

JCL LAW FIRM, APC

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ZAKAY LAW GROUP, APLC

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Attorneys for PLAINTIFF LUTHER RODDY

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF MARIN

LUTHER RODDY and SAVANNAH L.
BURNETT, individuals, on behalf of the state of
California, as a private attorneys general,

Plaintiffs,

vs.

O'NEILL BEVERAGES CO. LLC, a Delaware
Limited Liability Company; and DOES 1-50,
Inclusive;

Defendants

Case No: CIV2200067

**DECLARATION OF SHANI O. ZAKAY,
ESQ., IN SUPPORT OF MOTION TO
APPROVE PAGA SETTLEMENT**

Judge: Hon. Stephen P. Freccero
Courtroom: A

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 for
3 Plaintiff Savannah L. Burnett (“Plaintiff”). As such, I am fully familiar with the facts, pleadings, and
4 history of the matter. I am submitting this declaration in support of Plaintiff’s Motion to Approve
5 PAGA Settlement.

6 **I. EXPERIENCE**

7 2. Over the course of the litigation during the last thirty-one months, a number of attorneys
8 have worked on this matter. Their credentials are reflected in the Zakay Law Group, APLC firm resume,
9 a true and correct copy of which is attached hereto as Exhibit #1. Some of the major cases my firm has
10 undertaken are also set forth in Exhibit #1. The attorneys involved in this matter have had class litigation
11 experience, much of it in employment class actions, unfair business practices and other complex
12 litigation. I have experience in cases involving labor code violations and meal and rest break claims.
13 Counsel has litigated similar labor law cases against other employers on behalf of employees. Counsel
14 have been approved as experienced Counsel throughout California. It is this level of experience which
15 enabled the firms to undertake the instant matter and to successfully combat the resources of the
16 defendant and their capable and experienced counsel. Because of the concerted and dedicated effort
17 this case required to properly handle and prosecute, Counsel was precluded from taking other cases,
18 and in fact, had to turn away other potential fee generating cases.

19 **II. LOADSTAR AND REQUESTED COUNSEL FEES PAYMENT**

20 3. As of May 6, 2024, Zakay Law Group, APLC incurred lodestar totaling \$30,206.50 in
21 this matter. I have reviewed my firm’s lodestar in this matter and believe the charges are reasonable
22 and were reasonably necessary to the conduct of the case. From June 2021 through January 2024, my
23 firm has worked more than 55.5 hours prosecuting these claims with the attorneys’ hourly fee rates for
24 attorneys at \$375-\$550, resulting in the current lodestar. A detailed breakdown of the total fees and the
25 services performed by the firm on this case is attached hereto as Exhibit #2.

26 4. Additionally, Counsel will be performing additional work, including finalizing the orders
27 and judgment and monitoring completion of the settlement distribution. I expect this additional work
28 will result in at least \$10,000 to \$15,000 in additional loadstar, bringing the multiplier even lower.

1 5. The rates charged by my firm are in line with the prevailing rates of attorneys in the local
2 legal community for similar work and, if this were a commercial matter, these are the charges that would
3 be made and presented to the client. These hourly rates have been approved by Court's throughout
4 California, including the Courts in the Superior Court of California. Finally, the reasonableness of
5 Counsel's hourly rates is further confirmed by comparing such rates with the rates of comparable
6 counsel practicing complex and class litigation as detailed in the National Law Journal Billing Survey.
7 See e.g. *Zest IP Holdings, LLC v. Implant Direct MFG, LLC*, 2014 U.S. Dist. LEXIS 167563 (S.D. Cal.
8 2014) (finding that "Mayer Brown's \$775 average billing rate for partners" and "Mayer Brown's \$543
9 average associate billing rate" are reasonable rates when compared within 21 other firms practicing in
10 the Southern District of California). This survey is useful to show that Counsel's rates are in line with
11 the comparable rates of the defense counsel that opposes these types of class claims, such as Mayer
12 Brown. In another example, Sheppard Mullin Richter & Hampton, who is opposing counsel in many
13 cases prosecuted by Counsel charges rates as high as \$875 for partners and \$535 for associates.
14 Similarly, Paul Hastings, another opposing counsel in these types of cases, charges between \$900 and
15 \$750 for partners and \$755 and \$335 for associates. Thus, the rates charged by Counsel for comparable
16 work are less than these examples and are therefore undoubtedly reasonable.

17 **III. COSTS**

18 6. As part of the Settlement Agreement, the parties agreed that Counsel may seek
19 reimbursement of expenses incurred as documented in Counsel's billing records as part of the Counsel
20 Award. Attached hereto as Exhibit #3 is a true and correct copy of the Zakay Law Group, Cost Summary
21 detailing the actually incurred litigation expenses by the Zakay Law Group APLC, for this matter as of
22 May 6, 2024. As shown in detail in the attached Cost Summary, the Zakay Law Group incurred a total
23 of \$10,694.15 in litigation costs prosecuting this action – with additional costs anticipated.

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

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 6th day of May 2024, at San Diego, California.

By: 
Shani O. Zakay, Esq.
Attorney for Plaintiff

EXHIBIT 1

Zakay Law Group, APC
5440 Morehouse Drive, Suite 3600
San Diego, CA 92121
Telephone: (619) 255-9047
Fax: (858) 404-9203

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, *magma 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. **Attorney Rachel Newman 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, November 2023 – present

- **EDUCATION**

CALIFORNIA WESTERN SCHOOL OF LAW, San Diego, CA

Juris Doctor, *April 2023*

UNIVERSITY OF OREGON, Eugene, OR

Bachelor of Arts: Political Science: 2020

7. **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
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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	Settled

45. Curtis Edwards v. Resolve Group

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

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	Settled

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	Settled

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	Settled

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	Settled

56. Estefania Renteria v. Love's Country

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

57. Rachel Latin v. OneMain General Services Corp.

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

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

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

59. Jie Xu v. HT Multinational

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

60. Yvette Molina v. Hawaiian Airlines

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

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	Settled

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

Court	Los Angeles
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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	Settled

65. James Conley v. Siskiyou Forest Products

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

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	Settled

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	Settled

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	Settled

73. Willie Lang v. Pathways

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

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	Settled

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
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78. Hector Avitia v. LAZ Parking

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

79. Sukhraj Kaur v. ACES 2020, LLC

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

80. Michael 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	Settled

82. Evelyn Nwansi v. Princeton Healthcare Center, LLC

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

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
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85. Mark Williams v. Web to Door

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

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	Settled

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

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

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	Settled

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

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

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	Settled

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

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

98. David Ezell v. Diab Leasing, Inc.

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

Status	Settled
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99. Bria Ware v. Shake Shack Enterprise, LLC.

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

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

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

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

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

102. Jermell Jones v. Greenlawn Funeral Homes

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

103. Jesus Marin v. Chipotle Services, LLC.

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

104. Daniel Rosas v. WSD Engineering, Inc.

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

105. Isaiah Davis v. RPM Juice, Inc.

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

Status	Settled
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106. Christiane Hilden v. Oakwood Village, Inc.

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

107. Jose Garcia v. Ferma Greenbox

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

108. Brittney Jones v. ASD6

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

109. Melina Wilson v. Spreen Honda

Court	San Bernardino
Case No.	CIVSB2119857
Nature	PAGA
Status	Settled

110. Anthony Lopez v. Ferro Automotive

Court	Solano
Case No.	FCS056580
Nature	PAGA
Status	In Litigation

111. Michael Nash v. K. Hovnanian

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

112. 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
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113. 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	Settled

114. Gabriel Guzman v. Vulcan Materials Company

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

115. Cristal Rodriguez v. EAH , Inc.

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

116. Natalie Chrestensen v. Northeastern Rural Health Clinics

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

117. Khozama Almahdi v. Vitamin Shoppe Industries

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

118. 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

119. Janelle Harris v. 7Cuts, LLC

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

120. Claudia Nunez v. The Whole Child

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

121. Jaqueline Nayyar v. Pizza Investment Entrepreneurs, LLC

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

122. Michael Harrington v. Genesis Private Security

Court	Alameda
Case No.	RG21105476
Nature	Wage Statement
Status	Settled

123. Robert Baray v. Curation Foods

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

124. James Aguilar v. T & K

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

125. Arthur Gutierrez v. Anning Company

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

126. Phillip Soto v. Niki Investments

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

127. John Icabalceta v. Integrated Protection Corp.

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

128. 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

129. 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

130. Alahjah Brown v. NRI USA, Inc.

Court	San Bernardino
Case No.	CIVSB0228407
Nature	PAGA
Status	Settled

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

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

132. Tausha Griswold v. Savings Bank of Menocino County

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

133. 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

134. Joe Moreno v. Rambo, LLC.

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

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

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

136. 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

137. 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

138. Devin Terrell v. KaiserAir

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

139. Michelle Lee v. Aveanna Healthcare AS, LLC

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

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

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

141. Lydia Wedan v. Lakeport Post Acute, LLC

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

142. Dante Henderson v. Bizon Group, Inc.

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

143. Noemy Flores v. Aven Group, Inc.

Court	Los Angeles
Case No.	21STCV36642
Nature	Wage Order 5
Status	Settled

144. 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

145. Ricardo Rodriguez v. Employbridge

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

146. 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
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147. Tyra Toler v. Total Testing Solutions LLC

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

148. Juanita Allen v. Nissan of Stockton

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

149. Paola Villalvazo v. SK Market Inc.

Court	Los Angeles
Case No.	21STCV39911
Nature	PAGA
Status	Settled

150. Luke Delacruz v. Walmart (Bonobos)

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

151. Tanya Ripley v. Cerner Corp.

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

152. Powell v. Core Community Organized Relief Effort

Court	San Francisco
Case No.	CGC-21-596527
Nature	Meal/Rest Breaks
Status	Settled

153. Toshi Magee v. Children's Dentistry and Orthodontics

Court	Merced
Case No.	21CV-03773

Nature	Regular Rate of Pay
Status	In Litigation

154. Alisa Alvarez v. SLO Arches, Inc.

Court	San Luis Obispo
Case No.	21CV-0533
Nature	Meal/Rest Breaks
Status	Settled

155. Perla Rodriguez Gonzales v. CM School Supply, Inc.

Court	San Bernardino
Case No.	CIVSB2133207
Nature	Rounding
Status	In Litigation

156. Parastoo Maboudi v. The Neiman Marcus Group LLC

Court	Santa Clara
Case No.	22CV391973
Nature	Regular Rate of Pay Miscalculation
Status	Settled

157. Michael Hillstrom v. Constellation Brands, Inc. et al.

Court	Napa
Case No.	22CV000006
Nature	Regular Rate of Pay
Status	Settled

158. Chanda Young v. Breakfast Republic

Court	San Diego
Case No.	37-2022-00005487-CU-OE-CTL
Nature	Meal/Rest Break
Status	Settled

159. Maria Tabarez v. Alta Hospitals System LLC

Court	Los Angeles
Case No.	5220001658
Nature	Meal/Rest Break
Status	In Litigation

160. Luther Roddy v. O'Neil Beverages

Court	Marin
Case No.	CIV2200067

Nature	Various
Status	Settled

161. David Stevens v. Kamps Propane, Inc.

Court	San Diego
Case No.	37-2021-00016367-CU-OE-CTL
Nature	Various
Status	In Litigation

162. Veronica Maravilla v. Venus Et Fleur, LLC

Court	San Diego
Case No.	37-2021-00016367-CU-OE-CTL
Nature	Various
Status	Settled

163. Maria G. Gonzalez Romero v. Cabe Brothers Rentals LLC et al.

Court	Los Angeles
Case No.	22STCV18688
Nature	Various
Status	Settled

164. Daraka Banks v. General Motors LLC et al.

Court	San Bernardino
Case No.	CIVSB2203661
Nature	Meal/Rest Breaks
Status	In Litigation

165. Jesse Galindo v. PAQ, Inc. dba Food 4 Less et al.

Court	San Joaquin
Case No.	STK-CV-UOE-2022-0000452
Nature	Regular Rate of Pay
Status	Settled

166. Tyler Sneed v. Sunroad Auto, LLC et al.

Court	San Diego
Case No.	37-2022-00007661
Nature	Various
Status	In Litigation

167. Halie Williamson v. Stan Hotel

Court	Stanislaus
Case No.	CV-21-006861

Nature	Meal/Rest Periods
Status	In Litigation

168. Andrew Hernandez v. USGI dba Upland Group

Court	Orange
Case No.	30-2022-01250099
Nature	Augustus
Status	In Litigation

169. Alexa Lowe v. Ash's First LLC et al.

Court	San Diego
Case No.	37-2022-00010114
Nature	Various
Status	In Litigation

170. Marquan Nesbitt v. Autonomous, Inc.

Court	San Bernardino
Case No.	CIVSB2204742
Nature	Regular Rate of Pay
Status	Settled

171. Luis De Jesus Claudio v. Uni Care Home Health Inc.

Court	San Diego
Case No.	37-2022-00003063-CU-OE-CTL
Nature	Piece-Rate
Status	Settled

172. Vincent Leslie v. P.F.C. Enterprises, Inc. dba Allen Properties

Court	San Bernardino
Case No.	CIVSB2207363
Nature	Wage Statement
Status	Settled

173. Serenity Jean Dewolf v. Mountain Counties Supply Company

Court	Siskiyou
Case No.	SCCV-CVCV-2022-329
Nature	Meal/Rest Breaks
Status	In Litigation

174. Jeannete Gomes v. Homeaglow Inc.

Court	San Joaquin / Los Angeles
Case No.	22STCV27159

Nature	Independent Contractor Misclassification
Status	In Litigation

175. Manuel Villa v. Trillium Pumps USA, Inc.

Court	Fresno
Case No.	22CECG01104
Nature	Rounding
Status	Settled

176. Kimberlee Califano v. Alvarado Parkway Institute Behavioral Health Systems et al.

Court	San Diego
Case No.	37-2021-00021168
Nature	Meal/Rest Break
Status	Settled

177. Alan Carrillo Rodriguez v. Titan Workforce

Court	San Joaquin
Case No.	STK-CV-UOE-2022-0003036
Nature	Meal/Rest
Status	Settled

178. Isaiah D. Hughes v. Asian and Pacific Islander Wellness Center, Inc.

Court	San Francisco
Case No.	CGC-22-599270
Nature	Rounding
Status	Settled

179. Manuel Fimbres et al. v. Dreamstyle Remodling of California, LLC et al.

Court	San Diego
Case No.	37-2022-00013690
Nature	Piece-Rate
Status	Settled

180. Abigail Chamberlan v. Classic VMS, Inc. et al.

Court	Yolo
Case No.	CV2022-0652
Nature	Meal/Rest
Status	Settled

181. Marvin Glenn Holloway v. Water Damage Rescue, Inc.

Court	Sacramento
Case No.	34-2022-00319781

Nature	Meal/Rest Breaks
Status	Settled

182. John Schilder v. Tenderloin Neighborhood Development Corporation

Court	San Francisco
Case No.	CGC-22-599603
Nature	Various
Status	In Litigation

183. Kira Chambers v. Bass Medical Group

Court	Contra Costa
Case No.	C22-01058
Nature	Independent Contractor Misclassification
Status	Settled

184. Oscar Almanza v. Hope of the Valley Rescue Mission

Court	Los Angeles
Case No.	22STCV17591
Nature	Rounding
Status	Settled

185. Janene J. Caracaus v. Danny's Home Health Care Inc.

Court	San Diego
Case No.	37-2022-00020531
Nature	Piece Rate
Status	In Litigation

186. Alex Pegues v. eLink Recruiting Solutions, Inc. et al.

Court	Los Angeles
Case No.	22STCV18259
Nature	COVID-Screening Off-The-Clock
Status	In Litigation

187. Jesus Garica v. The Beach Chalet, L.P.

Court	San Francisco
Case No.	CGC-22-600090
Nature	Meal/Rest
Status	In Litigation

188. Sarina Yuan Jong Lai v. Sunmerry California Inc. et al.

Court	Los Angeles
Case No.	22STCV12086

Nature	Wage Statement
Status	Settled

189. Kyle Richard Dawkins v. Coalition For Responsible Community Development

Court	Los Angeles
Case No.	22STCV19341
Nature	Various
Status	In Litigation

190. Brennan Howard v. Koulax Enterprises

Court	Los Angeles
Case No.	21GDCV01154
Nature	Meal/Rest Breaks
Status	In Litigation

191. Joseph Christopher Kirkham v. Palm Desert Greens Association, Inc.

Court	Riverside
Case No.	CVRI2202569
Nature	Wage Statement
Status	In Litigation

192. Kaliyah Martin v. Blend Labs et al.

Court	San Francisco
Case No.	CGC-22-600420
Nature	Regular Rate Miscalculations
Status	Settled

193. Cesar Cando v. Academy Valet Parking Service, Inc.

Court	Los Angeles
Case No.	22STCV21833
Nature	Various
Status	Settled

194. Carlos Pinkney v. Patrol Masters Security Services, Inc.

Court	Orange
Case No.	30-2021-01213869-CU-OE-CXC
Nature	Labor Code 204
Status	In Litigation

195. Porsche Barrett v. Armadillo Holdings LLC dba Texas Roadhouse

Court	Stanislaus
Case No.	CV-22-003127

Nature	Meal/Rest Break
Status	In Litigation

196. Brad Klein v. Redzone Security Inc.

Court	Riverside
Case No.	CVRI2202841
Nature	Augustus
Status	In Litigation

197. Steve Martinez v. Radiant Services Corp.

Court	Los Angeles
Case No.	22STCV23115
Nature	Off-the-Clock
Status	In Litigation

198. Daniel Kennedy v. HCL America Solutions Inc. et al.

Court	San Francisco
Case No.	CGC-22-603642
Nature	Various
Status	In Litigation

199. Tiffany Britton v. Mountain Valley Child and Family Services, Inc.

Court	Nevada
Case No.	CU0000023
Nature	Various
Status	Settled

200. Chidinma Olisaemeka v. Lynwood Healthcare Center et al.

Court	Los Angeles
Case No.	22STCV13175
Nature	Rounding
Status	In Litigation

201. Britney Clarke v. St. Anne's Maternity Home et al.

Court	Los Angeles
Case No.	22STCV14674
Nature	Wage Order 5
Status	Settled

EXHIBIT 2

Activities Export

05/03/2024

12:28 PM

Date ▾	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
04/28/2024	 	Work on the motion for approval. ● Unbilled	43201-Roddy Luther Roddy v. O'Neill Winery	Shani Zakay	6.00h	\$600.00	-	\$3,600.00
04/05/2024	 	More work on the SAR. ● Unbilled	43201-Roddy Luther Roddy v. O'Neill Winery	Shani Zakay	0.40h	\$600.00	-	\$240.00
02/23/2024	 	Emails to schedule call to discuss SAR ● Unbilled	43201-Roddy Luther Roddy v. O'Neill Winery	Shani Zakay	0.10h	\$600.00	-	\$60.00
01/30/2024	 	Work on SAR ● Unbilled	43201-Roddy Luther Roddy v. O'Neill Winery	Shani Zakay	2.50h	\$600.00	-	\$1,500.00
01/22/2024	 	Follow up on SAR ● Unbilled	43201-Roddy Luther Roddy v. O'Neill Winery	Shani Zakay	0.10h	\$600.00	-	\$60.00
01/12/2024	 	Work on SAR ● Unbilled	43201-Roddy Luther Roddy v. O'Neill Winery	Shani Zakay	3.00h	\$600.00	-	\$1,800.00
01/10/2024	 	Work on SAR ● Unbilled	43201-Roddy Luther Roddy v. O'Neill Winery	Shani Zakay	3.50h	\$600.00	-	\$2,100.00
12/22/2023	 	Emails regarding SAR and amended complaint ● Unbilled	43201-Roddy Luther Roddy v. O'Neill Winery	Shani Zakay	0.20h	\$575.00	-	\$115.00
11/30/2023	 	Emails with co-counsel regarding issue with the client. Emails with OPC to set up a call. ● Unbilled	43201-Roddy Luther Roddy v. O'Neill Winery	Shani Zakay	0.40h	\$575.00	-	\$230.00
					55.50h		\$0.00 0.00h	\$30,206.50 55.50h

Activities Export

05/03/2024

12:28 PM

Date ▾	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
11/16/2023	 	Work on MOU Unbilled	43201-Roddy Luther Roddy v. O'Neill Winery	Shani Zakay	0.30h	\$575.00	-	\$172.50
11/15/2023	 	More work on MOU Unbilled	43201-Roddy Luther Roddy v. O'Neill Winery	Shani Zakay	0.80h	\$575.00	-	\$460.00
10/17/2023	 	Attend mediation Unbilled	43201-Roddy Luther Roddy v. O'Neill Winery	Shani Zakay	10.00h	\$575.00	-	\$5,750.00
10/09/2023	 	Work on mediation brief. Unbilled	43201-Roddy Luther Roddy v. O'Neill Winery	Shani Zakay	6.00h	\$575.00	-	\$3,450.00
10/04/2023	 	Work on JPA Unbilled	43201-Roddy Luther Roddy v. O'Neill Winery	Shani Zakay	1.00h	\$575.00	-	\$575.00
09/28/2023	 	Emails regarding data points for mediation. Unbilled	43201-Roddy Luther Roddy v. O'Neill Winery	Shani Zakay	0.30h	\$575.00	-	\$172.50
08/30/2023	 	Emails regarding JPA Unbilled	43201-Roddy Luther Roddy v. O'Neill Winery	Shani Zakay	0.20h	\$575.00	-	\$115.00
08/16/2023	 	Emails regarding sampling for mediation Unbilled	43201-Roddy Luther Roddy v. O'Neill Winery	Shani Zakay	0.30h	\$575.00	-	\$172.50
07/28/2023	 	Call with counsel in related case regarding JPA. Review docket and pleadings in related case. Unbilled	43201-Roddy Luther Roddy v. O'Neill Winery	Shani Zakay	1.00h	\$575.00	-	\$575.00
					55.50h		\$0.00 0.00h	\$30,206.50 55.50h

Activities Export

05/03/2024

12:28 PM

Date ▾	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
06/07/2023	 	Emails regarding mediation. ● Unbilled	43201-Roddy Luther Roddy v. O'Neill Winery	Shani Zakay	0.20h	\$575.00	-	\$115.00
02/27/2023	 	Review Defendant's CMS ● Unbilled	43201-Roddy Luther Roddy v. O'Neill Winery	Shani Zakay	0.20h	\$575.00	-	\$115.00
02/23/2023	 	Emails with co-counsel regarding MTC Arb. ● Unbilled	43201-Roddy Luther Roddy v. O'Neill Winery	Shani Zakay	0.30h	\$575.00	-	\$172.50
01/23/2023	 	Emails regarding MTC extension. ● Unbilled	43201-Roddy Luther Roddy v. O'Neill Winery	Shani Zakay	0.10h	\$575.00	-	\$57.50
12/30/2022	 	Review updated motion papers and emails with staff regarding calendarling accordingly. ● Unbilled	43201-Roddy Luther Roddy v. O'Neill Winery	Shani Zakay	1.00h	\$550.00	-	\$550.00
08/15/2022	 	Review client's documents related to unemployment application and emails with co-counsel regarding the same. ● Unbilled	43201-Roddy Luther Roddy v. O'Neill Winery	Shani Zakay	0.30h	\$550.00	-	\$165.00
08/02/2022	 	Emails with OPC regarding individual settlement and arbitration. ● Unbilled	43201-Roddy Luther Roddy v. O'Neill Winery	Shani Zakay	0.20h	\$550.00	-	\$110.00
07/25/2022	 	Call with OPC regarding various issues. ● Unbilled	43201-Roddy Luther Roddy v. O'Neill Winery	Shani Zakay	0.50h	\$550.00	-	\$275.00
					55.50h		\$0.00 0.00h	\$30,206.50 55.50h

Activities Export

05/03/2024

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Date ▾	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
07/21/2022	 	Drafting CMS and filing. ● Unbilled	43201-Roddy Luther Roddy v. O'Neill Winery	Rachel Newman	1.00h	\$165.00	-	\$165.00
07/19/2022	 	Review revised CMS and approve. ● Unbilled	43201-Roddy Luther Roddy v. O'Neill Winery	Shani Zakay	0.30h	\$550.00	-	\$165.00
07/12/2022	 	Emails re client's individual settlement demand and related SOL deadlines ● Unbilled	43201-Roddy Luther Roddy v. O'Neill Winery	Jackland Hom	0.20h	\$375.00	-	\$75.00
05/12/2022	 	Review and revise CMS ● Unbilled	43201-Roddy Luther Roddy v. O'Neill Winery	Shani Zakay	0.50h	\$550.00	-	\$275.00
05/12/2022	 	Drafting CMS, serving on OC, mail filing. ● Unbilled	43201-Roddy Luther Roddy v. O'Neill Winery	Rachel Newman	1.00h	\$165.00	-	\$165.00
03/08/2022	 	Phone call with client. ● Unbilled	43201-Roddy Luther Roddy v. O'Neill Winery	Rachel Newman	0.60h	\$165.00	-	\$99.00
02/16/2022	 	Emails with OPC regarding extension to respond to the complaint and stay pending Viking. ● Unbilled	43201-Roddy Luther Roddy v. O'Neill Winery	Shani Zakay	0.50h	\$550.00	-	\$275.00
01/31/2022	 	Review file and calendaring and call with client to provide status update re same ● Unbilled	43201-Roddy Luther Roddy v. O'Neill Winery	Jackland Hom	0.50h	\$375.00	-	\$187.50
					55.50h		\$0.00 0.00h	\$30,206.50 55.50h

Activities Export

05/03/2024

12:28 PM

Date ▼	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
01/24/2022	 	Emails regarding status of service of process. ● Unbilled	43201-Roddy Luther Roddy v. O'Neill Winery	Shani Zakay	0.20h	\$550.00	-	\$110.00
01/20/2022	 	Call with client to provide case update and answer case related questions ● Unbilled	43201-Roddy Luther Roddy v. O'Neill Winery	Jackland Hom	0.50h	\$375.00	-	\$187.50
01/20/2022	 	Call and voicemail for client re status update ● Unbilled	43201-Roddy Luther Roddy v. O'Neill Winery	Jackland Hom	0.20h	\$375.00	-	\$75.00
01/11/2022	 	Review filed complaint and related documents. Emails with instructions on service and uploading documents. Calendar relevant dates. ● Unbilled	43201-Roddy Luther Roddy v. O'Neill Winery	Shani Zakay	0.40h	\$550.00	-	\$220.00
01/05/2022	 	Draft the PAGA only complaint. ● Unbilled	43201-Roddy Luther Roddy v. O'Neill Winery	Shani Zakay	1.70h	\$550.00	-	\$935.00
12/21/2021	 	Review email with file from Defendant and emails to staff with instructions. ● Unbilled	43201-Roddy Luther Roddy v. O'Neill Winery	Shani Zakay	0.30h	\$550.00	-	\$165.00
12/03/2021	 	Review arbitration agreement and emails with co-counsel accordingly. Legal research regarding issues with the same and possible arguments against it. ● Unbilled	43201-Roddy Luther Roddy v. O'Neill Winery	Shani Zakay	1.40h	\$550.00	-	\$770.00
					55.50h		\$0.00 0.00h	\$30,206.50 55.50h

Activities Export

05/03/2024
12:28 PM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
12/01/2021	 	Doing the intake with the client and setting up the Clio. Unbilled	43201-Roddy Luther Roddy v. O'Neill Winery	Shani Zakay	1.00h	\$165.00	-	\$165.00
11/11/2021	 	Emails with client and co-counsel regarding settlement loan. Unbilled	43201-Roddy Luther Roddy v. O'Neill Winery	Shani Zakay	0.30h	\$550.00	-	\$165.00
11/09/2021	 	Review the employee's file. Review additional documents produced by client and defendant. Review and revise the complaint and PAGA letter. Unbilled	43201-Roddy Luther Roddy v. O'Neill Winery	Shani Zakay	6.00h	\$550.00	-	\$3,300.00
					55.50h		\$0.00 0.00h	\$30,206.50 55.50h

EXHIBIT 3

Activities Export

05/03/2024

10:27 AM

Date ▼	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
11/01/2023	\$	Expert Cost - Damage Analysis - Berger Consulting ● Unbilled	43201-Roddy Luther Roddy v. O'Neill Winery	Shani Zakay	1.00	\$1,980.00	-	\$1,980.00
09/22/2023	\$	Mediation Fee - Steve Serratore ● Unbilled	43201-Roddy Luther Roddy v. O'Neill Winery	Shani Zakay	1.00	\$6,250.00	-	\$6,250.00
03/20/2023	\$	Knox Invoice ● Unbilled	43201-Roddy Luther Roddy v. O'Neill Winery	Rachel Newman	1.00	\$116.75	-	\$116.75
03/06/2023	\$	Knox Priority Filings ● Unbilled	43201-Roddy Luther Roddy v. O'Neill Winery	Rachel Newman	1.00	\$116.75	-	\$116.75
01/25/2022	\$	Knox Invoice - Complaint ● Unbilled	43201-Roddy Luther Roddy v. O'Neill Winery	Rachel Newman	1.00	\$179.55	-	\$179.55
01/13/2022	\$	Knox Invoice - Complaint ● Unbilled	43201-Roddy Luther Roddy v. O'Neill Winery	Rachel Newman	1.00	\$552.25	-	\$552.25
01/11/2022	\$	OneLegal - Complaint ● Unbilled	43201-Roddy Luther Roddy v. O'Neill Winery	Rachel Newman	1.00	\$1,489.69	-	\$1,489.69
12/01/2021	\$	Postage Fee - PAGA ● Unbilled	43201-Roddy Luther Roddy v. O'Neill Winery	Shani Zakay	1.00	\$9.16	-	\$9.16
							\$0.00 0.00h	\$10,694.15 0.00h