

JCL LAW FIRM, APC

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Attorneys for Plaintiff MELINA WILSON

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SAN BERNARDINO

MELINA WILSON, an individual, on behalf
of herself, and on behalf of all persons
similarly situated,

Plaintiff,

vs.

SPREEN, INC. dba SPREEN HONDA;
HUDSON MOTOR CARS, LLC dba
SPREEN ACURA; JTS MOTOR CARS, LLC
dba SPREEN MAZDA; HUNTER MOTOR
CARS, INC. dba SPREEN HONDA
CORONA; and Does 1 through 50, Inclusive,

Defendants.

Case No. CIVSB2119857

**DECLARATION OF JEAN-CLAUDE
LAPUYADE, ESQ. IN SUPPORT OF
PLAINTIFF'S MOTION FOR APPROVAL
OF PAGA SETTLEMENT**

Hearing Date: April 5, 2022

Hearing Time: 10:00 a.m.

Judge: Hon. David S. Cohn

Dept.: S26

I, JEAN CLAUDE LAPUYADE, declare as follows:

1. I am the managing partner of JCL Law Firm, APC, and co-counsel of record for Plaintiff MELINA WILSON, on behalf of herself, and on behalf of all persons similarly situated, and in her representative capacity on behalf of the State of California and fellow Aggrieved Employees, ("Plaintiff") in this matter. As such, I am fully familiar with the facts, pleadings and history of the matter.

2. I am submitting this declaration in support of Plaintiff's Motion for Approval of PAGA Settlement.

3. Attached hereto as **Exhibit “A”** is a true and correct copy of the JCL Law Firm, APC’s “Transaction Summary” detailing Settlement Counsel’s actually incurred litigation expenses for this matter as of March 10, 2022. As shown in detail in the attached transaction summary, Counsel has incurred a total of \$4,110.04 in litigation costs prosecuting this action. I anticipate incurring an additional \$150 - \$200 for the filing, service and appearance at this motion.

4. Attached hereto as **Exhibit “B”** is a true and correct copy of the Time and Billing Journal for Counsel, Jean-Claude Lapuyade, Esq., as of March 10, 2022. Each entry was made contemporaneously by me and in the ordinary course of my usual course of business. The attached Billing Journal shows that I billed a total of 58.8 hours for a total of \$32,340.00 successfully litigating this action at \$550 per hour.

5. Attached hereto as **Exhibit “C”** is a true and correct copy of the Time and Billing Journal for case paralegal Tesla Stone as of Mach 10, 2022. It is my understanding and belief that Ms. Stone made each entry contemporaneously with her work and in the ordinary course of her employer’s, the JCL Law Firm, APC’s usual course of business. I have reviewed each entry and believe each to be accurate and complete to the best of my knowledge. The attached billing Journal shows that Ms. Stone worked a total of 17.1 hours at a rate of \$150 supporting this action for a total billing of \$2,565.00.

II. LOADSTAR & COSTS

6. As of March 10, 2022, the JCL Law Firm, APC incurred a total lodestar of \$34,905.00 for 75.9 hours worked by attorneys and staff successfully litigating this matter. I have reviewed my firm's lodestar in this matter and believe the charges are reasonable and were reasonably necessary to the conduct of the case. Detailed time and billing journals for the JCL Law Firm are attached hereto as Exhibits B and C. These time and billing entries are exclusive from the time and billing entries by co-counsel for Plaintiff in this action.

7. The JCL Law Firm's rates are comparable to those judicially approved for other plaintiff's firms, such as Baron & Budd (rates ranging from \$775 for the requested partner to \$390-

1 \$630 for non-partners), Western Comden Casselman & Essensten (rates ranging from \$670-\$750 for
2 partners and \$300-\$500 for associates), and Blood Hurst & Rearden (\$510-\$695 for partners). See
3 Aarons v. BMW of North America, No. 11-7667-PSG, 2014 U.S. Dist. LEXIS 118442, *40-41 (C.D.
4 Cal. Apr. 29, 2014). Other Southern California courts have approved hourly rates in the requested
5 range. See e.g., Kearney v. Hyundai Motor Am., 2013 U.S. Dist. LEXIS 91636, *24 (C.D. Cal. June
6 28, 2013) (approving hourly rates of \$650 -\$800 for senior attorneys in consumer class action);
7 Parkinson v. Hyundai Motor America, 796 F.Supp.2d 1160, 1172 (C.D. Cal. 2010)(approving hourly
8 rates between \$445 and \$675); Faigman v. AT&T Mobility, LLC, 2011 U.S. Dist. LEXIS 15825, *2
9 (N.D. Cal. Feb. 15, 2011)(Approving hourly rates of \$650 an hour for partners and \$500 for associates);
10 Richard v. Ameri-Force Mgmt. Servs., Inc., No 37-2008-00096019 (San Diego Superior Court, August
11 27, 2010)(\$695 to \$750 an hour for partners and \$495 for associates); Barrera v. Gamestop, No. CV
12 09-1399 (C.D. Cal. Nov. 29, 2010)(\$700 for partners and \$475 for associates); Anderson v. Nextel
13 Retail Stores, LLC, No. CV 07-4480 (C.D. Cal. June 20, 2010)(\$655- \$750 for partners and \$300 –
14 515 for associates); Luquetta v. Regents of Cal., CGC-05-443007 (San Francisco Sup. Ct.) (approving
15 2012 partner rates between \$550 and \$850 per hour); and Holoway v. Best Buy Co., C-05-5056-PJH
16 (MEJ)(N.D. Cal.)(approving 2011 partner rates between \$825 and \$700, and associates hourly rates
17 between \$355 and \$405 an hour).

18 8. Moreover, my billing rate has been approved multiple times within the last several
19 months by California Superior Court judges. (See generally *Rodriguez v. RSI Home Products, Inc.*,
20 San Bernardino Superior Court Case No. CIVDS 2023354 (July 30, 2021 – Hon. David Cohn approved
21 \$550 billing rate and appointed Jean-Claude Lapuyade, Esq. as Counsel in a \$1,450,000 wage and hour
22 class action settlement); *Nunes v. Home Depot U.S.A., Inc.*, San Joaquin Superior Court Case No. STK-
23 CV-UOE-2020-0011011 (October 20, 2021 – Hon. Roger Ross approved \$550 billing rate and
24 appointed Jean-Claude Lapuyade, Esq. as Counsel in a \$1,500,000 wage and hour class action
25 settlement); *Pillsbury v. T&T Restaurants CA, Inc.*, Del Norte Superior Court Case No. CVUJ-20-
26 1214 (December 14, 2021 – Hon. Darren McElfresh approved \$550 billing rate and appointed Jean-
27 Claude Lapuyade, Esq. as Counsel in a wage and hour class action settlement); *Elias Kaser v. Aviation*

1 *Consultants, Inc.*, Orange County Superior Court Case No. 30-2021-01191204-CU-OE-CXC
2 (September 22, 2021 – Hon. Peter J. Wilson approved \$550 billing rate in a representative California
3 Labor Code Private Attorney General Act settlement).

4 9. Further, Counsel will be performing additional work, including finalizing the orders and
5 judgment and monitoring the completion of the settlement process over the course of the next coming
6 months.

7 10. All of Counsel's out-of-pocket expenses are the types of expenses normally charged to
8 paying clients including the following: filing fees; copying; telephone; postage; factual and legal
9 research charges; mediation fees; expert costs and travel expenses, which were all incurred during, and
10 were necessary for the successful prosecution of, the litigation and, therefore, should be reimbursed.

11 11. Counsel now requests reimbursement for those incurred litigation expenses and costs as
12 provided for in the Settlement Agreement and based upon Counsel's billing records.

13 **II. JCL LAW FIRM EXPERIENCE**

14 12. Counsel in this matter has extensive class action and PAGA experience in multiple fields
15 and has represented tens-of-thousands of persons in class actions and PAGA matters. Counsel has
16 previously litigated similar wage and hour class actions involving similar meal and rest period
17 violations. Counsel has been approved as class counsel in similar wage and hour actions throughout
18 the State of California, including in the Superior Court for the County of San Diego. As such, courts
19 throughout the California have deemed Counsel experienced and knowledgeable in this area of law.
20 Counsel has participated in every aspect of the settlement discussions and has concluded the settlement
21 is fair, adequate and reasonable and in the best interests of the Class.

22 13. Plaintiff and the Aggrieved Employees are represented by competent and experienced
23 counsel to pursue their claims. I established the JCL Law Firm, APC ("Firm"), in 2010. The Firm is
24 a boutique plaintiff firm representing aggrieved employees and consumers throughout California in
25 wage and hour class actions, PAGA Actions and complex multi-party product liability matters. The
26 Firm currently consists of myself, Jean-Claude Lapuyade, Esq. (Partner/Owner), Eduardo Garcia
27 (Associate), Tesla Stone (Paralegal), and Leilani Edmunds (Legal Secretary).

1 PAGA settlement for, *inter alia*, failure to comply with piece-rate laws, and appointed
2 the JCL Law Firm, APC as Class Counsel)

3 e. *Elias Kaser v. Aviation Consultants, Inc.*, Orange County Superior Court Case
4 No. 30-2021-01191204-CU-OE-CXC (September 22, 2021 – Hon. Peter J. Wilson
5 approved \$550 billing rate in a representative California Labor Code Private Attorney
6 General Act settlement).

7 f. *Jer Vang v. Bridge Property Management*, Alameda County Superior Court,
8 Case No RG19047434 (January 8, 2021 – Hon. Winifred Smith approved a class and
9 PAGA settlement for, *inter alia*, unpaid off the clock work. The JCL Law Firm, APC
10 acted as class counsel for the settlement class and as representative PAGA counsel the
11 State of California and the Aggrieved Employees.)

12 g. *Johnson v. Volt Management Corp., Inc. et al.*, Los Angeles County Superior
13 Court, Case No. 19STCV16466 (December 11, 2020 – Hon. Amy Hogue approved a
14 PAGA Settlement negotiated on behalf of the State of California and the aggrieved
15 employees by the JCL Law Firm, APC.)

16 h. *Salazar v. Frontier Auto Sales Inc., dba Frontier Toyota*, Los Angeles Superior
17 Court, Case No. 19STCV20382 (November 24, 2020 – Hon. John P. Doyle appointed
18 the JCL Law Firm, APC as class counsel and approved a class and PAGA settlement
19 for, *inter alia*, missed meal and rest periods.)

20 i. *Villalobos v. Alterra Group, LLC et al.*, Los Angeles County Superior Court,
21 Case No. 19STCV19448 (November 11, 2020 – Hon. Richard Fruin approved a PAGA
22 Settlement for, *inter alia*, unreimbursed business expenses. The JCL Law Firm, APC
23 acted as counsel for the plaintiff, the State of California and the Aggrieved Employees.)

24 j. *Stevens et al., v. Bank of England*, San Diego County Superior Court Case No.
25 37-2019-00018662-CU-OE-CTL (October 16, 2020 – Hon. John Meyer appointed JCL
26 Law Firm as Class Counsel and granted final approval of wage and hour class action for,
27 *inter alia*, off-the-clock work.)

k. *Frazier v. ASA Carlton, Inc.*, San Diego Superior Court Case No. 37-2019-00036147 (October 9, 2020 Hon. Kenneth Medel appointed the JCL Law Firm as Class Counsel and granted final approval of wage and hour class action for off-the-clock work.)

l. *Krake et al., v. Central Valley Diner, Inc.*, Placer County Superior Court Case No. SCV0041645 (September 4, 2020 – Hon. Michael Jones appointed JCL Law Firm as class counsel and granted final approval of wage and hour class action for meal period violations.)

m. *Conner v. Ascendant Marketing, LLC et al.*, San Diego Superior Court Case No. 37-2019-00026864-CU-OE-CTL (July 24, 2020 Hon. Joel Wohlfeil granted approval of PAGA Settlement for, among other things, off-the-clock work. JCL Law Firm, APC acted as lead counsel.)

n. *Guerrero v. Estancia Operations, LLC.*, San Diego Superior Court Case No. 37-2019-00028963 (August 25, 2020 – Hon. Katherine Bacal approved PAGA Settlement for, *inter alia*, missed meal and rest periods. JCL LAW Firm, APC, acted as lead counsel.)

o. *Moreno v. Dash Lube, et al.*, United States District Court, Southern District of California, Case No. 18cv1922 DMS (AHG) (December 13, 2019 – Granted class certification of Labor Code Section 226 claim and appointed JCL Law Firm, APC, as Class Counsel.)

p. *Perkins et al., v. Tahiti Enterprises, Inc., et al.*, Orange County Superior Court Case No. 30-2016-00863095 (October 22, 2019 – Hon. Peter Wilson appointed JCL Law Firm, APC, as Class Counsel and granted final approval for an unlawful housing class action settlement arising out of Civil Code Section 1940.1.)

q. *Hill v. Stemak Holdings, Ltd.*, San Diego Superior Court Case No., 37-2018-00000747 (January 28, 2020 – Hon. Kenneth Medel appointed JCL Law Firm, APC as

class counsel and granted final approval of wage and hour class action for unpaid overtime.)

r. *Shachno et al., v. KT Hotels, LLC, et al.* San Diego Superior Court Case No. 37-2018-00043601 (May 31, 2019 – Hon. Gregory Pollack appointed JCL Law Firm, APC, as Class Counsel and granted preliminary approval for the wage and hour class action settlement involving nearly 900 current and former employees. Final approval scheduled for October 4, 2019)

s. *Almanza v. The Express Group, Inc.*, San Bernardino Superior Court Case No. CIVDS1722542 (April 19, 2019 – Hon. David Cohn appointed the JCL Law Firm, APC, as Class Counsel and granted final approval for a wage and hour class action settlement for *inter alia*, missed meal and rest periods and independent contractor misclassification.)

t. *Moschetto v. Pillow Global, Inc.* San Diego Superior Court, Case No. 37-2017-00024031-CU-OE-CTL (April 5, 2019 – Hon. John S. Meyer appointed JCL LAW Firm, APC, as Class Counsel and granted final approval for a wage and hour wage class action settlement involving misclassified house cleaners.)

u. *Burke v. Friendship Hotel, LLC*, San Diego County Superior Court Case No. 37-2017-00022517-CU-OE-CTL (March 10, 2019 – final approval granted on for an unlawful housing class action arising under Civil Code Section 1940.2)

v. *Terrado et al., v. Accredited Debt Relief, LLC*, San Diego County Superior Court Case No. 37-2018-00014181-CU-OE-CTL (February 8, 2019 – Hon. Gregory W. Pollock appointed JCL Law Firm, APC as Class Counsel and granted final approval for a wage and hour class action settlement for meal and rest period violations);

w. *Macaspac v. San Antonio Regional Hospital*, San Bernardino Superior Court Case No. CIVDS1512625, (July 27, 2018 – Hon. Thomas S. Garza appointed JCL Law Firm, APC, as Class Counsel and granted final approval for a wage and hour class action settlement involving claims for on duty meal and rest periods.);

x. *Summerlin et al. v. Maplebear, Inc. dba Instacart*, Los Angeles Superior Court Case No. BC603030 (2018 - certified and settled wage and hour class action.)

y. *Ortega v. Prime Healthcare*, San Diego Superior Court Case No. 37-2014-00011240-CU-OE-CTL (2018 – Approved PAGA only settlement for on duty meal and rest periods)

z. *Engstrom v. Bender-Rosenthal, Inc.* San Diego Superior Court Case No. 37-2016-00012373-CU-OE-CTL (2017 - Certified and settled class action for employee misclassification);

aa. *Crawford v. Outlook Amusements, Inc.*, Los Angeles Superior Court Case No. BC617160 (2017 - Certified and settled wage and hour class action.);

bb. *Hernandez v. Sunglass Hut Trading, LLC*, San Bernardino Superior Court Case No. CIVDS1505181 (2016 - Certified and settled wage and hour class action);

cc. *Burns v. Shalom, LLC*, San Diego Superior Court, Case No., 37-2013-00058356-CU-BT-CTL (2015 - certified and settled class action for unlawful housing practices arising out of Civil Code Section 1940.1);

17. Since 2010, I have successfully tried two (2) cases to conclusion, each resulting in a favorable verdict for the firm's clients.

18. Finally, I have published appellate experience in *William Blanchette et al., v. The Superior Court of Imperial County, (GHA Enterprises)*, 8 Cal.App.5th 521.

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EXHIBIT A

JCL Law Firm

Transaction Report

All Dates

DATE	TRANSACTION TYPE	NUM	NAME	MEMO/DESCRIPTION	ACCOUNT	SPLIT	AMOUNT	BALANCE
Wilson v. Spreen Honda (002-193)								
03/18/2021	Expense		LWDA		Client costs deferred	Chase Card 7349	75.00	75.00
04/20/2021	Expense		JAMS		Client costs deferred	Chase Card 7349	7,617.03	7,692.03
04/21/2021	Deposit		Wilson v. Spreen Honda (002-193)	Reimbursement for Mediation for 002-193 from Zakay	Client costs deferred	US Bank- Checking - 4270	-3,725.00	3,967.03
10/31/2021	Journal Entry	Oct 2021 Postage		Copies for Oct 2021	Client costs deferred	-Split-	1.00	3,968.03
11/11/2021	Check	2644	Knox Attorney Services, Inc.	Invoice No. 4351549 - Re Filing Fee: Request and (Proposed) Order to Continue Initial Case Management Conference	Client costs deferred	US Bank- Checking - 4270	137.50	4,105.53
11/15/2021	Journal Entry	Sept 2022 Postage		Copies for Sep 2021	Client costs deferred	-Split-	2.75	4,108.28
11/30/2021	Journal Entry	Nov 2021 Postage		Postage for Nov 2021	Client costs deferred	-Split-	1.26	4,109.54
12/31/2021	Journal Entry	Dec 2021 Postage		Copies for Dec 2021	Client costs deferred	-Split-	0.50	4,110.04
Total for Wilson v. Spreen Honda (002-193)							\$4,110.04	
TOTAL							\$4,110.04	

EXHIBIT B

JCL Law Firm

Unbilled Time

Activity: All Dates

ACTIVITY DATE	POSTING	EMPLOYEE	MEMO/DESCRIPTION	RATE	DURATION	AMOUNT	BALANCE
Wilson v. Spreen Honda (002-193)							
02/08/2021	No	Jean Claude Lapuyade	Fact Investigation - Client Interview	550.00	1:24	770.00	770.00
02/09/2021	No	Jean Claude Lapuyade	Fact Investigation - Reviewed Client Documents	550.00	3:06	1,705.00	2,475.00
02/10/2021	No	Jean Claude Lapuyade	Legal Research - Claim Analysis	550.00	3:18	1,815.00	4,290.00
02/12/2021	No	Jean Claude Lapuyade	Drafted Fee Agreement	550.00	1:00	550.00	4,840.00
03/11/2021	No	Jean Claude Lapuyade	Drafted LWDA Notice	550.00	4:30	2,475.00	7,315.00
03/24/2021	No	Jean Claude Lapuyade	Drafted, Revised and Finalized LWDA Notice	550.00	1:12	660.00	7,975.00
03/26/2021	No	Jean Claude Lapuyade	Drafted Client Status Letter	550.00	1:42	935.00	8,910.00
04/15/2021	No	Jean Claude Lapuyade	Legal Research - Mediation Brief Issues (Meal, Rest and Vaquero)	550.00	3:00	1,650.00	10,560.00
04/19/2021	No	Jean Claude Lapuyade	Mediation - Reviewed Defendant's Brief and Exhibits	550.00	2:24	1,320.00	11,880.00
04/20/2021	No	Jean Claude Lapuyade	Drafted Damage Report	550.00	4:48	2,640.00	14,520.00
04/20/2021	No	Jean Claude Lapuyade	Mediation - Reviewed and Revised Mediation Brief	550.00	0:54	495.00	15,015.00
04/21/2021	No	Jean Claude Lapuyade	Attended Mediation	550.00	8:00	4,400.00	19,415.00
04/26/2021	No	Jean Claude Lapuyade	Reviewed, Revised and Edited Amended LWDA Notice	550.00	1:30	825.00	20,240.00
06/17/2021	No	Jean Claude Lapuyade	Drafted Client Status Letter	550.00	0:54	495.00	20,735.00
07/07/2021	No	Jean Claude Lapuyade	Pleadings - Drafted, Revised and Edited Complaint	550.00	1:24	770.00	21,505.00
08/20/2021	No	Jean Claude Lapuyade	Drafted Client Status Letter	550.00	1:06	605.00	22,110.00
08/24/2021	No	Jean Claude Lapuyade	Reviewed and Revised Settlement Agreement	550.00	1:30	825.00	22,935.00
09/02/2021	No	Jean Claude Lapuyade	Emails to/from OC RE Settlement Agreement	550.00	0:42	385.00	23,320.00
10/28/2021	No	Jean Claude Lapuyade	Emails to/from OC RE Settlement Agreement	550.00	0:30	275.00	23,595.00
11/01/2021	No	Jean Claude Lapuyade	Emails to/from OC Re Settlement Agreement	550.00	0:30	275.00	23,870.00
11/03/2021	No	Jean Claude Lapuyade	Emails to/from OC Re Settlement Agreement	550.00	0:30	275.00	24,145.00
11/08/2021	No	Jean Claude Lapuyade	Emails to/from OC RE Settlement Agreement	550.00	0:30	275.00	24,420.00

JCL Law Firm

Unbilled Time

Activity: All Dates

ACTIVITY DATE	POSTING	EMPLOYEE	MEMO/DESCRIPTION	RATE	DURATION	AMOUNT	BALANCE
11/29/2021	No	Jean Claude Lapuyade	Emails to/from OC Re Settlement Agreement	550.00	0:36	330.00	24,750.00
12/22/2021	No	Jean Claude Lapuyade	Settlement - Reviewed PAGA Agreement w/ OC Edits	550.00	1:18	715.00	25,465.00
12/28/2021	No	Jean Claude Lapuyade	Settlement - Individual Settlement Agreement	550.00	3:30	1,925.00	27,390.00
12/28/2021	No	Jean Claude Lapuyade	Review and Revised Settlement Agreement	550.00	1:06	605.00	27,995.00
01/03/2022	No	Jean Claude Lapuyade	Emails to/from OC RE Settlement Agreement	550.00	0:18	165.00	28,160.00
01/17/2022	No	Jean Claude Lapuyade	Emails to/from OC Re Settlement Agreement	550.00	0:30	275.00	28,435.00
01/17/2022	No	Jean Claude Lapuyade	Drafted Client Status Letter Re Timeline for Approval	550.00	1:18	715.00	29,150.00
02/22/2022	No	Jean Claude Lapuyade	Legal Research - PAGA Approval Standards	550.00	3:30	1,925.00	31,075.00
03/07/2022	No	Jean Claude Lapuyade	Law and Motion - Reviewed, Revised and Edited Motion for Approval	550.00	2:18	1,265.00	32,340.00
Total for Wilson v. Spreen Honda (002-193)					58:48	\$32,340.00	

EXHIBIT C

JCL Law Firm

Unbilled Time

Activity: All Dates

ACTIVITY DATE	POSTING	EMPLOYEE	MEMO/DESCRIPTION	RATE	DURATION	AMOUNT	BALANCE
Wilson v. Spreen Honda (002-193)							
12/18/2020	No	Tesla Stone	File Maintenance	150.00	0:06	15.00	15.00
02/04/2021	No	Tesla Stone	File Maintenance; Sort PLA Docs	150.00	0:48	120.00	135.00
02/04/2021	No	Tesla Stone	File Maintenance	150.00	0:06	15.00	150.00
02/04/2021	No	Tesla Stone	File Maintenance	150.00	0:06	15.00	165.00
02/09/2021	No	Tesla Stone	Set up new case file; Send CIP; File Maintenance	150.00	1:30	225.00	390.00
03/16/2021	No	Tesla Stone	File Maintenance	150.00	0:06	15.00	405.00
03/16/2021	No	Tesla Stone	Draft PAGA; File and Serve; mail; File Maintenance	150.00	1:30	225.00	630.00
03/26/2021	No	Tesla Stone	Draft Amended PAGA; File and Serve; Mail; File Maintenance	150.00	1:30	225.00	855.00
04/19/2021	No	Tesla Stone	File Maintenance; circulate	150.00	0:18	45.00	900.00
04/20/2021	No	Tesla Stone	Review brief; circulate; File Maintenance	150.00	1:00	150.00	1,050.00
04/21/2021	No	Tesla Stone	File Maintenance	150.00	0:06	15.00	1,065.00
07/09/2021	No	Tesla Stone	Draft complaint; File; File Maintenance	150.00	1:30	225.00	1,290.00
08/02/2021	No	Tesla Stone	File Maintenance; Calendar	150.00	0:12	30.00	1,320.00
08/02/2021	No	Tesla Stone	File Maintenance; Calendar	150.00	0:12	30.00	1,350.00
08/04/2021	No	Tesla Stone	Draft NARs; File and Serve; File Maintenance	150.00	1:30	225.00	1,575.00
10/06/2021	No	Tesla Stone	File Maintenance	150.00	0:06	15.00	1,590.00
10/07/2021	No	Tesla Stone	Draft Order to Cont. ISC; File and Serve; File Maintenance	150.00	1:30	225.00	1,815.00
11/02/2021	No	Tesla Stone	Draft COA; File and Serve; File Maintenance	150.00	1:00	150.00	1,965.00
12/14/2021	No	Tesla Stone	Sort PLA' Docs; File Maintenance	150.00	0:30	75.00	2,040.00
01/11/2022	No	Tesla Stone	Sort Employee File; File Maintenance	150.00	1:00	150.00	2,190.00
01/18/2022	No	Tesla Stone	Send SARs; Review; File Maintenance; Call; Circulate	150.00	1:00	150.00	2,340.00
01/24/2022	No	Tesla Stone	Draft order to Cont. CMC ; File and Serve; File Maintenance	150.00	1:30	225.00	2,565.00

JCL Law Firm

Unbilled Time

Activity: All Dates

ACTIVITY DATE	POSTING	EMPLOYEE	MEMO/DESCRIPTION	RATE	DURATION	AMOUNT	BALANCE
Total for Wilson v. Spreen Honda (002-193)					17:06	\$2,565.00	