

ZAKAY LAW GROUP, APLC

Shani O. Zakay (State Bar #277924)
Jackland K. Hom (State Bar #327243)
5440 Morehouse Drive, Suite 3500
San Diego, CA 92121
Telephone: (619)255-9047
Facsimile: (858) 404-9203
shani@zakaylaw.com
jackland@zakaylaw.com

JCL LAW FIRM, APC

Jean-Claude Lapuyade (State Bar #248676)
Monnett De La Torre (State Bar #272884)
5440 Morehouse Drive, Suite 3500
San Diego, CA 92121
Telephone: (619)599-8292
Facsimile: (619) 599-8291
jlapuyade@jcl-lawfirm.com
mdeltatorre@jcl-lawfirm.com

Attorneys for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SAN DIEGO

GABRIEL GUZMAN JR. and JAMES
SANCHO, individuals, on behalf of themselves
and on behalf of all persons similarly situated,
and in their representative capacity on behalf of
the State of California and fellow Aggrieved
Employees,

Plaintiff,

v.

VULCAN MATERIALS COMPANY, a New
Jersey Corporation; CALMAT CO., a Delaware
Corporation; and DOES 1-50, Inclusive,

Defendants.

Case No.: 37-2021-00024583-CU-OE-CTL

**DECLARATION OF SHANI O. ZAKAY,
ESQ. IN SUPPORT OF MOTION FOR
FINAL APPROVAL OF SETTLEMENT
AND MOTION FOR AWARD OF
ATTORNEYS' FEES**

Complaint Filed: June 3, 2021

Hearing Date: May 19, 2023

Hearing Time: 1:30 p.m.

Dept.: 69

Judge: Katherine A. Bacal

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

2 1. I am over eighteen years of age and if called as a witness, I could and would competently
3 testify to the following facts from my own personal knowledge. I am an attorney-at-law and the owner
4 of the ZAKAY LAW GROUP, APLC (hereinafter "Class Counsel"). I am co-counsel for Plaintiffs and
5 putative class representatives, individually and on behalf of other members of the general public
6 similarly situated and on behalf of aggrieved employees pursuant to the Private Attorneys General Act
7 ("PAGA") (collectively, "Plaintiffs").

8 2. I am submitting this declaration in support of Plaintiff's Motion for Final Approval of
9 Settlement and Motion for Award of Attorneys' Fees.

10 **I. EXPERIENCE**

11 3. Over the course of the litigation during the last 28 months a number of attorneys have
12 worked on this matter. Their credentials are reflected in the Zakay Law Group, APC firm resume, a true
13 and correct copy of which is attached hereto as Exhibit #1. Some of the major cases my firm has
14 undertaken are also set forth in Exhibit #1. The attorneys involved in this matter have had class litigation
15 experience, much of it in employment class actions, unfair business practices and other complex
16 litigation. I have experience in cases involving labor code violations and meal and rest break claims.
17 Counsel have litigated similar labor law cases against other employers on behalf of employees. Counsel
18 have been approved as experienced Counsel throughout California. It is this level of experience which
19 enabled the firms to undertake the instant matter and to successfully combat the resources of the
20 defendant and their capable and experienced counsel. Because of the concerted and dedicated effort
21 this case required to properly handle and prosecute, Counsel were precluded from taking other cases,
22 and in fact, had to turn away other potential fee generating cases.

23 **II. LODestar AND REQUESTED COUNSEL FEES PAYMENT**

24 4. As of April 27, 2022, Zakay Law Group, APC incurred lodestar totaling \$82,848.00 in
25 this matter. I have reviewed my firm's lodestar in this matter and believe the charges are reasonable
26 and were reasonably necessary to the conduct of the case. From December 2020 through the present,
27 my firm has worked more than 172.80 hours prosecuting these claims with the attorneys' hourly fee

1 rates for attorneys at \$350-\$550, resulting in the current lodestar. A detailed breakdown of the total
2 fees and the services performed by the firm on this case is attached hereto as Exhibit #2.

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

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

22 **III. COSTS**

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

1 April 27, 2022. As shown in detail in the attached Cost Summary, the Zakay Law Group incurred a
2 total of \$7,177.54 in litigation costs prosecuting this action– with additional costs anticipated.

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

7 I declare under penalty of perjury under the laws of the State of California that the foregoing is
8 true and correct. Executed this 27th day of April 2023, at San Diego, California.

9
10 By: 
11 Shani O. Zakay

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

04/27/2023

1:39 PM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
01/16/2021		Emails w/ attorney Zakay and co-counsel re employee file and claims for complaint 	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Jackland Hom	0.50h	\$350.00	-	\$175.00
03/22/2021		Review file; draft complaint. 	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Jackland Hom	6.00h	\$350.00	-	\$2,100.00
03/23/2021		Continue drafting complaint; extract relevant paystubs; emails with Attorney Zakay and co-counsel re 226 violations 	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Jackland Hom	1.00h	\$350.00	-	\$350.00
03/25/2021		Call w/ client to discuss claims in complaint 	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Jackland Hom	0.50h	\$350.00	-	\$175.00
03/25/2021		Revise complaint to include additional allegations following call w/ client 	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Jackland Hom	0.40h	\$350.00	-	\$140.00
03/26/2021		Emails w/ staff re PAGA letter 	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Jackland Hom	0.20h	\$350.00	-	\$70.00
03/27/2021		Review the file. Review and approve the complaint. 	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Shani Zakay	6.00h	\$550.00	-	\$3,300.00
05/19/2021		Review letter from OPC and upload to CLIO. Emails with staff accordingly.	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Shani Zakay	0.60h	\$550.00	-	\$330.00
					172.80h		\$0.00 0.00h	\$82,848.00 172.80h

Activities Export

04/27/2023

1:39 PM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		● Unbilled						
05/21/2021	🕒	Call with OPC regarding possible mediation. Follow up conversation with co-counsel ● Unbilled	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Shani Zakay	1.00h	\$550.00	-	\$550.00
05/25/2021	🕒	Revise complaint to include PAGA cause of action ● Unbilled	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Jackland Hom	0.80h	\$350.00	-	\$280.00
05/25/2021	🕒	Drafting CCCS and Summons ● Unbilled	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Shani Zakay	1.00h	\$150.00	-	\$150.00
06/04/2021	🕒	Review the complaint and instruct staff on filinf ● Unbilled	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Shani Zakay	0.30h	\$550.00	-	\$165.00
06/18/2021	🕒	Call with OPC. Follow up emails with OPC and co-counsel regarding mediation. ● Unbilled	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Shani Zakay	0.60h	\$550.00	-	\$330.00
06/18/2021	🕒	Emails w/ OC re mediation scheduling ● Unbilled	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Jackland Hom	0.20h	\$350.00	-	\$70.00
06/28/2021	🕒	Emails regarding mediation ● Unbilled	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Shani Zakay	0.30h	\$550.00	-	\$165.00
07/06/2021	🕒	Emails with OPC regarding mediation. ● Unbilled	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Shani Zakay	0.30h	\$550.00	-	\$165.00
					172.80h		\$0.00	\$82,848.00
							0.00h	172.80h

Activities Export

04/27/2023

1:39 PM

Date ▲	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
07/08/2021	 	Multiple emails w/ OC re mediation scheduling ● Unbilled	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Jackland Hom	0.30h	\$350.00	-	\$105.00
09/13/2021	 	Emails regarding mediation and call to discuss data. ● Unbilled	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Shani Zakay	0.30h	\$550.00	-	\$165.00
09/13/2021	 	Multiple emails w/ OC re mediation scheduling ● Unbilled	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Jackland Hom	0.30h	\$350.00	-	\$105.00
09/28/2021	 	Call with counsel in related matter regarding JPA and mediation. ● Unbilled	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Shani Zakay	0.80h	\$550.00	-	\$440.00
10/01/2021	 	Emails w/ OC re exchange of informal discovery for mediation ● Unbilled	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Jackland Hom	0.40h	\$350.00	-	\$140.00
10/02/2021	 	Emails with OPC regarding questions and deposition and emails with Attorney Hom accordingly. ● Unbilled	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Shani Zakay	0.60h	\$550.00	-	\$330.00
10/03/2021	 	Emails with Attorney Zakay re call with client to discuss claims in preparation for mediation ● Unbilled	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Jackland Hom	0.20h	\$350.00	-	\$70.00
10/04/2021	 	Emails with OPC to schedule call to discuss discovery. ● Unbilled	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Shani Zakay	0.30h	\$550.00	-	\$165.00
					172.80h		\$0.00 0.00h	\$82,848.00 172.80h

Activities Export

04/27/2023

1:39 PM

Date ▲	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
10/05/2021		Prepare for phone call with OPC. Attend call with OPC.  Unbilled	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Shani Zakay	1.00h	\$550.00	-	\$550.00
10/05/2021		Review file for claims in anticipation of drafting mediation brief; draft email to Attorney Zakay re findings of 226 violations  Unbilled	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Jackland Hom	0.80h	\$350.00	-	\$280.00
10/11/2021		Review email from OPC with questions for mediation. Emails with Attorney Hom and co-counsel regarding the same and necessary preparation. Emails with staff regarding JPA and necessary work.  Unbilled	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Shani Zakay	3.00h	\$550.00	-	\$1,650.00
10/12/2021		Drafting, finalizing, filing COA.  Unbilled	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Shani Zakay	0.50h	\$165.00	-	\$82.50
10/14/2021		Review JPA and email to Bradley for review. Emails with Bradley to set up call to discuss claims.  Unbilled	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Shani Zakay	0.50h	\$550.00	-	\$275.00
10/14/2021		Review updated data production for mediation. Emails with OPC regarding the same. Emails with co-counsel regarding the same. Emails with co-counsel regarding expert review. Begin analysis.  Unbilled	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Shani Zakay	5.50h	\$550.00	-	\$3,025.00
					172.80h		\$0.00 0.00h	\$82,848.00 172.80h

Activities Export

04/27/2023

1:39 PM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
10/14/2021		Call with client to discuss facts in preparation for drafting mediation brief  Unbilled	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Jackland Hom	0.80h	\$350.00	-	\$280.00
10/14/2021		Draft informal memo to Attorney Zakay and co-counsel re facts ISO claims in preparation for drafting mediation brief  Unbilled	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Jackland Hom	1.00h	\$350.00	-	\$350.00
10/14/2021		Work on damage analysis and summary of claims and multiple calls with various co-counsel and expert to prepare for mediation.  Unbilled	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Shani Zakay	4.00h	\$550.00	-	\$2,200.00
10/15/2021		Emails with expert regarding data for mediation and necessary work.  Unbilled	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Shani Zakay	0.70h	\$550.00	-	\$385.00
10/17/2021		Emails with expert to set up a call.  Unbilled	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Shani Zakay	0.30h	\$550.00	-	\$165.00
10/17/2021		Emails with co-counsel regarding JPA and regarding questions from defense and answers to the same for mediation.  Unbilled	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Shani Zakay	0.50h	\$550.00	-	\$275.00
10/17/2021		Draft correspondence to DEF re PLA's claims for mediation  Unbilled	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Jackland Hom	2.50h	\$350.00	-	\$875.00
					172.80h		\$0.00 0.00h	\$82,848.00 172.80h

Activities Export

04/27/2023

1:39 PM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
10/18/2021		Call with expert to go over necessary work for mediation. Follow up call with co-counsel. 	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Shani Zakay	1.50h	\$550.00	-	\$825.00
10/18/2021		More work in preparation for mediation. 	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Shani Zakay	3.70h	\$550.00	-	\$2,035.00
10/19/2021		Prepare for and attend call with OPC in preparation for mediation. 	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Shani Zakay	0.60h	\$550.00	-	\$330.00
10/20/2021		More emails with OPC and expert regarding data and analysis. 	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Shani Zakay	0.40h	\$550.00	-	\$220.00
10/26/2021		Review damage analysis. Discussion with co-counsel regarding the same. Emails with co-counsel and emails with counsel for plaintiff in related matter. Emails with OPC and discussion with Attorney Hom regarding mediation brief. 	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Shani Zakay	3.50h	\$550.00	-	\$1,925.00
10/26/2021		Draft mediation brief and review file to extract relevant exhibits 	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Jackland Hom	6.00h	\$350.00	-	\$2,100.00
10/27/2021		Emails regarding mediation brief 	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Shani Zakay	0.30h	\$550.00	-	\$165.00
					172.80h		\$0.00 0.00h	\$82,848.00 172.80h

Activities Export

04/27/2023

1:39 PM

Date ▲	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
10/27/2021		Work on the mediation brief. ● Unbilled	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Shani Zakay	5.50h	\$550.00	-	\$3,025.00
10/27/2021		Finalize and submit Plaintiff's mediation brief ● Unbilled	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Jackland Hom	1.50h	\$350.00	-	\$525.00
11/02/2021		Prepare for mediation. Meet with co-counsel and client. Attend mediation. Follow up meeting and update to client. ● Unbilled	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Shani Zakay	10.00h	\$550.00	-	\$5,500.00
11/02/2021		Prepare for and attend mediation ● Unbilled	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Jackland Hom	6.00h	\$350.00	-	\$2,100.00
11/12/2021		Call with mediator. Follow up call with co-counsel. ● Unbilled	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Shani Zakay	1.00h	\$550.00	-	\$550.00
11/19/2021		Prepare for and attend CMC. ● Unbilled	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Shani Zakay	1.00h	\$550.00	-	\$550.00
12/08/2021		Work on the FAC. ● Unbilled	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Shani Zakay	1.40h	\$550.00	-	\$770.00
12/09/2021		Emails with the mediator. ● Unbilled	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Shani Zakay	0.20h	\$550.00	-	\$110.00
12/13/2021		Review and approve PAGA only complaint.	36901-Guzman Jr. Gabriel Guzman Jr. v.	Shani Zakay	1.00h	\$550.00	-	\$550.00
					172.80h		\$0.00 0.00h	\$82,848.00 172.80h

Activities Export

04/27/2023

1:39 PM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		● Unbilled	Vulcan Materials Company					
01/04/2022	🕒	Emails with co-counsel to discuss strategy moving forward with discovery. Emails regarding NAR. ● Unbilled	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Shani Zakay	0.50h	\$550.00	-	\$275.00
01/19/2022	🕒	Emails regarding settlement negotiations. ● Unbilled	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Shani Zakay	0.30h	\$550.00	-	\$165.00
01/21/2022	🕒	Call with co-counsel to follow up on call with the mediator. ● Unbilled	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Shani Zakay	0.30h	\$550.00	-	\$165.00
01/21/2022	🕒	Work on written discovery ● Unbilled	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Shani Zakay	3.50h	\$550.00	-	\$1,925.00
02/03/2022	🕒	Review Defendant's answer to the PAGA complaint. Legal research regarding various affirmative defenses. ● Unbilled	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Shani Zakay	3.10h	\$550.00	-	\$1,705.00
02/09/2022	🕒	Review mediator's proposal and discuss with co-counsel. Set up a call with counsel in related matter. Discuss with co-counsel. ● Unbilled	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Shani Zakay	1.50h	\$550.00	-	\$825.00
02/09/2022	🕒	Call with co-counsel regarding the mediator's proposal. ● Unbilled	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Shani Zakay	0.50h	\$550.00	-	\$275.00
					172.80h		\$0.00 0.00h	\$82,848.00 172.80h

Activities Export

04/27/2023

1:39 PM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
02/11/2022		Emails regarding mediator's proposal.  Unbilled	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Shani Zakay	0.40h	\$550.00	-	\$220.00
02/11/2022		Draft MOU. Emails regarding the same.  Unbilled	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Shani Zakay	2.00h	\$550.00	-	\$1,100.00
02/14/2022		Emails with OPC regarding the MOU.  Unbilled	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Shani Zakay	0.20h	\$550.00	-	\$110.00
02/15/2022		Review and revise CMS.  Unbilled	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Shani Zakay	0.50h	\$550.00	-	\$275.00
02/16/2022		Review, revise and approve the CMS.  Unbilled	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Shani Zakay	0.50h	\$550.00	-	\$275.00
02/16/2022		Drafting CMS, circulating to attorneys for approval, filing, and serving OC.  Unbilled	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Natalia Michele	1.00h	\$165.00	-	\$165.00
03/04/2022		Work on MOU. Call with OPC.  Unbilled	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Shani Zakay	1.00h	\$550.00	-	\$550.00
03/04/2022		Prepare for and attend CMC  Unbilled	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Jackland Hom	1.00h	\$375.00	-	\$375.00
03/07/2022		Call w/ client to provide case update	36901-Guzman Jr. Gabriel Guzman Jr. v.	Jackland Hom	0.50h	\$375.00	-	\$187.50
					172.80h		\$0.00 0.00h	\$82,848.00 172.80h

Activities Export

04/27/2023

1:39 PM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		● Unbilled	Vulcan Materials Company					
03/09/2022	🕒	Meeting with co-counsel to go over the MOU. ● Unbilled	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Shani Zakay	1.00h	\$550.00	-	\$550.00
03/15/2022	🕒	Review and revise status report. ● Unbilled	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Shani Zakay	0.40h	\$550.00	-	\$220.00
03/16/2022	🕒	Drafting CMS, filing, and serving on OC. ● Unbilled	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Natalia Michele	1.00h	\$165.00	-	\$165.00
04/04/2022	🕒	Emails regarding MOU and settlement agreement. ● Unbilled	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Shani Zakay	0.20h	\$550.00	-	\$110.00
04/06/2022	🕒	Emails regarding MOU and call to discuss. ● Unbilled	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Shani Zakay	0.20h	\$550.00	-	\$110.00
04/08/2022	🕒	More work on MOU. ● Unbilled	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Shani Zakay	1.00h	\$550.00	-	\$550.00
04/08/2022	🕒	Review summary of CMC and calendar dates. ● Unbilled	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Shani Zakay	0.20h	\$550.00	-	\$110.00
04/08/2022	🕒	Multiple emails w/ attorneys and co-counsel re revisions to MOU ● Unbilled	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Jackland Hom	0.80h	\$375.00	-	\$300.00
04/08/2022	🕒	Prepare for and attend CMC	36901-Guzman Jr.	Jackland	1.00h	\$375.00	-	\$375.00
					172.80h		\$0.00	\$82,848.00
							0.00h	172.80h

Activities Export

04/27/2023

1:39 PM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		● Unbilled	Gabriel Guzman Jr. v. Vulcan Materials Company	Hom				
04/20/2022	🕒	Emails regarding MOU. ● Unbilled	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Shani Zakay	0.30h	\$550.00	-	\$165.00
05/09/2022	🕒	More revisions to the MOU and emails with co-counsel regarding the same. ● Unbilled	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Shani Zakay	0.40h	\$550.00	-	\$220.00
06/09/2022	🕒	More work on MOU. ● Unbilled	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Shani Zakay	0.50h	\$550.00	-	\$275.00
06/10/2022	🕒	Review and revise SAR, class notice and exclusion form ● Unbilled	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Jackland Hom	1.70h	\$375.00	-	\$637.50
06/14/2022	🕒	Follow up on MOU. ● Unbilled	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Shani Zakay	0.10h	\$550.00	-	\$55.00
08/22/2022	🕒	Review OC's revisions to SAR, class notice and exclusion form ● Unbilled	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Jackland Hom	0.50h	\$375.00	-	\$187.50
08/23/2022	🕒	Work on the settlement agreement. ● Unbilled	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Shani Zakay	6.60h	\$550.00	-	\$3,630.00
09/07/2022	🕒	Work on MPA ● Unbilled	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Jackland Hom	6.00h	\$375.00	-	\$2,250.00
					172.80h		\$0.00 0.00h	\$82,848.00 172.80h

Activities Export

04/27/2023

1:39 PM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
09/07/2022		Review OC's revisions to SAR ● Unbilled	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Jackland Hom	0.30h	\$375.00	-	\$112.50
09/08/2022		Emails w/ OC re revisions to SAR ● Unbilled	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Jackland Hom	0.30h	\$375.00	-	\$112.50
09/12/2022		Work on the MPA ● Unbilled	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Shani Zakay	5.00h	\$550.00	-	\$2,750.00
09/12/2022		More work on settlement agreement. ● Unbilled	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Shani Zakay	1.80h	\$550.00	-	\$990.00
09/13/2022		More work on settlement agreement. ● Unbilled	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Shani Zakay	0.50h	\$550.00	-	\$275.00
09/15/2022		Review co-counsel's client dec. ISO MPA ● Unbilled	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Jackland Hom	0.50h	\$375.00	-	\$187.50
09/16/2022		More work on MPA ● Unbilled	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Shani Zakay	1.70h	\$550.00	-	\$935.00
09/16/2022		Revise SAR and Class Notice further ● Unbilled	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Jackland Hom	0.50h	\$375.00	-	\$187.50
09/17/2022		Review revised SAC. Review stipulation for leave. Emails regarding the same.	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Shani Zakay	2.00h	\$550.00	-	\$1,100.00
					172.80h		\$0.00 0.00h	\$82,848.00 172.80h

Activities Export

04/27/2023

1:39 PM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		● Unbilled						
09/17/2022	🕒	Prepare SAC ● Unbilled	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Jackland Hom	1.50h	\$375.00	-	\$562.50
09/19/2022	🕒	Work on the MPA ● Unbilled	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Shani Zakay	3.50h	\$550.00	-	\$1,925.00
09/19/2022	🕒	Review Defendant's dec. ISO MPA ● Unbilled	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Jackland Hom	0.50h	\$375.00	-	\$187.50
09/19/2022	🕒	More work on SAC ● Unbilled	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Jackland Hom	1.00h	\$375.00	-	\$375.00
09/19/2022	🕒	More work on MPA ● Unbilled	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Jackland Hom	1.20h	\$375.00	-	\$450.00
09/20/2022	🕒	Work on Decs. ISO MPA ● Unbilled	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Jackland Hom	2.30h	\$375.00	-	\$862.50
10/13/2022	🕒	Review Court's tentative and discuss with attorneys and OC ● Unbilled	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Jackland Hom	0.50h	\$375.00	-	\$187.50
10/20/2022	🕒	Work on supplemental papers for MPA ● Unbilled	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Jackland Hom	1.30h	\$375.00	-	\$487.50
10/27/2022	🕒	Review court's tentative for MPA and discuss with attorneys	36901-Guzman Jr. Gabriel Guzman Jr. v.	Jackland Hom	0.50h	\$375.00	-	\$187.50
					172.80h		\$0.00 0.00h	\$82,848.00 172.80h

Activities Export

04/27/2023

1:39 PM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
	● Unbilled		Vulcan Materials Company					
11/23/2022	⌚	Work on supplemental papers for MPA ● Unbilled	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Shani Zakay	3.20h	\$550.00	-	\$1,760.00
11/28/2022	⌚	Work with Attorney Hom on supplemental papers for MPA. ● Unbilled	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Shani Zakay	4.00h	\$550.00	-	\$2,200.00
11/28/2022	⌚	Legal research and work on supplemental papers ISO MPA ● Unbilled	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Jackland Hom	2.20h	\$375.00	-	\$825.00
12/09/2022	⌚	Review court's tentative for MPA and discuss w/ attorneys ● Unbilled	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Jackland Hom	0.50h	\$375.00	-	\$187.50
12/12/2022	⌚	Revise MPA Proposed Order ● Unbilled	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Jackland Hom	0.40h	\$375.00	-	\$150.00
12/27/2022	⌚	Emails with OPC regarding status of MPA order ● Unbilled	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Shani Zakay	0.20h	\$550.00	-	\$110.00
12/27/2022	⌚	Multiple emails w/ OC re signed MPA order ● Unbilled	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Jackland Hom	0.30h	\$375.00	-	\$112.50
01/09/2023	⌚	Emails with admin regarding notice administration ● Unbilled	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Shani Zakay	0.30h	\$575.00	-	\$172.50
					172.80h		\$0.00	\$82,848.00
							0.00h	172.80h

Activities Export

04/27/2023

1:39 PM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
01/09/2023		Emails w/ admin re mailing of class notice 	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Jackland Hom	0.30h	\$395.00	-	\$118.50
01/10/2023		Emails with admin regarding notice. 	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Shani Zakay	0.30h	\$575.00	-	\$172.50
01/10/2023		More emails w/ admin re mailing of class notice 	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Jackland Hom	0.80h	\$395.00	-	\$316.00
01/11/2023		More emails w/ admin re mailing of class notice and admin timeline 	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Jackland Hom	0.50h	\$395.00	-	\$197.50
01/19/2023		Review signed order and emails with co-counsel and admin. 	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Shani Zakay	0.30h	\$575.00	-	\$172.50
01/24/2023		Emails with OPC regarding administration and workweek allocation. 	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Shani Zakay	0.30h	\$575.00	-	\$172.50
01/30/2023		Emails with admin and OPC regarding issues with the data and status. 	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Shani Zakay	0.30h	\$575.00	-	\$172.50
02/08/2023		Emails with admin regarding status of administration 	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Shani Zakay	0.20h	\$575.00	-	\$115.00
					172.80h		\$0.00	\$82,848.00
							0.00h	172.80h

Activities Export

04/27/2023

1:39 PM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
02/14/2023	 Unbilled	Review admin's weekly report	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Jackland Hom	0.20h	\$395.00	-	\$79.00
02/23/2023	 Unbilled	Review admin's weekly report	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Jackland Hom	0.20h	\$395.00	-	\$79.00
03/02/2023	 Unbilled	Review admin's weekly report	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Jackland Hom	0.20h	\$395.00	-	\$79.00
03/09/2023	 Unbilled	Review admin's weekly report	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Jackland Hom	0.20h	\$395.00	-	\$79.00
03/16/2023	 Unbilled	Review admin's weekly report	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Jackland Hom	0.20h	\$395.00	-	\$79.00
03/21/2023	 Unbilled	Review Class Member correspondence and discuss with attorneys	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Jackland Hom	0.30h	\$395.00	-	\$118.50
03/21/2023	 Unbilled	Review letter from class member and emails regarding the same.	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Shani Zakay	0.40h	\$575.00	-	\$230.00
03/23/2023	 Unbilled	Review admin's weekly report	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Jackland Hom	0.20h	\$395.00	-	\$79.00
03/27/2023	 Unbilled	Emails with Admin regarding additional class members	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Shani Zakay	0.30h	\$575.00	-	\$172.50
					172.80h		\$0.00 0.00h	\$82,848.00 172.80h

Activities Export

04/27/2023

1:39 PM

Date ▲	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
04/21/2023	 	Multiple emails w/ co-counsel re MFA/MFF ● Unbilled	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Jackland Hom	0.30h	\$395.00	-	\$118.50
04/21/2023	 	Review admin dec. ISO MFA ● Unbilled	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Jackland Hom	0.50h	\$395.00	-	\$197.50
04/22/2023	 	Work on declarations in support of motion for final approval and motion for fees. More work on MFA/MFF documents. ● Unbilled	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Shani Zakay	4.00h	\$575.00	-	\$2,300.00
04/25/2023	 	Call w/ client to discuss dec. ISO MFF ● Unbilled	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Jackland Hom	0.50h	\$395.00	-	\$197.50
					172.80h		\$0.00 0.00h	\$82,848.00 172.80h

EXHIBIT 3

Activities Export

04/25/2023

7:09 AM

Date ▲	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
09/22/2021	\$	Mediation Fee ● Unbilled	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Shani Zakay	1.00	\$5,000.00	-	\$5,000.00
10/12/2021	\$	OneLegal Fee - COA ● Unbilled	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Shani Zakay	1.00	\$12.35	-	\$12.35
11/17/2021	\$	Expert Cost - DMA ● Unbilled	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Shani Zakay	1.00	\$2,101.88	-	\$2,101.88
12/13/2021	\$	OneLegal - Amended Complaint ● Unbilled	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Shani Zakay	1.00	\$12.35	-	\$12.35
02/16/2022	\$	OneLegal - CMS ● Unbilled	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Natalia Michele	1.00	\$12.35	-	\$12.35
03/16/2022	\$	OneLegal - CMS ● Unbilled	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Natalia Michele	1.00	\$12.87	-	\$12.87
11/29/2022	\$	OneLegal - Dec ● Unbilled	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Natalia Michele	1.00	\$12.87	-	\$12.87
01/20/2023	\$	OneLegal - Order ● Unbilled	36901-Guzman Jr. Gabriel Guzman Jr. v. Vulcan Materials Company	Natalia Michele	1.00	\$12.87	-	\$12.87
							\$0.00 0.00h	\$7,177.54 0.00h