

ZAKAY LAW GROUP, APLC
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Jackland K. Hom (State Bar #327243)
Rachel N. Newman (State Bar #350826)
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Jean-Claude Lapuyade (State Bar #248676)
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Attorneys for Plaintiff JOE MORENO

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SAN DIEGO

JOE MORENO, on behalf of himself, other
Aggrieved Employees, and the State of California,

Plaintiffs,

vs.

EAGLE FOODS, LLC, a California limited
liability company; RAMBO, LLC, a California
limited liability company; and DOES 1 through
50, Inclusive;

Defendants.

Case No: 37-2021-00038129-CU-OE-CTL

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

Date: September 19, 2025

Time: 10:30am

Judge: Hon. Carolyn M. Caietti

Dept: 70

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 Joe Moreno ("Plaintiff"). As such, I am fully familiar with the facts, pleadings, and history of
4 the matter. I am submitting this declaration in support of Plaintiff's Motion to Approve PAGA
5 Settlement.

6 **I. EXPERIENCE**

7 2. Over the course of the litigation during the last forty-eight 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
11 litigation experience, much of it in employment class actions, unfair business practices and other
12 complex litigation. I have experience in cases involving labor code violations and meal and rest break
13 claims. Counsel has litigated similar labor law cases against other employers on behalf of employees.
14 Counsel have been approved as experienced Counsel throughout California. It is this level of experience
15 which 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 March 26, 2025, Zakay Law Group, APLC incurred lodestar totaling \$74,005.00
21 in 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 March 2021 through March 2025, my
23 firm has worked more than 161.2 hours prosecuting these claims with the attorneys' hourly fee rates for
24 attorneys at \$375-\$675, 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
21 Summary detailing the actually incurred litigation expenses by the Zakay Law Group APLC, for this
22 matter as of March 26, 2025. As shown in detail in the attached Cost Summary, the Zakay Law Group
23 incurred a total of \$6,954.48 in litigation costs prosecuting this action – with additional costs
24 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 22nd day of April 2025, 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:

• **PRACTICE 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

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4. **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

5. **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

6. Lead Counsel – Class Action and/or 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. Tressler v. Spoonful Management

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

7. Murphy v. Rockler Retailer Group, Inc.

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

8. Bruemmer v. Tempur Retail Stores, LLC.

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

9. 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

10. 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

11. Heather McIntyre v. JRR Enterprises

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

12. 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

13. 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

14. 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

15. Derik Scott et al. v. Ultimate Performance

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

16. Raymond Frazier v. Asa Carlton

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

17. Amber Price v. DMSD Restaurants

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

18. Jamaal Johnson v. Volt Management Corp

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

19. Mark Connor v. Ascendant Marketing

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

20. Niki Nunez v. Home Depot

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

21. Alma Salazar v. Frontier Toyota

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

22. Josefina Garces v. Kar Auction Services

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

23. Madison Weiss v. Niznik Behavior

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

24. Jimmy Mack v. ERM Enterprises

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

25. Josefina Garces v. DriverDo

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

26. Perseus Porras v. Tantalum Restaurant

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

27. Nicholas Leon v. Miller Event Management

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

28. Aaris Watts v. TRL Systems

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

29. Johnathan Roa v. Otay Mesa Sales

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

30. Jonathan Mitchell v. Mack Trucking

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

31. Richard Jer Vang v. Bridge Property Management

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

32. Madison Marrero v. Stat Med

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

33. Brian Reyes v. Stowasser Buick-GMC

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

34. 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

35. Griselda Duran v. EmployBridge

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

36. Luis Rendon v. Healthcare Investments, Inc.

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

37. Richard Melead v. TVI, Inc.

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

38. Thomas Haven v. California Vocations, Inc.

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

39. Estefania Renteria v. Love's Country

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

40. Rachel Latin v. OneMain General Services Corp.

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

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

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

42. Jie Xu v. HT Multinational

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

43. Yvette Molina v. Hawaiian Airlines

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

44. Reinald Pillsbury v. T & T Restaurants CA

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

45. Luis de Jesus v. Guardian Angel Home Care

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

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

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

47. Gabriel Mendez v. Bondz, Inc.

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

48. James Conley v. Siskiyou Forest Products

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

49. Alex Castellanos v. Southwest Patrol

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

50. Rodney Stovall v. Javelin Logistics Company

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

51. Gabrielle Boyd v. Bluestone Lane Holdings, LLC

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

52. Elias Kaser v. Aviation Consultants, Inc.

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

53. Christopher Chacon v. Panda Motors, Inc.

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

54. Willie Lang v. Pathways

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

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

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

Status	Settled
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56. Daniel Jacobs v. Rush Media Company

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

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

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

58. Sukhraj Kaur v. ACES 2020, LLC

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

59. James Rachal v. ELG Metals, Inc.

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

60. Michael Ashlock v. Advantis Medical Staffing

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

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

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

62. Nicolas Neutall v. Urban Alchemy

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

Status	Settled
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63. Courteney Arneson v. Bahn Thai, Inc.

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

64. Traci Pollinger v. Hoehn Motors, Inc.

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

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

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

66. Shasta Collins v. Hilton Management, LLC

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

67. Amanda Hernandez v. Parenting Network, Inc.

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

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

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

69. 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
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70. 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

71. David Ezell v. Diab Leasing, Inc.

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

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

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

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

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

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

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

75. Jermell Jones v. Greenlawn Funeral Homes

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

76. 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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77. Jose Garcia v. Ferma Greenbox

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

78. Brittney Jones v. ASD6

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

79. Melina Wilson v. Spreen Honda

Court	San Bernardino
Case No.	CIVSB2119857
Nature	PAGA
Status	Settled

80. Anthony Lopez v. Ferro Automotive

Court	Solano
Case No.	FCS056580
Nature	PAGA
Status	In Litigation

81. Michael Nash v. K. Hovnanian

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

82. 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

83. Gabriel Guzman v. Vulcan Materials Company

Court	San Diego
Case No.	37-2021-00024583-CU-OE-CTL

Nature	Unpaid Wages, PAGA
Status	Settled

84. Cristal Rodriguez v. EAH , Inc.

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

85. Natalie Chrestensen v. Northeastern Rural Health Clinics

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

86. 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

87. Claudia Nunez v. The Whole Child

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

88. Jaqueline Nayyar v. Pizza Investment Entrepreneurs, LLC

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

89. Michael Harrington v. Genesis Private Security

Court	Alameda
Case No.	RG21105476
Nature	Wage Statement
Status	Settled

90. Robert Baray v. Curation Foods

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

91. James Aguilar v. T & K

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

92. Alahjah Brown v. NRI USA, Inc.

Court	San Bernardino
Case No.	CIVSB0228407
Nature	PAGA
Status	Settled

93. 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

94. Joe Moreno v. Rambo, LLC.

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

95. 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

96. Devin Terrell v. KaiserAir

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

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

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

98. Dante Henderson v. Bizon Group, Inc.

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

99. Noemy Flores v. Aven Group, Inc.

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

100. 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

101. Ricardo Rodriguez v. Employbridge

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

102. 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

103. Tyra Toler v. Total Testing Solutions LLC

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

104. Juanita Allen v. Nissan of Stockton

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

105. Paola Villalvazo v. SK Market Inc.

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

106. 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

107. Powell v. Core Community Organized Relief Effort

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

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

Court	Merced
Case No.	21CV-03773
Nature	Regular Rate of Pay
Status	In Litigation

109. Alisa Alvarez v. SLO Arches, Inc.

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

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

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

111. Parastoo Maboudi v. The Neiman Marcus Group LLC

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

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

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

113. Maria Tabarez v. Alta Hospitals System LLC

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

114. Luther Roddy v. O'Neil Beverages

Court	Marin
Case No.	CIV2200067
Nature	Various
Status	Settled

115. David Stevens v. Kamps Propane, Inc.

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

116. Veronica Maravilla v. Venus Et Fleur, LLC

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

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

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

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

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

119. 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

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

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

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

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

122. Marquan Nesbitt v. Autonomous, Inc.

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

123. 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

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

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

125. Serenity Jean Dewolf v. Mountain Counties Supply Company

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

126. Jeannete Gomes v. Homeaglow Inc.

Court	San Joaquin / Los Angeles
Case No.	22STCV27159
Nature	Independent Contractor Misclassification
Status	In Litigation

127. Alan Carrillo Rodriguez v. Titan Workforce

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

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

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

129. Manuel Fimbres et al. v. Dreamstyle Remodeling of California, LLC et al.

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

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

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

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

Court	Sacramento
Case No.	34-2022-00319781
Nature	Meal/Rest Breaks
Status	Settled

132. John Schilder v. Tenderloin Neighborhood Development Corporation

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

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

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

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

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

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

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

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

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

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

Court	Los Angeles
Case No.	22STCV12086
Nature	Wage Statement
Status	Settled

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

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

139. Brennan Howard v. Koulax Enterprises

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

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

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

141. Kaliyah Martin v. Blend Labs et al.

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

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

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

143. 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

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

Court	Stanislaus
Case No.	CV-22-003127
Nature	Meal/Rest Break
Status	In Litigation

145. Brad Klein v. Redzone Security Inc.

Court	Riverside
Case No.	CVRI2202841
Nature	Augustus
Status	In Litigation

146. Steve Martinez v. Radiant Services Corp.

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

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

Court	Nevada
Case No.	CU0000023
Nature	Various
Status	Settled

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

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

149. 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

03/27/2025

7:55 AM

Date ▼	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
03/26/2025	 	Additional work on the motion for settlement approval Unbilled	39201-Moreno Joe Moreno v. Rambo, LLC	Rachel Newman	3.50h	\$425.00	-	\$1,487.50
03/04/2025	 	More work on Motion for Settlement Approval Unbilled	39201-Moreno Joe Moreno v. Rambo, LLC	Jackland Hom	2.00h	\$525.00	-	\$1,050.00
02/26/2025	 	Work on Motion for Settlement Approval Unbilled	39201-Moreno Joe Moreno v. Rambo, LLC	Jackland Hom	6.00h	\$525.00	-	\$3,150.00
02/25/2025	 	Work on settlement agreement Unbilled	39201-Moreno Joe Moreno v. Rambo, LLC	Rachel Newman	1.50h	\$425.00	-	\$637.50
02/20/2025	 	More work on SAR Unbilled	39201-Moreno Joe Moreno v. Rambo, LLC	Jackland Hom	1.50h	\$525.00	-	\$787.50
01/16/2025	 	Work on SAR Unbilled	39201-Moreno Joe Moreno v. Rambo, LLC	Jackland Hom	2.50h	\$525.00	-	\$1,312.50
01/02/2025	 	Emails with OPC and internal emails Unbilled	39201-Moreno Joe Moreno v. Rambo, LLC	Rachel Newman	2.10h	\$425.00	-	\$892.50
12/08/2024	 	Work on SAR Unbilled	39201-Moreno Joe Moreno v. Rambo, LLC	Shani Zakay	1.50h	\$650.00	-	\$975.00
11/27/2024	 	Work on CMS Unbilled	39201-Moreno Joe Moreno v. Rambo, LLC	Rachel Newman	0.80h	\$395.00	-	\$316.00
11/22/2024	 	Work on CMS Unbilled	39201-Moreno Joe Moreno v. Rambo, LLC	Shani Zakay	0.30h	\$650.00	-	\$195.00
					161.20h		\$0.00 0.00h	\$74,005.00 161.20h

Activities Export

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Date ▼	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
11/19/2024	 Unbilled	Internal emails	39201-Moreno Joe Moreno v. Rambo, LLC	Rachel Newman	1.90h	\$395.00	-	\$750.50
11/19/2024	 Unbilled	Work on SAR	39201-Moreno Joe Moreno v. Rambo, LLC	Shani Zakay	0.20h	\$650.00	-	\$130.00
11/15/2024	 Unbilled	Work on SAR	39201-Moreno Joe Moreno v. Rambo, LLC	Shani Zakay	1.00h	\$650.00	-	\$650.00
11/14/2024	 Unbilled	Emails with OPC	39201-Moreno Joe Moreno v. Rambo, LLC	Rachel Newman	0.20h	\$395.00	-	\$79.00
11/11/2024	 Unbilled	Work on SAR and Aggrieved Employees Notice	39201-Moreno Joe Moreno v. Rambo, LLC	Jackland Hom	6.00h	\$475.00	-	\$2,850.00
11/04/2024	 Unbilled	Emails w/ settlement admin	39201-Moreno Joe Moreno v. Rambo, LLC	Jackland Hom	0.40h	\$475.00	-	\$190.00
10/04/2024	 Unbilled	Preparation for and attendance of status conference	39201-Moreno Joe Moreno v. Rambo, LLC	Rachel Newman	1.00h	\$395.00	-	\$395.00
10/02/2024	 Unbilled	Follow up on MOU	39201-Moreno Joe Moreno v. Rambo, LLC	Shani Zakay	0.10h	\$650.00	-	\$65.00
09/23/2024	 Unbilled	Work on MOU	39201-Moreno Joe Moreno v. Rambo, LLC	Shani Zakay	0.50h	\$650.00	-	\$325.00
09/11/2024	 Unbilled	Work on the MOU	39201-Moreno Joe Moreno v. Rambo, LLC	Shani Zakay	1.00h	\$650.00	-	\$650.00
09/03/2024	 Unbilled	Work on MOU	39201-Moreno Joe Moreno v. Rambo, LLC	Rachel Newman	1.00h	\$395.00	-	\$395.00
					161.20h		\$0.00	\$74,005.00
							0.00h	161.20h

Activities Export

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Date ▼	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
09/03/2024	 	Attend mediation Unbilled	39201-Moreno Joe Moreno v. Rambo, LLC	Rachel Newman	8.00h	\$395.00	-	\$3,160.00
09/03/2024	 	Prepare for and attend mediation. Unbilled	39201-Moreno Joe Moreno v. Rambo, LLC	Shani Zakay	10.00h	\$650.00	-	\$6,500.00
08/26/2024	 	Work on mediation brief Unbilled	39201-Moreno Joe Moreno v. Rambo, LLC	Rachel Newman	3.50h	\$395.00	-	\$1,382.50
08/26/2024	 	Work on the mediation brief. Unbilled	39201-Moreno Joe Moreno v. Rambo, LLC	Shani Zakay	3.00h	\$650.00	-	\$1,950.00
08/26/2024	 	Work on the mediation brief Unbilled	39201-Moreno Joe Moreno v. Rambo, LLC	Shani Zakay	1.00h	\$650.00	-	\$650.00
08/26/2024	 	Review mediation agreement and confidentiality agreement for mediation and execute and review email confirmation. Unbilled	39201-Moreno Joe Moreno v. Rambo, LLC	Shani Zakay	0.50h	\$650.00	-	\$325.00
08/25/2024	 	Work on mediation brief Unbilled	39201-Moreno Joe Moreno v. Rambo, LLC	Shani Zakay	1.00h	\$650.00	-	\$650.00
08/12/2024	 	Emails with expert regarding data for mediation. Unbilled	39201-Moreno Joe Moreno v. Rambo, LLC	Shani Zakay	0.10h	\$650.00	-	\$65.00
08/06/2024	 	Call with client Unbilled	39201-Moreno Joe Moreno v. Rambo, LLC	Rachel Newman	0.40h	\$395.00	-	\$158.00
07/23/2024	 	Follow up on data for mediation Unbilled	39201-Moreno Joe Moreno v. Rambo, LLC	Shani Zakay	0.10h	\$650.00	-	\$65.00
					161.20h		\$0.00 0.00h	\$74,005.00 161.20h

Activities Export

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Date ▼	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
06/11/2024		Emails w/ attorneys re Stipulation to Stay Pending Mediation and Data Demand  Unbilled	39201-Moreno Joe Moreno v. Rambo, LLC	Jackland Hom	0.50h	\$400.00	-	\$200.00
06/07/2024		Follow up on mediation data  Unbilled	39201-Moreno Joe Moreno v. Rambo, LLC	Shani Zakay	0.10h	\$600.00	-	\$60.00
04/03/2024		Emails regarding report and mediation.  Unbilled	39201-Moreno Joe Moreno v. Rambo, LLC	Shani Zakay	0.20h	\$600.00	-	\$120.00
03/20/2024		Work on joint report.  Unbilled	39201-Moreno Joe Moreno v. Rambo, LLC	Shani Zakay	0.20h	\$600.00	-	\$120.00
03/20/2024		Emails  Unbilled	39201-Moreno Joe Moreno v. Rambo, LLC	Rachel Newman	1.10h	\$350.00	-	\$385.00
03/19/2024		Review CMS  Unbilled	39201-Moreno Joe Moreno v. Rambo, LLC	Jackland Hom	0.40h	\$400.00	-	\$160.00
03/19/2024		Work on CMS  Unbilled	39201-Moreno Joe Moreno v. Rambo, LLC	Rachel Newman	1.00h	\$350.00	-	\$350.00
02/18/2024		Call with OPC  Unbilled	39201-Moreno Joe Moreno v. Rambo, LLC	Rachel Newman	0.30h	\$350.00	-	\$105.00
02/14/2024		Emails regarding mediation  Unbilled	39201-Moreno Joe Moreno v. Rambo, LLC	Shani Zakay	0.30h	\$600.00	-	\$180.00
12/29/2023		Work on M&C letter to defense regarding liability and mediation.  Unbilled	39201-Moreno Joe Moreno v. Rambo, LLC	Shani Zakay	1.00h	\$595.00	-	\$595.00
					161.20h		\$0.00 0.00h	\$74,005.00 161.20h

Activities Export

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Date ▼	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
12/28/2023	 	Draft liability letter re mediation Unbilled	39201-Moreno Joe Moreno v. Rambo, LLC	Jennifer Gerstenzang	6.00h	\$400.00	-	\$2,400.00
10/06/2023	 	Prepare for and attend motion for reconsideration hearing Unbilled	39201-Moreno Joe Moreno v. Rambo, LLC	Jennifer Gerstenzang	2.00h	\$400.00	-	\$800.00
10/06/2023	 	Follow up on outcome of hearing and discuss necessary work with staff. Unbilled	39201-Moreno Joe Moreno v. Rambo, LLC	Shani Zakay	0.30h	\$595.00	-	\$178.50
10/05/2023	 	Review tentative and confer internally Unbilled	39201-Moreno Joe Moreno v. Rambo, LLC	Jaclyn Joyce	0.50h	\$525.00	-	\$262.50
08/14/2023	 	Draft documents in support of supplemental brief Unbilled	39201-Moreno Joe Moreno v. Rambo, LLC	Jaclyn Joyce	1.40h	\$525.00	-	\$735.00
08/14/2023	 	Further draft supplemental brief Unbilled	39201-Moreno Joe Moreno v. Rambo, LLC	Jaclyn Joyce	2.10h	\$525.00	-	\$1,102.50
08/09/2023	 	Begin drafting supplemental brief Unbilled	39201-Moreno Joe Moreno v. Rambo, LLC	Jaclyn Joyce	1.60h	\$525.00	-	\$840.00
08/03/2023	 	Further correspond with OC re stipulation to stay Unbilled	39201-Moreno Joe Moreno v. Rambo, LLC	Jaclyn Joyce	0.20h	\$525.00	-	\$105.00
07/28/2023	 	Prepare for and attend hearing Unbilled	39201-Moreno Joe Moreno v. Rambo, LLC	Jaclyn Joyce	0.70h	\$525.00	-	\$367.50
07/27/2023	 	Review tentative and confer	39201-Moreno	Jaclyn	0.50h	\$525.00	-	\$262.50
					161.20h		\$0.00 0.00h	\$74,005.00 161.20h

Activities Export

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		internally ● Unbilled	Joe Moreno v. Rambo, LLC	Joyce				
07/24/2023	🕒	Further correspond with OC re stip to stay ● Unbilled	39201-Moreno Joe Moreno v. Rambo, LLC	Jaclyn Joyce	0.20h	\$525.00	-	\$105.00
07/19/2023	🕒	correspond with OC re stip to stay ● Unbilled	39201-Moreno Joe Moreno v. Rambo, LLC	Jaclyn Joyce	0.20h	\$525.00	-	\$105.00
07/07/2023	🕒	Review and revise reply brief in support of motion for reconsideration; finalize for filing. ● Unbilled	39201-Moreno Joe Moreno v. Rambo, LLC	Jaclyn Joyce	1.60h	\$525.00	-	\$840.00
07/07/2023	🕒	Emails and conversation with Attorney Joyce regarding the reply on the motion for reconsideration. ● Unbilled	39201-Moreno Joe Moreno v. Rambo, LLC	Shani Zakay	0.50h	\$595.00	-	\$297.50
07/06/2023	🕒	Review opposition to Motion for reconsideration; begin drafting reply brief ● Unbilled	39201-Moreno Joe Moreno v. Rambo, LLC	Jaclyn Joyce	1.90h	\$525.00	-	\$997.50
07/05/2023	🕒	Review and revise reply brief in support of motion for reconsideration; finalize for filing. ● Unbilled	39201-Moreno Joe Moreno v. Rambo, LLC	Jaclyn Joyce	1.60h	\$525.00	-	\$840.00
07/05/2023	🕒	Further draft reply brief in support of Plaintiff's Motion for Reconsideration, along with supporting documents ● Unbilled	39201-Moreno Joe Moreno v. Rambo, LLC	Jaclyn Joyce	2.10h	\$525.00	-	\$1,102.50
					161.20h		\$0.00	\$74,005.00
							0.00h	161.20h

Activities Export

03/27/2025

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Date ▼	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
06/07/2023	 	Revise Motion for reconsideration; draft RJN Unbilled	39201-Moreno Joe Moreno v. Rambo, LLC	Jaclyn Joyce	1.60h	\$525.00	-	\$840.00
06/06/2023	 	Further draft Motion for Reconsideration and supporting documents Unbilled	39201-Moreno Joe Moreno v. Rambo, LLC	Jaclyn Joyce	2.80h	\$525.00	-	\$1,470.00
06/05/2023	 	Begin drafting Motion for Reconsideration Unbilled	39201-Moreno Joe Moreno v. Rambo, LLC	Jaclyn Joyce	2.30h	\$525.00	-	\$1,207.50
03/27/2023	 	Review Ex Parte application and discuss with co-counsel. Unbilled	39201-Moreno Joe Moreno v. Rambo, LLC	Shani Zakay	0.50h	\$595.00	-	\$297.50
01/27/2023	 	Review tentative and discuss necessary work with Attorney Alvarado and staff. Unbilled	39201-Moreno Joe Moreno v. Rambo, LLC	Shani Zakay	0.40h	\$595.00	-	\$238.00
01/20/2023	 	Additional work on Reply Unbilled	39201-Moreno Joe Moreno v. Rambo, LLC	Jennifer Gerstenzang	2.00h	\$395.00	-	\$790.00
01/20/2023	 	Work on reply to motion for reconsideration Unbilled	39201-Moreno Joe Moreno v. Rambo, LLC	Shani Zakay	0.50h	\$595.00	-	\$297.50
01/19/2023	 	Additional work on Reply Unbilled	39201-Moreno Joe Moreno v. Rambo, LLC	Jennifer Gerstenzang	2.00h	\$395.00	-	\$790.00
01/19/2023	 	Draft Reply to DEF's Opposition to Motion for Reconsideration	39201-Moreno Joe Moreno v. Rambo, LLC	Jennifer Gerstenzang	4.00h	\$395.00	-	\$1,580.00
					161.20h		\$0.00 0.00h	\$74,005.00 161.20h

Activities Export

03/27/2025

7:55 AM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		● Unbilled						
01/18/2023	🕒	Legal research re Reply to DEF's Opposition to Motion to Reconsideration ● Unbilled	39201-Moreno Joe Moreno v. Rambo, LLC	Jennifer Gerstenzang	4.00h	\$395.00	-	\$1,580.00
01/13/2023	🕒	Read and review DEF's opposition to Motion for Reconsideration ● Unbilled	39201-Moreno Joe Moreno v. Rambo, LLC	Jennifer Gerstenzang	2.00h	\$395.00	-	\$790.00
12/20/2022	🕒	Additional legal research re Motion for Reconsideration ● Unbilled	39201-Moreno Joe Moreno v. Rambo, LLC	Jennifer Gerstenzang	4.00h	\$350.00	-	\$1,400.00
12/19/2022	🕒	Legal research for supplemental briefing on Motion for Reconsideration ● Unbilled	39201-Moreno Joe Moreno v. Rambo, LLC	Jennifer Gerstenzang	4.00h	\$350.00	-	\$1,400.00
08/30/2022	🕒	Emails regarding deadline for appeal and motion for reconsideration. ● Unbilled	39201-Moreno Joe Moreno v. Rambo, LLC	Shani Zakay	0.20h	\$575.00	-	\$115.00
08/02/2022	🕒	Additional review of motion for reconsideration and approve for filing. ● Unbilled	39201-Moreno Joe Moreno v. Rambo, LLC	Shani Zakay	0.50h	\$575.00	-	\$287.50
08/02/2022	🕒	Additional work on Motion for Reconsideration ● Unbilled	39201-Moreno Joe Moreno v. Rambo, LLC	Jennifer Gerstenzang	4.00h	\$350.00	-	\$1,400.00
					161.20h		\$0.00 0.00h	\$74,005.00 161.20h

Activities Export

03/27/2025

7:55 AM

Date ▼	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
08/01/2022	 Unbilled	Draft Motion for Reconsideration	39201-Moreno Joe Moreno v. Rambo, LLC	Jennifer Gerstenzang	4.00h	\$350.00	-	\$1,400.00
07/29/2022	 Unbilled	Legal research re Motion for Reconsideration	39201-Moreno Joe Moreno v. Rambo, LLC	Jennifer Gerstenzang	4.00h	\$350.00	-	\$1,400.00
07/29/2022	 Unbilled	Work on motino for reconsideration.	39201-Moreno Joe Moreno v. Rambo, LLC	Shani Zakay	1.00h	\$575.00	-	\$575.00
07/07/2022	 Unbilled	Emails with OPC regarding stipulation to arbitrate and stay.	39201-Moreno Joe Moreno v. Rambo, LLC	Shani Zakay	0.20h	\$575.00	-	\$115.00
06/22/2022	 Unbilled	Drafting CMS, filing, and serving on OC.	39201-Moreno Joe Moreno v. Rambo, LLC	Rachel Newman	1.00h	\$165.00	-	\$165.00
03/18/2022	 Unbilled	Call with Client	39201-Moreno Joe Moreno v. Rambo, LLC	Jennifer Gerstenzang	0.50h	\$350.00	-	\$175.00
02/17/2022	 Unbilled	Review Defendant's CMS.	39201-Moreno Joe Moreno v. Rambo, LLC	Shani Zakay	0.20h	\$575.00	-	\$115.00
02/14/2022	 Unbilled	Drafting CMS, circulating to attorneys for approval, finalizing, filing, and serving OC.	39201-Moreno Joe Moreno v. Rambo, LLC	Rachel Newman	1.00h	\$165.00	-	\$165.00
02/11/2022	 Unbilled	Follow up on discovery.	39201-Moreno Joe Moreno v. Rambo, LLC	Shani Zakay	0.10h	\$575.00	-	\$57.50
01/11/2022	 Unbilled	Finalize meet and confer letter to	39201-Moreno	Jennifer	0.50h	\$350.00	-	\$175.00
					161.20h		\$0.00 0.00h	\$74,005.00 161.20h

Activities Export

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		be sent to OPC and emails with Attorney Zakay regarding the same ● Unbilled	Joe Moreno v. Rambo, LLC	Gerstenzang				
01/11/2022	🕒	Review and revise meet and confer letter to OPC and emails with Attorney Alvarado regarding the same. ● Unbilled	39201-Moreno Joe Moreno v. Rambo, LLC	Shani Zakay	0.50h	\$575.00	-	\$287.50
01/10/2022	🕒	Review initial meet and confer correspondence, review employee file, conduct legal research, and draft meet and confer letter ● Unbilled	39201-Moreno Joe Moreno v. Rambo, LLC	Jennifer Gerstenzang	6.00h	\$350.00	-	\$2,100.00
01/10/2022	🕒	Meeting with Attorney Zakay to discuss work on meet and confer ● Unbilled	39201-Moreno Joe Moreno v. Rambo, LLC	Jennifer Gerstenzang	0.20h	\$350.00	-	\$70.00
01/10/2022	🕒	Meeting with Attorney Alvarado to discuss work on meet and confer ● Unbilled	39201-Moreno Joe Moreno v. Rambo, LLC	Shani Zakay	0.20h	\$575.00	-	\$115.00
01/06/2022	🕒	Call with Attorney Hom and client to provide case update and questions re joint employer ● Unbilled	39201-Moreno Joe Moreno v. Rambo, LLC	Jennifer Gerstenzang	0.40h	\$350.00	-	\$140.00
01/06/2022	🕒	Call with Attorney Alvarado and client to provide case update and questions re joint employer ● Unbilled	39201-Moreno Joe Moreno v. Rambo, LLC	Jackland Hom	0.40h	\$375.00	-	\$150.00
01/05/2022	🕒	Discuss with Attorney Hom OPC's	39201-Moreno	Jennifer	0.20h	\$350.00	-	\$70.00
					161.20h		\$0.00	\$74,005.00
							0.00h	161.20h

Activities Export

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		m/c resp letter and strategy moving forward ● Unbilled	Joe Moreno v. Rambo, LLC	Gerstenzang				
01/05/2022	🕒	Call and voicemail to client re case update ● Unbilled	39201-Moreno Joe Moreno v. Rambo, LLC	Jackland Hom	0.10h	\$375.00	-	\$37.50
01/05/2022	🕒	Discuss with Attorney Alvarado OPC's m/c resp letter and strategy moving forward ● Unbilled	39201-Moreno Joe Moreno v. Rambo, LLC	Jackland Hom	0.20h	\$375.00	-	\$75.00
12/30/2021	🕒	Emails with staff and co-counsel regarding discovery dispute and possible fight over arbitration agreement. ● Unbilled	39201-Moreno Joe Moreno v. Rambo, LLC	Shani Zakay	0.30h	\$550.00	-	\$165.00
12/29/2021	🕒	Review letter from OPC and discuss necessary work with staff. ● Unbilled	39201-Moreno Joe Moreno v. Rambo, LLC	Shani Zakay	0.70h	\$550.00	-	\$385.00
12/28/2021	🕒	Emails with OPC regarding discovery ● Unbilled	39201-Moreno Joe Moreno v. Rambo, LLC	Shani Zakay	0.30h	\$550.00	-	\$165.00
12/21/2021	🕒	Review and approve meet and confer correspondence and emails regarding the same. ● Unbilled	39201-Moreno Joe Moreno v. Rambo, LLC	Shani Zakay	0.30h	\$550.00	-	\$165.00
10/14/2021	🕒	DRAFTING AND FILING COA. ● Unbilled	39201-Moreno Joe Moreno v. Rambo, LLC	Shani Zakay	0.50h	\$550.00	-	\$275.00
					161.20h		\$0.00 0.00h	\$74,005.00 161.20h

Activities Export

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Date ▼	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
09/03/2021	 	Draft PAGA Only complaint. Unbilled	39201-Moreno Joe Moreno v. Rambo, LLC	Shani Zakay	2.00h	\$550.00	-	\$1,100.00
07/13/2021	 	Review file and emails with client re status of pleadings Unbilled	39201-Moreno Joe Moreno v. Rambo, LLC	Jackland Hom	0.20h	\$350.00	-	\$70.00
06/29/2021	 	Call with client to discuss complaint prior to approval Unbilled	39201-Moreno Joe Moreno v. Rambo, LLC	Jackland Hom	0.30h	\$350.00	-	\$105.00
06/28/2021	 	Revise complaint to remove all misclassification allegations and other causes of action accordingly Unbilled	39201-Moreno Joe Moreno v. Rambo, LLC	Jackland Hom	2.00h	\$350.00	-	\$700.00
06/26/2021	 	Review and revise complaint. Unbilled	39201-Moreno Joe Moreno v. Rambo, LLC	Shani Zakay	2.00h	\$550.00	-	\$1,100.00
06/22/2021	 	Review file. Draft complaint. Unbilled	39201-Moreno Joe Moreno v. Rambo, LLC	Jackland Hom	6.00h	\$350.00	-	\$2,100.00
					161.20h		\$0.00 0.00h	\$74,005.00 161.20h

EXHIBIT 3

Activities Export

03/26/2025

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Date ▼	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
03/06/2025	\$	One Legal ● Unbilled	39201-Moreno Joe Moreno v. Rambo, LLC	Shani Zakay	1.00	\$84.36	-	\$84.36
12/10/2024	\$	SDSC ROA Fee ● Unbilled	39201-Moreno Joe Moreno v. Rambo, LLC	Shani Zakay	1.00	\$2.00	-	\$2.00
10/17/2024	\$	SDSC ROA Fee ● Unbilled	39201-Moreno Joe Moreno v. Rambo, LLC	Shani Zakay	1.00	\$1.00	-	\$1.00
10/04/2024	\$	Courthouse Parking and Mileage (RNN) ● Unbilled	39201-Moreno Joe Moreno v. Rambo, LLC	Shani Zakay	1.00	\$58.76	-	\$58.76
09/23/2024	\$	One Legal ● Unbilled	39201-Moreno Joe Moreno v. Rambo, LLC	Shani Zakay	1.00	\$19.31	-	\$19.31
09/10/2024	\$	Berger Consulting - Expert Costs ● Unbilled	39201-Moreno Joe Moreno v. Rambo, LLC	Shani Zakay	1.00	\$1,147.50	-	\$1,147.50
04/10/2024	\$	Mediation Fee - Steve Mehta ● Unbilled	39201-Moreno Joe Moreno v. Rambo, LLC	Shani Zakay	1.00	\$5,000.00	-	\$5,000.00
03/21/2024	\$	One Legal ● Unbilled	39201-Moreno Joe Moreno v. Rambo, LLC	Shani Zakay	1.00	\$14.95	-	\$14.95
10/31/2023	\$	JAMS Filing Fee ● Unbilled	39201-Moreno Joe Moreno v. Rambo, LLC	Rachel Newman	1.00	\$411.96	-	\$411.96
01/20/2023	\$	OneLegal - Reply ● Unbilled	39201-Moreno Joe Moreno v. Rambo, LLC	Rachel Newman	1.00	\$13.33	-	\$13.33
08/03/2022	\$	OneLegal - Motion ● Unbilled	39201-Moreno Joe Moreno v. Rambo, LLC	Rachel Newman	1.00	\$74.64	-	\$74.64
							\$0.00 0.00h	\$6,954.48 0.00h

Activities Export

03/26/2025

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Date ▼	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
07/19/2022	\$	Knox Invoice Fee ● Unbilled	39201-Moreno Joe Moreno v. Rambo, LLC	Rachel Newman	1.00	\$64.25	-	\$64.25
07/05/2022	\$	OneLegal - Oppo ● Unbilled	39201-Moreno Joe Moreno v. Rambo, LLC	Rachel Newman	1.00	\$12.87	-	\$12.87
06/21/2022	\$	OneLegal - CMS ● Unbilled	39201-Moreno Joe Moreno v. Rambo, LLC	Rachel Newman	1.00	\$12.50	-	\$12.50
02/14/2022	\$	OneLegal - CMS ● Unbilled	39201-Moreno Joe Moreno v. Rambo, LLC	Rachel Newman	1.00	\$12.35	-	\$12.35
10/14/2021	\$	OneLegal - COA ● Unbilled	39201-Moreno Joe Moreno v. Rambo, LLC	Shani Zakay	1.00	\$12.35	-	\$12.35
09/15/2021	\$	OneLegal Fee - POS ● Unbilled	39201-Moreno Joe Moreno v. Rambo, LLC	Shani Zakay	1.00	\$12.35	-	\$12.35
							\$0.00 0.00h	\$6,954.48 0.00h