ZAKAY LAW GROUP, APLC
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San Diego, CA 92121
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Attorneys for PLAINTIFF

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF LOS ANGELES

ELISEO FUENTES, an individual, on behalf of himself, and on behalf of all persons similarly situated, Plaintiff, v. KLINE AUTOMOTIVE, INC., a Minnesota corporation; RK Automotive, INC., a Minnesota corporation; and DOES 1-50, Inclusive, Defendants.	Lead Case No.: 24STCV15011 **DECLARATION OF SHANI O. ZAKAY, ESQ. IN SUPPORT OF PLAINTIFF'S MOTION FOR FINAL APPROVAL OF CLASS ACTION AND PAGA SETTLEMENT** Date: December 10, 2026 Time: 11:00a.m. Judge: Hon. David S. Cunningham III Dept: 11

I, Shani O. Zakay, declare as follows:

1. I am the managing partner of Zakay Law Group, APLC, and co-counsel of record for Plaintiff ELISEO FUENTES, (hereafter "Plaintiff") in this matter. As such, I am fully familiar with the facts, pleadings, and history of the matter.

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

I. EXPERIENCE

3. My firm has worked on this matter over the course of the litigation during the last two-years and five months. My credentials are reflected in the Zakay Law Group, APLC firm resume, a true and correct copy of which is attached hereto as **Exhibit A**. Some of the major cases my firm has undertaken are also set forth in **Exhibit A**. I have had class litigation experience, mostly in the area of employment class actions, unfair business practices, and other complex litigation. I have experience in cases involving labor code violations and wage and hour claims. I have litigated similar wage and hour cases against other employers on behalf of employees. I have been approved as experienced class counsel in courts throughout California. It is this level of experience which enabled my firm to undertake the instant matter and to successfully combat the resources of the defendant and its capable and experienced counsel.

II. LODESTAR AND REQUESTED ATTORNEYS FEES PAYMENT

4. As of November 4, 2026, Zakay Law Group, APLC incurred lodestar totaling $33,840.00 in 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. From June of 2024 through November of 2026, my firm has worked more than 42.30 hours prosecuting these claims with the attorneys' hourly fee rates for attorneys at $425-$800, resulting in the current lodestar. A detailed breakdown of the total fees and the services performed by the firm is attached hereto as **Exhibit B**.

5. Further, Class Counsel will be performing additional work, including finalizing the motion for final approval, attending the hearing on final approval, finalizing the orders and judgment, and monitoring completion of the settlement process over the course of several years. I expect this

additional work will result in an additional 10-15 hours of additional work and an additional lodestar between $5,500 and $8,250.

6. In assessing the reasonableness of the billing rates for the attorneys and staff at the Zakay Law Group, APLC, the firm refers to the "*Laffey* Matrix" to set our hourly billing rates. *See* http://www.laffeymatrix.com/. The *Laffey* Matrix is a fee schedule used by many courts throughout the United States, including some California state courts and California Federal District Courts. The *Laffey* Matrix is a well-established objective source that California courts have relied on in assessing hourly rates since 2005. (see *In Re HPL Technologies, Inc. Securities Litigation,* 366 F.Supp.2d 912, 921 (N.D. Cal. 2005) [Confirming use of the *Laffey* Matrix adjusted to account for locality pay differentials]; *Rubalcaba v. Albertson's, LLC,* No. BC528755, 2017 WL 4330597, at *4 (Cal. Super. Ct. May 25, 2017), reversed on other grounds.).

7. When comparing my billing rates with the *Laffey* Matrix, I bill below the rate similarly skilled and tenured legal professionals:

Name	Laffey Matrix Fee	Actual Billing Rate	Hours Billed	Lodestar
Shani Zakay, Esq. (Managing Attorney)	$948	$800	42.30	$33,840.00
		Total	42.30	$33,840.00

III. COSTS

8. As part of the Agreement, the parties agreed that Class Counsel may seek reimbursement of expenses incurred as documented in Class Counsel's billing records. Attached hereto as **Exhibit C** is a true and correct copy of the Zakay Law Group, Cost Summary detailing the actually incurred litigation expenses by the Zakay Law Group APLC, for this matter as of November 4, 2026. As shown in detail in the attached Cost Summary, the Zakay Law Group incurred a total of $12,194.49 in litigation costs prosecuting this action– with additional costs anticipated.

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9. These litigation expenses include the expenses incurred for mediation fees, expert costs and filing fees, all of which are normally billed to and paid by the client. The costs were reasonably incurred by Class 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 4th day of November 2026, at San Diego, California.

By:_____
Shani O. Zakay, Esq.
Attorney for PLAINTIFFS

EXHIBIT A

ZAKAY LAW GROUP, APLC

3110 Camino Del Rio South, Suite 308, San Diego, CA 92108 | 619-255-9047

FIRM PRACTICE AREAS:

Employment Litigation, Employment Class Action, Wage and Hour Class Actions, PAGA Litigation.

ATTORNEY SHANI O. ZAKAY BIOGRAPHY:

1. PRACTICE AREAS

Employment Litigation, Employment Class Action, Wage and Hour Class Actions, Civil Litigation, Business Litigation, Corporate/Business General Counsel Advice.

2. BAR ADMISSIONS, MEMBERSHIPS & BOARDS

State of California (all courts)
United States District Court for the District of California (all courts)

3. 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

4. EDUCATION

CALIFORNIA WESTERN SCHOOL OF LAW, San Diego, CA
Juris Doctor, *magma cum laude,* April 2011
Honors: Dean's List: Spring 2009, Fall 2009, Spring 2010, Fall 2010, Spring 2011.

Academic Achievement Awards: Advanced Legal Research, Constitutional Law II, Criminal Procedure, Insurance Law & Litigation, Law Office Technologies, Property II, Products Liability, Trusts & Estates.
Activities: Associate Editor, *California Western Law Review*
Legal Skills Honor Instructor for Professor Leslie Culver
Vice President, Jewish Student Union

SAN DIEGO STATE UNIVERSITY, San Diego, CA
Bachelor of Science, Business Administration, Management, *cum laude*, May 2008
Honors: Dean's List: Spring 2007 and Fall 2007

5. 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

ATTORNEY JACKLAND K. HOM BIOGRAPHY:

1. PRACTICE AREAS

Employment Litigation, Employment Class Action, Wage and Hour Class Actions, PAGA Litigation.

2. BAR ADMISSIONS, MEMBERSHIPS & BOARDS

State of California (all courts)
United States District Courts of California (all courts)

3. 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

4. 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

ATTORNEY JACLYN JOYCE BIOGRAPHY:

1. PRACTICE AREAS

Employment Litigation, Employment Class Action, Wage and Hour Class Actions, PAGA Litigation.

2. BAR ADMISSIONS, MEMBERSHIPS & BOARDS

State of California (all courts)

3. 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

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4. 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

ATTORNEY JENNIFER GERSTENZANG BIOGRAPHY:

1. PRACTICE AREAS

Employment Litigation, Employment Class Action, Wage and Hour Class Actions, PAGA Litigation.

2. BAR ADMISSIONS, MEMBERSHIPS & BOARDS

State of California (all courts)
United States District Courts of California (all courts)

3. PROFESSIONAL EXPERIENCE

Zakay Law Group, APLC, San Diego, CA
Associate, November 2024 – present

San Diego County Office of the Public Defender, San Diego, CA
Deputy Public Defender, August 2019 - October 2024

Gerstenzang Law, San Diego, CA
Owner and Lead Attorney, January 2015 - August 2019

San Diego County Office of the Public Defender, San Diego, CA
Deputy Public Defender, December 2011 – January 2015

4. EDUCATION

California Western School of Law, San Diego, CA
Juris Doctor, *cum laude,* April 2011
Area of Concentration in Criminal Prosecution and Defense Practice, with Honors

Emory University, Atlanta, GA
Bachelor of Arts: Psychology, May 2006

ATTORNEY EDEN ZAKAY BIOGRAPHY:

1. PRACTICE AREAS.

Employment Litigation, Employment Class Action, Wage and Hour Class Actions, PAGA Litigation.

2. BAR ADMISSIONS, MEMBERSHIPS & BOARDS

State of California (all courts)
State of North Carolina (all courts)

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3. PROFESSIONAL EXPERIENCE

Zakay Law Group, APLC, San Diego, CA
Associate, January 2025 - Present

Wood, Smith, Henning & Berman LLP, Raleigh, NC
Associate, July 2022 – January 2025

San Diego Law Review, San Diego, CA
Associate, July 2019 – May 2021

4. EDUCATION

University of San Diego School of Law, San Diego, CA
Juris Doctor, April 2021

University of California San Diego, La Jolla, CA
Bachelor of Arts: Political Science, June 2017

ATTORNEY NICOLE NOURSAMADI BIOGRAPHY:

1. PRACTICE AREAS.

Employment Litigation, Employment Class Action, Wage and Hour Class Actions, PAGA Litigation.

2. BAR ADMISSIONS, MEMBERSHIPS & BOARDS

State of California (all courts)
State of North Carolina (all courts)

3. PROFESSIONAL EXPERIENCE

Zakay Law Group, APLC, San Diego, CA
Associate, November 2024 - Present

4. EDUCATION

California Western School of Law, San Diego, CA
Juris Doctor, April 2024

San Diego State University, San Diego, CA
Bachelor of Arts: Political Science, June 2020

5. COMMUNITY SERVICE

COMMUNITY LAW PROJECT, San Diego, CA
Summer of 2024
Volunteer

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LEAD COUNSEL – CLASS ACTION AND/OR REPRESENTATIVE CASES:

1. **Arakilians v. Trophy Universal City Group**

Court	Los Angeles
Case No.	20STCV05724
Nature	Meal/Rest Breaks, Unpaid Overtime, and PAGA
Status	In Litigation

2. **Cortez Oceguera v. M & M Automotive**

Court	Alameda
Case No.	HG21086853
Nature	PAGA
Status	In Litigation

3. **Carbajal v. Keys Motors, Inc.**

Court	Los Angeles
Case No.	20STCV49714
Nature	PAGA
Status	Settled

4. **Gregory v. Verio Healthcare, Inc**

Court	Los Angeles
Case No.	20STCV37254
Nature	Meal/Rest Breaks, Unpaid Overtime, and PAGA
Status	Settled

5. **Putman v. Winco Holdings, Inc.**

Court	Sacramento
Case No.	2:21-cv-01760-MCE-JDP
Nature	Meal/Rest Breaks, Unpaid Overtime, and PAGA
Status	In Litigation

6. **Williamson v. Stan Hotel**

Court	Stanislaus
Case No.	CV-21-006861
Nature	Meal/Rest Break claims
Status	In Litigation

7. **Hernandez v. USGI, Inc.**

Court	Orange
Case No.	30-2022-01250099
Nature	Overtime and Regular Rate claims, and Meal/Rest Breaks
Status	In Litigation

8. **De Jesus v. UniCare**

Court	San Diego

Case No.	37-2022-00003063-CU-OE-CTL
Nature	Meal/Rest Breaks, Unpaid Overtime, and PAGA
Status	Settled

9. Chambers v. Bass Medical Group

Court	Contra Costa
Case No.	C22-01058
Nature	Overtime and Minimum Wage claims, Meal/Rest Breaks and PAGA
Status	Settled

10. Lindsay v. Denso Products (Staffmark)

Court	Riverside
Case No.	CVRI2203360
Nature	Overtime, Minimum Wage claims, and Meal/Rest Breaks
Status	Settled

11. Maheia v. Clean Earth Environmental Solutions

Court	Los Angeles
Case No.	22STCV24279
Nature	Overtime, Meal/Rest Periods, Failure to Pay PTO and PAGA
Status	Settled

12. Gray v. Sky Hotels

Court	Stanislaus
Case No.	CV-22-004004
Nature	Overtime, Minimum Wage claims, Meal/Rest Breaks, and PAGA
Status	Settled

13. Mariscal v. Janco Industries

Court	San Joaquin
Case No.	STK-CV-UOE-2022-8450
Nature	Meal and Rest Breaks and Reporting Time Violations
Status	Settled

14. Trudelle v. Children of the Rainbow

Court	San Diego
Case No.	37-2022-00034860
Nature	Overtime, Wage, Meal/Rest Break claims, and PAGA
Status	Settled

15. Rodriguez v. Shaxon Industries

Court	Los Angeles
Case No.	30-2022-01289124-CU-OE-CXC
Nature	Overtime, Wage, Meal/Rest Break claims, and PAGA

Status	Settled

16. Bautista v. Xtreme Auto Collision & Glass

Court	San Diego
Case No.	37-2022-00044708-CU-OE-CTL
Nature	Overtime Wages, Meal/Rest Break violations
Status	Settled

17. Miller v. Barry's Security

Court	Riverside
Case No.	CVRI2202929
Nature	Overtime Wages, Meal/Rest Break violations
Status	In Litigation

18. Kanafani v. Mitra VI, LLC (Superstar Car Wash)

Court	San Diego
Case No.	37-2022-00044660
Nature	Overtime, Wage, Meal/Rest Break claims, and PAGA
Status	Settled

19. Maria Vazquez v. Mt. Collision

Court	Los Angeles
Case No.	22STCV34689
Nature	Minimum Wage violations, Meal/Rest Break, PAGA
Status	In Litigation

20. Rodriguez v. Performance Food Group

Court	Alameda
Case No.	22CV021320
Nature	Overtime Wages, Meal/Rest Break violations
Status	Settled

21. Shabazz v. Mann & Company

Court	Butte
Case No.	22CV02669
Nature	Overtime Wages, Meal/Rest Break violations
Status	Settled

22. Adame v. Hustead's Collision Center

Court	Alameda
Case No.	22CV018744
Nature	Minimum Wage violations, Meal/Rest Break, PAGA
Status	Settled

23. Monroy v. Donsuemor

Court	Alameda
Case No.	22CV011917
Nature	Minimum Wage violations, Meal/Rest Break, PAGA, Wrongful Termination
Status	Settled

24. Murbach v. Love Automotive

Court	Kern
Case No.	BCV-22-103469
Nature	Overtime Wages, Meal/Rest Break violations
Status	In Litigation

25. Bove v. S&B Restaurant Group

Court	Los Angeles
Case No.	23STCV02528
Nature	Overtime Wages, Meal/Rest Break violations
Status	Settled

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
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
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

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

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

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

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
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 B

Activities Export

11/05/2026
12:22 AM

Date	Type	Description	Matter	Client	User	Qty	Rate ($)	Non-billable ($)	Billable ($)
06/17/2024		Review the intake. Review documents from client and personnel file. work on the PAGA letter. Unbilled	92001-Fuentes Eliseo Fuentes v. Kline Automotive, Inc., et al.	Eliseo Fuentes	Shani Zakay	6.00h	$800.00	-	$4,800.00
06/24/2024		Research and investigation regarding various defendants. Multiple discussions with the team regarding the same. Unbilled	92001-Fuentes Eliseo Fuentes v. Kline Automotive, Inc., et al.	Eliseo Fuentes	Shani Zakay	1.00h	$800.00	-	$800.00
08/01/2024		Work on the joint report Unbilled	92001-Fuentes Eliseo Fuentes v. Kline Automotive, Inc., et al.	Eliseo Fuentes	Shani Zakay	0.50h	$800.00	-	$400.00
08/02/2024		Emails regarding notice of appearance Unbilled	92001-Fuentes Eliseo Fuentes v. Kline Automotive, Inc., et al.	Eliseo Fuentes	Shani Zakay	0.10h	$800.00	-	$80.00
09/13/2024		Team meeting to discuss status of the case and necessary work following call with OC. Unbilled	92001-Fuentes Eliseo Fuentes v. Kline Automotive, Inc., et al.	Eliseo Fuentes	Shani Zakay	0.50h	$800.00	-	$400.00
09/18/2024		Draft joint report for CMC Unbilled	92001-Fuentes Eliseo Fuentes v. Kline Automotive, Inc., et al.	Eliseo Fuentes	Shani Zakay	1.00h	$800.00	-	$800.00
09/22/2024		Work on stipulation to stay and data demand	92001-Fuentes Eliseo Fuentes v.	Eliseo Fuentes	Shani Zakay	1.50h	$800.00	-	$1,200.00
						42.30h		**$0.00** 0.00h	**$33,840.00** 42.30h

Activities Export

11/05/2026
12:22 AM

Date	Type	Description	Matter	Client	User	Qty	Rate ($)	Non-billable ($)	Billable ($)
		Unbilled	Kline Automotive, Inc., et al.						
10/02/2024		Emails regarding adding former owner as defendant Unbilled	92001-Fuentes Eliseo Fuentes v. Kline Automotive, Inc., et al.	Eliseo Fuentes	Shani Zakay	0.30h	$800.00	-	$240.00
10/08/2024		Follow up emails regarding the CMC and necessary work Unbilled	92001-Fuentes Eliseo Fuentes v. Kline Automotive, Inc., et al.	Eliseo Fuentes	Shani Zakay	0.30h	$800.00	-	$240.00
10/11/2024		M&C emails with OC regarding mediation and terms of the mediation Unbilled	92001-Fuentes Eliseo Fuentes v. Kline Automotive, Inc., et al.	Eliseo Fuentes	Shani Zakay	0.30h	$800.00	-	$240.00
10/21/2024		M&C regarding mediators. Unbilled	92001-Fuentes Eliseo Fuentes v. Kline Automotive, Inc., et al.	Eliseo Fuentes	Shani Zakay	0.20h	$800.00	-	$160.00
10/31/2024		Emails to M&C regarding mediation, mediation data, and stipulation to stay. Unbilled	92001-Fuentes Eliseo Fuentes v. Kline Automotive, Inc., et al.	Eliseo Fuentes	Shani Zakay	0.50h	$800.00	-	$400.00
11/05/2024		Emails regarding discovery extension. Unbilled	92001-Fuentes Eliseo Fuentes v. Kline Automotive, Inc., et al.	Eliseo Fuentes	Shani Zakay	0.10h	$800.00	-	$80.00
11/08/2024		More work on stipulation to stay Unbilled	92001-Fuentes Eliseo Fuentes v. Kline Automotive,	Eliseo Fuentes	Shani Zakay	0.40h	$800.00	-	$320.00
						42.30h		**$0.00** 0.00h	**$33,840.00** 42.30h

Activities Export

11/05/2026
12:22 AM

Date	Type	Description	Matter	Client	User	Qty	Rate ($)	Non-billable ($)	Billable ($)
			Inc., et al.						
11/11/2024		M&C with OC regarding informal discovery for mediation. Unbilled	92001-Fuentes Eliseo Fuentes v. Kline Automotive, Inc., et al.	Eliseo Fuentes	Shani Zakay	0.50h	$800.00	-	$400.00
11/12/2024		Emails and work regarding stipulation to stay Unbilled	92001-Fuentes Eliseo Fuentes v. Kline Automotive, Inc., et al.	Eliseo Fuentes	Shani Zakay	0.20h	$800.00	-	$160.00
11/14/2024		Work on stipulation to stay Unbilled	92001-Fuentes Eliseo Fuentes v. Kline Automotive, Inc., et al.	Eliseo Fuentes	Shani Zakay	0.50h	$800.00	-	$400.00
11/15/2024		Call with OC and emails regarding stipulation. Unbilled	92001-Fuentes Eliseo Fuentes v. Kline Automotive, Inc., et al.	Eliseo Fuentes	Shani Zakay	0.50h	$800.00	-	$400.00
11/16/2024		Emails regarding status of discovery responses. Unbilled	92001-Fuentes Eliseo Fuentes v. Kline Automotive, Inc., et al.	Eliseo Fuentes	Shani Zakay	0.10h	$800.00	-	$80.00
11/19/2024		Follow up on sample size Unbilled	92001-Fuentes Eliseo Fuentes v. Kline Automotive, Inc., et al.	Eliseo Fuentes	Shani Zakay	0.10h	$800.00	-	$80.00
12/05/2024		Emails with team and OC regarding sampling for mediation. Unbilled	92001-Fuentes Eliseo Fuentes v. Kline Automotive, Inc., et al.	Eliseo Fuentes	Shani Zakay	0.20h	$800.00	-	$160.00
						42.30h		**$0.00** 0.00h	**$33,840.00** 42.30h

Activities Export

11/05/2026
12:22 AM

Date	Type	Description	Matter	Client	User	Qty	Rate ($)	Non-billable ($)	Billable ($)
12/10/2024		M&C with OC and emails with the team regarding named defendants and possible dismissal Unbilled	92001-Fuentes Eliseo Fuentes v. Kline Automotive, Inc., et al.	Eliseo Fuentes	Shani Zakay	0.50h	$800.00	-	$400.00
12/11/2024		Follow up with OC on stipulation to stay. Unbilled	92001-Fuentes Eliseo Fuentes v. Kline Automotive, Inc., et al.	Eliseo Fuentes	Shani Zakay	0.20h	$800.00	-	$160.00
12/16/2024		Multiple emails with the team regarding named entities and necessary work Unbilled	92001-Fuentes Eliseo Fuentes v. Kline Automotive, Inc., et al.	Eliseo Fuentes	Shani Zakay	0.20h	$800.00	-	$160.00
12/17/2024		Emails regarding sampling and issues with the same Unbilled	92001-Fuentes Eliseo Fuentes v. Kline Automotive, Inc., et al.	Eliseo Fuentes	Shani Zakay	0.10h	$800.00	-	$80.00
12/20/2024		More M&C emails regarding informal discovery and sampling for mediation. Unbilled	92001-Fuentes Eliseo Fuentes v. Kline Automotive, Inc., et al.	Eliseo Fuentes	Shani Zakay	0.40h	$800.00	-	$320.00
12/27/2024		Work on joint report and emails with OC regarding the same. Unbilled	92001-Fuentes Eliseo Fuentes v. Kline Automotive, Inc., et al.	Eliseo Fuentes	Shani Zakay	1.00h	$800.00	-	$800.00
01/03/2025		More work on joint report Unbilled	92001-Fuentes Eliseo Fuentes v. Kline Automotive,	Eliseo Fuentes	Shani Zakay	0.30h	$800.00	-	$240.00
						42.30h		**$0.00** 0.00h	**$33,840.00** 42.30h

Activities Export

11/05/2026
12:22 AM

Date	Type	Description	Matter	Client	User	Qty	Rate ($)	Non-billable ($)	Billable ($)
			Inc., et al.						
01/14/2025		Follow up emails regarding status conference and IDC Unbilled	92001-Fuentes Eliseo Fuentes v. Kline Automotive, Inc., et al.	Eliseo Fuentes	Shani Zakay	0.30h	$800.00	-	$240.00
01/27/2025		Review defendant's declaration and meeting with team to discuss dismissal Unbilled	92001-Fuentes Eliseo Fuentes v. Kline Automotive, Inc., et al.	Eliseo Fuentes	Shani Zakay	0.50h	$800.00	-	$400.00
02/06/2025		Work on joint report. Unbilled	92001-Fuentes Eliseo Fuentes v. Kline Automotive, Inc., et al.	Eliseo Fuentes	Shani Zakay	0.50h	$800.00	-	$400.00
06/06/2025		Emails with expert and with the team regarding data for mediation and necessary work and analysis for the mediation. Discuss scope of work with team. Unbilled	92001-Fuentes Eliseo Fuentes v. Kline Automotive, Inc., et al.	Eliseo Fuentes	Shani Zakay	1.00h	$800.00	-	$800.00
07/12/2025		Work on the mediation brief. Unbilled	92001-Fuentes Eliseo Fuentes v. Kline Automotive, Inc., et al.	Eliseo Fuentes	Shani Zakay	1.50h	$800.00	-	$1,200.00
07/21/2025		Attend mediation. Unbilled	92001-Fuentes Eliseo Fuentes v. Kline Automotive, Inc., et al.	Eliseo Fuentes	Shani Zakay	4.00h	$800.00	-	$3,200.00
						42.30h		**$0.00** 0.00h	**$33,840.00** 42.30h

Activities Export

11/05/2026
12:22 AM

Date	Type	Description	Matter	Client	User	Qty	Rate ($)	Non-billable ($)	Billable ($)
07/22/2025		Work on MOU Unbilled	92001-Fuentes Eliseo Fuentes v. Kline Automotive, Inc., et al.	Eliseo Fuentes	Shani Zakay	1.00h	$800.00	-	$800.00
07/24/2025		More work on MOU Unbilled	92001-Fuentes Eliseo Fuentes v. Kline Automotive, Inc., et al.	Eliseo Fuentes	Shani Zakay	1.00h	$800.00	-	$800.00
08/20/2025		More work on MOU Unbilled	92001-Fuentes Eliseo Fuentes v. Kline Automotive, Inc., et al.	Eliseo Fuentes	Shani Zakay	0.50h	$800.00	-	$400.00
10/24/2025		Work on SAR Unbilled	92001-Fuentes Eliseo Fuentes v. Kline Automotive, Inc., et al.	Eliseo Fuentes	Shani Zakay	4.00h	$800.00	-	$3,200.00
11/04/2025		More work on SAR Unbilled	92001-Fuentes Eliseo Fuentes v. Kline Automotive, Inc., et al.	Eliseo Fuentes	Shani Zakay	0.50h	$800.00	-	$400.00
11/28/2025		M&C with OC and discussion with team regarding possible addition of new defendant as part of settlement. Unbilled	92001-Fuentes Eliseo Fuentes v. Kline Automotive, Inc., et al.	Eliseo Fuentes	Shani Zakay	0.50h	$800.00	-	$400.00
12/27/2025		Work on SAC and stipulatio to amend Unbilled	92001-Fuentes Eliseo Fuentes v. Kline Automotive, Inc., et al.	Eliseo Fuentes	Shani Zakay	0.50h	$800.00	-	$400.00
						42.30h		**$0.00** 0.00h	**$33,840.00** 42.30h

Activities Export

11/05/2026
12:22 AM

Date	Type	Description	Matter	Client	User	Qty	Rate ($)	Non-billable ($)	Billable ($)
01/20/2026		Work on revised SAR Unbilled	92001-Fuentes Eliseo Fuentes v. Kline Automotive, Inc., et al.	Eliseo Fuentes	Shani Zakay	1.50h	$800.00	-	$1,200.00
01/27/2026		M&C regarding escalator clause triggering and revised agreement Unbilled	92001-Fuentes Eliseo Fuentes v. Kline Automotive, Inc., et al.	Eliseo Fuentes	Shani Zakay	0.50h	$800.00	-	$400.00
02/04/2026		M&C regarding escalator clause triggering and update GSA accordingly. Unbilled	92001-Fuentes Eliseo Fuentes v. Kline Automotive, Inc., et al.	Eliseo Fuentes	Shani Zakay	0.50h	$800.00	-	$400.00
02/19/2026		More work on revised SAR Unbilled	92001-Fuentes Eliseo Fuentes v. Kline Automotive, Inc., et al.	Eliseo Fuentes	Shani Zakay	0.50h	$800.00	-	$400.00
03/01/2026		Work on MPA Unbilled	92001-Fuentes Eliseo Fuentes v. Kline Automotive, Inc., et al.	Eliseo Fuentes	Shani Zakay	2.50h	$800.00	-	$2,000.00
04/08/2026		Review outcome of MPA and discuss with the team Unbilled	92001-Fuentes Eliseo Fuentes v. Kline Automotive, Inc., et al.	Eliseo Fuentes	Shani Zakay	0.50h	$800.00	-	$400.00
11/04/2026		Work on the MFA Unbilled	92001-Fuentes Eliseo Fuentes v. Kline Automotive, Inc., et al.	Eliseo Fuentes	Shani Zakay	3.00h	$800.00	-	$2,400.00
						42.30h		**$0.00** 0.00h	**$33,840.00** 42.30h

EXHIBIT C

Activities Export

11/05/2026
12:21 AM

Date	Type	Description	Matter	Client	User	Qty	Rate ($)	Non-billable ($)	Billable ($)
11/06/2024	$	Case Anywhere - Online Case Management Unbilled	92001-Fuentes Eliseo Fuentes v. Kline Automotive, Inc., et al.	Eliseo Fuentes	Shani Zakay	1.00	$107.31	-	$107.31
02/06/2025	$	Case Anywhere Unbilled	92001-Fuentes Eliseo Fuentes v. Kline Automotive, Inc., et al.	Eliseo Fuentes	Shani Zakay	1.00	$147.00	-	$147.00
03/07/2025	$	Case Anywhere-System Access Fee Unbilled	92001-Fuentes Eliseo Fuentes v. Kline Automotive, Inc., et al.	Eliseo Fuentes	Shani Zakay	1.00	$49.00	-	$49.00
03/17/2025	$	Econ One Unbilled	92001-Fuentes Eliseo Fuentes v. Kline Automotive, Inc., et al.	Eliseo Fuentes	Shani Zakay	1.00	$1,624.74	-	$1,624.74
04/05/2025	$	Case Anywhere Unbilled	92001-Fuentes Eliseo Fuentes v. Kline Automotive, Inc., et al.	Eliseo Fuentes	Shani Zakay	1.00	$49.00	-	$49.00
06/18/2025	$	Gig Kyriacou Unbilled	92001-Fuentes Eliseo Fuentes v. Kline Automotive, Inc., et al.	Eliseo Fuentes	Shani Zakay	1.00	$5,625.00	-	$5,625.00
07/01/2025	$	Case Anywhere - Invoice No. 418913 Unbilled	92001-Fuentes Eliseo Fuentes v. Kline Automotive, Inc., et al.	Eliseo Fuentes	Shani Zakay	1.00	$49.00	-	$49.00
07/24/2025	$	Berger Consulting Group - Expert Fees	92001-Fuentes Eliseo Fuentes v.	Eliseo Fuentes	Shani Zakay	1.00	$3,285.00	-	$3,285.00
								$0.00 0.00h	**$12,194.49** 0.00h

Activities Export

11/05/2026
12:21 AM

Date	Type	Description	Matter	Client	User	Qty	Rate ($)	Non-billable ($)	Billable ($)
		Unbilled	Kline Automotive, Inc., et al.						
08/04/2025	$	Case Anywhere - Invoice No. 431475 Unbilled	92001-Fuentes Eliseo Fuentes v. Kline Automotive, Inc., et al.	Eliseo Fuentes	Shani Zakay	1.00	$49.00	-	$49.00
08/12/2025	$	One Legal - Order No. 26043890 Unbilled	92001-Fuentes Eliseo Fuentes v. Kline Automotive, Inc., et al.	Eliseo Fuentes	Shani Zakay	1.00	$23.44	-	$23.44
09/02/2025	$	Case Anywhere - Invoice No. 0443902 Unbilled	92001-Fuentes Eliseo Fuentes v. Kline Automotive, Inc., et al.	Eliseo Fuentes	Shani Zakay	1.00	$49.00	-	$49.00
10/01/2025	$	Case Anywhere - Invoice No. 456561 Unbilled	92001-Fuentes Eliseo Fuentes v. Kline Automotive, Inc., et al.	Eliseo Fuentes	Shani Zakay	1.00	$49.00	-	$49.00
11/03/2025	$	Case Anywhere - Invoice No. 469429 Unbilled	92001-Fuentes Eliseo Fuentes v. Kline Automotive, Inc., et al.	Eliseo Fuentes	Shani Zakay	1.00	$49.00	-	$49.00
12/01/2025	$	Case Anywhere - Invoice No. 482324 Unbilled	92001-Fuentes Eliseo Fuentes v. Kline Automotive, Inc., et al.	Eliseo Fuentes	Shani Zakay	1.00	$49.00	-	$49.00
01/02/2026	$	Case Anywhere – Invoice No. 495244 Unbilled	92001-Fuentes Eliseo Fuentes v. Kline Automotive, Inc., et al.	Eliseo Fuentes	Admin Zakay	1.00	$49.00	-	$49.00
								$0.00 0.00h	**$12,194.49** 0.00h

Activities Export

11/05/2026
12:21 AM

Date	Type	Description	Matter	Client	User	Qty	Rate ($)	Non-billable ($)	Billable ($)
02/02/2026	$	Case Anywhere – Invoice No. 508411 Unbilled	92001-Fuentes Eliseo Fuentes v. Kline Automotive, Inc., et al.	Eliseo Fuentes	Admin Zakay	1.00	$49.00	-	$49.00
03/02/2026	$	Case Anywhere – Invoice No. 521729 Unbilled	92001-Fuentes Eliseo Fuentes v. Kline Automotive, Inc., et al.	Eliseo Fuentes	Admin Zakay	1.00	$49.00	-	$49.00
03/02/2026	$	Legal Research Fee - UniCourt Invoice No. 925840 Unbilled	92001-Fuentes Eliseo Fuentes v. Kline Automotive, Inc., et al.	Eliseo Fuentes	Admin Zakay	1.00	$26.00	-	$26.00
04/01/2026	$	CaseAnywhere - Invoice No. 535085 Unbilled	92001-Fuentes Eliseo Fuentes v. Kline Automotive, Inc., et al.	Eliseo Fuentes	Admin Zakay	1.00	$49.00	-	$49.00
05/01/2026	$	Legal Research Fee - EveLegal Invoice No. 20603038390 Unbilled	92001-Fuentes Eliseo Fuentes v. Kline Automotive, Inc., et al.	Eliseo Fuentes	Admin Zakay	1.00	$175.00	-	$175.00
05/01/2026	$	CaseAnywhere - Invoice No. 548575 Unbilled	92001-Fuentes Eliseo Fuentes v. Kline Automotive, Inc., et al.	Eliseo Fuentes	Admin Zakay	1.00	$49.00	-	$49.00
06/01/2026	$	Case Anywhere - Invoice No. 561975 Unbilled	92001-Fuentes Eliseo Fuentes v. Kline Automotive, Inc., et al.	Eliseo Fuentes	Admin Zakay	1.00	$49.00	-	$49.00
07/01/2026	$	Case Anywhere - Invoice	92001-Fuentes	Eliseo	Admin	1.00	$49.00	-	$49.00
								$0.00 0.00h	**$12,194.49** 0.00h

Activities Export

11/05/2026
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Date	Type	Description	Matter	Client	User	Qty	Rate ($)	Non-billable ($)	Billable ($)
		No. 575291 Unbilled	Eliseo Fuentes v. Kline Automotive, Inc., et al.	Fuentes	Zakay				
08/01/2026	$	Case Anywhere - Invoice No. 588450 Unbilled	92001-Fuentes Eliseo Fuentes v. Kline Automotive, Inc., et al.	Eliseo Fuentes	Admin Zakay	1.00	$49.00	-	$49.00
09/01/2026	$	Case Anywhere - Invoice No. 601732 Unbilled	92001-Fuentes Eliseo Fuentes v. Kline Automotive, Inc., et al.	Eliseo Fuentes	Admin Zakay	1.00	$49.00	-	$49.00
10/01/2026	$	Case Anywhere - Invoice No. 615039 Unbilled	92001-Fuentes Eliseo Fuentes v. Kline Automotive, Inc., et al.	Eliseo Fuentes	Admin Zakay	1.00	$49.00	-	$49.00
11/02/2026	$	Case Anywhere - Invoice No. Unbilled	92001-Fuentes Eliseo Fuentes v. Kline Automotive, Inc., et al.	Eliseo Fuentes	Admin Zakay	1.00	$49.00	-	$49.00
11/05/2026	$	Anticipated Case Anywhere Costs Unbilled	92001-Fuentes Eliseo Fuentes v. Kline Automotive, Inc., et al.	Eliseo Fuentes	Admin Zakay	1.00	$250.00	-	$250.00
								$0.00 0.00h	**$12,194.49** 0.00h