

JCL LAW FIRM, APC

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ZAKAY LAW GROUP, APLC

Shani O. Zakay (State Bar #277924)

Jackland K. Hom (State Bar #327243)

5440 Morehouse Drive, Suite 3600

San Diego, CA 92121

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jackland@zakaylaw.com

Attorneys for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SANTA CRUZ

CRISTAL RODRIGUEZ, on behalf of herself
and on behalf of all persons similarly situated,

Plaintiff,

vs.

EAH INC. a California Corporation; and DOES
1-50, Inclusive,

Defendants.

Case No. 21CV00884

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

Date: July 13, 2023

Time: 8:30 a.m.

Judge: Hon. Marjorie Carter

Dept.: 10

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

2 1. I am the managing partner of the law firm of Zakay Law Group, APLC, co-counsel
3 of record for Plaintiff in this matter. As such, I am fully familiar with the facts, pleadings, and
4 history of the matter. The following facts are within my own personal knowledge, and if called as
5 a witness, I could testify competently to the matters stated herein.

6 2. This Declaration is being submitted in support of Plaintiff's Motion for Final
7 Approval of Class Action and PAGA Settlement.

8 **I. EXPERIENCE**

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

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

22 4. As of June 14, 2023, Zakay Law Group, APLC incurred lodestar totaling
23 \$108,627.50 in this matter. I have reviewed my firm's lodestar in this matter and believe the charges
24 are reasonable and were reasonably necessary to the conduct of the case. From January 2021
25 through June 2023, my firm has worked more than 228.6 hours prosecuting these claims with the
26 attorneys' hourly fee rates for attorneys at \$375-\$575, resulting in the current lodestar. A detailed
27 breakdown of the total fees and the services performed by the firm on this case is attached hereto as
28 Exhibit #2.

1 5. Further, Class Counsel will be performing additional work, including finalizing the
2 motion for final approval, attending the hearing on final approval, finalizing the orders and
3 judgment, and monitoring completion of the settlement process over the course of several years. I
4 expect this additional work will result in an additional 10-15 hour of additional work and an
5 additional lodestar between \$5,500 and \$8,250.

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

23 **III. COSTS**

24 7. As part of the Settlement Agreement, the parties agreed that Counsel may seek
25 reimbursement of expenses incurred as documented in Counsel's billing records as part of the
26 Counsel Award. Attached hereto as **Exhibit #3** is a true and correct copy of the Zakay Law Group,
27 Cost Summary detailing the actually incurred litigation expenses by the Zakay Law Group APLC,
28 for this matter as of June 14, 2023. As shown in detail in the attached Cost Summary, the Zakay

1 Law Group incurred a total of \$14,361.10 in litigation costs prosecuting this action– with additional
2 costs anticipated.

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

7
8 I declare under penalty of perjury under the laws of the State of California that the foregoing
9 is true and correct. Executed this 15th day of June 2023, at San Diego, California.

10
11 **ZAKAY LAW GROUP, APLC**

12
13 By: 

14 Shani O. Zakay
15 Attorney for Plaintiff
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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, *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 2

Activities Export

06/13/2023

3:58 PM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
01/10/2021	 Unbilled	Review multiple emails and docs from co-counsel re PLA's claims and research on DEF	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Jackland Hom	1.00h	\$350.00	-	\$350.00
01/11/2021	 Unbilled	Emails with client	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Jackland Hom	0.20h	\$350.00	-	\$70.00
03/29/2021	 Unbilled	Review file; draft complaint	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Jackland Hom	6.00h	\$350.00	-	\$2,100.00
03/29/2021	 Unbilled	Legal research re housing benefits and regular rate	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Jackland Hom	2.20h	\$350.00	-	\$770.00
03/29/2021	 Unbilled	Draft memo to attorneys re findings from legal research on regular rate and housing issues	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Jackland Hom	1.20h	\$350.00	-	\$420.00
03/31/2021	 Unbilled	Review file. Review various employment documents from client. Review employee file from defendant. Review wage statements. Discuss findings and claims with client. Discuss claims with co-counsel. Legal research regarding claims. Review complaint, revise, and approve.	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Shani Zakay	8.50h	\$550.00	-	\$4,675.00
04/05/2021	 Unbilled	Certified Mail - Calendaring	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Shani Zakay	0.50h	\$150.00	-	\$75.00
					228.60h		\$0.00	\$108,627.50
							0.00h	228.60h

Activities Export

06/13/2023

3:58 PM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
04/05/2021		Multiple emails w/ staff re PAGA notice 	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Jackland Hom	0.40h	\$350.00	-	\$140.00
04/06/2021		Review filed complaint and related documents. Upload to CLIO. Emails with counsel regarding judge assignment. Research judicial assignment. Instruct accordingly. 	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Shani Zakay	0.70h	\$550.00	-	\$385.00
04/06/2021		Email re Judicial Assignment 	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Jackland Hom	0.20h	\$350.00	-	\$70.00
06/08/2021		Review and revise FAC 	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Jackland Hom	0.80h	\$350.00	-	\$280.00
06/09/2021		Review the file further. Review PAGA letter. Draft FAC to add PAGA cause of action. Discuss with client and discuss with co-counsel. 	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Shani Zakay	2.80h	\$550.00	-	\$1,540.00
06/09/2021		Printing, filing on LWDA, and mailing out documents 	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Shani Zakay	0.50h	\$150.00	-	\$75.00
07/01/2021		Review DEF's Answer to FAC and discuss with attorneys 	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Jackland Hom	1.00h	\$350.00	-	\$350.00
					228.60h		\$0.00 0.00h	\$108,627.50 228.60h

Activities Export

06/13/2023

3:58 PM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
07/07/2021		Review Defendant's answer. Legal research regarding multiple potentially applicable affirmative defenses. Discussion with co-counsel accordingly. Instruct associate attorneys on work.  Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Shani Zakay	4.80h	\$550.00	-	\$2,640.00
07/19/2021		Review, revise, and approve the case management statement. Update file.  Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Shani Zakay	1.00h	\$550.00	-	\$550.00
07/20/2021		Review Defendant's CMS and discuss with staff and co-counsel.  Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Shani Zakay	0.50h	\$550.00	-	\$275.00
07/20/2021		Review and revise Case Management Statement  Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Jackland Hom	0.50h	\$350.00	-	\$175.00
07/21/2021		Emails re client status update  Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Jackland Hom	0.30h	\$350.00	-	\$105.00
08/09/2021		Multiple emails w/ OC re scheduling M&C call  Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Jackland Hom	0.50h	\$350.00	-	\$175.00
08/11/2021		Attorney case strategy meeting  Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Jackland Hom	0.50h	\$350.00	-	\$175.00
09/20/2021		Emails regarding scheduling of mediation. Meeting with associates and co-counsel to discuss.	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Shani Zakay	0.60h	\$550.00	-	\$330.00

Activities Export

06/13/2023

3:58 PM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		● Unbilled						
09/20/2021	🕒	Emails regarding mediation. ● Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Shani Zakay	0.40h	\$550.00	-	\$220.00
09/20/2021	🕒	Multiple emails w/ OC re scheduling mediation ● Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Jackland Hom	0.30h	\$350.00	-	\$105.00
09/21/2021	🕒	Review and revise Case Management Statement ● Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Jackland Hom	0.50h	\$350.00	-	\$175.00
09/21/2021	🕒	Review DEF's Case Management Statement ● Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Jackland Hom	0.40h	\$350.00	-	\$140.00
09/24/2021	🕒	Review correspondence from mediator re mediation ● Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Jackland Hom	0.40h	\$350.00	-	\$140.00
09/25/2021	🕒	Multiple emails and calls with co- counsel and OPC to confer on mediation date and mediator's identity. Review mediation confirmation letter and invoice and email with staff with instructions accordingly. Calendar relevant dates.Process payment. ● Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Shani Zakay	1.60h	\$550.00	-	\$880.00
10/14/2021	🕒	Drafting, finalizing, and filing COA. ● Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Shani Zakay	0.50h	\$165.00	-	\$82.50
					228.60h		\$0.00 0.00h	\$108,627.50 228.60h

Activities Export

06/13/2023

3:58 PM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
10/15/2021		Review notice of continued CMC hearing. Emails with staff accordingly. Update calendar. 	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Shani Zakay	0.50h	\$550.00	-	\$275.00
10/19/2021		Emails w/ attorneys re client status update 	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Jackland Hom	0.50h	\$350.00	-	\$175.00
12/22/2021		Emails with staff regarding tolling agreement and mediation. Work on tolling agreement. 	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Shani Zakay	0.70h	\$550.00	-	\$385.00
01/14/2022		Review and revise Amended Tolling Agreement 	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Jackland Hom	0.50h	\$375.00	-	\$187.50
02/02/2022		Call with Attorney Lapuyade and Client re case updates and mediation 	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Julieann Alvarado	0.80h	\$350.00	-	\$280.00
03/21/2022		Emails w/ OC re scheduling call re mediation 	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Jackland Hom	0.20h	\$375.00	-	\$75.00
03/28/2022		Call with OPC regarding data for mediation and conversation with co-counsel. Follow up call with expert regarding necessary work on review. 	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Shani Zakay	1.00h	\$550.00	-	\$550.00
04/07/2022		Emails regarding mediation.	37001-Rodriguez	Shani	0.30h	\$550.00	-	\$165.00
					228.60h		\$0.00	\$108,627.50
							0.00h	228.60h

Activities Export

06/13/2023

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		● Unbilled	Cristal Rodriguez v. EAH, Inc.	Zakay				
04/11/2022	🕒	Emails with OPC regarding data for mediation. ● Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Shani Zakay	0.50h	\$550.00	-	\$275.00
04/12/2022	🕒	Emails with OPC regarding data for mediation. ● Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Shani Zakay	0.40h	\$550.00	-	\$220.00
05/23/2022	🕒	Begin review of DEF's mediation data production ● Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Jackland Hom	3.20h	\$375.00	-	\$1,200.00
05/23/2022	🕒	Begin review of mediation data production ● Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Shani Zakay	2.00h	\$575.00	-	\$1,150.00
05/25/2022	🕒	More review of DEF's mediation data production ● Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Jackland Hom	1.80h	\$375.00	-	\$675.00
05/25/2022	🕒	Meeting w/ attorneys to discuss findings in review of DEF's mediation data production ● Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Jackland Hom	1.00h	\$375.00	-	\$375.00
05/26/2022	🕒	More review of DEF's mediation data production ● Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Jackland Hom	2.20h	\$375.00	-	\$825.00
05/27/2022	🕒	More review of mediation data production ● Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Shani Zakay	3.50h	\$575.00	-	\$2,012.50
					228.60h		\$0.00	\$108,627.50
							0.00h	228.60h

Activities Export

06/13/2023

3:58 PM

Date ▲	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
06/02/2022		More review of DEF's mediation data production ● Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Jackland Hom	1.20h	\$375.00	-	\$450.00
06/03/2022		More review of DEF's mediation data production ● Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Jackland Hom	3.20h	\$375.00	-	\$1,200.00
06/06/2022		More review of DEF's mediation data production ● Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Jackland Hom	1.10h	\$375.00	-	\$412.50
06/08/2022		More review of DEF's mediation data production ● Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Jackland Hom	1.60h	\$375.00	-	\$600.00
06/09/2022		More review of DEF's mediation data production ● Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Jackland Hom	1.00h	\$375.00	-	\$375.00
06/09/2022		More review of mediation data production ● Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Shani Zakay	2.50h	\$575.00	-	\$1,437.50
06/13/2022		Emails w/ client re mediation ● Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Jackland Hom	0.50h	\$375.00	-	\$187.50
06/14/2022		Multiple emails w/ staff re scheduling call w/ client ● Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Jackland Hom	0.30h	\$375.00	-	\$112.50
06/15/2022		Call w/ expert to discuss claims for mediation damage model ● Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Jackland Hom	0.80h	\$375.00	-	\$300.00
					228.60h		\$0.00	\$108,627.50
							0.00h	228.60h

Activities Export

06/13/2023

3:58 PM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
06/15/2022		More review of DEF's mediation data production ● Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Jackland Hom	2.20h	\$375.00	-	\$825.00
06/16/2022		Emails regarding mediation and mediation data. More review of mediation data and discuss with associates and co-counsel. Follow up discussion with expert. ● Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Shani Zakay	2.50h	\$550.00	-	\$1,375.00
06/16/2022		Call w/ client to discuss claims in preparation for drafting mediation brief ● Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Jackland Hom	1.00h	\$375.00	-	\$375.00
06/16/2022		Meeting w/ LC to discuss work required for mediation document review task ● Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Jackland Hom	1.00h	\$375.00	-	\$375.00
06/16/2022		Multiple emails w/ LC re mediation document review task and findings ● Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Jackland Hom	0.70h	\$375.00	-	\$262.50
06/16/2022		Emails w/ OC re mediation data production ● Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Jackland Hom	0.80h	\$375.00	-	\$300.00
06/16/2022		Legal research re regular rate issue for mediation brief ● Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Jackland Hom	2.20h	\$375.00	-	\$825.00
06/17/2022		Draft mediation brief ● Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Jackland Hom	6.50h	\$375.00	-	\$2,437.50
					228.60h		\$0.00 0.00h	\$108,627.50 228.60h

Activities Export

06/13/2023

3:58 PM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
			Inc.					
06/17/2022		Multiple emails w/ co-counsel re work required on mediation brief  Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Jackland Hom	0.40h	\$375.00	-	\$150.00
06/17/2022		Further review file and DEF's mediation data production to research regular rate issue for mediation  Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Jackland Hom	2.10h	\$375.00	-	\$787.50
06/17/2022		Work on mediation data analysis email to expert  Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Jackland Hom	1.00h	\$375.00	-	\$375.00
06/17/2022		Emails w/ client re mediation  Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Jackland Hom	0.40h	\$375.00	-	\$150.00
06/17/2022		Meeting w/ LC to discuss findings re mediation document review task  Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Jackland Hom	0.80h	\$375.00	-	\$300.00
06/20/2022		Emails w/ expert re mediation damage report  Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Jackland Hom	0.40h	\$375.00	-	\$150.00
06/20/2022		Emails w/ expert re mediation damage analysis  Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Jackland Hom	0.30h	\$375.00	-	\$112.50
06/21/2022		More emails w/ client re mediation  Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Jackland Hom	0.70h	\$375.00	-	\$262.50
					228.60h		\$0.00 0.00h	\$108,627.50 228.60h

Activities Export

06/13/2023

3:58 PM

Date ▲	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
06/24/2022		Emails with mediator ● Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Jackland Hom	0.40h	\$375.00	-	\$150.00
06/26/2022		Emails w/ client re mediation ● Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Jackland Hom	0.20h	\$375.00	-	\$75.00
06/27/2022		Emails with co-counsel and mediator and OPC regarding data for mediation and issues with the same. Follow up meeting and conversation with co-counsel and staff. ● Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Shani Zakay	1.50h	\$550.00	-	\$825.00
06/28/2022		Emails and calls with the expert and co-counsel and OPC regarding data for mediation. ● Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Shani Zakay	1.60h	\$550.00	-	\$880.00
06/29/2022		Work on the mediation brief ● Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Shani Zakay	6.60h	\$550.00	-	\$3,630.00
06/29/2022		Emails w/ attorneys re revisions to mediation brief ● Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Jackland Hom	0.20h	\$375.00	-	\$75.00
06/30/2022		Emails w/ expert re mediation damage analysis ● Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Jackland Hom	0.80h	\$375.00	-	\$300.00
06/30/2022		Review expert's mediation damage model ● Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Jackland Hom	0.50h	\$375.00	-	\$187.50

Activities Export

06/13/2023

3:58 PM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
07/01/2022		Review damage model and discuss issues with co-counsel. Meeting with co-counsel and conference call with expert to discuss various issues and necessary work.  Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Shani Zakay	3.30h	\$550.00	-	\$1,815.00
07/01/2022		Emails with client and co-counsel regarding various issues for mediation.  Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Shani Zakay	0.50h	\$550.00	-	\$275.00
07/01/2022		More work on mediation brief.  Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Shani Zakay	4.70h	\$550.00	-	\$2,585.00
07/01/2022		Emails w/ attorneys re mediation brief  Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Jackland Hom	0.50h	\$375.00	-	\$187.50
07/01/2022		Emails w/ expert re mediation damage analysis  Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Jackland Hom	0.50h	\$375.00	-	\$187.50
07/02/2022		Review DEF's mediation brief and exhibits attached thereto  Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Jackland Hom	2.20h	\$375.00	-	\$825.00
07/02/2022		Review Defendant's mediation brief. Legal research regarding various defenses and theories raised. Discuss with co-counsel.  Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Shani Zakay	3.90h	\$550.00	-	\$2,145.00
					228.60h		\$0.00 0.00h	\$108,627.50 228.60h

Activities Export

06/13/2023

3:58 PM

Date ▲	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
07/03/2022		More work on damage report and emails with expert in preparation for mediation ● Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Shani Zakay	4.00h	\$550.00	-	\$2,200.00
07/03/2022		Emails w/ expert re mediation damage analysis ● Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Jackland Hom	0.40h	\$375.00	-	\$150.00
07/03/2022		Review expert's damage model in preparation for mediation ● Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Jackland Hom	0.50h	\$375.00	-	\$187.50
07/05/2022		Prepare for mediation. Multiple meetings with co-counsel and client. Attend mediation. Follow up meeting with co-counsel and staff to discuss necessary work. ● Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Shani Zakay	10.00h	\$550.00	-	\$5,500.00
07/05/2022		Attend mediation ● Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Jackland Hom	4.50h	\$375.00	-	\$1,687.50
07/05/2022		Post-mediation case strategy meeting with attorneys to discuss next steps ● Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Jackland Hom	1.00h	\$375.00	-	\$375.00
07/05/2022		Emails w/ OPC re additional data and docs needed ● Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Jackland Hom	0.40h	\$375.00	-	\$150.00
07/19/2022		Continue work on the tolling agreement.	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Shani Zakay	1.00h	\$550.00	-	\$550.00
					228.60h		\$0.00 0.00h	\$108,627.50 228.60h

Activities Export

06/13/2023

3:58 PM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		● Unbilled	Inc.					
07/19/2022	🕒	Review and approve updated tolling agreement. ● Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Shani Zakay	0.40h	\$550.00	-	\$220.00
08/01/2022	🕒	drafting cms, filing, and serving on OC. ● Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Donia Saadi	1.00h	\$165.00	-	\$165.00
08/02/2022	🕒	Review DEF's Case Management Statement ● Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Jackland Hom	0.40h	\$375.00	-	\$150.00
08/04/2022	🕒	Discussion with expert regarding additional necessary data points for purposes of settlement negotiations. Emails with staff and OPC regarding additional data for settlement negotiations. Review new data. ● Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Shani Zakay	2.20h	\$550.00	-	\$1,210.00
08/18/2022	🕒	Emails w/ attorneys re CMC ● Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Jackland Hom	0.20h	\$375.00	-	\$75.00
08/23/2022	🕒	Meeting w/ attorneys to discuss case strategy ● Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Jackland Hom	0.50h	\$375.00	-	\$187.50
09/02/2022	🕒	Emails with OPC and mediator regarding status of settlement negotiations. Follow up calls with mediator and client.	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Shani Zakay	1.30h	\$550.00	-	\$715.00
					228.60h		\$0.00 0.00h	\$108,627.50 228.60h

Activities Export

06/13/2023

3:58 PM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		● Unbilled						
09/15/2022	🕒	Prepare for and attend call with OPC ● Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Shani Zakay	0.70h	\$550.00	-	\$385.00
09/19/2022	🕒	Meeting w/ attorneys to discuss case strategy ● Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Jackland Hom	0.50h	\$375.00	-	\$187.50
09/21/2022	🕒	Review expert retention agreement and execute. Emails with mediator regarding status. ● Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Shani Zakay	0.80h	\$550.00	-	\$440.00
09/27/2022	🕒	Conference with the mediator to discuss settlement. Follow up meeting with co-counsel and call with client. ● Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Shani Zakay	1.00h	\$550.00	-	\$550.00
09/28/2022	🕒	Correspondence with mediator and co-counsel regarding status of settlement negotiations. ● Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Shani Zakay	1.00h	\$550.00	-	\$550.00
09/30/2022	🕒	Emails with mediator regarding settlement and negotiations and follow up call with co-counsel. ● Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Shani Zakay	0.50h	\$550.00	-	\$275.00
10/03/2022	🕒	Emails with staff regarding contact from new class member. Follow up emails with mediator regarding settlement negotiations.	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Shani Zakay	0.40h	\$550.00	-	\$220.00
					228.60h		\$0.00 0.00h	\$108,627.50 228.60h

Activities Export

06/13/2023

3:58 PM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		● Unbilled						
10/03/2022	🕒	Emails w/ mediator re settlement discussions ● Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Jackland Hom	0.20h	\$375.00	-	\$75.00
10/04/2022	🕒	Emails regarding settlement negotiations. ● Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Shani Zakay	0.50h	\$550.00	-	\$275.00
10/04/2022	🕒	Emails w/ mediator re settlement discussions ● Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Jackland Hom	0.20h	\$375.00	-	\$75.00
10/06/2022	🕒	Review and revise Case Management Statement ● Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Jackland Hom	0.50h	\$375.00	-	\$187.50
10/10/2022	🕒	Review DEF's Case Management Statement ● Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Jackland Hom	0.40h	\$375.00	-	\$150.00
10/11/2022	🕒	Emails w/ mediator re settlement discussions ● Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Jackland Hom	0.40h	\$375.00	-	\$150.00
10/18/2022	🕒	Emails w/ attorneys re potential class members ● Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Jackland Hom	0.40h	\$375.00	-	\$150.00
10/19/2022	🕒	Review and revise PLA's SI (Set 1) ● Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Jackland Hom	0.50h	\$375.00	-	\$187.50
					228.60h		\$0.00	\$108,627.50
							0.00h	228.60h

Activities Export

06/13/2023

3:58 PM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
10/20/2022		Emails w/ mediator re settlement discussions 	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Jackland Hom	0.30h	\$375.00	-	\$112.50
10/26/2022		Emails with mediator and conversation regarding possible proposal. 	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Shani Zakay	0.70h	\$550.00	-	\$385.00
10/27/2022		Emails with mediator and co-counsel regarding settlement negotiations. 	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Shani Zakay	0.60h	\$550.00	-	\$330.00
10/27/2022		Prepare for and attend CMC 	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Jackland Hom	0.80h	\$375.00	-	\$300.00
10/27/2022		Emails w/ mediator re settlement discussions 	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Jackland Hom	0.30h	\$375.00	-	\$112.50
11/07/2022		Emails with the mediator and discussion with co-counsel regarding mediator's proposal. Review the proposal and discuss with co-counsel and client. 	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Shani Zakay	1.50h	\$550.00	-	\$825.00
11/07/2022		Emails w/ mediator re settlement discussions 	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Jackland Hom	0.40h	\$375.00	-	\$150.00
11/18/2022		Emails w/ mediator and OC re settlement	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Jackland Hom	0.40h	\$375.00	-	\$150.00
					228.60h		\$0.00 0.00h	\$108,627.50 228.60h

Activities Export

06/13/2023

3:58 PM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		● Unbilled	Inc.					
11/18/2022	🕒	Review and revise MOU ● Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Jackland Hom	0.50h	\$375.00	-	\$187.50
12/01/2022	🕒	Review First Amended Tolling Agreement ● Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Jackland Hom	0.40h	\$375.00	-	\$150.00
12/09/2022	🕒	Review OC's revisions to MOU and emails re same ● Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Jackland Hom	0.50h	\$375.00	-	\$187.50
12/12/2022	🕒	Work on MOU ● Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Shani Zakay	2.30h	\$550.00	-	\$1,265.00
01/06/2023	🕒	Emails w/ staff re client call ● Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Jackland Hom	0.20h	\$395.00	-	\$79.00
01/06/2023	🕒	Emails w/ OC re MOU ● Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Jackland Hom	0.30h	\$395.00	-	\$118.50
01/08/2023	🕒	Meeting w/ attorneys to discuss case strategy ● Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Jackland Hom	0.50h	\$395.00	-	\$197.50
01/26/2023	🕒	Prepare for and attend CMC. Provide status update to client. Update staff on new dates. ● Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Shani Zakay	1.50h	\$575.00	-	\$862.50
					228.60h		\$0.00 0.00h	\$108,627.50 228.60h

Activities Export

06/13/2023

3:58 PM

Date ▲	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
01/26/2023		Emails w/ attorneys re CMC and case strategy  Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Jackland Hom	0.40h	\$395.00	-	\$158.00
01/28/2023		Work on settlement agreement  Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Jackland Hom	2.40h	\$395.00	-	\$948.00
01/28/2023		Work on settlement agreement  Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Shani Zakay	6.90h	\$575.00	-	\$3,967.50
01/30/2023		Emails w/ attorneys re Class Notice  Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Jackland Hom	0.40h	\$395.00	-	\$158.00
02/07/2023		Emails w/ attorneys re Admin bids  Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Jackland Hom	0.40h	\$395.00	-	\$158.00
02/07/2023		Review Admin bid and emails re same  Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Jackland Hom	0.30h	\$395.00	-	\$118.50
02/07/2023		Further review and revise draft of settlement agreement  Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Jackland Hom	0.50h	\$395.00	-	\$197.50
02/15/2023		Review executed SAR and emails regarding the same  Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Shani Zakay	0.50h	\$575.00	-	\$287.50
02/15/2023		Emails w/ OC re settlement agreement  Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Jackland Hom	0.40h	\$395.00	-	\$158.00
					228.60h		\$0.00 0.00h	\$108,627.50 228.60h

Activities Export

06/13/2023

3:58 PM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
02/20/2023		Work on MPA ● Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Jackland Hom	2.80h	\$395.00	-	\$1,106.00
02/22/2023		Review finalized and executed SAR and emails regarding the same and the tolling agreement ● Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Shani Zakay	0.20h	\$575.00	-	\$115.00
02/27/2023		Review fully executed SAR and instruct staff accordingly. ● Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Shani Zakay	0.20h	\$575.00	-	\$115.00
02/27/2023		Work on decs. ISO MPA ● Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Jackland Hom	0.50h	\$395.00	-	\$197.50
03/02/2023		More work on MPA and supporting decs. ● Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Jackland Hom	1.80h	\$395.00	-	\$711.00
03/03/2023		Work on the MPA ● Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Shani Zakay	7.20h	\$575.00	-	\$4,140.00
03/03/2023		Review, revise, and approve declaration in support of MPA ● Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Shani Zakay	2.00h	\$575.00	-	\$1,150.00
03/09/2023		Review emails and telephone conversations regarding issues with workweek count and issues with the language of the settlement agreement. Emails and work with OPC on the amendment to the SAR. More work on amended	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Shani Zakay	2.40h	\$575.00	-	\$1,380.00
					228.60h		\$0.00 0.00h	\$108,627.50 228.60h

Activities Export

06/13/2023

3:58 PM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		SAR. ● Unbilled						
03/14/2023	🕒	Review amendment to settlement agreement ● Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Jackland Hom	0.40h	\$395.00	-	\$158.00
03/15/2023	🕒	Review and approve closeout letter and discuss fees discount with co-counsel. ● Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Shani Zakay	0.50h	\$575.00	-	\$287.50
03/16/2023	🕒	Emails w/ attorneys re MPA ● Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Jackland Hom	0.40h	\$395.00	-	\$158.00
03/27/2023	🕒	Review Court's MPA tentative and discuss necessary work for tomorrow's MPA hearing ● Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Jackland Hom	0.50h	\$395.00	-	\$197.50
03/28/2023	🕒	Review tentative. Call with Attorney Hom and JCL to discuss. Review final outcome and calendar dates. ● Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Shani Zakay	1.30h	\$575.00	-	\$747.50
03/28/2023	🕒	Prepare for and attend MPA hearing ● Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Jackland Hom	1.50h	\$395.00	-	\$592.50
03/28/2023	🕒	Email w/ Admin re settlement ● Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Jackland Hom	0.40h	\$395.00	-	\$158.00
					228.60h		\$0.00 0.00h	\$108,627.50 228.60h

Activities Export

06/13/2023

3:58 PM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
03/30/2023		Review docket and emails regarding status of admin. Multiple emails with admin and co-counsel and staff regarding necessary work.  Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Shani Zakay	1.00h	\$575.00	-	\$575.00
03/30/2023		Emails w/ Admin re settlement administration timeline  Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Jackland Hom	0.30h	\$395.00	-	\$118.50
03/30/2023		Review and approve settlement admin timeline  Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Jackland Hom	0.30h	\$395.00	-	\$118.50
04/03/2023		Emails w/ Admin and OC re data discrepancies  Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Jackland Hom	0.30h	\$395.00	-	\$118.50
04/07/2023		Meeting w/ co-counsel to discuss work required for MFA/MFF  Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Jackland Hom	0.40h	\$395.00	-	\$158.00
04/17/2023		Emails w/ OC re workweeks total in settlement  Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Jackland Hom	0.50h	\$395.00	-	\$197.50
04/20/2023		Review calculations and multiple calls and emails with co-counsel and OPC regarding issues with calculations and workweek count. Review revised calculations and approve. Review timeline and approve. Review notice and discuss issues with co-counsel and	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Shani Zakay	2.00h	\$575.00	-	\$1,150.00
					228.60h		\$0.00 0.00h	\$108,627.50 228.60h

Activities Export

06/13/2023

3:58 PM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		staff. ● Unbilled						
04/20/2023	🕒	Emails w/ attorneys re Class Notice ● Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Jackland Hom	0.50h	\$395.00	-	\$197.50
05/01/2023	🕒	Emails w/ attorneys re Class Member inquiry ● Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Jackland Hom	0.30h	\$395.00	-	\$118.50
05/30/2023	🕒	Review Class Member settlement opt-out form ● Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Jackland Hom	0.20h	\$395.00	-	\$79.00
05/30/2023	🕒	Review multiple weekly reports from admin and address various issues/calls from class members. Discuss with staff. ● Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Shani Zakay	2.00h	\$575.00	-	\$1,150.00
05/31/2023	🕒	Work on MFF ● Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Jackland Hom	2.80h	\$395.00	-	\$1,106.00
05/31/2023	🕒	Work on MFF ● Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Shani Zakay	6.60h	\$575.00	-	\$3,795.00
06/09/2023	🕒	Work on MFA ● Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Jackland Hom	2.80h	\$395.00	-	\$1,106.00
06/09/2023	🕒	Work on MFA ● Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Shani Zakay	6.80h	\$575.00	-	\$3,910.00

EXHIBIT 3

Activities Export

06/13/2023

3:58 PM

Date ▲	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
06/03/2021	\$	Onelegal Fee - Filing POS of Summons ● Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Shani Zakay	1.00	\$16.06	-	\$16.06
06/09/2021	\$	Printing Fee - FAC to entities address ● Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Shani Zakay	1.00	\$11.50	-	\$11.50
07/20/2021	\$	OneLegal Fee - CMS ● Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Shani Zakay	1.00	\$16.06	-	\$16.06
09/21/2021	\$	OneLegal Fee - CMS ● Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Shani Zakay	1.00	\$15.60	-	\$15.60
10/05/2021	\$	Mediation Fee ● Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Shani Zakay	1.00	\$4,500.00	-	\$4,500.00
10/14/2021	\$	OneLegal - COA ● Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Shani Zakay	1.00	\$16.06	-	\$16.06
07/05/2022	\$	meals for mediation ● Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Donia Saadi	1.00	\$115.12	-	\$115.12
08/01/2022	\$	OneLegal - CMS ● Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Donia Saadi	1.00	\$16.57	-	\$16.57
08/29/2022	\$	Expert Cost ● Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Shani Zakay	1.00	\$1,109.13	-	\$1,109.13
							\$0.00 0.00h	\$14,361.10 0.00h

Activities Export

06/13/2023

3:58 PM

Date ▲	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
09/20/2022	\$	Expert Cost ● Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Shani Zakay	1.00	\$1,364.67	-	\$1,364.67
10/13/2022	\$	Expert Costs ● Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Shani Zakay	1.00	\$1,724.25	-	\$1,724.25
11/17/2022	\$	Expert Cost ● Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Shani Zakay	1.00	\$5,422.00	-	\$5,422.00
03/22/2023	\$	Declaration ● Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Donia Saadi	1.00	\$17.04	-	\$17.04
03/29/2023	\$	One Legal- Declaration ● Unbilled	37001-Rodriguez Cristal Rodriguez v. EAH, Inc.	Donia Saadi	1.00	\$17.04	-	\$17.04
							\$0.00 0.00h	\$14,361.10 0.00h