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ZAKAY LAW GROUP, APLC

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Attorneys for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SAN DIEGO

LUCAS DELACRUZ, an individual, on behalf
of himself, and on behalf of all persons
similarly situated,

Plaintiffs,

vs.

WAL-MART ASSOCIATES, INC., a
Delaware Corporation; BONOBOs, INC., a
Delaware Corporation; and DOES 1 through
50, Inclusive,

Defendants.

Case No. 37-2021-00046421-CU-OE-CTL

**DECLARATION OF SHANI O. ZAKAY,
ESQ. IN SUPPORT OF PLAINTIFF'S
MOTION FOR FINAL APPROVAL OF
CLASS AND PAGA ACTION
SETTLEMENT**

Date: October 20, 2023
Time: 8:30 a.m.

Judge: Hon. Keri Katz
Dept.: C-74

1 I, SHANI O. ZAKAY, declare as follows:

2 1. I am the managing partner of Zakay Law Group, APLC, and co-counsel of record
3 for Plaintiff LUCAS DELACRUZ, on behalf of himself, and on behalf of all persons similarly
4 situated, and in his representative capacity on behalf of the State of California and fellow Aggrieved
5 Employees, (“Plaintiff”) in this matter. As such, I am fully familiar with the facts, pleadings, and
6 history of the matter.

7 2. This Declaration is being submitted in support of Plaintiff’s Motion for Final
8 Approval of Class Action and PAGA Settlement and Plaintiff’s Motion for Attorneys’ Fees and
9 Expenses and Service Award.

10 3. My firm has worked on this matter over the course of the litigation during the last
11 twenty-two months. My credentials are reflected in the Zakay Law Group, APLC firm resume, a
12 true and correct copy of which is attached hereto as Exhibit #A. Some of the major cases my firm
13 has undertaken is also set forth in Exhibit #A. I have had class litigation experience, mostly in the
14 area of employment class actions, unfair business practices and other complex litigation. I have
15 experience in cases involving labor code violations and wage and hour claims. I have litigated
16 similar wage and hour cases against other employers on behalf of employees. I have been approved
17 as experienced class counsel in courts throughout California. It is this level of experience which
18 enabled my firm to undertake the instant matter and to successfully combat the resources of the
19 defendant and its capable and experienced counsel.

20 **I. EXPERIENCE**

21 4. Over the course of the litigation during the last twenty-seven months, a number of
22 attorneys have worked on this matter. Their credentials are reflected in the Zakay Law Group, APLC
23 firm resume, a true and correct copy of which is attached hereto as Exhibit #A. Some of the major
24 cases my firm has undertaken are also set forth in Exhibit #A. The attorneys involved in this matter
25 have had class litigation experience, much of it in employment class actions, unfair business
26 practices and other complex litigation. I have experience in cases involving labor code violations
27 and meal and rest break claims. Counsel have litigated similar labor law cases against other
28 employers on behalf of employees. Counsel have been approved as experienced Counsel throughout

1 California. It is this level of experience which enabled the firms to undertake the instant matter and
2 to successfully combat the resources of the defendant and their capable and experienced counsel.
3 Because of the concerted and dedicated effort this case required to properly handle and prosecute,
4 Counsel were precluded from taking other cases, and in fact, had to turn away other potential fee
5 generating cases.

6 **II. LODESTAR AND REQUESTED COUNSEL FEES PAYMENT**

7 5. As of September 14, 2023, Zakay Law Group, APLC incurred lodestar totaling
8 \$59,589.00 in this matter. I have reviewed my firm's lodestar in this matter and believe the charges
9 are reasonable and were reasonably necessary to the conduct of the case. From November 2021
10 through September 2023, my firm has worked more than 120.5 hours prosecuting these claims with
11 the attorneys' hourly fee rates for attorneys at \$375-\$550, resulting in the current lodestar. A
12 detailed breakdown of the total fees and the services performed by the firm on this case is attached
13 hereto as Exhibit #B.

14 6. Further, Class Counsel will be performing additional work, including finalizing the
15 motion for final approval, attending the hearing on final approval, finalizing the orders and
16 judgment, and monitoring completion of the settlement process over the course of several years. I
17 expect this additional work will result in an additional 20-30 hour of additional work and an
18 additional lodestar between \$11,000 and \$16,500.

19 7. The rates charged by my firm are in line with the prevailing rates of attorneys in the
20 local legal community for similar work and, if this were a commercial matter, these are the charges
21 that would be made and presented to the client. These hourly rates have been approved by Court's
22 throughout California, including the Courts in the Superior Court of California. Finally, the
23 reasonableness of Counsel's hourly rates is further confirmed by comparing such rates with the rates
24 of comparable counsel practicing complex and class litigation as detailed in the National Law
25 Journal Billing Survey. See e.g. *Zest IP Holdings, LLC v. Implant Direct MFG, LLC*, 2014 U.S.
26 Dist. LEXIS 167563 (S.D. Cal. 2014) (finding that "Mayer Brown's \$775 average billing rate for
27 partners" and "Mayer Brown's \$543 average associate billing rate" are reasonable rates when
28 compared within 21 other firms practicing in the Southern District of California). This survey is

1 useful to show that Counsel's rates are in line with the comparable rates of the defense counsel that
2 opposes these types of class claims, such as Mayer Brown. In another example, Sheppard Mullin
3 Richter & Hampton, who is opposing counsel in many cases prosecuted by Counsel charges rates
4 as high as \$875 for partners and \$535 for associates. Similarly, Paul Hastings, another opposing
5 counsel in these types of cases, charges between \$900 and \$750 for partners and \$755 and \$335 for
6 associates. Thus, the rates charged by Counsel for comparable work are less than these examples
7 and are therefore undoubtedly reasonable.

8 **III. COSTS**

9 8. As part of the Settlement Agreement, the parties agreed that Counsel may seek
10 reimbursement of expenses incurred as documented in Counsel's billing records as part of the
11 payment for Attorneys' Fees and Expenses. Attached hereto as Exhibit #C is a true and correct copy
12 of the Zakay Law Group, Cost Summary detailing the actually incurred litigation expenses by the
13 Zakay Law Group APLC, for this matter as of September 14, 2023. As shown in detail in the
14 attached Cost Summary, the Zakay Law Group incurred a total of \$9,555.13 in litigation costs
15 prosecuting this action – with additional costs anticipated.

16 9. These litigation expenses include the expenses incurred for mediation fees, expert
17 costs, and filing fees, all of which are costs normally billed to and paid by the client. The costs were
18 reasonably incurred by Counsel in the prosecution of this matter and are set forth in detail in the
19 contemporaneous billing records attached hereto.

20 I declare under the penalty of perjury under the laws of the State of California that the
21 foregoing is true and correct. Executed this 14th day of September 2023, at San Diego, California.

22
23 **ZAKAY LAW GROUP, APLC**

24 By: 

25 Shani O. Zakay
26 Attorney for Plaintiff
27
28

EXHIBIT A

1. Firm Practice Areas:

Employment Litigation, Employment Class Action, Wage and Hour Class Actions, PAGA Litigation.

2. Attorney Shani O. Zakay Biography:

• **PRACITCE AREAS**

Employment Litigation, Employment Class Action, Wage and Hour Class Actions, Civil Litigation, Business Litigation, Corporate/Business General Counsel Advice.

• **BAR ADMISSIONS, MEMBERSHIPS & BOARDS**

State of California (all courts)

United States District Court for the District of California (all courts)

• **PROFESSIONAL EXPERIENCE**

ZAKAY LAW GROUP, APLC, San Diego, CA

Founder, April 2018

SILLDORF LAW, LLP, San Diego, CA (now known as Berding & Weil)

Partner, January 2012 – March 2018

• **EDUCATION**

CALIFORNIA WESTERN SCHOOL OF LAW, San Diego, CA

Juris Doctor, *magna cum laude*, April 2011

Honors: Dean's List: Spring 2009, Fall 2009, Spring 2010, Fall 2010, Spring 2011.

Academic Achievement Awards: Advanced Legal Research, Constitutional Law II, Criminal Procedure, Insurance Law & Litigation, Law Office Technologies, Property II, Products Liability, Trusts & Estates.

Activities: Associate Editor, *California Western Law Review*

Legal Skills Honor Instructor for Professor Leslie Culver

Vice President, Jewish Student Union

SAN DIEGO STATE UNIVERSITY, San Diego, CA

Bachelor of Science, Business Administration, Management, *cum laude*, May 2008

Honors: Dean's List: Spring 2007 and Fall 2007

• **COMMUNITY SERVICE**

CALIFORNIA WESTERN SCHOOL OF LAW, San Diego, CA

Spring 2016, 2018

Moot Court Judge

COMMUNITY LAW PROJECT, San Diego, CA

October 2018 – Present

Volunteer Attorney on Employment Matters

3. Attorney Jackland K. Hom Biography:

• **PRACTICE AREAS**

Employment Litigation, Employment Class Action, Wage and Hour Class Actions, PAGA Litigation.

• **BAR ADMISSIONS, MEMBERSHIPS & BOARDS**

State of California (all courts)

United States District Courts of California (all courts)

- **PROFESSIONAL EXPERIENCE**

ZAKAY LAW GROUP, APLC, San Diego, CA
Associate, January 2021 - present

BLUMENTHAL NORDREHAUG BHOWMIK DE BLOUW LLP, San Diego, CA
Associate, November 2019 – September 2020

- **EDUCATION**

CALIFORNIA WESTERN SCHOOL OF LAW, San Diego, CA
Juris Doctor, April 2019

Honors: Dean's List: Fall 2017, Spring 2018.

Academic Achievement Awards: Advanced Prosecution Function.

Activities: Senior Editor, *California Western Law Review*

President, Asian Pacific American Law Students Association

UNIVERSITY OF CALIFORNIA, RIVERSIDE, Riverside, CA
Bachelor of Arts: Political Science, English Literature, June 2015
Honors: Dean's List

4. **Attorney Julieann Alvarado Biography:**

- **PRACTICE AREAS**

Employment Litigation, Employment Class Action, Wage and Hour Class Actions, PAGA Litigation.

- **BAR ADMISSIONS, MEMBERSHIPS & BOARDS**

State of California (all courts)

- **PROFESSIONAL EXPERIENCE**

ZAKAY LAW GROUP, APLC, San Diego, CA
Associate, January 2022 – present

GOMEZ TRIAL ATTORNEYS, San Diego, CA
Trial Attorney, January 2021 – December 2021

- **EDUCATION**

UNIVERSITY OF SAN DIEGO SCHOOL OF LAW, San Diego, CA

Juris Doctor, *cum laude*, May 2020

Honors: Dean's Honor Scholarship Recipient (Renewed as 2L and 3L)

CALI Excellence for the Future Award: Legal Writing and Research I

Activities: President of External Affairs, Consumer Attorneys of USD
Competing Member, USD National Mock Trial Team

UNIVERSITY OF SOUTHERN CALIFORNIA, Los Angeles, CA

Bachelor of Arts: Psychology, *magna cum laude*, May 2017

Honors: Presidential Scholarship Recipient

Dean's List: Spring 2015-Spring 2017

5. **Attorney Jaclyn Joyce Biography:**

• **PRACTICE AREAS**

Employment Litigation, Employment Class Action, Wage and Hour Class Actions, PAGA Litigation.

• **BAR ADMISSIONS, MEMBERSHIPS & BOARDS**

State of California (all courts)

• **PROFESSIONAL EXPERIENCE**

ZAKAY LAW GROUP, APLC, San Diego, CA
Associate, March 2023 – present

LIGHTGABLER, Camarillo, CA
Attorney, April 2019 – February 2023

WESTON & McELVAIN (now called Weston & Agness LLP), Los Angeles, CA
Attorney, June 2016 – April 2019

• **EDUCATION**

UCLA SCHOOL OF LAW, Los Angeles, CA

Juris Doctor, *May 2012*

NORTHWESTERN UNIVERSITY, Chicago, IL

Bachelor of Arts: Political Science; Bachelor of Arts: Psychology, 2005

6. **Lead Counsel – Class Action & Representative Cases:**

1. **Hubscher v. Bodyspirit, LLC**

Court	San Diego
Case No.	37-2016-00021261-CU-OE-CTL
Nature	Independent Contractor Misclassification
Status	Settled

2. **Henry v. InMotion Entertainment Group, LLC**

Court	San Francisco
Case No.	CGC-18-565643
Nature	Meal/Rest Break claims and overtime and regular rate claims
Status	Settled

3. **Moore v. Zirx Transportation**

Court	San Francisco
Case No.	CGC-18-566655
Nature	Independent Contractor Misclassification
Status	Settled

4. **Pasallo v. GSG Protective Services**

Court	San Diego
Case No.	37-2018-00037611-CU-OE-CTL
Nature	Meal/Rest Break claims
Status	Settled

5. Villaroman v. C.C.H.C.

Court	Orange County
Case No.	30-2018-01013128-CU-OE-CXC
Nature	Meal/Rest Break claims
Status	Settled

6. Flores v. Plastic Express

Court	Los Angeles
Case No.	BC719071
Nature	Meal/Rest Break and minimum wage claims
Status	Settled

7. Tressler v. Spoonful Management

Court	Los Angeles
Case No.	BC719405
Nature	Meal/Rest Break claims
Status	Settled

8. Leymaster v. Toms Sierra Company, Inc.

Court	Placer
Case No.	SCV0041735
Nature	Meal/Rest Break claims and overtime and regular rate claims
Status	Settled

9. Murphy v. Rockler Retailer Group, Inc.

Court	Sacramento
Case No.	34-2018-00241374
Nature	Overtime and regular rate claims and wrongful termination
Status	Settled

10. Bruemmer v. Tempur Retail Stores, LLC.

Court	Marin
Case No.	CIV1803646
Nature	Overtime and regular rate claims and wrongful termination
Status	Settled

11. Christina Cummings v. G6 Hospitality, LLC

Court	San Diego
Case No.	37-2018-00056207-CU-OE-CTL 19CV122 GPC LL
Nature	Overtime and Minimum Wage claims and Meal and Rest Breaks
Status	Settled

12. Nicolai Laguatan v. Prevent LSS

Court	San Diego
Case No.	37-2018-00057434-CU-OE-CTL
Nature	Overtime and Minimum Wage claims and Meal and Rest Breaks
Status	Settled

13. Lisa Ramirez v. Carefusion Resources, LLC

Court	San Diego
Case No.	37-2018-00058078-CU-OE-CTL 3:18-CV-02852-BEN-MSB
Nature	Overtime and Meal and Rest Breaks
Status	Settled

14. Charles Ornelas v. C&A Transportation Services

Court	San Diego
Case No.	37-2018-00061289-CU-OE-CTL
Nature	Minimum Wage and Meal/Rest Break claims
Status	Settled

15. Luz Marin v. California Marine Cleaning

Court	San Diego
Case No.	37-2018-00063483-CU-OE-CTL
Nature	Meal Break claims
Status	Settled

16. Christian Van Cleave v. Sunrise Senior Living Management

Court	San Diego
Case No.	37-2018-00061960-CU-OE-CTL 19CV0044BEN NLS
Nature	Regular rate and meal premium miscalculation
Status	Settled

17. Heather McIntyre v. JRR Enterprises

Court	Sacramento
Case No.	34-2019-00251220
Nature	Overtime and Meal and Rest Periods
Status	Settled

18. Lori Phipps v. Soapy Joe's

Court	San Diego
Case No.	37-2019-00017673-CU-OE-CTL
Nature	Tip Polling and Meal and Rest Periods
Status	Settled

19. Heather Broughton v. NFG San Francisco, LLC

Court	San Francisco
Case No.	CGC-19-574657
Nature	Meal and Rest Breaks
Status	Settled

20. Marcos Antonios v. Interface Rehab, LLC

Court	Orange County
Case No.	30-2019-01067547-CU-OE-CXC
Nature	Meal and Rest Breaks and Reporting Time Violations
Status	Settled

21. Tiffany Rodriguez v. Circle K

Court	Riverside
Case No.	RIC 1901407 5:19-cv-00469
Nature	Overtime Wage and Meal/Rest Break claims
Status	Settled

22. Derik Scott et al. v. Ultimate Performance

Court	Los Angeles
Case No.	19STCV22823
Nature	Piece Rate Pay violations
Status	Settled

23. Raymond Frazier v. Asa Carlton

Court	San Diego
Case No.	37-2019-00036147-CU-OE-CTL
Nature	Overtime Wages
Status	Settled

24. John Moreno v. Da Kitchen

Court	San Diego
Case No.	37-2019-00024885-CU-OE-CTL
Nature	Overtime Wage and Meal/Rest Break claims
Status	Settled

25. Penny Lane v. International Aero Clubs, LLC

Court	San Diego
Case No.	37-2019-00021793-CU-OE-CTL
Nature	Meal and Rest Breaks and Regular Rate Miscalculation
Status	Settled

26. Amber Price v. DMSD Restaurants

Court	San Diego
Case No.	37-2019-00024062-CU-OE-CTL
Nature	Meal and Rest Break violations
Status	Settled

27. Jamaal Johnson v. Volt Management Corp

Court	Los Angeles
Case No.	19STCV16466
Nature	On Duty Meal Break violations
Status	Settled

28. Ezzat Menias v. All American Private Security

Court	Orange County
Case No.	30-2019-01085120-CU-OE-CXC
Nature	On Duty Meal Break violations
Status	Settled

29. Mark Connor v. Ascendant Marketing

Court	San Diego
Case No.	37-2019-00026864-CU-OE-CTL
Nature	Minimum Wage violations
Status	Settled

30. Niki Nunez v. Home Depot

Court	San Joaquin
Case No.	STK-CV-406-2019-6656
Nature	Overtime Wages violations
Status	In Litigation

31. Alma Salazar v. Frontier Toyota

Court	Los Angeles
Case No.	19STCV20382
Nature	Rest Break violations
Status	Settled

32. Josefina Garces v. Kar Auction Services

Court	Los Angeles
Case No.	19STCV28489
Nature	Rest Break violations
Status	Settled

33. Madison Weiss v. Niznik Behavior

Court	San Diego
Case No.	37-2019-00039441-CU-OE-CTL
Nature	Meal and Rest Break violations
Status	Settled

34. Jimmy Mack v. ERM Enterprises

Court	Sacramento
Case No.	2019-00262259
Nature	Meal and Rest Break violations
Status	Settled

35. Josefina Garces v. DriverDo

Court	Los Angeles
Case No.	19STCV32773
Nature	Independent Contractor Misclassification
Status	In Litigation

36. Perseus Porras v. Tantalum Restaurant

Court	Los Angeles
Case No.	19STCV31015
Nature	Unpaid Wages + Missed Meal/Rest Breaks
Status	Settled

37. Dorcena Deutsch v. Scripps

Court	San Diego
Case No.	37-2019-00036333-CU-OE-CTL
Nature	Regular Rate Miscalculation for Nurses
Status	Settled

38. Josalyn O'Quinn v. Laugh Factory

Court	Los Angeles
Case No.	19STCV28155
Nature	Regular Rate Miscalculation, Wage Theft
Status	In Litigation

39. Nicholas Leon v. Miller Event Management

Court	San Luis Obispo
Case No.	19CV-0435
Nature	Meal/Rest Breaks, Reporting Time, 2802
Status	Settled

40. Aaris Watts v. TRL Systems

Court	Orange County
Case No.	30-2019-01102457-CU-OE-CXC
Nature	Meal/Rest Breaks, Reporting Time
Status	Settled

41. Faith Smith v. Island Pizza

Court	Contra Costa
Case No.	MSC19-01654
Nature	Meal/Rest Breaks, 226, 2802
Status	Settled

42. Johnathan Roa v. Otay Mesa Sales

Court	San Diego
Case No.	37-2019-00057735-CU-OE-CTL
Nature	Meal/Rest Breaks, 226
Status	Settled

43. Sabrina Ivon v. Sinclair Television of California

Court	Humboldt
Case No.	DR190699
Nature	Vaquero
Status	Settled

44. Jonathan Mitchell v. Mack Trucking

Court	San Bernardino
Case No.	CIVDS1928334
Nature	Independent Contractor Misclassification
Status	In Litigation

45. Curtis Edwards v. Resolve Group

Court	San Francisco
Case No.	CGC-19-579095
Nature	Meal & Rest Breaks + 2802
Status	In Litigation

46. Elena Kiseleva v. TotalMed Staffing, Inc

Court	Santa Clara
Case No.	19CV354635
Nature	Overtime + Meal and Rest Breaks
Status	Settled

47. Richard Jer Vang v. Bridge Property Management

Court	Alameda
Judge	Winfred Smith
Nature	Off the clock work, regular rate miscalc.
Status	Settled

48. Madison Marrero v. Stat Med

Court	Alameda
Case No.	HG19043214
Nature	Unpaid Overtime + Meal/Rest Breaks
Status	In Litigation

49. Brian Reyes v. Stowasser Buick-GMC

Court	Santa Barbara
Case No.	19CV06183
Nature	Vaquero
Status	Settled

50. Erik Foss v. Anderson Hospitality, Inc.

Court	Shasta
Case No.	195317
OPC	Wood Smith – Andrew Kleiner
Nature	Meal and Rest Breaks, Regular Rate
Status	In Litigation

51. Griselda Duran v. EmployBridge

Court	Kern
Case No.	BCV-20-101583
Nature	Regular Rate, 226
Status	In Litigation

52. Luis Rendon v. Healthcare Investments, Inc.

Court	Los Angeles
Case No.	20STCV39775
Nature	Meal and Rest Breaks
Status	In Litigation

53. Richard Melead v. TVI, Inc.

Court	Orange
Case No.	30-2020-01140887-CU-OE-CXC
Nature	Regular Rate, 226 (Magadia)
Status	Settled

54. David Spencer v. Asset Gas, Inc.

Court	San Diego
Case No.	37-2020-00024642-CU-OE-CTL
Nature	Meal and Rest Breaks
Status	Settled

55. Thomas Haven v. California Vocations, Inc.

Court	Butte
Case No.	20CV01514
Nature	Regular Rate + Meal and Rest Breaks
Status	In Litigation

56. Estefania Renteria v. Love's Country

Court	Kern
Case No.	BCV-20-101260
Nature	226
Status	In Litigation

57. Rachel Latin v. OneMain General Services Corp.

Court	Stanislaus
Case No.	CV-20-002498
Nature	Dart + Magadia
Status	In Litigation

58. Kalaina Dula v. 2 Kings Gaming, Inc.

Court	Merced
Case No.	#20CV-02289
Nature	Meal and Rest Breaks
Status	In Litigation

59. Jie Xu v. HT Multinational

Court	San Bernardino
Case No.	CIV-DS2015679
Nature	Exempt Misclassification
Status	In Litigation

60. Yvette Molina v. Hawaiian Airlines

Court	Los Angeles
Case No.	20STCV28079
Nature	Meal and Rest + Magadia
Status	In Litigation

61. Reinald Pillsbury v. T & T Restaurants CA

Court	Del Norte
Case No.	CVUJ-2020-1214
Nature	Meal/Rest Breaks + Regular Rate
Status	Settled

62. Luis de Jesus v. Guardian Angel Home Care

Court	San Diego
Case No.	37-2020-00021049-CU-OE-CTL
Nature	Piece-Rate
Status	In Litigation

63. Charles Sandlin v. Secure Nursing Services, Inc.

Court	Los Angeles
Case No.	20STCV25675
Nature	Regular Rate
Status	Settled

64. Gabriel Mendez v. Bondz, Inc.

Court	San Joaquin
Case No.	STK-CV-UOE-2020-0007486
Nature	Piece-Rate
Status	In Litigation

65. James Conley v. Siskiyou Forest Products

Court	Shasta
Case No.	195819
Nature	Regular Rate and Meal/Rest Breaks + 226
Status	In Litigation

66. Alex Castellanos v. Southwest Patrol

Court	San Diego
Case No.	37-2020-00024905-CU-OE-CTL
Nature	Augutus
Status	Settled

67. Damien Hampton v. Pegasus Investors

Court	Sacramento
Case No.	34-2020-00281394-CU-BT-GDS
Nature	Unlawful Housing
Status	In Litigation

68. Tamara Perkins v. FSEI

Court	Sacramento
Case No.	34-2020-00287054
Nature	Regular Rate
Status	Settled

69. Rodney Stovall v. Javelin Logistics Company

Court	Alameda
Case No.	RG20075705
Nature	Meal / Rest Breaks
Status	In Litigation

70. Gabrielle Boyd v. Bluestone Lane Holdings, LLC

Court	San Francisco
Case No.	CGC-20-585787
Nature	Tip Pooling ; Magadia
Status	Settled

71. Elias Kaser v. Aviation Consultants, Inc.

Court	Orange County
Case No.	
Nature	Meal / Rest Breaks, Regular Rate
Status	Settled

72. Christopher Chacon v. Panda Motors, Inc.

Court	San Bernardino
Case No.	CIV DS2022220
Nature	Regular Rate
Status	In Litigation

73. Willie Lang v. Pathways

Court	San Diego
Case No.	37-2019-00049969
Nature	Off the Clock
Status	In Litigation

74. Norma Reyes v. Simpson Garden Grove, Inc.

Court	Orange
Case No.	30-2020-0117564-CU-OE-CJC
Nature	Meal / Rest Breaks
Status	Settled

75. Daniel Jacobs v. Rush Media Company

Court	Los Angeles
Case No.	20STCV32350
Nature	Independent Contractor Misclassification
Status	Litigation

76. Luis Ledesma v. TVJ Sons I, Inc.

Court	Santa Barbara
Case No.	20CV03573
Nature	Vaquero
Status	Settled

77. Kevin Cianfarani v. Career Strategies Temporary, Inc. (MPI)

Court	Los Angeles
Case No.	
Nature	Off the clock work
Status	Settled

78. Hector Avitia v. LAZ Parking

Court	San Diego
Case No	37-2020-00030133-CU-OE-CTL
Nature	Magadia + Augustus
Status	Litigation

79. Sukhraj Kaur v. ACES 2020, LLC

Court	Contra Costa
Case No.	C20-02482
Nature	Meal/Rest Breaks, 2802
Status	Litigation

80. Boaventura v. Rei Do Gado

Court	Contra Costa
Case No.	37-2020-00032342-CU-OE-CTL
Nature	Meal/Rest Breaks, 2802
Status	Litigation

81. James Rachal v. ELG Metals, Inc.

Court	Los Angeles
Case No.	20STCV45861
Nature	Meal/Rest Breaks, Regular Rate
Status	Litigation

82. Evelyn Nwansi v. Princeton Healthcare Center, LLC

Court	Alameda
Case No.	RG20083664
Nature	Meal/Rest Breaks, Unpaid Overtime
Status	Litigation

83. Michael Ashlock v. Advantis Medical Staffing

Court	San Diego
Case No.	37-2020-00022305-CU-OE-CTL
Nature	Regular Rate
Status	Settled

84. Moe Popal v. Ameriprise Auto & Home Insurance

Court	Riverside
Case No.	RIC2000006
Nature	Exempt/Non-Exempt Misclassification
Status	Settled

85. Mark Williams v. Web to Door

Court	San Francisco
Case No.	CGC-20-588382
Nature	Meal and Rest Break + Regular Rate
Status	Litigation

86. Jessica Barackman v. Teaz N Pleaz, Inc.

Court	El Dorado
Case No.	SC20200179
Nature	Meal/Rest Breaks, Seating
Status	Settled

87. Nicolas Neutall v. Urban Alchemy

Court	San Francisco
Case No.	CGC-20-588622
Nature	Meal/Rest Breaks, Unpaid Overtime
Status	In Litigation

88. Courteney Arneson v. Bahn Thai, Inc.

Court	Sacramento
Case No.	34-2021-00295429
Nature	Meal/Rest Breaks, Unpaid Overtime
Status	Settled

89. Carlos Cortez v. M & M Automotive Group, LLC.

Court	Alameda
Case No.	HG21086853
Nature	Violation of PAGA
Status	In Litigation

90. Christian Soltero v. Summit Pizza West, LLC

Court	San Diego
Case No.	37-2021-00001288-CU-OE-CTL
Nature	Meal/Rest Breaks, 2698
Status	Settled

91. Traci Pollinger v. Hoehn Motors, Inc.

Court	San Diego
Case No.	37-2021-00003888-CU-OE-CTL
Nature	Violation of PAGA
Status	In Litigation

92. Mohammad Alavicheh v. Suburban Buick GMC Cadillac, LLC

Court	Orange
Case No.	30-2021-01181315-CU-OE-CXC
Nature	Violation of PAGA
Status	In Litigation

93. Shasta Collins v. Hilton Management, LLC

Court	San Francisco
Case No.	CGC-21-590959
Nature	Violation of PAGA
Status	In Litigation

94. Amanda Hernandez v. Parenting Network, Inc.

Court	Tulare
Case No.	VCU287027
Nature	Meal/Rest Breaks, PAGA
Status	In Litigation

95. Richard Sanchez v. Salinas Lincoln Mercury, Inc.

Court	Monterey
Case No.	21CV001535
Nature	Violation of PAGA
Status	In Litigation

96. Doretha Jackson v. White Fir Holdings, LLC dba Midtown Oaks Post-Acute

Court	Sacramento
Case No.	34-2021-00301656
Nature	Meal/Rest Breaks, PAGA
Status	In Litigation

97. Gabriel Guzman Jr. v. Vulcan Materials Company

Court	San Diego
Case No.	30-2021-00052064-CU-OE-CTL
Nature	Violation of PAGA
Status	In Litigation

98. Pedro Rodriguez v. R.M. Parks Place, Inc.

Court	San Joaquin
Case No.	STK-CV-UOE-2021-0006050
Nature	Meal/Rest Breaks, PAGA
Status	In Litigation

99. Michael Harrington v. Genesis Private Security, Inc.

Court	Alameda
Case No.	RG21105476
Nature	Meal/Rest Breaks, Unpaid Overtime
Status	In Litigation

100. David Ezell v. Diab Leasing, Inc.

Court	Sacramento
Case No.	34-2021-00305329
Nature	Meal/Rest Breaks, Unpaid Overtime
Status	In Litigation

101. Joe Moreno v. Rambo, LLC

Court	San Francisco
Case No.	CGC-21-590959
Nature	Violation of PAGA
Status	In Litigation

102. Noemy Flores v. Aven Group, Inc.

Court	Los Angeles
Case No.	21STCV36642
Nature	Meal/Rest Breaks, Unpaid Overtime
Status	In Litigation

103. Bria Ware v. Shake Shack Enterprise, LLC.

Court	Alameda
Case No.	21CV002063
Nature	Meal/Rest Breaks, Unpaid Overtime
Status	In Litigation

104. Latisha Anderson v. Barton Meyers Associates, Inc.

Court	Los Angeles
Case No.	21STCV43314
Nature	Meal/Rest Breaks, Unpaid Overtime, PAGA
Status	In Litigation

105. Eduardo Ybarra v. Helzberg's Diamond Shops, LLC

Court	Alameda
Case No.	21CV003531
Nature	Meal/Rest Breaks, Unpaid Overtime, PAGA
Status	In Litigation

106. Jermell Jones v. Greenlawn Funeral Homes

Court	Kern
Case No.	BCV-21-102356
Nature	Meal/Rest Breaks, Unpaid Overtime, PAGA
Status	In Litigation

107. Chanda Young v. Breakfast Republic

Court	Los Angeles
Case No.	21SMCV01447
Nature	2699, 201, 202, 203
Status	In Litigation

108. Jesus Marin v. Chipotle Services, LLC.

Court	San Diego
Case No.	37-2021-00051618
Nature	Meal/Rest Breaks, Unpaid Overtime
Status	In Litigation

109. Daniel Rosas v. WSD Engineering, Inc.

Court	Alameda
Case No.	RG21086699
Nature	Meal/Rest Breaks, Unpaid Overtime, PAGA
Status	In Litigation

110. Isaiah Davis v. RPM Juice, Inc.

Court	San Francisco
Case No.	21STCV14755
Nature	Meal/Rest Breaks, Unpaid Overtime, PAGA
Status	In Litigation

111. Amanda Hernandez v. Parenting Network

Court	San Joaquin
Case No.	VCU287027
Nature	Meal/Rest Breaks, Wage Statement Violations, PAGA
Status	Settled

112. Christiane Hilden v. Oakwood Village, Inc.

Court	Placer
Case No.	S-CV-0046676
Nature	PAGA
Status	Settled

113. Jose Garcia v. Ferma Greenbox

Court	Alameda
Case No.	RG21101104
Nature	Unpaid Wages, PAGA
Status	Settled

114. Brittney Jones v. ASD6

Court	San Diego
Case No.	37-2021-00016864-CU-OE-CTL
Nature	PAGA
Status	Settled

115. Richard Sanchez v. Salinas Lincoln Mercury

Court	Monterey
Case No.	21CV001535
Nature	PAGA
Status	In Litigation

116. Melina Wilson v. Spreen Honda

Court	San Bernardino
Case No.	CIVSB2119857
Nature	PAGA
Status	Settled

117. Anthony Lopez v. Ferro Automotive

Court	Solano
Case No.	FCS056580
Nature	PAGA
Status	In Litigation

118. Michael Nash v. K. Hovnanian

Court	Riverside
Case No.	RIC2003319
Nature	Meal/Rest Breaks, Unpaid Overtime, PAGA
Status	In Litigation

119. Katsiaryna Karnachova v. INTO North America, Inc.

Court	San Diego
Case No.	37-2021-00023758-CU-OE-CTL
Nature	Meal/Rest Breaks, Unpaid Overtime, PAGA
Status	Settled

120. Doretha Jackson v. White Fir Holdings, LLC

Court	Sacramento
Case No.	34-2021-00301656
Nature	Meal/Rest Breaks, Unpaid Overtime, PAGA
Status	Settled

121. Emily Tolosa v. Kensington Redwood City, LLC

Court	San Mateo
Case No.	21-CIV-03030
Nature	Meal/Rest Breaks, Unlawful Rounding, Unpaid Overtime, PAGA
Status	In Litigation

122. Gabriel Guzman v. Vulcan Materials Company

Court	San Diego
Case No.	37-2021-00024583-CU-OE-CTL
Nature	Unpaid Wages, PAGA
Status	Settled

123. Cristal Rodriguez v. EAH , Inc.

Court	Santa Cruz
Case No.	21CV00884
Nature	Meal/Rest Breaks, Unpaid Overtime, PAGA
Status	Settled

124. Natalie Chrestensen v. Northeastern Rural Health Clinics

Court	Lassen
Case No.	63703
Nature	Meal/Rest Breaks, Unpaid Overtime, PAGA
Status	Settled

125. Khozama Almahdi v. Vitamin Shoppe Industries

Court	Santa Clara
Case No.	20CV365150
Nature	PAGA
Status	Settled

126. Omar Vejar v. Fineline Woodworking, Inc.

Court	Orange
Case No.	30-2021-01208607-CU-OE-CXC
Nature	Meal/Rest Breaks, Unpaid Overtime, PAGA
Status	Settled

127. Janelle Harris v. 7Cuts, LLC

Court	Contra Costa
Case No.	MSC21-01375
Nature	Meal/Rest Breaks, Wage Statement Violations, PAGA
Status	Settled

128. Claudia Nunez v. The Whole Child

Court	Los Angeles
Case No.	21STCV25160
Nature	Meal/Rest Breaks, Unpaid Overtime, PAGA
Status	In Litigation

129. Jaqueline Nayyar v. Pizza Investment Entrepreneurs, LLC

Court	Solano
Case No.	FCS056804
Nature	Meal/Rest Breaks, Unpaid Overtime, PAGA
Status	In Litigation

130. Michael Harrington v. Genesis Private Security

Court	Alameda
Case No.	RG21105476
Nature	PAGA
Status	In Litigation

131. Robert Baray v. Curation Foods

Court	Santa Barbara
Case No.	21CV2834
Nature	Meal/Rest Breaks, Unpaid Overtime, PAGA
Status	Settled

132. James Aguilar v. T & K

Court	Santa Clara
Case No.	21CV384674
Nature	Meal/Rest Breaks, Unpaid Overtime, Untimely Payment of Wages, PAGA
Status	Settled

133. Arthur Gutierrez v. Anning Company

Court	Los Angeles
Case No.	21PSCV00785
Nature	Unpaid Wages, PAGA
Status	In Litigation

134. Pedro Rodriguez v. RM Parks

Court	San Joaquin
Case No.	STK-CV-UOE-2021-0006050
Nature	Unpaid Wages, Wage Statement Violations, PAGA
Status	Settled

135. Phillip Soto v. Niki Investments

Court	Orange
Case No.	30-2021-01213064-CU-OE-CXC
Nature	Meal/Rest Breaks, Unpaid Overtime, PAGA
Status	Settled

136. David Ezell v. Diab Leasing

Court	Sacramento
Case No.	2021-305329
Nature	Meal/Rest Breaks, Unpaid Overtime, Wage Statement Violations, PAGA
Status	Settled

137. John Icabalceta v. Integrated Protection Corp.

Court	Los Angeles
Case No.	21STCV28920
Nature	Meal/Rest Breaks, Unpaid Overtime, PAGA
Status	In Litigation

138. Jose Garcia v. Pacific Shellfish Inc.

Court	San Diego
Case No.	37-2021-00021898-CU-OE-CTL
Nature	Meal/Rest Breaks, Unpaid Overtime, PAGA
Status	Settled

139. Geneva Putman v. Winco Holdings, Inc.

Court	Sacramento
Case No.	2:21-cv-01760-MCE-JDP
Nature	Meal/Rest Breaks, Unpaid Overtime, PAGA
Status	In Litigation

140. Alahjah Brown v. NRI USA, Inc.

Court	San Bernardino
Case No.	CIVSB0228407
Nature	PAGA
Status	Settled

141. Isabella Ruiz v. Tiwana & Sons, Inc.

Court	San Joaquin
Case No.	STK-CV-400-2021-6420
Nature	Meal/Rest Breaks, Unpaid Overtime
Status	Settled

142. Tausha Griswold v. Savings Bank of Menocino County

Court	Mendocino
Case No.	21CV00670
Nature	Wage Statement Violations, PAGA
Status	Settled

143. Dino Desanctis v. Douglas Products and Packaging Company, LLC

Court	Contra Costa
Case No.	C21-01874
Nature	Meal/Rest Breaks, Unpaid Overtime, PAGA
Status	Settled

144. Joe Moreno v. Rambo, LLC.

Court	San Diego
Case No.	37-2021-00038129-CU-OE-CTL
Nature	PAGA
Status	Settled

145. Sara Chiu v. Cornish & Carey (NewMark)

Court	Alameda
Case No.	34-2021-00295429
Nature	Meal/Rest Breaks, Unpaid Overtime
Status	Settled

146. Norman Respass v. The Scion Group

Court	Eastern District
Case No.	2:20-cv-02307-MCE-JDP
Nature	Meal/Rest Breaks, Unpaid Overtime, PAGA
Status	Settled

147. Jalil Hasim v. The Davey Tree Expert Company

Court	San Francisco
Case No.	CGC-21-595544
Nature	Meal/Rest Breaks, Unpaid Overtime, PAGA
Status	Settled

148. Devin Terrel v. KaiserAir

Court	Alameda
Case No.	RG21113701
Nature	Meal/Rest Breaks, Unpaid Overtime, PAGA
Status	Settled

149. Michelle Lee v. Aveanna Healthcare AS, LLC

Court	Santa Clara
Case No.	21CV387081
Nature	PAGA
Status	Settled

150. Annklein Pacia v. Kilroy Realty, L.P.

Court	Los Angeles
Case No.	21STCV20624
Nature	Meal/Rest Breaks, Unpaid Overtime, PAGA, FCRA
Status	Settled

151. Lydia Wedan v. Lakeport Post Acute, LLC

Court	Lake
Case No.	CV-422113
Nature	Meal/Rest Breaks, Unpaid Overtime
Status	Settled

152. Dante Henderson v. Bizon Group, Inc.

Court	Alameda
Case No.	HG21115170
Nature	Wage Statement Violations, Meal/Rest Breaks, Unpaid Overtime, PAGA
Status	In Litigation

153. Noemy Flores v. Aven Group, Inc.

Court	Los Angeles
Case No.	21STCV36642
Nature	Meal/Rest Breaks, Unpaid Overtime, PAGA
Status	In Litigation

154. Alissa Whitney v. Five J's Family Enterprises

Court	San Bernardino
Case No.	CIVSB 2129063
Nature	Meal/Rest Breaks, Unpaid Overtime, Unlawful Rounding, PAGA
Status	Settled

155. Ricardo Rodriguez v. Employbridge

Court	Ventura
Case No.	56-2021-00559039-CU-OE-VTA
Nature	PAGA
Status	In Litigation

156. Amanda Patterson v. RCSH Operations, Inc.

Court	Contra Costa
Case No.	MSC21-02077
Nature	Wage Statement Violations, Meal/Rest Breaks, Unpaid Overtime, PAGA
Status	Settled

157. Tyra Toler v. Total Testing Solutions LLC

Court	Los Angeles
Case No.	21STCV38452
Nature	Meal/Rest Breaks, Unpaid Overtime, PAGA
Status	Settled

158. Juanita Allen v. Nissan of Stockton

Court	San Joaquin
Case No.	STK-CV-UOE-2021-8956
Nature	PAGA
Status	In Litigation

159. Bria Ware v. Shake Shack

Court	Alameda
Case No.	21CV002063
Nature	Meal/Rest Breaks, Unpaid Overtime, PAGA
Status	Settled

160. Paola Villalvazo v. SK Market Inc.

Court	Los Angeles
Case No.	21STCV39911
Nature	PAGA
Status	In Litigation

161. Luke Delacruz v. Walmart (Bonobos)

Court	San Diego
Case No.	37-2021-00046421-CU-OE-CTL
Nature	Meal/Rest Breaks, Unpaid Overtime, PAGA
Status	In Litigation

162. Tanya Ripley v. Cerner Corp.

Court	Placer
Case No.	S-CV-0045961
Nature	Meal/Rest Breaks, Unpaid Overtime
Status	Settled

EXHIBIT B

Activities Export

09/12/2023

10:19 AM

Date ▼	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
09/03/2023	 Unbilled	Work on the motion for final approval.	41201-Delacruz Luke Delacruz v. Wal-Mart Associates, Inc.	Shani Zakay	6.00h	\$575.00	-	\$3,450.00
08/30/2023	 Unbilled	Work on MFA	41201-Delacruz Luke Delacruz v. Wal-Mart Associates, Inc.	Jackland Hom	2.00h	\$395.00	-	\$790.00
08/02/2023	 Unbilled	Emails re Tolling Agreement	41201-Delacruz Luke Delacruz v. Wal-Mart Associates, Inc.	Jackland Hom	0.20h	\$395.00	-	\$79.00
07/27/2023	 Unbilled	Review admin declaration, revise and approve. Review final report. Review calculations and approve.	41201-Delacruz Luke Delacruz v. Wal-Mart Associates, Inc.	Shani Zakay	0.80h	\$575.00	-	\$460.00
06/09/2023	 Unbilled	Prepare for and attend CMC	41201-Delacruz Luke Delacruz v. Wal-Mart Associates, Inc.	Jackland Hom	0.50h	\$395.00	-	\$197.50
06/05/2023	 Unbilled	Review and approve calculations and notice	41201-Delacruz Luke Delacruz v. Wal-Mart Associates, Inc.	Shani Zakay	1.00h	\$575.00	-	\$575.00
05/20/2023	 Unbilled	Work on the MPA	41201-Delacruz Luke Delacruz v. Wal-Mart Associates, Inc.	Shani Zakay	6.50h	\$575.00	-	\$3,737.50
05/19/2023	 Unbilled	Work on MPA	41201-Delacruz Luke Delacruz v. Wal-Mart Associates, Inc.	Jackland Hom	1.80h	\$395.00	-	\$711.00
05/05/2023	 Unbilled	Discussion with counsel in preparation for hearing this morning	41201-Delacruz Luke Delacruz v. Wal-Mart Associates, Inc.	Shani Zakay	0.20h	\$575.00	-	\$115.00
					120.50h		\$0.00 0.00h	\$59,589.00 120.50h

Activities Export

09/12/2023

10:19 AM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		● Unbilled						
04/10/2023	🕒	More work on SAR ● Unbilled	41201-Delacruz Luke Delacruz v. Wal-Mart Associates, Inc.	Shani Zakay	2.70h	\$575.00	-	\$1,552.50
04/06/2023	🕒	Review OC's revisions to settlement agreement and discuss w/ attorneys ● Unbilled	41201-Delacruz Luke Delacruz v. Wal-Mart Associates, Inc.	Jackland Hom	0.80h	\$395.00	-	\$316.00
03/23/2023	🕒	Emails regarding status of SAR ● Unbilled	41201-Delacruz Luke Delacruz v. Wal-Mart Associates, Inc.	Shani Zakay	0.20h	\$575.00	-	\$115.00
03/22/2023	🕒	Review and revise settlement agreement and class notice ● Unbilled	41201-Delacruz Luke Delacruz v. Wal-Mart Associates, Inc.	Jackland Hom	3.50h	\$395.00	-	\$1,382.50
03/20/2023	🕒	Work on TAC and 2nd Amended PAGA Letter ● Unbilled	41201-Delacruz Luke Delacruz v. Wal-Mart Associates, Inc.	Jackland Hom	1.80h	\$395.00	-	\$711.00
03/20/2023	🕒	Draft TAC and 2nd Amended PAGA Letter ● Unbilled	41201-Delacruz Luke Delacruz v. Wal-Mart Associates, Inc.	Jackland Hom	1.20h	\$395.00	-	\$474.00
03/16/2023	🕒	Emails and discussion regarding necessary work on amended complaint. Review and approve stipulation for leave. ● Unbilled	41201-Delacruz Luke Delacruz v. Wal-Mart Associates, Inc.	Shani Zakay	0.40h	\$575.00	-	\$230.00
03/06/2023	🕒	Prepare for and attend mediation ● Unbilled	41201-Delacruz Luke Delacruz v. Wal-Mart	Jackland Hom	10.00h	\$395.00	-	\$3,950.00
					120.50h		\$0.00 0.00h	\$59,589.00 120.50h

Activities Export

09/12/2023

10:19 AM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
Associates, Inc.								
03/06/2023	 	Prepare for and attend mediation Unbilled	41201-Delacruz Luke Delacruz v. Wal-Mart Associates, Inc.	Shani Zakay	10.00h	\$575.00	-	\$5,750.00
03/03/2023	 	Emails regarding mediation next week. Unbilled	41201-Delacruz Luke Delacruz v. Wal-Mart Associates, Inc.	Shani Zakay	0.20h	\$575.00	-	\$115.00
02/27/2023	 	More work on mediation brief Unbilled	41201-Delacruz Luke Delacruz v. Wal-Mart Associates, Inc.	Shani Zakay	2.30h	\$575.00	-	\$1,322.50
02/26/2023	 	Work on the mediation brief Unbilled	41201-Delacruz Luke Delacruz v. Wal-Mart Associates, Inc.	Shani Zakay	5.50h	\$575.00	-	\$3,162.50
02/24/2023	 	Emails regarding mediation brief. Unbilled	41201-Delacruz Luke Delacruz v. Wal-Mart Associates, Inc.	Shani Zakay	0.20h	\$575.00	-	\$115.00
02/23/2023	 	Emails regarding mediation brief Unbilled	41201-Delacruz Luke Delacruz v. Wal-Mart Associates, Inc.	Shani Zakay	0.10h	\$575.00	-	\$57.50
02/22/2023	 	Review expert report and work on mediation brief Unbilled	41201-Delacruz Luke Delacruz v. Wal-Mart Associates, Inc.	Shani Zakay	1.90h	\$575.00	-	\$1,092.50
02/21/2023	 	More emails w/ OC re mediation data and demographics Unbilled	41201-Delacruz Luke Delacruz v. Wal-Mart Associates, Inc.	Jackland Hom	0.50h	\$395.00	-	\$197.50
02/21/2023	 	Review and execute the confidentiality agreement.	41201-Delacruz Luke Delacruz v. Wal-Mart	Shani Zakay	0.80h	\$575.00	-	\$460.00
					120.50h		\$0.00 0.00h	\$59,589.00 120.50h

Activities Export

09/12/2023

10:19 AM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		● Unbilled	Associates, Inc.					
02/21/2023	🕒	Work on mediation brief ● Unbilled	41201-Delacruz Luke Delacruz v. Wal-Mart Associates, Inc.	Shani Zakay	2.50h	\$575.00	-	\$1,437.50
02/17/2023	🕒	Emails with OPC and expert regarding data for mediation and necessary work ● Unbilled	41201-Delacruz Luke Delacruz v. Wal-Mart Associates, Inc.	Shani Zakay	0.50h	\$575.00	-	\$287.50
02/16/2023	🕒	Emails with expert regarding sample data and necessary work. ● Unbilled	41201-Delacruz Luke Delacruz v. Wal-Mart Associates, Inc.	Shani Zakay	0.60h	\$575.00	-	\$345.00
02/16/2023	🕒	Emails with expert regarding data review ● Unbilled	41201-Delacruz Luke Delacruz v. Wal-Mart Associates, Inc.	Shani Zakay	0.40h	\$575.00	-	\$230.00
02/15/2023	🕒	Review mediation data and emails with OPC regarding the same ● Unbilled	41201-Delacruz Luke Delacruz v. Wal-Mart Associates, Inc.	Shani Zakay	3.00h	\$575.00	-	\$1,725.00
02/13/2023	🕒	Emails w/ OC re mediation data ● Unbilled	41201-Delacruz Luke Delacruz v. Wal-Mart Associates, Inc.	Jackland Hom	0.50h	\$395.00	-	\$197.50
02/10/2023	🕒	Emails to follow up on mediation data ● Unbilled	41201-Delacruz Luke Delacruz v. Wal-Mart Associates, Inc.	Shani Zakay	0.10h	\$575.00	-	\$57.50
02/08/2023	🕒	Emails with co-counsel and OPC regarding data for mediation and necessary review. ● Unbilled	41201-Delacruz Luke Delacruz v. Wal-Mart Associates, Inc.	Shani Zakay	0.50h	\$575.00	-	\$287.50
					120.50h		\$0.00 0.00h	\$59,589.00 120.50h

Activities Export

09/12/2023

10:19 AM

Date ▼	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
02/07/2023	 	Emails w/ co-counsel re mediation ● Unbilled	41201-Delacruz Luke Delacruz v. Wal-Mart Associates, Inc.	Jackland Hom	0.30h	\$395.00	-	\$118.50
02/07/2023	 	Emails regarding data for mediation. ● Unbilled	41201-Delacruz Luke Delacruz v. Wal-Mart Associates, Inc.	Shani Zakay	0.20h	\$575.00	-	\$115.00
01/24/2023	 	Meeting with counsel to discuss sampling for mediation and necessary work on stipulation. ● Unbilled	41201-Delacruz Luke Delacruz v. Wal-Mart Associates, Inc.	Shani Zakay	0.30h	\$575.00	-	\$172.50
01/13/2023	 	Emails w/ co-counsel re 01/13/ 2023 CMC ● Unbilled	41201-Delacruz Luke Delacruz v. Wal-Mart Associates, Inc.	Jackland Hom	0.20h	\$395.00	-	\$79.00
01/03/2023	 	Review confirmation letter and dates for mediation. Emails with mediator's office and with staff accordingly. Work on co-counsel on data demand. ● Unbilled	41201-Delacruz Luke Delacruz v. Wal-Mart Associates, Inc.	Shani Zakay	1.00h	\$575.00	-	\$575.00
12/28/2022	 	Review and revise CMS ● Unbilled	41201-Delacruz Luke Delacruz v. Wal-Mart Associates, Inc.	Jackland Hom	0.50h	\$375.00	-	\$187.50
12/19/2022	 	Emails regarding mediation. ● Unbilled	41201-Delacruz Luke Delacruz v. Wal-Mart Associates, Inc.	Shani Zakay	0.20h	\$550.00	-	\$110.00
11/04/2022	 	More emails regarding mediation and call with OPC to discuss possible dates. ● Unbilled	41201-Delacruz Luke Delacruz v. Wal-Mart Associates, Inc.	Shani Zakay	0.50h	\$550.00	-	\$275.00

Activities Export

09/12/2023

10:19 AM

Date ▼	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
11/04/2022		Emails regarding mediation  Unbilled	41201-Delacruz Luke Delacruz v. Wal-Mart Associates, Inc.	Shani Zakay	0.50h	\$550.00	-	\$275.00
10/04/2022		Review DEF's Answer to SAC  Unbilled	41201-Delacruz Luke Delacruz v. Wal-Mart Associates, Inc.	Jackland Hom	0.80h	\$375.00	-	\$300.00
07/22/2022		Prepare for and attend CMC  Unbilled	41201-Delacruz Luke Delacruz v. Wal-Mart Associates, Inc.	Jackland Hom	1.00h	\$375.00	-	\$375.00
07/07/2022		Emails w/ OC re stipulation for leave to file SAC  Unbilled	41201-Delacruz Luke Delacruz v. Wal-Mart Associates, Inc.	Jackland Hom	0.30h	\$375.00	-	\$112.50
07/06/2022		Drafting CMS, filing, and serving.  Unbilled	41201-Delacruz Luke Delacruz v. Wal-Mart Associates, Inc.	Donia Saadi	1.00h	\$165.00	-	\$165.00
07/05/2022		Review and revise joint report.  Unbilled	41201-Delacruz Luke Delacruz v. Wal-Mart Associates, Inc.	Shani Zakay	0.50h	\$550.00	-	\$275.00
06/20/2022		Emails with OPC regarding mediation.  Unbilled	41201-Delacruz Luke Delacruz v. Wal-Mart Associates, Inc.	Shani Zakay	0.50h	\$550.00	-	\$275.00
06/09/2022		Emails regarding mediation.  Unbilled	41201-Delacruz Luke Delacruz v. Wal-Mart Associates, Inc.	Shani Zakay	0.30h	\$550.00	-	\$165.00
06/03/2022		More work on SAC  Unbilled	41201-Delacruz Luke Delacruz v. Wal-Mart Associates, Inc.	Shani Zakay	0.50h	\$550.00	-	\$275.00
					120.50h		\$0.00 0.00h	\$59,589.00 120.50h

Activities Export

09/12/2023

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Date ▼	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
06/03/2022	 Unbilled	Review and revise the SAC	41201-Delacruz Luke Delacruz v. Wal-Mart Associates, Inc.	Shani Zakay	1.60h	\$550.00	-	\$880.00
05/11/2022	 Unbilled	Emails w/ mediator re mediation	41201-Delacruz Luke Delacruz v. Wal-Mart Associates, Inc.	Jackland Hom	0.30h	\$375.00	-	\$112.50
05/11/2022	 Unbilled	Emails with mediator regarding rescheduling of the mediation.	41201-Delacruz Luke Delacruz v. Wal-Mart Associates, Inc.	Shani Zakay	0.30h	\$550.00	-	\$165.00
05/10/2022	 Unbilled	Emails regarding call with OPC.	41201-Delacruz Luke Delacruz v. Wal-Mart Associates, Inc.	Shani Zakay	0.10h	\$550.00	-	\$55.00
05/10/2022	 Unbilled	Emails and discussions regarding rescheduling of the mediation.	41201-Delacruz Luke Delacruz v. Wal-Mart Associates, Inc.	Shani Zakay	0.40h	\$550.00	-	\$220.00
05/04/2022	 Unbilled	Calls and emails with OPC and co- counsel regarding mediation and rescheduling of mediation.	41201-Delacruz Luke Delacruz v. Wal-Mart Associates, Inc.	Shani Zakay	1.00h	\$550.00	-	\$550.00
04/13/2022	 Unbilled	Emails regarding amended complaint.	41201-Delacruz Luke Delacruz v. Wal-Mart Associates, Inc.	Shani Zakay	0.20h	\$550.00	-	\$110.00
03/28/2022	 Unbilled	Call with OPC regarding mediation and follow up call with co-counsel.	41201-Delacruz Luke Delacruz v. Wal-Mart Associates, Inc.	Shani Zakay	0.50h	\$550.00	-	\$275.00
03/22/2022	 Unbilled	More emails w/ OC re mediation	41201-Delacruz Luke Delacruz v. Wal-Mart	Jackland Hom	0.80h	\$375.00	-	\$300.00
					120.50h		\$0.00 0.00h	\$59,589.00 120.50h

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
Associates, Inc.								
03/18/2022		Emails regarding mediation. ● Unbilled	41201-Delacruz Luke Delacruz v. Wal-Mart Associates, Inc.	Shani Zakay	0.40h	\$550.00	-	\$220.00
03/15/2022		Emails w/ OC re potential mediation ● Unbilled	41201-Delacruz Luke Delacruz v. Wal-Mart Associates, Inc.	Jackland Hom	0.20h	\$375.00	-	\$75.00
03/15/2022		Review email from OPC and respond. Call with OPC accordingly. ● Unbilled	41201-Delacruz Luke Delacruz v. Wal-Mart Associates, Inc.	Shani Zakay	0.60h	\$550.00	-	\$330.00
03/14/2022		Review and revise Amended PAGA Letter ● Unbilled	41201-Delacruz Luke Delacruz v. Wal-Mart Associates, Inc.	Jackland Hom	0.50h	\$375.00	-	\$187.50
02/17/2022		Review and approve amended PAGA notice. ● Unbilled	41201-Delacruz Luke Delacruz v. Wal-Mart Associates, Inc.	Shani Zakay	0.30h	\$550.00	-	\$165.00
02/11/2022		Review and revise SI (Set 1) ● Unbilled	41201-Delacruz Luke Delacruz v. Wal-Mart Associates, Inc.	Jackland Hom	0.50h	\$375.00	-	\$187.50
02/07/2022		Work on written discovery. ● Unbilled	41201-Delacruz Luke Delacruz v. Wal-Mart Associates, Inc.	Shani Zakay	3.40h	\$550.00	-	\$1,870.00
02/03/2022		Additional Intake for Attorneys. ● Unbilled	41201-Delacruz Luke Delacruz v. Wal-Mart Associates, Inc.	Donia Saadi	0.50h	\$165.00	-	\$82.50
					120.50h		\$0.00	\$59,589.00
							0.00h	120.50h

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Date ▼	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
01/31/2022		Review DEF's answer to complaint and legal research on affirmative defenses  Unbilled	41201-Delacruz Luke Delacruz v. Wal-Mart Associates, Inc.	Jackland Hom	1.80h	\$375.00	-	\$675.00
01/31/2022		Review Defendant's Answer. Legal research regarding various affirmative defenses.  Unbilled	41201-Delacruz Luke Delacruz v. Wal-Mart Associates, Inc.	Shani Zakay	2.80h	\$550.00	-	\$1,540.00
01/31/2022		Adding documents into Clio.  Unbilled	41201-Delacruz Luke Delacruz v. Wal-Mart Associates, Inc.	Donia Saadi	0.20h	\$165.00	-	\$33.00
01/20/2022		Call with OPC regarding meet and confer on demurrer.  Unbilled	41201-Delacruz Luke Delacruz v. Wal-Mart Associates, Inc.	Shani Zakay	0.50h	\$550.00	-	\$275.00
01/19/2022		Multiple emails w/ OC re M&C on demurrer  Unbilled	41201-Delacruz Luke Delacruz v. Wal-Mart Associates, Inc.	Jackland Hom	0.80h	\$375.00	-	\$300.00
01/19/2022		Emails with OPC regarding demurrer and meet and confer. Legal research regarding Defendant's arguments on demurrer.  Unbilled	41201-Delacruz Luke Delacruz v. Wal-Mart Associates, Inc.	Shani Zakay	2.50h	\$550.00	-	\$1,375.00
12/27/2021		Emails w/ OC re FAC  Unbilled	41201-Delacruz Luke Delacruz v. Wal-Mart Associates, Inc.	Jackland Hom	0.30h	\$350.00	-	\$105.00
12/27/2021		Emails with staff regarding filing of FAC.	41201-Delacruz Luke Delacruz v. Wal-Mart Associates, Inc.	Shani Zakay	0.10h	\$550.00	-	\$55.00

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		● Unbilled						
12/24/2021	🕒	Draft FAC ● Unbilled	41201-Delacruz Luke Delacruz v. Wal-Mart Associates, Inc.	Shani Zakay	1.50h	\$550.00	-	\$825.00
12/22/2021	🕒	More emails with OPC and co- counsel regarding meet and confer and FAC. ● Unbilled	41201-Delacruz Luke Delacruz v. Wal-Mart Associates, Inc.	Shani Zakay	0.30h	\$550.00	-	\$165.00
12/21/2021	🕒	Review meet and confer email from OPC and draft reply. ● Unbilled	41201-Delacruz Luke Delacruz v. Wal-Mart Associates, Inc.	Shani Zakay	0.50h	\$550.00	-	\$275.00
12/05/2021	🕒	Legal research re issues discussed in OC's M&C re partial demurrer ● Unbilled	41201-Delacruz Luke Delacruz v. Wal-Mart Associates, Inc.	Jackland Hom	1.20h	\$350.00	-	\$420.00
12/05/2021	🕒	Emails regarding meet and confer on demurrer. ● Unbilled	41201-Delacruz Luke Delacruz v. Wal-Mart Associates, Inc.	Shani Zakay	0.30h	\$550.00	-	\$165.00
12/03/2021	🕒	Review OC's M&C email re partial demurrer to FAC ● Unbilled	41201-Delacruz Luke Delacruz v. Wal-Mart Associates, Inc.	Jackland Hom	0.80h	\$350.00	-	\$280.00
12/03/2021	🕒	Review meet and confer email from OPC and emails with OPC and co-counsel regarding the same. ● Unbilled	41201-Delacruz Luke Delacruz v. Wal-Mart Associates, Inc.	Shani Zakay	1.00h	\$550.00	-	\$550.00
11/30/2021	🕒	Review file, status of pleadings, calendaring and call with client to	41201-Delacruz Luke Delacruz v. Wal-Mart	Jackland Hom	0.50h	\$350.00	-	\$175.00
					120.50h		\$0.00 0.00h	\$59,589.00 120.50h

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		provide status update ● Unbilled	Associates, Inc.					
11/02/2021	🕒	drafting docs, filing complaint. ● Unbilled	41201-Delacruz Luke Delacruz v. Wal-Mart Associates, Inc.	Shani Zakay	1.00h	\$165.00	-	\$165.00
11/01/2021	🕒	Work on the complaint - add PAGA and instruct staff on filing. ● Unbilled	41201-Delacruz Luke Delacruz v. Wal-Mart Associates, Inc.	Shani Zakay	1.70h	\$550.00	-	\$935.00
08/28/2021	🕒	Multiple calls and meetings with the client. Review the file. Review and revise the complaint and PAGA letter ● Unbilled	41201-Delacruz Luke Delacruz v. Wal-Mart Associates, Inc.	Shani Zakay	6.50h	\$550.00	-	\$3,575.00
08/16/2021	🕒	Emails re client approval of complaint ● Unbilled	41201-Delacruz Luke Delacruz v. Wal-Mart Associates, Inc.	Jackland Hom	0.30h	\$350.00	-	\$105.00
07/28/2021	🕒	Review file and draft complaint ● Unbilled	41201-Delacruz Luke Delacruz v. Wal-Mart Associates, Inc.	Jackland Hom	6.50h	\$350.00	-	\$2,275.00
					120.50h		\$0.00 0.00h	\$59,589.00 120.50h

EXHIBIT C

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Date ▾	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
07/12/2023	\$	One Legal - Notice of Ruling,Proof of Service ● Unbilled	41201-Delacruz Luke Delacruz v. Wal-Mart Associates, Inc.	Donia Saadi	1.00	\$13.33	-	\$13.33
06/12/2023	\$	One Legal - POS ● Unbilled	41201-Delacruz Luke Delacruz v. Wal-Mart Associates, Inc.	Donia Saadi	1.00	\$13.33	-	\$13.33
06/08/2023	\$	One Legal - PROPOSED ORDER GRANTING PLAINTIFFS MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION AND PAGA SETTLEMENT ● Unbilled	41201-Delacruz Luke Delacruz v. Wal-Mart Associates, Inc.	Donia Saadi	1.00	\$53.79	-	\$53.79
06/06/2023	\$	One Legal- Proposed Order ● Unbilled	41201-Delacruz Luke Delacruz v. Wal-Mart Associates, Inc.	Donia Saadi	1.00	\$13.33	-	\$13.33
05/16/2023	\$	POS ● Unbilled	41201-Delacruz Luke Delacruz v. Wal-Mart Associates, Inc.	Donia Saadi	1.00	\$53.79	-	\$53.79
05/16/2023	\$	POS ● Unbilled	41201-Delacruz Luke Delacruz v. Wal-Mart Associates, Inc.	Donia Saadi	1.00	\$53.79	-	\$53.79
04/24/2023	\$	One Legal - Amended Complaint ● Unbilled	41201-Delacruz Luke Delacruz v. Wal-Mart Associates, Inc.	Donia Saadi	1.00	\$13.33	-	\$13.33
03/14/2023	\$	Expert Cost ● Unbilled	41201-Delacruz Luke Delacruz v. Wal-Mart Associates, Inc.	Shani Zakay	1.00	\$1,365.00	-	\$1,365.00
01/04/2023	\$	Mediation Fee	41201-Delacruz	Shani	1.00	\$6,250.00	-	\$6,250.00
							\$0.00 0.00h	\$9,555.13 0.00h

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		● Unbilled	Luke Delacruz v. Wal-Mart Associates, Inc.	Zakay				
08/25/2022	\$	OneLegal - Stipulation ● Unbilled	41201-Delacruz Luke Delacruz v. Wal-Mart Associates, Inc.	Donia Saadi	1.00	\$33.46	-	\$33.46
07/06/2022	\$	OneLegal - CMS ● Unbilled	41201-Delacruz Luke Delacruz v. Wal-Mart Associates, Inc.	Donia Saadi	1.00	\$12.87	-	\$12.87
11/15/2021	\$	Knox Invoice - Complaint Serving ● Unbilled	41201-Delacruz Luke Delacruz v. Wal-Mart Associates, Inc.	Shani Zakay	1.00	\$66.67	-	\$66.67
11/15/2021	\$	Knx Invoice - Complaint ● Unbilled	41201-Delacruz Luke Delacruz v. Wal-Mart Associates, Inc.	Shani Zakay	1.00	\$122.75	-	\$122.75
11/02/2021	\$	OneLegal - COMPLAINT ● Unbilled	41201-Delacruz Luke Delacruz v. Wal-Mart Associates, Inc.	Shani Zakay	1.00	\$1,489.69	-	\$1,489.69
							\$0.00 0.00h	\$9,555.13 0.00h