most notably, I served as a Committee Member of the Orange County Bar Association Young Lawyers' Education Committee and Social Committee.

3. In January 2017, I officially started my own practice Jackson Law, APC. Throughout my career, I have currently litigated approximately 100 Private Attorney General Act cases and/or class action cases to resolution by way of settlement or trial. Over the course of my career, I have litigated above 150 employment cases, including wage and hour representative actions to resolution by way of settlement, default or trial. I have argued before the Ninth Circuit and achieved a reversal and published opinion. Based upon my experience, I believe the benefit conferred by the proposed Settlement is eminently fair and reasonable, and is in the best interests of the Class Members because (1) of the monetary benefits to the Class Members and (2) avoiding the risk, delay, and uncertainty of continued litigation.

4. Jackson Law, APC advanced 100% of all costs for this matter.

5. Plaintiff's counsel has been certified by the United States District Court, Central District of California, Hon. Josephine L. Staton in *Chacon v. Express Fashion*, Case No. 8:19-cv-00564-JLS-DFM and appointed class counsel for several other state courts including, *Kim v. FNS, Inc.*, Los Angeles Superior Court, Case No. BC 578015; *Demery v. Pacific Rim Capital Alliance Corporation et al.*, San Diego Superior Court, Case No. 37-2017-00003415-CU-OE-CTL; *Hernandez v. Personnel Staffing Group, LLC et al.*, Orange County Superior Court, Case No. 30-2017-00899277-CU-OE-CXC; *Santisteban v. Rod Fraser*

1 *Enterprises, Inc. et al*, Orange County Superior Court; *Ajin v. Lymi, Inc*, Los
2 Angeles County Superior Court, Case No. BC696168; *Taylor v. G.I. Trucking*
3 *Company dba Estes West et al*, Los Angeles Superior Court, Case No. BC722778.

4 6. Below is a list of prior wage and hour representative actions on which
5 I have served as lead or co-counsel.

6 1. *Kim v. FNS, Inc.*, Los Angeles Superior Court, Case No. BC 578015

7 2. *Demery v. Pacific Rim Capital Alliance Corporation et al.*, San Diego
8 Superior Court, Case No. 37-2017-00003415-CU-OE-CTL

9 3. *Goldbaum v. Dollarsmart et al.*, San Diego Superior Court, 30-2015-
10 000077437-CU-WT-CLT

11 4. *Hernandez v. Personnel Staffing Group, LLC et al.*, Orange County
12 Superior Court, Case No. 30-2017-00899277-CU-OE-CXC

13 5. *Sanchez, et al v. Pueblo Restaurant, Inc. dba Casa Torres*, Los Angeles
14 Superior Court, Case No. BC697241

15 6. *Augusto v. HIOG Management Services, LLC, et al.*, San Bernardino
16 Superior Court, Case No. CIVDS1610431

17 7. *Mendoza v. McNeal, Duckworth and McNeal, Inc.*, Orange County
18 Superior Court, Case No. 30-2017-00899290-CU-OE-CXC

19 8. *Ortiz v. Bayside Insurance Associates, Inc. et al*, Orange County Superior
20 Court, Case No. 30-2016-00895669-CU-OE-CXC

21 9. *Paramo v. Quest Nutrition LLC et al.*, Los Angeles County Superior
22 Court, Case No. BC609306

23 10. *Luis v. Second Street Corporation dba Huntley House Hotel*, Los
24 Angeles County Superior Court, Case No. BC691018

25 11. *Venegas, at al. v. Bergen Shippers Corp, et al*, Los Angeles County
26 Superior Court, Case No. BC715217

12. *Bernal v. Bristol Equity Partners LP et al*, Orange County Superior Court, Case No. 30-2016-00854699-CU-OE-CXC
13. *Rowe v. Rasier-CA, LLC*, Orange County Superior Court, Case No. 30-2018-00989673-CU-OE-CXC
14. *Martinez v. Habit Restaurants, LLC, The et al*, Orange County Superior Court, Case No. 30-2016-00840385-CU-OE-CJC
15. *Radilla v. States Logistics Services, Inc.*, Orange County Superior Court, Case No. 30-2018-00978231-CU-WT-CJC
16. *Rodriguez v. Lampson Sewing Incorporated et al*, Orange County Superior Court, Case No. 30-2017-00900653-CU-OE-CJC
17. *January v. Discovery Management Inc. et al*, Los Angeles Superior Court, Case No. BC635918
18. *Angel Hernandez v. Merchants Landscape Services, Inc. et al.*, Los Angeles Superior Court, Case No. BC674131
19. *Quezada v. Garden Fresh Restaurant Corp. et al*, Orange County Superior Court, Case No. 30-2016-00840321-CU-OE-CJC
20. *Munoz v. Batten Down, Inc. et al*, Los Angeles County Superior Court, Case No. BC617880
21. *Salgado v. Resort at Pelican Hill, LLC et al*, Orange County Superior Court, Case No. 30-2016-00840386-CU-OE-CJC
22. *Darmawati v. Westview Services Inc.*, Orange County Superior Court, Case No. 30-2015-00795449-CU-OE-CJC
23. *Escobar v. Westcoast Textiles, Inc. et al*, Orange County Superior Court, Case No. 30-2018-00979111-CU-OE-CXC
24. *Chacon v. Express Fashion Operations, LLC*, Orange County Superior Court, Case No. 30-2017-00900648-CU-OE-CXC

1 25. *Chacon v. Express Fashion Operations, LLC*, Orange County Superior
2 Court, Case No. 8:19-cv-00564
3 26. *Plascencia v. RM HQ, LLC, dba Real Mex Restaurants*, Orange County
4 Superior Court, Case No. 30-2017-00926015-CU-OE-CXC
5 27. *Casas v. PC Hospitality et al.*, Orange County Superior Court,
6 Case No. 30-2016-00877489-CU-OE-CXC
7 28. *Leon v. SWH Mimi's Café, LLC*, Orange County Superior Court,
8 Case No. 30-2018-00978815-CU-OE-CXC
9 29. *Quintanilla v. Southwest Wine & Spirits, LLC*, Los Angeles Superior
10 Court, Case No. BC653817
11 30. *Fabiola Rodriguez v. Second Floor Food, Drinks and Art, LLC*, Orange
12 County Superior Court, Case No. 30-2018-00981362-CU-WT-CXC
13 31. *Santisteban v. Rod Fraser Enterprises, Inc. et al*, Orange County
14 Superior Court, Case No. 30-2017-00904202-CU-OE-CXC
15 32. *Milano v. Lev Tambor dba Distractions Lounge*, Orange County
16 Superior Court, Case No. 30-2018-00966582-CU-WT-CXC
17 33. *Ajin v. Lymi, Inc*, Los Angeles County Superior Court, Case No.
18 BC696168
19 34. *Recinos v. Pacific American Fish Co., et al*, Los Angeles Superior Court,
20 Case No. BC710735
21 35. *Valle-Valdez v. St. Jude Hospital Yorba Linda, et al*, Orange County
22 Superior Court, Case No. 30-2015-00795457-CU-OE-CJC
23 36. *Juarez v. Arakelian Enterprises, Inc.*, et al, Los Angeles Superior Court,
24 Case No. BC710736
25 37. *Solarzano v. T&J Fresh Co. dba Chomp Sushi*, Orange County Superior
26 Court, Case No. 30-2018-00981299-CU-OE-CXC
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- 1 38. *Taylor v. G.I. Trucking Company dba Estes West et al*, Los Angeles
2 Superior Court, Case No. BC722778
- 3 39. *Rendon v. L & L Foods Holdings, LLC, et al*, Orange County Superior
4 Court, Case No. 30-2018-00982745-CU-OE-CXC
- 5 40. *Magana v. Zara USA, Inc., et al*, Orange County Superior Court,
6 Case No. 8:18-cv-02249-AG (ADSx)
- 7 41. *Flores v. ABM Industry Groups, LLC et al*, Orange County Superior
8 Court, Case No. 30-2018-00971152-CU-WT-CJC
- 9 42. *Diaz v. Macy's West Stores, Inc. dba Macy's*, Central District of
10 California, Case No. SACV19-00303 ODW (MAAx)
- 11 43. *Aguirre v. Shelfmaster et al*, Orange County Superior Court, 30-2015-
12 00787557-CU-OE-CJC
- 13 44. *Goldman v. Encore Energy, Inc.*, Los Angeles County Superior Court,
14 BC606773
- 15 45. *Munoz v. 8947 Sunset Pizza, LLC et al.*, Los Angeles Superior Court,
16 Case No. BC646999

17 7. On December 22, 2023, I extrapolated the cost and time sheet entries
18 for this matter maintained through my firm's Legal Practice Management
19 Software. My firm advanced all itemized cost contained in the attached record and
20 attached hereto as **Exhibit A** is a true and correct copy of the record maintained on
21 my practice management software for cost incurred. Attached hereto as **Exhibit B**
22 is a true and correct copy of the record maintained on my practice management
23 software for time entries regarding this case

24 8. My hourly rate is \$725. The other attorneys and staff whom worked
25 on this matter are comprised of Andrea Fernandez- Jackson whom is an 9-year
26 California licensed attorney with a billable rate of \$515 per hour which should be
27 considered reasonable. Ms. Fernandez-Jackson has argued before the Ninth Circuit
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1 and has achieved a reversal from the Ninth Circuit. Another attorney at my office
2 Anthony Filer Jr. also worked on this matter whom is a 2-year California licensed
3 attorney with a billable rate of \$250 per hour which should be considered
4 reasonable. Yesenia Villalba whom is a paralegal with over five years of legal
5 experience with a billable rate of \$145 which should be considered reasonable.
6 Attached hereto as **Exhibit C** is a true and correct copy of the Laffey Fee Matrix.

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9 I declare under the penalty of perjury under the laws of the State of
10 California that the foregoing is true and correct. Executed on this 22nd day of
11 December 2023 in Irvine, California.

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14 /s/ Armond M. Jackson
15 Armond M. Jackson, Declarant
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EXHIBIT A

INVOICE

Company Logo

Jackson APC,

BILL TO

Karla Godinez
655 Baker St. Apt. Y 107
Costa Mesa CA 92626

Invoice Number: 592
Invoice Date: 12/22/2023
Terms: 30

Due Date: **1/21/2024**
Amount Due: **\$13,505.60**
Invoice Start Date:
Invoice End Date:

TIME

Date	Description	Team Member	Code	Code 2	Rate	Hours	Total
							\$0.00

EXPENSES

Date	Description	Code	Code 2	Qty	Price	Unit	Total
01/30/20	One Legal Invoice 12251082			1	1,447.20	1	1,447.20
02/04/20	Mailed out: Request Personnel Records and Preservation letters			1	0.65	1	0.65
03/03/20	Certified Mail Receipts			3	7.60	1	22.80
03/04/20	Labor and Workforce Development Agency filing fee check#1260			1	75.00	1	75.00
05/21/20	Mailed out Prepaid Envelope			1	1.20	1	1.20
05/21/20	Prepaid Envelope			1	8.25	1	8.25
11/24/20	Mailed out: Request for production of documents			1	0.50	1	0.50
09/02/21	Mediation Fee Inv. No. 28962			1	10,000.00	1	10,000.00

11/16/21	Berger Consulting Group	1	1,950.00	1	1,950.00
INVOICE # 4910					

\$13,505.60

FLAT FEE

Date	Description	Code	Code 2	Qty	Price	Unit	Total
							\$0.00

Invoice Total:	\$13,505.60
Amount Paid:	(\$0.00)
Amount Due:	\$13,505.60

EXHIBIT B

INVOICE

Company Logo

Jackson APC,

BILL TO

Karla Godinez
655 Baker St. Apt. Y 107
Costa Mesa CA 92626

Invoice Number: 593
Invoice Date: 12/22/2023
Terms: 30

Due Date: **1/21/2024**
Amount Due: **\$352,624.00**
Invoice Start Date:
Invoice End Date:

TIME

Date	Description	Team Member	Code	Code 2	Rate	Hours	Total
09/24/19	Corresponded with the client re: working conditions and potential claims.	Armond Jackson			725.00	1.10	797.50
11/13/19	Telephone call with client re: claims.	Armond Jackson			725.00	0.90	652.50
11/15/19	Follow-up call with client re: facts.	Armond Jackson			725.00	0.90	652.50
11/21/19	Review and analyze original intake notes. Legal research regarding any related litigation in state and federal court and the Defendant's business operations.	Armond Jackson			725.00	4.10	2,972.50
11/22/19	Cont. review and analyze original intake notes. Legal research regarding any related litigation in state and federal court and the Defendant's business operations.	Armond Jackson			725.00	3.90	2,827.50
11/25/19	Cont. analysis of claims re: wage and hour issues.	Armond Jackson			725.00	4.20	3,045.00

11/25/19	Requested additional information and follow-up question sent to client re: potential claims.	Armond Jackson	725.00	2.10	1,522.50
12/05/19	Researched public records regarding overlapping officers in Defendant entities with regard to a single enterprise as hotel contained several locations.	Armond Jackson	725.00	2.30	1,667.50
12/09/19	Pre-Lawsuit investigation of the Key Facts with a Focus on Class Certification Elements, Including Adequacy, Typicality, Superiority, and Commonality.	Armond Jackson	725.00	3.10	2,247.50
12/13/19	Reviewed and analyzed notes from telephone call with clients. Created additional follow-up questions.	Armond Jackson	725.00	1.10	797.50
12/13/19	Researched the defendant's size and operations.	Armond Jackson	725.00	2.90	2,102.50
12/16/19	Researched case theory, for class claims.	Armond Jackson	725.00	3.10	2,247.50
12/17/19	Researched PAGA standing issue.	Armond Jackson	725.00	1.10	797.50
12/17/19	Entity Analysis re: the job sites, managers, linkedin profile and business profile.	Armond Jackson	725.00	4.10	2,972.50
12/19/19	Drafted outline of the complaint.	Armond Jackson	725.00	3.10	2,247.50
12/19/19	Investigation of Defendant's Organizational and Corporate Structure, and Executive Reporting Structure as It Relates to the Employment and Management of the Putative Class Members	Armond Jackson	725.00	3.10	2,247.50
12/20/19	Read Defendant's SEC filings including the 2018 10-K Report.	Armond Jackson	725.00	6.10	4,422.50

01/27/20	Drafted Complaint.	Armond Jackson	725.00	6.50	4,712.50
01/29/20	Finalized complaint to file.	Armond Jackson	725.00	3.60	2,610.00
02/07/20	Drafted internal case notes memo detailing facts and law. Review case file.	Armond Jackson	725.00	2.60	1,885.00
02/10/20	Cont. review of employment file. Researched potential Private Attorney General Act Claims	Armond Jackson	725.00	4.30	3,117.50
02/25/20	Reviewed and analyzed employment file for claims. Analyze pay statements for violations. Legal research regarding the same.	Armond Jackson	725.00	4.50	3,262.50
02/28/20	Drafted Private Attorney General Act letter to submit to the LWDA.	Armond Jackson	725.00	5.20	3,770.00
03/03/20	Revised Private Attorney General Act letter to submit to the LWDA. Cont. to research Labor Code violations alleged in the letter before submission.	Armond Jackson	725.00	4.10	2,972.50
04/02/20	Confirmed upcoming calendar events.	Armond Jackson	725.00	0.20	145.00
04/08/20	Corresponded with client re: claims.	Armond Jackson	725.00	0.20	145.00
04/10/20	Read the email re: Notice of Acknowledgment.	Armond Jackson	725.00	0.20	145.00
04/10/20	Read email from opposing counsel re: meeting.	Armond Jackson	725.00	0.20	145.00
04/10/20	Responded to email from opposing counsel re: meeting.	Armond Jackson	725.00	0.20	145.00
04/10/20	Read email from opposing counsel re: meeting.	Armond Jackson	725.00	0.20	145.00

04/10/20	Responded to email from opposing counsel confirming time of conference call.	Armond Jackson	725.00	0.20	145.00
04/10/20	Conducted conference with opposing counsel.	Armond Jackson	725.00	0.50	362.50
04/20/20	Analyzed regarding class action investigation.	Armond Jackson	725.00	0.50	362.50
04/20/20	Drafted Amended Complaint.	Armond Jackson	725.00	2.80	2,030.00
04/21/20	Confirmed upcoming calendar events.	Armond Jackson	725.00	0.20	145.00
04/29/20	Analyzed regarding next steps for litigation.	Armond Jackson	725.00	0.30	217.50
04/29/20	Read and reviewed email re: notice and acknowledgment.	Armond Jackson	725.00	0.60	435.00
04/30/20	Reviewed email from opposing counsel re: document production.	Armond Jackson	725.00	0.20	145.00
04/30/20	Reviewed and analyzed document production re: 0-78 regarding relevant records for claims.	Armond Jackson	725.00	3.10	2,247.50
04/30/20	Responded to an email from opposing counsel re: document production.	Armond Jackson	725.00	0.40	290.00
04/30/20	Reviewed email re: filing of a coordinated motion.	Armond Jackson	725.00	0.40	290.00
04/30/20	Responded to counsel re: filing of the coordinated motion.	Armond Jackson	725.00	0.20	145.00
05/01/20	Conducted legal research on criteria for a coordinated motion.	Armond Jackson	725.00	3.50	2,537.50
05/04/20	Read email re: contemplated removal.	Armond Jackson	725.00	0.20	145.00
05/05/20	Responded to email from opposing counsel re: claims.	Armond Jackson	725.00	0.30	217.50
05/07/20	Researched law firm representing and prior representation of	Armond Jackson	725.00	4.70	3,407.50

Defendants in other cases. CONducted investigation into prior cases and litigation strategy.

05/11/20	Responded to email from oc re: removal.	Armond Jackson	725.00	0.20	145.00
05/11/20	Read email re: overlapping case.	Armond Jackson	725.00	0.20	145.00
05/13/20	Responded to email re: overlapping case.	Armond Jackson	725.00	0.20	145.00
05/14/20	Read, researched and analyzed Defendants' 27 affirmative defenses in its Answer to Plaintiff's complaint.	Armond Jackson	725.00	2.90	2,102.50
05/14/20	Read the email identifying overlapping claim that needs to be carved out for purposes of litigation due to prior release.	Armond Jackson	725.00	0.20	145.00
05/14/20	Read and analyzed complaint filed in the overlapping action.	Armond Jackson	725.00	1.80	1,305.00
05/18/20	Read approval papers of the prior settled case Calzada v. Defendants regarding a hotel location in Santa Cruz.	Armond Jackson	725.00	6.70	4,857.50
05/18/20	Reviewed docket of the Calzada case re: overlap issues.	Andrea Fernandez	515.00	3.10	1,596.50
05/21/20	Read and analyzed Notice of Removal motion papers.	Armond Jackson	725.00	5.10	3,697.50
05/21/20	Researched and analyzed Merritt Hospitality, LLC and the 6 other interested parties of Defendants identified in the Notice of Interested Parties.	Armond Jackson	725.00	4.70	3,407.50
05/21/20	Read and reviewed the notice of state court removal.	Armond Jackson	725.00	0.30	217.50

05/22/20	Contemplated filing motion for remand.	Armond Jackson	725.00	1.60	1,160.00
05/26/20	Researched Defendants' citizenship to determine jurisdiction. Researched rulings re: removal under CAFA and jurisdictional issues in removal papers.	Armond Jackson	725.00	5.20	3,770.00
05/27/20	Read email re: stipulations to amend to carve out overlapping claims.	Armond Jackson	725.00	0.20	145.00
05/27/20	Reviewed email from counsel re: related case.	Armond Jackson	725.00	0.20	145.00
06/18/20	Reviewed email from opposing counsel re: stipulations.	Armond Jackson	725.00	0.20	145.00
06/18/20	Responded to an email from opposing counsel re: status of stipulation.	Armond Jackson	725.00	0.20	145.00
06/18/20	Reviewed email from opposing counsel re: the stipulation to file SAC.	Armond Jackson	725.00	0.20	145.00
06/18/20	Reviewed stipulation to file amended complaint.	Armond Jackson	725.00	0.40	290.00
06/18/20	Contemplated requested carve out and responded to opposing counsel accordingly.	Armond Jackson	725.00	0.20	145.00
06/18/20	Reviewed stipulation to amend and proposed order.	Armond Jackson	725.00	0.90	652.50
06/18/20	Read email from opposing counsel re: stipulation.	Armond Jackson	725.00	0.20	145.00
06/18/20	Reviewed email from opposing counsel re: SAC.	Armond Jackson	725.00	0.20	145.00
06/18/20	Read the response from opposing counsel.	Armond Jackson	725.00	0.20	145.00
06/29/20	Read email from opposing counsel.	Armond Jackson	725.00	0.20	145.00
06/30/20	Revised FAC.	Armond Jackson	725.00	2.30	1,667.50

06/30/20	Responded to the email from opposing counsel.	Armond Jackson	725.00	0.20	145.00
06/30/20	Responded to email from opposing counsel re: SAC and stipulation.	Armond Jackson	725.00	0.20	145.00
06/30/20	Read email from opposing counsel re: SAC.	Armond Jackson	725.00	0.20	145.00
06/30/20	Resent SAC and LDA notice to opposing counsel.	Armond Jackson	725.00	0.20	145.00
06/30/20	Read email from opposing counsel.	Armond Jackson	725.00	0.10	72.50
06/30/20	Read email from opposing counsel.	Armond Jackson	725.00	0.20	145.00
06/30/20	Responded to an email from opposing counsel.	Armond Jackson	725.00	0.20	145.00
07/07/20	System 8-Review Answer From Defendant	Armond Jackson	725.00	0.80	580.00
07/07/20	Corrected FAC.	Armond Jackson	725.00	0.90	652.50
07/07/20	Read email from opposing counsel re: SAC.	Armond Jackson	725.00	0.20	145.00
07/08/20	Read email from opposing counsel re: signature to stipulation.	Armond Jackson	725.00	0.30	217.50
07/14/20	Filed Amended Complaint.	Armond Jackson	725.00	0.90	652.50
08/18/20	Drafted Notice of Rulings and Summons. Analyzed regarding next steps for service.	Armond Jackson	725.00	2.50	1,812.50
08/25/20	Submitted for service.	Armond Jackson	725.00	0.20	145.00
08/25/20	Sent opposing counsel email re: service of Summons and SAC.	Armond Jackson	725.00	0.20	145.00
08/26/20	Read and reviewed Order Setting Scheduling Conference.	Armond Jackson	725.00	1.40	1,015.00

09/01/20	Initial Status Conference	Armond Jackson	725.00	0.50	362.50
09/01/20	Read email re: discovery.	Armond Jackson	725.00	0.20	145.00
09/02/20	Read Defendant's Initial Disclosures.	Armond Jackson	725.00	0.50	362.50
09/03/20	Cataloged the 17 departments and name and 25 job titles maintained and identified in Defendant's Initial Disclosures. Researched job duties of the job titles to determine relevancy.	Armond Jackson	725.00	3.20	2,320.00
09/04/20	Cont to catalog the 17 departments and name and 25 job titles maintained and identified in Defendant's Initial Disclosures. Researched job duties of the job titles to determine relevancy.	Armond Jackson	725.00	3.30	2,392.50
09/09/20	Drafted Rule 26 Report	Armond Jackson	725.00	3.70	2,682.50
09/10/20	Reviewed case file and drafted outline and discovery matrix for class claims.	Armond Jackson	725.00	4.60	3,335.00
09/11/20	Drafted discovery to propound.	Armond Jackson	725.00	4.30	3,117.50
09/11/20	Proofread discovery to propound.	Armond Jackson	725.00	2.10	1,522.50
09/14/20	Reviewed 26f report.	Armond Jackson	725.00	0.80	580.00
09/14/20	Conducted legal research based upon class claims matrix.	Armond Jackson	725.00	3.50	2,537.50
09/16/20	Cont. legal research based upon class claims matrix.	Armond Jackson	725.00	2.40	1,740.00
09/17/20	Cont. legal research based upon class claims matrix.	Armond Jackson	725.00	3.10	2,247.50

09/21/20	Drafted outline of rest break claims for certification based upon legal research. Catalogues discovery to support theories.	Armond Jackson	725.00	3.10	2,247.50
09/23/20	Drafted outline of meal break claims for certification based upon legal research. Catalogues discovery to support theories.	Armond Jackson	725.00	4.20	3,045.00
09/28/20	Calendared discovery responses.	Armond Jackson	725.00	0.30	217.50
09/29/20	Drafted outline of wage statement claims for certification based upon legal research. Catalogues discovery to support theories.	Armond Jackson	725.00	2.10	1,522.50
09/29/20	Drafted outline of reimbursement claims for certification based upon legal research. Catalogues discovery to support theories.	Armond Jackson	725.00	2.80	2,030.00
09/30/20	Drafted email to opposing counsel re: discovery.	Armond Jackson	725.00	0.20	145.00
10/02/20	analyzed case regarding completing firm systems	Armond Jackson	725.00	0.30	217.50
10/02/20	Revised 26(f) report.	Armond Jackson	725.00	1.40	1,015.00
10/02/20	Finalized initial Disclosures and reviewed document production Nos. 1-177.	Armond Jackson	725.00	2.40	1,740.00
10/05/20	Drafted outline of overtime claims for certification based upon legal research. Catalogues discovery to support theories.	Armond Jackson	725.00	3.10	2,247.50
10/06/20	Drafted outline of failure to pay upon termination claims for certification based upon legal research. Catalogues discovery to support	Armond Jackson	725.00	1.80	1,305.00

theories.

10/07/20	Researched recent state court rulings on certification regarding meal breaks.	Armond Jackson	725.00	2.60	1,885.00
10/09/20	analyzed case regarding completing firm systems	Armond Jackson	725.00	0.30	217.50
10/12/20	Researched recent state court rulings on certification regarding rest breaks.	Armond Jackson	725.00	2.90	2,102.50
10/12/20	Reviewed Judge Holcomb's Standing Order,	Armond Jackson	725.00	0.50	362.50
10/13/20	Created task allocation list for employees to determine the pressure of work tasks impacting the ability to take rest breaks.	Armond Jackson	725.00	2.70	1,957.50
10/15/20	Researched recent state court rulings on certification regarding failure to pay upon termination and wage statement claims.	Armond Jackson	725.00	3.30	2,392.50
10/21/20	Researched recent state court rulings on certification regarding overtime claims.	Armond Jackson	725.00	3.10	2,247.50
10/27/20	Drafted initial draft of memorandum based upon legal research and law.	Armond Jackson	725.00	4.50	3,262.50
10/27/20	Prepared for and attended Scheduling Conference.	Armond Jackson	725.00	1.10	797.50
10/27/20	Read and calendared trial scheduling order.	Armond Jackson	725.00	1.50	1,087.50
10/29/20	Cont. drafting initial draft of memorandum based upon legal research and law.	Armond Jackson	725.00	4.30	3,117.50
10/29/20	DRafted case timeline of events based upon trial calendar deadlines.	Armond Jackson	725.00	2.30	1,667.50

11/24/20	Drafted discovery responses.	Armond Jackson	725.00	4.40	3,190.00
01/04/21	Drafted meet and confer letter.	Armond Jackson	725.00	3.30	2,392.50
01/05/21	analyze next regarding steps	Armond Jackson	725.00	0.20	145.00
01/12/21	Read email re: discovery.	Armond Jackson	725.00	0.40	290.00
01/21/21	Drafted joint LR 37 stipulation.	Armond Jackson	725.00	3.20	2,320.00
01/22/21	Reviewed and analyzed document production.	Armond Jackson	725.00	3.10	2,247.50
01/22/21	Drafted 2 Joint Stipulations for RFP and SI discovery.	Armond Jackson	725.00	8.00	5,800.00
01/27/21	Revised motion.	Armond Jackson	725.00	3.70	2,682.50
02/03/21	analyze next regarding steps	Armond Jackson	725.00	0.20	145.00
02/09/21	Drafted Notice and Proof of Service	Yesenia Villalba	145.00	0.70	101.50
02/09/21	Finalized discovery motions to file in federal court..	Armond Jackson	725.00	3.00	2,175.00
02/09/21	Proofread discovery motions.	Andrea Fernandez	515.00	1.90	978.50
02/10/21	Drafted and finalized two discovery motions.	Armond Jackson	725.00	3.60	2,610.00
02/22/21	Drafted PMK notice.	Armond Jackson	725.00	3.50	2,537.50
03/02/21	Finalized supplemental memorandums	Armond Jackson	725.00	3.50	2,537.50
03/03/21	Read email re: mediation.	Armond Jackson	725.00	0.30	217.50
03/04/21	Read discovery order and confirmed mediation.	Armond Jackson	725.00	1.20	870.00
03/05/21	Sent email to mediator re: mediation.	Armond Jackson	725.00	0.50	362.50

03/05/21	Drafted stipulation re: mediation.	Armond Jackson	725.00	0.10	72.50
03/08/21	Sent email requesting informal discovery.	Armond Jackson	725.00	0.50	362.50
03/15/21	Prepared for and attended the status conference.	Armond Jackson	725.00	0.60	435.00
05/10/21	Created data matrix for expert in anticipation of date exchange for mediation.	Armond Jackson	725.00	4.70	3,407.50
05/13/21	Revised and modified data matrix for expert report.	Armond Jackson	725.00	4.70	3,407.50
05/17/21	Finalized data matrix for expert report.	Armond Jackson	725.00	2.70	1,957.50
06/18/21	Reviewed class data and pay codes.	Armond Jackson	725.00	5.10	3,697.50
06/18/21	Researched Defendants' Embassy Suites San Diego work-site hotel location and room count, geographic map and ownership.	Armond Jackson	725.00	1.50	1,087.50
06/21/21	Reviewed pay data and CSV file to confirm the location of hotels and sampling.	Armond Jackson	725.00	3.90	2,827.50
06/21/21	Modified data matrix based upon review of pay data from CSV file.	Armond Jackson	725.00	3.90	2,827.50
06/21/21	Researched Defendants' Westin Pasadena work-site hotel location and room count, geographic map and ownership.	Armond Jackson	725.00	1.30	942.50
06/21/21	Researched Defendants' Le Meridien San Francisco work-site hotel location and room count, geographic map and ownership.	Armond Jackson	725.00	1.80	1,305.00
06/21/21	Researched Defendants' Hyatt Centric Santa Barbara work-site hotel location and room count,	Armond Jackson	725.00	1.90	1,377.50

geographic map and ownership.

06/22/21	Researched Defendants' Marriot La Jolla work-site hotel location and room count, geographic map and ownership.	Armond Jackson	725.00	1.60	1,160.00
06/22/21	Researched Defendants' Delphine work-site hotel location and room count, geographic map and ownership.	Armond Jackson	725.00	2.30	1,667.50
06/22/21	Researched Defendants' Hotel Republic-San Diego work-site hotel location and room count, geographic map and ownership.	Armond Jackson	725.00	2.10	1,522.50
06/23/21	Researched Defendants' Inn at Rancho Santa Fe work-site hotel location and room count, geographic map and ownership.	Armond Jackson	725.00	1.90	1,377.50
06/24/21	Researched Defendants' The Pullman San Francisco work-site hotel location and room count, geographic map and ownership.	Armond Jackson	725.00	1.70	1,232.50
06/24/21	Researched Defendants' Marriott-Costa Mesa work-site hotel location and room count, geographic map and ownership.	Armond Jackson	725.00	1.80	1,305.00
06/25/21	Researched Defendants' Monterey Tides work-site hotel location and room count, geographic map and ownership.	Armond Jackson	725.00	1.80	1,305.00
06/25/21	Researched Defendants' Riviera Palm Springs work-site hotel location and room count, geographic map and ownership.	Armond Jackson	725.00	1.80	1,305.00
06/28/21	Drafted memorandum regarding Defendants hotel locations.	Armond Jackson	725.00	3.10	2,247.50

07/01/21	Reviewed time data and pay code for same.	Armond Jackson	725.00	4.10	2,972.50
07/06/21	Cont. reviewed of time data and looked for any trends in the data to spot check for expert analysis.	Armond Jackson	725.00	4.90	3,552.50
07/09/21	Reviewed and analyzed employee manuals.	Armond Jackson	725.00	3.40	2,465.00
08/04/21	Spoke to expert re: discovery.	Armond Jackson	725.00	0.40	290.00
08/05/21	Reviewed pay code analysis. Sent email to expert and OC re: pay code information.	Armond Jackson	725.00	0.40	290.00
08/09/21	Emailed expert and reviewed pay code information.	Armond Jackson	725.00	0.80	580.00
08/12/21	Review, analyze, and select mediation exhibits.	Armond Jackson	725.00	3.40	2,465.00
08/23/21	Drafted outline of mediation brief.	Armond Jackson	725.00	2.50	1,812.50
08/25/21	Drafted mediation brief.	Armond Jackson	725.00	6.30	4,567.50
08/26/21	Drafted mediation brief.	Armond Jackson	725.00	8.90	6,452.50
08/26/21	Cite check mediation brief and update exhibits.	Armond Jackson	725.00	2.90	2,102.50
08/26/21	Proofread and revised mediation brief.	Andrea Fernandez	515.00	3.10	1,596.50
08/27/21	Contacted client with case updates. Spoke to client re: mediation and analysis of claims.	Andrea Fernandez	515.00	3.70	1,905.50
09/01/21	Reviewed MOU.	Armond Jackson	725.00	0.70	507.50
09/01/21	Prepared for mediation.	Armond Jackson	725.00	3.50	2,537.50
09/02/21	mediation	Andrea Fernandez	515.00	6.00	3,090.00
09/02/21	Participated in mediation.	Armond Jackson	725.00	6.00	4,350.00

09/07/21	Drafted Belaire West notice.	Armond Jackson	725.00	1.70	1,232.50
09/22/21	Met and conferred re: Belaire West and PMK deposition.	Armond Jackson	725.00	2.10	1,522.50
09/28/21	Read email from mediator.	Armond Jackson	725.00	0.10	72.50
09/28/21	Read email from oc.	Armond Jackson	725.00	0.20	145.00
10/13/21	Called client to ask to sign doc for settlement. Received signature, saved and gave to AJ; serve to other side.	Yesenia Villalba	145.00	0.40	58.00
11/02/21	Researched federal class action standards and downloaded pleadings to draft preliminary approval motion.	Armond Jackson	725.00	2.50	1,812.50
11/02/21	Drafted Notice of Settlement.	Armond Jackson	725.00	0.50	362.50
11/30/21	Drafted preliminary approval motion.	Armond Jackson	725.00	3.50	2,537.50
12/01/21	Drafted preliminary approval motion.	Armond Jackson	725.00	7.30	5,292.50
12/02/21	Continued drafting PA motion.	Armond Jackson	725.00	4.30	3,117.50
12/03/21	Finalized brief.	Armond Jackson	725.00	4.80	3,480.00
12/06/21	Finalized PA motion.	Armond Jackson	725.00	5.60	4,060.00
12/10/21	Drafted and filed Re-Notice of Motion.	Armond Jackson	725.00	1.50	1,087.50
09/13/22	Checked court docket re: approval papers.	Armond Jackson	725.00	0.20	145.00
10/14/22	Reviewed and analyzed order.	Armond Jackson	725.00	1.80	1,305.00
10/14/22	Discussed order and resolution re: approval. Researched issues outlined in order for resolution.	Armond Jackson	725.00	2.40	1,740.00

10/14/22	Discussed order w/ opposing counsel.	Armond Jackson	725.00	1.00	725.00
10/25/22	Revised joint statement, crafted preliminary approval motion timeline.	Armond Jackson	725.00	0.60	435.00
10/25/22	Reviewed joint statement and made revisions.	Armond Jackson	725.00	0.60	435.00
11/07/22	Meeting of counsels.	Armond Jackson	725.00	3.40	2,465.00
11/10/22	Reviewed declaration and prelim motion.	Armond Jackson	725.00	0.50	362.50
11/16/22	Reviewed declaration on preliminary approval motion.	Armond Jackson	725.00	2.20	1,595.00
11/25/22	Revised preliminary approval motion.	Armond Jackson	725.00	4.50	3,262.50
11/28/22	Revised preliminary approval motion.	Armond Jackson	725.00	3.00	2,175.00
11/29/22	Drafted preliminary approval motion.	Armond Jackson	725.00	5.50	3,987.50
11/29/22	Drafted preliminary approval motion.	Armond Jackson	725.00	2.00	1,450.00
11/30/22	Drafted preliminary approval motion.	Armond Jackson	725.00	5.00	3,625.00
12/01/22	Finalized preliminary approval motion.	Armond Jackson	725.00	5.50	3,987.50
12/01/22	Drafted preliminary approval motion.	Armond Jackson	725.00	7.60	5,510.00
12/02/22	Attended status conference.	Armond Jackson	725.00	1.70	1,232.50
12/20/22	Drafted Amended Complaint.	Armond Jackson	725.00	1.00	725.00
03/29/23	Read email from opposing counsel re: settlement approval process.	Armond Jackson	725.00	0.20	145.00
10/02/23	Reviewed proposed timeline and conferred w/ AF re: proposed timeline.	Armond Jackson	725.00	0.10	72.50

10/04/23	Draft Proposed Timeline	Anthony Filer	250.00	0.70	175.00
10/05/23	Follow up re: class notice schedule	Anthony Filer	250.00	0.30	75.00
10/06/23	Follow up re: Joint Stipulation	Anthony Filer	250.00	0.30	75.00
10/09/23	Review emails re: class list	Anthony Filer	250.00	0.10	25.00
10/10/23	Review emails re: class list	Anthony Filer	250.00	0.10	25.00
10/11/23	Review notice letter	Anthony Filer	250.00	0.10	25.00
10/12/23	Follow up re: proposed order	Anthony Filer	250.00	0.10	25.00
10/13/23	Drafted Proposed Order	Anthony Filer	250.00	0.20	50.00
10/18/23	Drafted proposed order.	Armond Jackson	725.00	4.30	3,117.50
11/13/23	Drafted MFA	Anthony Filer	250.00	0.50	125.00
11/16/23	Drafted MFA / Mtn. for Attys.' Fees	Anthony Filer	250.00	8.70	2,175.00
11/17/23	Drafted MFA / Mtn. for Attys' Fees	Anthony Filer	250.00	1.70	425.00
12/11/23	Analyzed and revised final approval motion.	Armond Jackson	725.00	3.20	2,320.00
12/12/23	Continued revision of final approval motion. Shepardized cases and cite checked.	Armond Jackson	725.00	3.90	2,827.50
12/14/23	Revised motion for attorney fees.	Armond Jackson	725.00	3.10	2,247.50
12/15/23	Continued to revise motion for attorney fees.	Armond Jackson	725.00	2.70	1,957.50
12/19/23	Reviewed final approval declaration from the administrator.	Armond Jackson	725.00	1.10	797.50
12/21/23	Proofread motion for final approval.	Armond Jackson	725.00	3.10	2,247.50

\$352,624.00

EXPENSES

Date	Description	Code	Code 2	Qty	Price	Unit	Total
							\$0.00

FLAT FEE

Date	Description	Code	Code 2	Qty	Price	Unit	Total
							\$0.00

Invoice Total:	\$352,624.00
Amount Paid:	(\$0.00)
Amount Due:	\$352,624.00

EXHIBIT C

LAFFEY MATRIX

History

Case Law

See the 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 +
6/01/22- 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.