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7 Attorneys for Plaintiff JANICE INSIXIENGMAY

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10 **UNITED STATES DISTRICT COURT**
11 **FOR THE EASTERN DISTRICT OF CALIFORNIA**

12
13 JANICE INSIXIENGMAY, individually and
on behalf of all other similarly situated
14 employees,

15 Plaintiff,

16 vs.

17 HYATT CORPORATION DBA HYATT
18 REGENCY SACRAMENTO, a Delaware
Corporation; and DOES 1 to 100, inclusive,

19 Defendants.
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21
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23
24

Case No. 2:18-cv-02993-TLN-DB

CLASS ACTION

**DECLARATION OF JUSTIN P. RODRIGUEZ
IN SUPPORT OF PLAINTIFF'S MOTION FOR
ATTORNEYS' FEES AND COSTS,
REPRESENTATIVE ENHANCEMENT, AND
SETTLEMENT ADMINISTRATOR COSTS**

Date: September 19, 2024

Time: 2:00 p.m.

Courtroom: 2, 15th Floor

Judge: Hon. Troy L. Nunley

Filed: October 4, 2018

AC Filed: April 7, 2020

AC Filed: April 6, 2023

Trial Date: None Set

1 I, Justin P. Rodriguez, declare:

2 1. I am an attorney at law duly admitted to practice before all the courts of the State of
3 California and the United States District Court for the Eastern District of California. I am an attorney
4 of record for Plaintiff Janice Insixiengmay (“Plaintiff”) herein. I am making this declaration in support
5 of Plaintiff’s Motion for Attorney’s Fees and Costs, Representative Enhancement, and Settlement
6 Administrator Costs (“Motion”).

7 2. I am a Shareholder of the Shimoda & Rodriguez Law PC. I am familiar with the file,
8 the documents, and the history related to this case. In summary, Plaintiff is seeking a total of
9 \$103,250.00, in attorneys’ fees and \$29,051.07 in litigation expenses in this case. As of May 8, 2024,
10 our firm’s lodestar will be \$396,947.50, (a firm total of 674.3 hours). A true and correct copy of our
11 firm’s billing entries for this matter as of May 8, 2024, is attached to this declaration as Exhibit A. The
12 requested 35% fee of the \$295,000.00 common fund created in this case would result in a negative
13 lodestar multiplier of approximately .26x as of May 8, 2024. The negative multiplier will likely be
14 exacerbated by the time all money is distributed in this case as the lodestar does not include time spent
15 on drafting a final approval motion and attending related proceedings, and overseeing the complete
16 implementation of the settlement through final disbursement of money and compliance hearings.

17 3. A true and correct copy of a cost summary itemizing the litigation expenses incurred and
18 to be incurred through final approval is attached to this declaration as Exhibit B. True and correct
19 copies of receipts and/or invoices documenting the itemized litigation costs are being filed with this
20 declaration as Exhibit C. We were not able to obtain receipts from the PACER system regarding the
21 Court records obtained for two related cases. The charge was ten cents per page and the records
22 included approval motion filings, operative pleadings, and orders after hearing on the approval motions.
23 This was necessary to ensure there was no impact on the claims in our case. In the past, I have been
24 able to get the receipts from prior transactions off the PACER website for any Court records pulled, but
25 there appears to have been a change to the PACER service/website and I was not able to do so for these
26 costs. While the our was pending in Sacramento County Superior Court and up through December
27 2021, our firm charged \$40 in costs for taking physical filings to Sacramento County Superior Court.
28 We did this in lieu of using a third-party service as the costs being charged by available third-party

1 services for physical filings were the same or higher. Our firm taking the physical filings allowed us
2 greater flexibility and reliability in making sure papers were filed when needed. Thus, there are no
3 separate receipts for those charges as they are simply entered as a cost in our billing system when the
4 service is provided. The State Court continued to require case management conference statement
5 filings even after our motion to remand was denied and did not stop requesting these filings until
6 December 17, 2021. Our firm also charges a flat \$500 costs to cover litigation expenses associated
7 with copies, faxes, basic postage, and legal research services attributable to the case (*e.g.* Westlaw) that
8 are incurred in litigation. Thus, there are no separate receipts for this charge as it is simply entered as a
9 cost in our billing system after a case is opened. Charging a flat fee for these items as opposed to
10 itemizing each charge is more typical and practical in plaintiff side employment litigation where
11 individuals often seek legal services after they have lost their jobs and are otherwise unable to forecast
12 their ability to cover such expenses as litigation progresses. A flat fee provides certainty in the amounts
13 to be charged for these items and makes it easier for clients to plan for the financial impact of litigation.
14 These costs represent charges that I would normally bill to fee paying clients.

15 4. My firm is a boutique law practice that focuses primarily in employment litigation,
16 emphasizing wage and hour litigation, including class actions and Private Attorneys' General Act
17 ("PAGA") cases. In agreeing to represent Plaintiff and take on the case for all class members, our
18 office agreed to take this case on a contingency basis, meaning that we would take the risk of obtaining
19 no money for the time and effort our firm expended on the case unless our firm was able to recover
20 compensation for the class. We took a risk that we would not recover any money in this matter if we
21 were unsuccessful at trial. We also took on the risk that the case may be subject to an unfavorable
22 summary judgment ruling. This is a substantial risk in class litigation because in addition to the normal
23 perils of litigation associated with overcoming merits and damages issues in the case, class certification
24 must typically be granted if our firm is to recovery anything close to the value of our time put in the
25 case. Typically, the damages suffered by any one individual, including the named representative, is
26 disproportionately low compared to the time and expense of litigating that case on an individual basis.
27 However, we believe it is important to make sure employees are able to find affordable representation
28

1 in order to ensure that employers are complying with all their legal obligations towards employees and
2 paying employees all their hard-earned wages.

3 5. My firm does not have a large number of attorneys or cases and taking on class actions
4 to vindicate the rights of class members represents a substantial risk and burden as class action
5 litigation requires a substantial amount of time and financial resources to successfully litigate. During
6 the course of this case, our firm had only three to five attorneys at any given time, including myself. I
7 believe the risk experienced by my firm taking on class action litigation cases is much more substantial
8 than what typically larger law firms would face as they could spread the risk across multiple practice
9 departments and a large number of cases. Because we are a smaller firm, the amount of time it takes to
10 litigate class cases will naturally take away time we could spend on other cases and limit the amount of
11 cases we can take at any given time.

12 6. We rely on attorneys' fee awards in order to continue working to ensure enforcement of
13 California wage and hour protections. Recovery of our full lodestar plus an appropriate multiplier is
14 necessary to compensate for the risk undertaken. Otherwise, we could not continue to represent
15 employees who are denied wages, but whose cases may be time-consuming and difficult to prove.
16 There have been many class cases we have litigated where ultimately we get zero for our time because
17 we are unable to meet certification requirements or the company becomes financially insolvent.
18 Additionally, there are occasions, such as in this case, where the fee actually results in a negative
19 multiplier of our lodestar. In addition to investing our time, our firm will have incurred \$29,051.07 in
20 litigation costs that have not been paid. This is a financial burden and risk that should be recognized as
21 well.

22 7. The risks faced in this case were made apparent by defense counsel and the arguments
23 they made throughout this case. The meal and rest period claims were one of the main claims for
24 Plaintiff. Plaintiff alleged that meal and rest period premiums paid by Defendant were not paid at the
25 correct rate of pay. Prior to June 2019, Defendant paid meal and rest period premiums at Class
26 Members' base hourly rate and did not incorporate the value of any premium pay (*e.g.*,
27 nondiscretionary bonuses, incentives, etc.). After June 2, 2019, Defendant modified its policy and
28 practice to include premium pay in its regular rate calculation. However, Defendant did not include the

1 value of free meals provided to Class Members, which Plaintiff contends should have been included.
2 Defendant produced in excess of 10,000 pages of documents through discovery. Additionally, several
3 excel spreadsheets containing payroll data for earnings and hours worked for two different payroll
4 systems that Defendant used during the Class Period were produced, which had to be cross referenced
5 for each employee, for each period, in order to perform the appropriate regular rate of pay calculations
6 relevant to Plaintiff's asserted claims. The spreadsheets contained more than 300,000 rows of data and
7 between one (1) to four (4) different spreadsheets had to be referenced at a time to get the necessary
8 information from more than fifty (50) different pay codes when performing the regular rate calculations
9 and comparing them to Defendant's interrogatory and deposition responses. This was an incredibly
10 tedious and time-consuming task that required the use of an expert to help calculate the amounts. This
11 also required the use of a vendor, iBridge, to convert several thousand pages of PDF payroll document
12 into a useable excel format, which also had to be cross referenced with the payroll spreadsheets
13 produced by Defendant to perform the regular rate calculations. At the time of mediation, the
14 maximum possible damages for these claims based on Defendant's records was \$22,597.25. This
15 amount does not take into account any potential risks with respect to Plaintiff proving the merits or
16 damages. Plaintiff's strongest claims are for meal and rest premiums owed prior to June 2019, which
17 equates to \$8,534.50. For the claim period after June 2019, recovery depends on Plaintiff proving that
18 the value of free meals should have been included in Defendant's regular rate of pay calculation. There
19 is a substantial risk a trier of fact or the Court would find the value of meals did not need to be included
20 in the regular rate calculation because Defendant's policy was to provide one (1) meal per day. *See* 29
21 C.F.R. §548.3(d); 29 C.F.R. § 548.304. The issue would be whether occasional instances where some
22 Class Members were able to get additional food were sufficient to become "customary" for Defendant
23 to provide more than one (1) meal a day despite its express written policy to the contrary. If Defendant
24 was successful in its arguments, the value of the claim post June 2019 would be \$0. Through discovery
25 we determined that the only pay not incorporated into the regular rate of pay during the Class Period for
26 the purpose of paying overtime and sick leave wages was the value of free meals provided to Class
27 Members. For the reasons described above, there is a substantial risk a trier of fact or the Court would
28 find the value of meals did not need to be included in the regular rate calculation. If Defendant

1 prevailed on its argument, the value of these claims would be \$0. These claims were the primary
2 source of Plaintiff's damages calculations, so this was a substantial risk and would affect all other
3 derivative claim calculations, such as statutory and civil penalties and waiting time penalties. For
4 example, the waiting time penalties claim is derivative of the overtime, meal, rest, and paid sick time
5 claims. It is based on allegations that Class Members had wages due and owing to them that remained
6 unpaid after the end of their employment due to Defendant's failure to correctly calculate Class
7 Members' regular rates of pay. Because this claim is derivative, it carries the same risks identified for
8 Plaintiff's overtime, meal and rest period, and paid sick time claims. Plaintiff's failure to prevail on
9 any of the above claims would reduce the number of former Class Members with unpaid wages who
10 would be eligible to recover waiting time penalties. Further, there is a substantial risk that Defendant's
11 belief that it correctly calculated Class Members' regular rates of pay would cause a trier of fact to find
12 the failure to pay wages was not willful or that Defendant had a good faith affirmative defense, which
13 would eliminate the value of this claim entirely. *See* Cal. Lab. Code § 203 (a good faith dispute that
14 any wages are due will preclude imposition of waiting time penalties); *Estrada v. Royal Carpet Mills,*
15 *Inc.*, 76 Cal.App.5th 685, 729 (2022) ("A good faith dispute that any wages are due occurs when an
16 employer presents a defense, based in law or fact, which if successful, would preclude any recovery on
17 the party of the employee.") (internal citations omitted); *Kao v. Joy Holiday*, 12 Cal. App. 5th 947, 963
18 (2017) (a good faith dispute as to whether an employee is exempt will preclude an award of waiting
19 time penalties). The maximum possible damages at the time of mediation for the portion of this claim
20 arising from Plaintiff's strongest argument, that Defendant did not correctly pay meal and rest period
21 premiums prior to June 2019, was \$738,000. However, as mentioned above, it was not conclusively
22 established until May 2022 that meal and rest period premiums were required to be paid at the regular
23 rate of pay. *See Naranjo v. Spectrum Security Services, Inc.*, 13 Cal.5th 93 (2022). Taking these
24 factors into account, a more realistic range of recovery for this claim is approximately \$0 to \$738,000.
25 The California Supreme Court recently extended the applicability of the good faith defense to wage
26 statement penalties, substantially increasing the risk associated with that derivative claim as well. *See*
27 *Naranjo v. Spectrum Sec. Servs., Inc.*, No. S279397, 2024 WL 1979980, at *1 (Cal. May 6, 2024).

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1 8. I believe the \$295,000.00 non-reversionary settlement achieved in this case represents a
2 substantial value to the Class Members. There is an estimated average award of \$119.85 and a
3 maximum award of \$538.54, which is after all requested deductions for attorneys' fees and costs,
4 representative enhancements, payment to the Labor and Workforce Development Agency, and claims
5 administrator costs. Defendants are also paying the employer taxes in addition to the gross settlement
6 amount. This average recovery represents approximately 470% more than the average recovery in a
7 recent related case against Hyatt Corporation, *Crump v. Hyatt Corporation*, Case No. 4:20-cv-00295-
8 HSG ("*Crump*"). On or about February 14, 2023, the United States District Court for the Northern
9 District of California granted final approval of a class action settlement in *Crump*. The scope of the
10 *Crump* settlement included all current and former non-exempt, hourly employees working for Hyatt
11 Corporation in California at any time between December 6, 2015, through June 9, 2019, which includes
12 many of the individuals covered by the settlement in this case. The class included approximately
13 15,870 individuals. The *Crump* action was based on allegations that Hyatt Corporation failed to pay its
14 employees all wages owed due to an unlawful rounding policy and practice and was liable for
15 derivative statutory and civil penalties. The gross settlement amount was \$990,000. The released
16 claims in the *Crump* action included:

17
18 all claims asserted or that could have been asserted based on the facts and
19 theory that Defendant or any of the Released Parties maintained a
20 timekeeping system that unlawfully rounded time as alleged in the Second
21 Amended Complaint in the Action, including those for: (1) all claims for
22 alleged failure to pay minimum, straight time, overtime, or double time
23 wages, wages or damages under the FLSA, California law, or common
24 law, based on a theory that Defendant or any of the Released Parties
25 maintained a timekeeping system that unlawfully rounded time; (2) failure
26 to pay final wages due at separation or upon termination; (3) failure to
27 timely pay wages during employment; (4) failure to provide accurate and
28 itemized wage statements; (5) failure to keep requisite payroll records; (6)
claims brought under Business & Professions Code section 17200 et seq.
including, but not limited to, all claims for unfair, unlawful and harmful
conduct to class members, the general public and Defendant's competitors
and claims of unlawfully gaining an unfair advantage over other
businesses based on the facts and allegations contained in the Second
Amended Complaint; (7) PAGA claims for civil penalties due to any
Labor Code violations by Defendant arising out of or related to events
alleged in the Second Amended Complaint including, but not limited to,
Labor Code sections 201, 202, 203, 204, 226, 226.3, 510, 1174, 1194,
1197, 1197.1, and 1198; and California Industrial Welfare Commission
Wage Orders; (8) penalties of any nature; (9) interest; (10) liquidated
damages; (11) attorneys' fees; (12) costs; and (13) any other claims arising

1 out of or related to the Second Amended Complaint filed in the Action
2 through final approval of the Settlement. This Settlement, Settlement
3 Agreement, and the definition of Released Claims expressly exclude all
4 claims pled in *Hartstein v. Hyatt Corporation*, Case No. 2:20-cv-04874-
5 DSF-JPR and *Insixiengmay v. Hyatt Corporation, et al.*, Case No. 2:18-cv-
6 02993-TLN-DB.

7 9. The average recovery per class member in *Crump* based on the net settlement amount in
8 that case was \$26.08 (\$413,841.44/15,870). As stated above, the settlement in this case is estimated to
9 provide an average net recovery per class member of \$119.85, which is roughly 470% higher than the
10 *Crump* net recovery. Furthermore, any Class Members in this case were able to recover funds in the
11 *Crump* settlement, while still being able to receive payment in his action. To avoid any standing issues
12 that could arise if Plaintiff did not opt out of the *Crump* action, Plaintiff opted out and was not able to
13 recover any such payment like other Class Members.

14 10. I am a shareholder at Shimoda & Rodriguez Law, PC. My law firm is a boutique law
15 practice that focuses primarily on employment litigation, emphasizing wage and hour litigation. I
16 attended and graduated college from U.C. Davis, receiving a Bachelor of Arts in Philosophy and the
17 Departmental Citation for Academic Achievement in the Philosophy program. I was one of only two
18 recipients of this award out of the entire Philosophy Department. After U.C. Davis, I attended the
19 University of the Pacific, McGeorge School of Law, graduating in 2011 and receiving a Juris
20 Doctorate. I graduated in the top 20% of my class and was a member of the Traynor Honor Society at
21 McGeorge. Other academic achievements of mine include receiving a Witkin Award (top grade) in my
22 legal research and writing course, a Witkin Award in complex civil litigation, being a member of the
23 Dean's List from 2008 to 2011, being a Legislative Staff Writer for the *McGeorge Law Review* from
24 2009–2010, being an Associate Comment Editor for the *Pacific McGeorge Global Business &*
25 *Development Law Journal* from 2010–2011, and being selected as a Sacramento County Bar
26 Association Diversity Fellow in 2009. I was also a member of the Employment and Labor Law Society
27 and an officer for the Latino Law Students Association from 2009 to 2010.

28 11. I have been practicing law since 2011. From 2011 to 2016, I worked with the Shimoda
Law Corp. as an Associate. I became a Shareholder/Partner in the firm in 2017. Shimoda Law Corp.
became Shimoda & Rodriguez Law, PC, in 2022. Since 2017, I have received an AV Preeminent
rating from Martindale-Hubbell for my legal ability and ethical standards. From 2018 to 2023, I have

1 been recognized as a Super Lawyer (Rising Star) and, in 2024, I was recognized at a Super Lawyer. I
2 have been a panel speaker and presented a number of seminars covering issues in wage and hour
3 litigation in general and complex class and PAGA litigation in particular. These engagements include
4 the following: (1) *Epic Systems*, PAGA, and the Future of Employment Arbitration in California
5 (Sacramento County Bar Assoc., Sept. 2018); (2) Class Actions and PAGA Claims (Assoc. of Defense
6 Counsel of Northern California & Nevada, Jul. 2020); (3) Mediation: The Experienced Trial Lawyers
7 Perspective (Sacramento County Bar Assoc., Sept. 2020); (4) How to Become a Pivotal Part of Any
8 Wage and Hour Practice Group (Sacramento County Bar Assoc., Mar. 2021); (5) Emerging Trends and
9 Issues Relating to Arbitration and PAGA Claims in a Post-*Viking River Cruises* World (Sacramento
10 County Bar Assoc., Nov. 2022). I was elected to the Sacramento County Bar Association Labor and
11 Employment Law Section's executive committee in 2019 and was the Chair of the executive committee
12 for 2022. I have also been a member of the Presiding Judge Civil Law Advisory Committee for
13 Sacramento County Superior Court since August 2020. My practice focuses on complex civil
14 litigation, including wage and hour class actions, PAGA claims, and Fair Labor Standards Act
15 ("FLSA") claims. I am actively involved in most all of the complex litigation handled by our firm.
16 Some of the class and/or PAGA actions I have litigated or am currently litigating, including the instant
17 case, includes, but is not limited to, the following:

- 18 • *Aanerud v. Neumann Ltd., et al.*, Case No. 34-2014-00169324 (Sac. Sup. Ct.);
- 19 • *Adams-Anguy v. Placer Title Company, et al.*, Case No. SCV0040845 (Placer Sup. Ct.);
- 20 • *Adewumi v. GHS Interactive Security, LLC*, Case No. 34-2017-00210768 (Sac. Sup. Ct.);
- 21 • *Arrington v. Capital Express Lines, Inc., et al.*, Case No. 34-2012-00134195 (Sac. Sup. Ct.);
- 22 • *Aslam v. American Custom Private Security, Inc.*, Case No. STK-CV-UOE-2018-0012080 (San
23 Joaquin Sup. Ct.);
- 24 • *Aslam v. Cypress Security, LLC*, Case No. 34-2017-00220143 (Sac. Sup. Ct.);
- 25 • *Aslam v. Surveillance, Security, Inc.*, Case No. 34-2017-00220142 (Sac. Sup. Ct.);
- 26 • *Azzolino v. Brake Masters of Sacramento, LLC, et al.*, Case No. 34-2017-00218293 (Sac. Sup.
27 Ct.);
- 28 • *Barkhausen v. Bank of Stockton*, Case No. STK-CV-UOE-2019-17145 (San Joaquin Sup. Ct.);

- 1 • *Benak v. MDStat Urgent Care, Inc.*, Case No. 34-2015-00188181 (Sac. Sup. Ct.);
- 2 • *Bigornia v. Quest Diagnostics Clinical Laboratories, Inc., et al.*, Case No. 34-2019-00271174
- 3 (Sac. Sup. Ct.);
- 4 • *Blig v. Medical Management International, Inc.*, Case No. 34-2017-00213906 (Sac. Sup. Ct.);
- 5 • *Caguioa, et al. v. Fortune Senior Enterprises, et al.*, Case No. 34-2014-00171831 (Sac. Sup.
- 6 Ct.);
- 7 • *Camacho, et al. v. Z Street, Inc., d.b.a. Tower Café, et al.*, Case No. 34-2014-00163880 (Sac.
- 8 Sup. Ct.);
- 9 • *Castorena v. Flowmaster, Inc.*, Case No. CV18-2191 (Yolo Sup. Ct.);
- 10 • *Cannon v. Miller Event Management, Inc., et al.*, Case No. 34-2014-00168103 (Sac. Sup. Ct.);
- 11 • *Carr, et al. v. CableCom, LLC*, Case No. 34-2017-00212739 (Sac. Sup. Ct.);
- 12 • *Chace v. Daisy Holdings, LLC, dba Pine Creek Care Center, et al.*, Case No. 34-2017-00209613
- 13 (Sac. Sup. Ct.);
- 14 • *Clamens-Hollenback v. Atterro, Inc.*, Case No. 17-CV-305535 (Santa Clara Sup. Ct.);
- 15 • *Cress, et al. v. Mitsubishi Chemical Carbon Fiber and Composites, Inc.*, Case No. 34-2017-
- 16 00222101 (Sac. Sup. Ct.);
- 17 • *De Arcos v. Amware Pallet Services, LLC*, Case No. CV-17-629 (Yolo Sup. Ct.);
- 18 • *Ferreyra v. Point Digital Finance, Inc., et al.*, Case No. 20CV373776 (Santa Clara Sup. Ct.);
- 19 • *Foye v. The Golden 1 Credit Union*, Case No. 34-2018-00235003 (Sac. Sup. Ct.);
- 20 • *Garcia v. A-L Financial Corp.*, Case No. 34-2014-00171831 (Sac. Sup. Ct.);
- 21 • *Garcia v. Royal Plywood Company, LLC, et al.*, Case No. 34-2017-00221627 (Sac. Sup. Ct.);
- 22 • *Gomes v. Progressive Casualty Insurance Company*, Case No. 34-2018-00241979 (Sac. Sup.
- 23 Ct.);
- 24 • *Gomez v. Mayflower Farms Incorporated, et al.*, Case No. CV24157 (Colusa Sup. Ct.);
- 25 • *Gilliam v. Matrix Energy Services, Inc.* Case No. RG 11592345 (Alameda Sup. Court);
- 26 • *Gonzalez v. Northcentral Pizza, LLC, et al.*, Case No. 34-2019-00252018 (Sac Sup. Ct.);
- 27 • *Gordon, et al. v. Hospice Source, LLC, et al.*, Case No. 34-2019-00250022 (Sac. Sup. Ct.);
- 28 • *Gotts v. John L. Sullivan Chevrolet, Inc.*, Case No. 34-2018-00231576 (Sac Sup. Ct.);

- 1 • *Hartwell v. Techforce Telecom, Inc.*, Case No. 39-2014-00307197 (San Joaquin Sup. Ct.);
- 2 • *Hellum v. AI Protective Services, LLC, et al.*, Case No. 34-2018-00234449 (Sac. Sup. Ct.);
- 3 • *Hercules v. Maximus Services, LLC, et al.*, Case No. 34-2019-00268385 (Sac Sup. Ct.);
- 4 • *Hernandez v. Snyir, Inc.*, Case No. 34-2017-00207641 (Sac. Sup. Ct.);
- 5 • *Heinz v. Wright Tree Services*, Case No. 34-2012-00131949 (Sac. Sup. Ct.);
- 6 • *Hoover v. Mom365*, Case No. 2:17-cv-01328-TLN-CKD (E.D. Cal.);
- 7 • *Insixiengmay v. Hyatt Corporation, et al.*, Case No. 2:18-cv-02993-TLN-DB (E.D. Cal.);
- 8 • *Josol v. Dial Medical Corp.*, Case No. 34-2008-00010040 (Sac. Sup. Ct.);
- 9 • *McMahon v. Airco Mechanical, Inc.*, Case No. 34-2019-00259269 (Sac. Sup. Ct.);
- 10 • *Muhieddine v. KBA Docusys, Inc.*, Case No. 34-2014-00164720 (Sac. Sup. Ct.);
- 11 • *Nguyen v. Cardinal Health Pharmacy Services, LLC, et al.*, Case No. 2:19-cv-01939-KJM-EFB
12 (E.D. Cal.);
- 13 • *Prasad v. D. G. Smith Enterprises, Inc.*, Case No. 34-2017-00215046 (Sac. Sup. Ct.);
- 14 • *Ralston v. JMJ Incorporated, Inc. et al.*, Case No. 34-2017-00217047 (Sac. Sup. Ct.);
- 15 • *Roberts v. CableCom, LLC*, Case No. 34-2017-00212739 (Sac. Sup. Ct.);
- 16 • *Robinson v. West of Chicago Restaurants, Inc., dba Chicago Fire*, Case No. 34-2010-00082201
17 (Sac Sup. Ct.);
- 18 • *Salas, et al. v. Joint Ventures, LLC, et al.*, Case No. 34-2018-00227493 (Sac. Sup. Ct.);
- 19 • *Salmon v. Ovarions Fanfare, L.P., et al.*, Case No. 34-2018-00244749 (Sac. Sup. Ct.) ;
- 20 • *Scarano v. J.R. Putman, Inc.*, Case No. 34-2018-00244753 (Sac. Sup. Ct.) ;
- 21 • *Smith v. Greyhound Lines, Inc.*, Case No. 34-2017-00219188 (Sac. Sup. Ct.);
- 22 • *Sullivan v. National Response Corporation*, Case No. 34-2018-00244757 (Sac. Sup. Ct.);
- 23 • *Talent v. Leslie's Poolmart, Inc.*, Case No. 34-2012-00128539 (Sac. Sup. Ct.);
- 24 • *Thornton v. McConnell Jones Lanier & Murphy LLP*, Case No. No. 34-2017-00211553 (Sac.
25 Sup. Ct.);
- 26 • *Watson v. Quarter At A Time, LLC*, Case No. 34-2017-00217570 (Sac. Sup. Ct.); and
- 27 • *Willis v. Premier Pools, Incorporated*, Case No. 34-2017-00211710 (Sac. Sup. Ct.).
- 28

1 12. The preceding list does not include those cases where, for various reasons, the case was
2 filed as a class action and/or PAGA action, but did not maintain that status through the end of the case.

3 13. My partner, Galen T. Shimoda, Esq., worked with me on this matter and assisted with all
4 aspects of the litigation of this case. Mr. Shimoda and I are some of only a handful of plaintiff
5 attorneys located in Sacramento who handle wage and hour class actions. Mr. Shimoda attended and
6 graduated from the University of Utah in 2000 with a B.S. in Business Management and a B.A. in
7 Asian Studies, with a minor in Japanese language. He then attended and graduated from the University
8 of the Pacific, McGeorge School of Law and received his J.D. degree in 2003. He graduated from
9 McGeorge in the top 5% of his class and was a member of the Order of the Coif and Traynor Honor
10 Society. Since graduating from McGeorge, Mr. Shimoda has authored a number of employment law
11 articles for journals and our firm regularly publishes articles on our firm's website. Mr. Shimoda has
12 been a regular panel speaker for the CEB (Continuing Education of the Bar) Employment Review
13 seminars from 2014 to the present. His speaking engagements include the following: 1) Lorman
14 Military Leave Law Speaker; 2) Restaurant Association Speaker at Annual Seminar (Los Angeles); 3)
15 Federal Bar Association, Sacramento Chapter: 2015 Amendments to the Federal Rules of Civil
16 Procedure (Mar. 30, 2016); 4) CEB – Employment Law Practice: 2016 Year in Review (Jan. 20, 2017);
17 5) CEB – Employment Law Practice: 2015 Year in Review (Jan. 22, 2016); 6) CEB – Employment
18 Law Practice: Year in Review (2014) (Jan. 9, 2015); 7) CEB - Employment Law Practice: Year in
19 Review (2013) (Jan. 10, 2014); 8) Sacramento County Bar Association - Class Actions from the
20 Trenches: Real World Experiences from the Plaintiff and Defense Bar (Feb. 21, 2012); 9) Sacramento
21 Employer Advisory Council – Wage and Hour Workshop: Going Beyond the Exemption Discussion
22 (Apr. 7, 2016); 10) Sacramento Employer Advisory Council - Wage & Hour Panel and AB 1825
23 Training: Updates on California's New Wage Laws and Manager Compliance Training (Apr. 25,
24 2017); 11) Sacramento County Bar Association, Labor and Employment Section – PAGA
25 Representative Litigation: Emerging Trends and Issues (May 17, 2016); 12) Sacramento Business
26 Journal Panel – Overtime Rules (Jun. 23, 2016); 13) Association of Defense Counsel of Norther
27 California & Nevada - Employment Law Update – Do the Math: Calculation Exposure and Damages in
28 Wage and Hour Cases (Aug. 12, 2016); 14) California Employment Lawyers Association - PAGA

1 Today and PAGA Tomorrow: Moderate-Advanced Issues In PAGA Litigation (Oct. 20, 2017); 15)
2 California Employment Lawyers Association Advanced Wage and Hour Seminar – Better Know a
3 Venue Roundup (May 17, 2019). Mr. Shimoda has been AV rated by Martindale Hubbell since 2013,
4 was recognized as a Super Lawyer (Rising Star) from approximately 2009 to 2013 and was recognized
5 as a Super Lawyer from 2014 to present.

6 14. Mr. Shimoda has practiced law in California since being admitted to the State Bar in
7 2003, litigating wage and hour class actions and individual wage and hour litigation among other cases.
8 Mr. Shimoda began practicing class action law on the defense side at the firm of Orrick, Herrington &
9 Sutcliffe LLP. He then switched to plaintiff class action work in 2005. His class action experience is
10 in wage and hour law. Mr. Shimoda has litigated several class action cases in California State and
11 Federal Courts, including up to certification, settlement, preliminary and final approval, and
12 disbursement of monies, and has been found to be satisfy the adequacy requirements for class counsel.
13 Some of the class action and/or PAGA cases he is litigating and/or has litigated as lead or co-counsel
14 include, but are not limited to, the following:

- 15 • *Aanerud v. Neumann Ltd., et al.*, Case No. 34-2014-00169324 (Sac. Sup. Ct.);
- 16 • *Acosta v. Acosta Sales, LLC, et al.*, Case No. 2:11-CV-01796 (C.D. Cal.);
- 17 • *Atchley v. Blaggs Food Service, LLC*, 34-2017-0215930 (Sac. Sup. Ct.);
- 18 • *Adewumi v. GHS Interactive Security, LLC*, Case No. 34-2017-00210768 (Sac. Sup. Ct.);
- 19 • *Arnall v. North American Merchandising Service Inc.*, Case No. 06AS01439 (Sac. Sup. Ct.);
- 20 • *Arrington v. Capital Express Lines, Inc., et al.*, Case No. 34-2012-00134195 (Sac. Sup. Ct.);
- 21 • *Aslam v. Cypress Security, LLC*, Case No. 34-2017-00220143 (Sac. Sup. Ct.);
- 22 • *Aslam v. Surveillance, Security, Inc.*, Case No. 34-2017-00220142 (Sac. Sup. Ct.);
- 23 • *Azzolino v. Brake Masters of Sacramento, LLC, et al.*, Case No. 34-2017-00218293 (Sac. Sup.
24 Ct.);
- 25 • *Benak v. MDStat Urgent Care, Inc.*, No. 34-2015-00188181 (Sac. Sup. Ct.);
- 26 • *Blig v. Medical Management International, Inc.*, Case No. 34-2017-00213906 (Sac. Sup. Ct.);
- 27 • *Caguioa, et al. v. Fortune Senior Enterprises, et al.*, Case No. 34-2014-00171831 (Sac. Sup.
28 Ct.);

- 1 • *Camacho, et al. v. Z Street, Inc., d.b.a. Tower Café, et al.*, Case No. 34-2014-00163880 (Sac.
2 Sup. Ct.);
- 3 • *Carlos v. Abel Mendoza, Inc., et al.*, Case No. 34-2016-00195806 (Sac. Sup. Ct.);
- 4 • *Cannon v. Miller Event Management, Inc., et al.*, Case No. 34-2014-00168103 (Sac. Sup. Ct.);
- 5 • *Carr et al. v. CableCom, LLC*, Case No. 34-2017-00212739 (Sac. Sup. Ct.);
- 6 • *Chace v. Daisy Holdings, LLC, dba Pine Creek Care Center, et al.*, Case No. 34-2017-00209613
7 (Sac. Sup. Ct.);
- 8 • *Clamens-Hollenback v. Atterro, Inc.*, Case No. 17-CV-305535 (Santa Clara Sup. Ct.);
- 9 • *Colbert v. American Home Craft Inc.*, Case No. 05AS05012 (Sac. Sup. Ct.);
- 10 • *De Arcos v. Amware Pallet Services, LLC*, Case No. CV-17-629 (Yolo Sup. Ct.);
- 11 • *Diosdado v. Nor-Cal Venture Group, Inc., et al.*, Case No. STK-CV-UOE-2020-0008242 (San
12 Joaquin Sup. Ct.);
- 13 • *Dugue v. Sierra Forever Families, et al.*, Case No. 34-2017-00210770 (Sac. Sup. Ct.);
- 14 • *Fadhl v. Siemens Healthcare Diagnostics, Inc., et al.*, Case No. 34-2017-00209518 (Sac. Sup.
15 Ct.);
- 16 • *Fujimoto v. Nabe-Ya, Inc., et al.*, Case No. 20CV01255 (Butte Sup. Ct.);
- 17 • *Garcia v. A-L Financial Corp.*, Case No. 34-2014-00171831 (Sac. Sup. Ct.);
- 18 • *Gerard v. Les Schwab Tires Center of California, Inc.*, Case No. 34-2007-30000003 (Sac. Sup.
19 Ct.);
- 20 • *Gomez v. Mayflower Farms Incorporated, et al.*, Case No. CV24157 (Colusa Sup. Ct.);
- 21 • *Gilliam v. Matrix Energy Services, Inc.* Case No. RG 11592345 (Alameda Sup. Court);
- 22 • *Hartwell v. Techforce Telecom, Inc.*, Case No. 39-2014-00307197 (San Joaquin Sup. Ct.);
- 23 • *Hernandez et al. v. MP Nexlevel, LLC et al*, Case No. 3 :16-cv-03015-JCS (N.D. Cal.);
- 24 • *Hernandez v. Snyir, Inc.*, Case No. 34-2017-00207641 (Sac Sup. Ct.);
- 25 • *Heinz v. Wright Tree Services*, Case No. 34-2012-00131949 (Sac. Sup. Ct.);
- 26 • *Hoover v. Mom365*, Case No. 2:17-cv-01328-TLN-CKD (E.D. Cal.);
- 27 • *James v. Language World Services, Inc., et al.*, Case No. 34-2020-00279929 (Sac. Sup. Ct.);
- 28 • *Josol v. Dial Medical Corp.*, Case No. 34-2008-00010040 (Sac. Sup. Ct.);

- 1 • *Koretsky v. Furniture USA, Inc.*, Case No. 34-2014-00172142 (Sac. Sup. Ct.);
- 2 • *Muhieddine v. KBA Docusys, Inc.*, Case No. 34-2014-00164720 (Sac. Sup. Ct.);
- 3 • *Massey v. V3 Electric, Inc., et al.*, Case No. 34-2019-00263666 (Sac. Sup. Ct.);
- 4 • *Miller v. Caldwell Transportation Company, LLC, et al.*, Case No. 34-2018-00234954 (Sac. Sup.
- 5 Ct.);
- 6 • *Miller v. Leaders in Community Alternatives*, Case No. FCSO47249 (Solano Sup. Ct.);
- 7 • *Pickens v. Elica Health Centers*, Case No. 34-2016-00200382 (Sac. Sup. Ct.);
- 8 • *Prasad v. D. G. Smith Enterprises, Inc.*, Case No. 34-2017-00215046 (Sac. Sup. Ct.);
- 9 • *Ralston v. JMJ Incorporated, Inc. et al.*, Case No. 34-2017-00217047 (Sac. Sup. Ct.);
- 10 • *Rickwalt v. Direct Reconditioning, LLC, et al.*, Case No. 34-2015-00175642 (Sac. Sup. Ct.);
- 11 • *Robinson v. West of Chicago Restaurants, Inc., dba Chicago Fire*, Case No. 34-2010-00082201
- 12 (Sac Sup. Ct.);
- 13 • *Rogers v. Les Scwhab Tires Center of California, Inc.*, Case No. 34-2009-00066320 (Sac. Sup.
- 14 Ct.);
- 15 • *Schechter et al. v. Isys Solutions, Inc.*, Case No. RG10550517 (Alameda Sup. Ct.);
- 16 • *Smith v. Greyhound Lines, Inc.*, Case No. 34-2017-00219188 (Sac. Sup. Ct.);
- 17 • *Talent v. Leslie's Poolmart, Inc.*, Case No. 34-2012-00128539 (Sac. Sup. Ct.);
- 18 • *Thornton v. McConnell Jones Lanier & Murphy LLP*, Case No. No. 34-2017-00211553 (Sac.
- 19 Sup. Ct.);
- 20 • *Valencia v. Lowbrau Bier Garten, LLC, et al.*, Case No. 34-2019-00258038 (Sac Sup. Ct.);
- 21 • *Watson v. Quarter At A Time, LLC*, Case No. 34-2017-00217570 (Sac. Sup. Ct.);
- 22 • *Williams v. Civic Development Group*, Case No. 06AS00267 (Sac. Sup. Ct.); and
- 23 • *Willis v. Premier Pools, Incorporated*, Case No. 34-2017-00211710 (Sac. Sup. Ct.).

24 15. The preceding list of cases does not include those where, for a variety of reasons, the
25 case was initially filed as a class and/or PAGA action, but did not maintain that status through the end
26 of the case.

27 16. My former senior associate, Brittany V. Berzin, Esq., also worked with me on this
28 matter and was critical in assisting with all aspects of the litigation of this case. Ms. Berzin attended

1 and graduated college from U.C. Davis, receiving a Bachelor of Arts in Psychology. She received her
2 J.D. from the University of the Pacific McGeorge School of Law. She joined Shimoda & Rodriguez
3 Law, PC as a law clerk in February 2015 where she gained civil litigation experience working on
4 individual, class action and PAGA employment cases throughout law school. She also participated in
5 an employment law clinic in 2015 and 2016 that helped low-income workers by providing free legal
6 consultations, advising employees of their legal remedies on a variety of matters (*e.g.*, wage and hour,
7 discrimination/harassment, California leave laws, unemployment, workers' compensation, retaliation,
8 and wrongful termination, etc.) under the supervision of an attorney, preparing wage claims, and
9 providing representation in wage claims before the California Labor Commissioner. From 2016-2017,
10 she completed an externship at the Federal Public Defenders Office as a Certified Law Student where
11 she obtained discovery, completed legal research, drafted motions, negotiated plea deals, represented
12 clients in a variety of hearings (*e.g.*, arraignments, motion hearings, sentencing hearings, etc.), and
13 defended a client against five misdemeanor charges in a jury trial in the United States District Court for
14 The Eastern District of California. Ms. Berzin was also a member of the nationally recognized
15 McGeorge Mock Trial Team and went on to coach a high school Mock Trial team in 2018 after
16 graduating from law school. In May 2017, she graduated from the University of the Pacific, McGeorge
17 School of Law with Great Distinction and was inducted into the Order of the Coif, graduating in the top
18 10% of her class. Ms. Berzin received the Witkin Award for Academic Excellence in Legal Research
19 and Writing, Civil Procedure, Bankruptcy, and Criminal Procedure. From 2020 to 2024, she has been
20 recognized as a Super Lawyer (Rising Star). Ms. Berzin has been a member of the executive
21 committee of the Sacramento County Bar Association Labor & Employment Section since January
22 2020, serving as Co-Chair of the committee in 2021. She has over seven years of experience working
23 on civil litigation in employment law matters. Most of that experience has been specific to analyzing
24 and litigating wage and hour claims. As an associate, Ms. Berzin has worked on a variety of individual,
25 class action, and PAGA cases involving wage and hour claims, such as failure to pay overtime, failure
26 to pay minimum wages, failure to provide meal and rest periods, failure to pay reimbursement
27 expenses, unlawful deductions, failure to keep accurate time records, failure to provide paid sick leave,
28 failure to pay all wages upon separation, unfair competition, breach of contract, independent contractor

1 misclassification, and salaried misclassifications. Some of the class action and/or PAGA cases she
2 worked on with our firm include the following:

- 3 • *Arosemena v. Ranchhodrai, Inc., et al.*, Case No. STK-CV-UOE-2019-15963 (San Joaquin Sup.
4 Ct.);
- 5 • *Balli v. Brown Box Investments, Inc., et al.*, Case No. 34-2018-00232656 (Sac. Sup. Ct.);
- 6 • *Barkhousen, et al. v. Bank of Stockton*, Case No. STK-CV-UOE-2019-17145 (San Joaquin Sup.
7 Ct.);
- 8 • *Barrios v. American Property Management, Inc.*, Case No. 1:18-cv-00352-AWI-SKO (E.D.
9 Cal.);
- 10 • *Blair v. Clark Wagaman Designs*, Case No. 34-2021-00313156 (Sac. Sup. Ct.);
- 11 • *Callahan v. Creative Alternatives, Inc., et al.*, Case No. 2027518 (Stanislaus Sup. Ct.);
- 12 • *Collazo v. T.O.P. Marketing Group, Inc.*, Case No. 34-2022-00314092 (Sac. Sup. Ct.);
- 13 • *Cristobal v. BAT Residential Services, Inc.*, Case No. FCS056331 (Solano Sup. Ct.);
- 14 • *Coronado v. MGD, Inc.*, Case No. STK-CV-UOE-2021-893 (San Joaquin Sup. Ct.);
- 15 • *Estrada v. MAD Security Services, Inc.*, Case No. 34-2021-00300627 (Sac. Sup. Ct.);
- 16 • *Ferreyra v. Point Digital Finance, Inc., et al.*, Case No. 20CV373776 (Santa Clara Sup. Ct.);
- 17 • *Finance of America Wage And Hour Cases*, Case No. JCCP 5081 (Orange County Sup. Ct.);
- 18 • *Gomez, et al. v. Kleary Masonry, Inc.*, Case No. 34-2020-00278067 (Sac. Sup. Ct.);
- 19 • *Gonzalez v. Northcentral Pizza, LLC, et al.*, Case No. 34-2019-00252018 (Sac. Sup. Ct.);
- 20 • *Gordon, et al. v. Hospice Source, LLC*, Case No. 34-2019-00250022 (Sac. Sup. Ct.);
- 21 • *Green v. Warden Security Associates, Inc.*, Case No. 22CV396140 (Santa Clara Sup. Ct.);
- 22 • *Hampton v. Unlimited Security Specialists, Inc.*, Case No. CV2021-2130 (Yolo Sup. Ct.);
- 23 • *Hercules, et al. v. Maximus Services, LLC*, Case No. 34-2019-00268385 (Sac. Sup. Ct.);
- 24 • *Kurtz v. Perimeter Security Group, LLC, et al.*, Case No. CU19-083650 (Nevada Sup. Ct.);
- 25 • *Leong-Call v. MRB Foods, Inc.*, Case No. 34-2020-00287486 (Sac. Sup. Ct.);
- 26 • *Magat v. Medical Care Professionals, Inc., et al.*, Case No. SCV0042579 (Placer Sup. Ct.);
- 27 • *Mayorga v. Brown Strauss, Inc.*, Case No. STK-CV-UOE-2020-0010906 (San Joaquin Sup.
28 Ct.);

- 1 • *McGhee v. Salute Incorporated*, Case No. 34-2022-00315317 (Sac Sup. Ct.);
- 2 • *Meals v. Grass Valley Extended Care, Inc., et al.*, Case No. CU19-083606 (Nevada Sup. Ct.);
- 3 • *Munoz v. Wilmor And Sons Plumbing And Construction*, Case No. 34-2021-00306609 (Sac.
- 4 Sup. Ct.);
- 5 • *Neufield v. Professional Transportation, Inc.*, Case No. 34-2021-00309849 (Sac. Sup. Ct.);
- 6 • *Ruiz v. CTE Cal, Inc.*, Case No. 34-2020-00289168 (Sac. Sup. Ct.);
- 7 • *Saavedra, et al. v. SMF Global, Inc.*, Case No. 34-2018-00243363 (Sac. Sup. Ct.);
- 8 • *Scarano v. J.R. Putman, Inc., et al.*, Case No. 34-2018-00244753 (Sac. Sup. Ct.);
- 9 • *Scoggins, et al. v. Energy Star Construction, Inc.*, Case No. 34-2018-00243048 (Sac. Sup. Ct.);
- 10 • *Strawn v. Bridgestone Retail Operations, LLC*, Case No. 34-2018-00242049 (Sac. Sup. Ct.);
- 11 • *Sullivan v. National Response Corporation*, Case No. 34-2018-00244757 (Sac. Sup. Ct.);
- 12 • *Tracy v. Von Housen's Sacramento, Inc.*, Case No. 34-2020-00282778 (Sac. Sup. Ct.);
- 13 • *Uribe v. Ecoguard Pest Management, Inc.*, Case No. 34-2021-00300650 (Sac. Sup. Ct.);
- 14 • *Vasquez v. Chriswell Home Improvements, Inc.*, Case No. 34-2021-00305938 (Sac. Sup. Ct.);
- 15 • *Villarruel, et al. v. General Produce Company, et al.*, Case No. 34-2021-00311463 (Sac. Sup.
- 16 Ct.);
- 17 • *Walker v. Yan Kalika Dental Corporation*, Case No. 34-2021-00305106 (Sac. Sup. Ct.); and
- 18 • *Webb v. Professional Healthcare At Home, LLC*, Case No. FCS055317 (Solano Sup. Ct.).

19 17. My associate, Renald Konini, Esq., also worked with me on this case. In May 2011, Mr.
20 Konini graduated from Seton Hall University School of Law. Prior to moving to California, he
21 practiced law in New Jersey. While working for my firm, Mr. Konini has worked on a variety of
22 individual and class action cases, including those involving wage and hour claims, Private Attorney
23 General Act claims, wrongful termination claims, discrimination claims, retaliation claims, and
24 harassment claims. Mr. Konini passed the July 2016 California Bar Examination and started practicing
25 as an associate at my firm from approximately April 2019 to February 2021 and rejoined my firm in
26 September 2022. Mr. Konini has worked on written discovery and depositions, calculating class-wide
27 damages, communicating with class representatives, drafting briefs and motions, and more. Mr. Konini
28 worked on other class and/or PAGA wage and hour actions that my firm has filed, namely *Bertelli v.*

1 *Air Products and Chemicals, Inc.*, Case No. 34-2018-00236898 (Sac. Sup. Ct.), *Carr v. Howroyd-*
2 *Wright Employment Agency, Inc.*, Case No. 34-2018-00228290 (Sac. Sup. Ct.), *Gomez v. Vander*
3 *Schaaf Dairy, et al.*, Case No. STK-CV-UOE-2020-0003954 (San Joaquin Sup. Ct.), *Haggins v. Kelly*
4 *Services, Inc.*, Case No. 34-2017-00220473 (Sac. Sup. Ct.), *Hussaini v. Integrated Resources, Inc.*, et
5 al, Case No. 34-2021-00297152 (Sac. Sup. Ct.), *Kee, et al. v. Dr. Jeffrey A. Saladin, Dental*
6 *Corporation (D/B/A Children's Choice Pediatric Dental Care), et al.*, Case No. 34-2020-00290072
7 (Sac. Sup. Ct.), *Lear v. Raxium, Inc.*, Case No. 21CV004358 (Alameda Sup. Ct.), *Serrano v. Cool*
8 *Time, LLC*, Case No. 34-2021-00312356 (Sac. Sup. Ct.), *Grebe v. Mary Ann's Baking Co., Inc.*, Case
9 No. 34-2020-00285254-CU-OE-GDS (Sac. Sup. Ct.), *Fujimoto v. Nabe-Ya, Inc., et al.*, Case No.
10 20CV01255 (Butte Sup. Ct.), *Massey v. V3 Electric, Inc., et al.*, Case No. 34-2019-00263666 (Sac.
11 Sup. Ct.), *Miller v. Caldwell Transportation Company, LLC, et al.*, Case No. 34-2018-00234954 (Sac.
12 Sup. Ct.), *Pek, et al v. Varris Management, Inc.*, Case No. STK-CV-UOE-2020-3954 (San Joaquin Sup.
13 Ct.), *Valencia v. Lowbrau Bier Garten, LLC, et al.*, Case No. 34-2019-00258038 (Sac Sup. Ct). Mr.
14 Konini's practice largely revolves around wage and hour matters, including PAGA claims.

15 18. I believe the request for attorney's fees in the amount of 35% of the Gross Settlement
16 Amounts is reasonable and appropriate whether based on the common fund method or lodestar method
17 of fee calculation. The common fund doctrine is applicable pursuant to *Laffitte v. Robert Half*
18 *Internat., Inc.*, 1 Cal. 5th 480 (2016) and *Paul, Johnson, Alston & Hunt v. Gaulty*, 886 F.2d 268, 271
19 (9th Cir. 1989). Plaintiff and our firm have been able to secure an identifiable benefit on behalf of the
20 class and equity counsels that the cost of the representation should be born equally amongst all class
21 members receiving these benefits. I have reviewed fee arrangements and Court ordered fee awards in
22 similar class cases and I believe that the thirty-five percent (35%) fee request is within the accepted
23 ranges and eminently reasonable in light of the results obtained for Class Members and the amount of
24 work that has been required in securing this benefit. In my experience with contingency cases in
25 employment law cases, the typical percentage negotiated between parties ranges from thirty-five to
26 forty percent (35% to 40%) in individual litigation. In class action litigation, my experience in my own
27 firm and working with several other firms has been that the typical percentage negotiated between
28 parties and approved by a court typically ranges from thirty to forty percent (30% to 40%). I have also

1 reviewed several recent Federal District Court Cases where the Court has approved common fund
 2 based fee requests, including those cited in the Motion. I believe our request of thirty-five percent
 3 (35%) for attorneys' fees is justified given the results obtained on behalf of the class.

4 19. I believe a lodestar analysis also supports finding a 35% fee award is appropriate in this
 5 case. I have reviewed the firm's billing records, Exhibit A to this declaration, with Mr. Shimoda and
 6 Mr. Konini and have created a summary showing the task categories and hours worked by each billing
 7 attorney in each category. Ms. Berzin was no longer with our firm at the time this Motion was filed, so
 8 I was not able to review with her. However, I have separately reviewed her billing entries, which are
 9 also included in the summary chart. I, as well as all other individuals billing their time in the firm, use
 10 our firm's billing software, which tracks the entries by day and time. Our billing software also records
 11 time in 1/10 of an hour increments. I recorded the tasks I performed on primarily a daily basis
 12 contemporaneously with the work performed. On few occasions, the time worked would be reported a
 13 day or two after the work was completed because the work occurred while I was out of the office
 14 attending deposition, hearing, or other similar tasks. Our billing software also enables the use of a
 15 start/stop timer that can be used to more accurately record how long a particular task takes. Everyone
 16 billing time in our firm is given instruction on how to utilize the software and instructed to record their
 17 time in a similar manner as described herein. A summary of the entries in Exhibit A by timekeeper is
 18 as follows:

| <u>Timekeeper</u> | <u>Hours</u> | <u>Lodestar</u> |
|--------------------------|---------------------|------------------------|
| Galen T. Shimoda | 109.5 | \$79,387.50 |
| Justin P. Rodriguez | 397.2 | \$246,330 |
| Renald Konini | 15.3 | \$6,502.50 |
| Brittany Berzin | 152.3 | \$64,727.50 |
| TOTAL: | 674.3 | \$396,947.50 |

26 20. I have been actively involved in this litigation, through pre-filing and post-filing factual
 27 investigation and legal research, the preparation and review of pleadings, motions, and settlement
 28 administration documents. This included, but was not limited to, meeting and interviewing our client,

1 drafting pleadings, administrative notices, motions, settlement documents, and other documents,
2 researching complex legal issues relating to class certification, PAGA manageability issues, the merits,
3 and damages, reviewing and cross comparing primary source documents for damages and
4 predominance analysis, and overseeing settlement administration. I have reviewed the billing entries
5 and have deleted and/or reduced any of entries for my time or my staff's time that I felt was duplicative
6 or did not add value to the case. Where possible, I also delegated tasks to individuals billing at lower
7 rates to achieve more efficient results.

8 21. I believe the requested rates are within the prevailing market rates for Sacramento
9 County and elsewhere. We have approximately 7 years, 8 years, 12 years, and 20 years of experience,
10 respectively, litigating complex wage and hour class and PAGA actions. In fact, the Sacramento
11 County Superior Court approved Mr. Shimoda, Ms. Berzin, and I at these rates in November 2022. *See*
12 *Strawn v. Bridgestone Retail Operations, LLC*, Case No. 34-2018-00242049 (Sac. Sup. Ct.). Mr.
13 Konini was approved at his requested rate in connection with a wage and hour class action in
14 Sacramento County Superior Court in January 2023. *See Kee, et al. v. Dr. Jeffrey A. Saladin, Dental*
15 *Corporation (D/B/A Children's Choice Pediatric Dental Care), et al.*, Case No. 34-2020-00290072.
16 Given that these judicially approved rates are in the same county where the case is pending, they should
17 be deemed reasonable for this case. Furthermore, awarding fees at the hourly rate in effect at the time
18 of the fee request is an appropriate and judicially approved method. *See Missouri v. Jenkins by Agyei*,
19 491 U.S. 274, 283 (1989). For the foregoing reasons, I believe the request of \$103,250.00 (35%) for
20 attorneys' fees is justified given the results obtained on behalf of the class.

21 22. As part of the class notice process, Class Members were given the option to submit any
22 objections to either the Court or Settlement Administrator. To date, we have received no notice, from
23 the Settlement Administrator or from the Court filings or otherwise, of any objection to the submitted
24 settlement in any respect. We have not received any notice from State Attorneys General or the U.S.
25 Attorney General about them having any objection to the settlement either.

26 23. Although the final Settlement Administrator Costs are higher than what was originally
27 anticipated and presented as part of the preliminary approval motion, this is due to the fact that the
28 original bid did not include the cost of a static website nor costs for any skip tracing that would occur

1 during the notice period. The bid specifically stated that the amount charged for postage would be at
2 the rates in effect at the time of mailing, which accounts for the added costs. While the total of the
3 added costs exceed \$750, CPT Group, Inc. only increased the fee by \$750. The \$13,500 is still well
4 under the \$20,000 originally allocated and disclosed to Class Members as potential Settlement
5 Administrator Costs.

6 I declare under penalty of perjury under the laws of the State of California and the United States
7 that the foregoing is true and correct. Executed this 9th day of May, 2024 in Sacramento, California.

8
9 /s/ Justin P. Rodriguez

10 Justin P. Rodriguez
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EXHIBIT A

| Date | Attorney | Description | Duration | Rate | Amount |
|------------|--------------|--|----------|------|------------|
| 8/3/2018 | G. Shimoda | Review of client wage statements and other case documents | 1.3 | 725 | \$942.50 |
| 8/8/2018 | G. Shimoda | Review email from client with all facts | 0.6 | 725 | \$435.00 |
| 8/27/2018 | G. Shimoda | Review of personnel file and other documents. | 3.5 | 725 | \$2,537.50 |
| 8/27/2018 | J. Rodriguez | Emails regarding client records; review client records | 0.5 | 625 | \$312.50 |
| 8/28/2018 | J. Rodriguez | Initial review of personnel request response by Deft. | 0.2 | 625 | \$125.00 |
| 8/31/2018 | J. Rodriguez | Review spreadsheets regarding client time/pay records and review RROP calculations; Research RROP issues | 3.8 | 625 | \$2,375.00 |
| 9/4/2018 | G. Shimoda | Review of spreadsheets & causes of action per personnel file info | 1.2 | 725 | \$870.00 |
| 9/20/2018 | G. Shimoda | Consultation with client | 1.5 | 725 | \$1,087.50 |
| 9/20/2018 | J. Rodriguez | Consultation with client | 1.5 | 625 | \$937.50 |
| 9/25/2018 | J. Rodriguez | Review file/documents & intake/consultation notes; Research regarding claims; Search for pre-filed cases | 5.8 | 625 | \$3,625.00 |
| 9/27/2018 | J. Rodriguez | Review public records act request forms; Speak with staff | 0.2 | 625 | \$125.00 |
| 9/28/2018 | G. Shimoda | Partner Case Status meeting; Discuss POA and upcoming deadlines; Forecast case priorities | 0.1 | 725 | \$72.50 |
| 9/28/2018 | J. Rodriguez | Emails with client regarding firm discovery and process | 0.2 | 625 | \$125.00 |
| 9/28/2018 | J. Rodriguez | Review documents/file; Speak with client; Draft/Revise PAGA letter & Complaint | 6.8 | 625 | \$4,250.00 |
| 10/1/2018 | J. Rodriguez | Email with client regarding facts | 0.1 | 625 | \$62.50 |
| 10/1/2018 | J. Rodriguez | Emails with client regarding firm discovery | 0.2 | 625 | \$125.00 |
| 10/2/2018 | J. Rodriguez | Emails with client regarding facts | 0.2 | 625 | \$125.00 |
| 10/2/2018 | J. Rodriguez | Review updates to Public Records Act request form; Speak with staff; Email regarding PRA submission | 0.2 | 625 | \$125.00 |
| 10/3/2018 | J. Rodriguez | Speak to client regarding status and PAGA/Complaint facts for filing | 0.3 | 625 | \$187.50 |
| 10/4/2018 | J. Rodriguez | Review court filing service package | 0.1 | 625 | \$62.50 |
| 10/4/2018 | J. Rodriguez | Review/Revise draft complaint | 2.1 | 625 | \$1,312.50 |
| 10/5/2018 | G. Shimoda | Partner Case Status meeting; Discuss POA and upcoming deadlines; Forecast case priorities | 0.1 | 725 | \$72.50 |
| 10/5/2018 | J. Rodriguez | Review PAGA letter submission filings with staff | 0.8 | 625 | \$500.00 |
| 10/11/2018 | J. Rodriguez | Review client payroll records; Speak with staff regarding spreadsheeting client payroll records | 0.6 | 625 | \$375.00 |
| 10/12/2018 | G. Shimoda | Partner Case Status meeting; Discuss POA and upcoming deadlines; Forecast case priorities | 0.2 | 725 | \$145.00 |
| 10/15/2018 | J. Rodriguez | Emails with client regarding filing complaint | 0.2 | 625 | \$125.00 |
| 10/15/2018 | J. Rodriguez | Review letter to client regarding status | 0.1 | 625 | \$62.50 |
| 10/17/2018 | G. Shimoda | Review of Complaint, oversee filing process. | 3.2 | 725 | \$2,320.00 |
| 10/17/2018 | J. Rodriguez | Emails regarding filing confirmation and proof of service of summons | 0.2 | 625 | \$125.00 |
| 10/19/2018 | G. Shimoda | Partner Case Status meeting; Discuss POA and upcoming deadlines; Forecast case priorities | 0.1 | 725 | \$72.50 |
| 10/19/2018 | G. Shimoda | Emails to client with filed Complaint | 0.5 | 725 | \$362.50 |
| 10/26/2018 | G. Shimoda | Partner Case Status meeting; Discuss POA and upcoming deadlines; Forecast case priorities | 0.2 | 725 | \$145.00 |
| 11/2/2018 | G. Shimoda | Partner Case Status meeting; Discuss POA and upcoming deadlines; Forecast case priorities | 0.1 | 725 | \$72.50 |
| 11/5/2018 | J. Rodriguez | Email regarding PRA response | 0.1 | 625 | \$62.50 |
| 11/8/2018 | G. Shimoda | Review draft discovery requests; discuss POA. | 0.5 | 725 | \$362.50 |
| 11/8/2018 | G. Shimoda | Review of email to client re PAGA complaint facts; review client questionnaire responses from client; review call notes with client regarding witnesses. | 2.1 | 725 | \$1,522.50 |
| 11/9/2018 | G. Shimoda | Partner Case Status meeting; Discuss POA and upcoming deadlines; Forecast case priorities | 0.1 | 725 | \$72.50 |
| 11/14/2018 | G. Shimoda | Review Answer to complaint; Research re asserted Defenses; Email to staff regarding processing. | 1.5 | 725 | \$1,087.50 |
| 11/15/2018 | J. Rodriguez | Draft/Revise discovery requests | 2.7 | 625 | \$1,687.50 |
| 11/16/2018 | G. Shimoda | Partner Case Status meeting; Discuss POA and upcoming deadlines; Forecast case priorities | 0.3 | 725 | \$217.50 |
| 11/19/2018 | G. Shimoda | Reveipt and review of Court's Initial Pretrial Scheduling Order | 0.5 | 725 | \$362.50 |
| 11/19/2018 | J. Rodriguez | Review Deft Answer to complaint & Scheduling Order | 0.8 | 625 | \$500.00 |
| 11/26/2018 | J. Rodriguez | Review notice of removal and associated fed court filings | 1.2 | 625 | \$750.00 |
| 11/29/2018 | G. Shimoda | Review notes regarding call with opposing counsel regarding Motion to Remand, deadline for joint statement. | 0.4 | 725 | \$290.00 |
| 11/29/2018 | J. Rodriguez | Call regarding joint statement and remand motion; speak with G. Shimoda | 0.6 | 625 | \$375.00 |
| 12/4/2018 | J. Rodriguez | Research/Review issues related to motion to remand; Draft motion to remand | 7.4 | 625 | \$4,625.00 |
| 12/4/2018 | J. Rodriguez | Review correspondence with DLSE regarding PRA request | 0.1 | 625 | \$62.50 |
| 12/6/2018 | G. Shimoda | Review Remand research, discuss POA. | 2.3 | 725 | \$1,667.50 |

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| 12/6/2018 | J. Rodriguez | Research re motion to remand | 0.6 | 625 | \$375.00 |
| 12/7/2018 | G. Shimoda | Partner Case Status meeting; Discuss POA and upcoming deadlines; Forecast case priorities | 0.2 | 725 | \$145.00 |
| 12/7/2018 | J. Rodriguez | Email regarding PRA response | 0.1 | 625 | \$62.50 |
| 12/11/2018 | J. Rodriguez | Revise/Finalize motion to remand drafts | 1.6 | 625 | \$1,000.00 |
| 12/13/2018 | J. Rodriguez | Review final remand motion filing package | 0.3 | 625 | \$187.50 |
| 12/14/2018 | G. Shimoda | Work on scheduling order | 1.5 | 725 | \$1,087.50 |
| 12/17/2018 | G. Shimoda | Review DLSE response to PRA Request. | 0.3 | 725 | \$217.50 |
| 12/17/2018 | J. Rodriguez | Draft/revise joint statement regarding vacating scheduling order; emails with opposing counsel; call with Client regarding status | 0.6 | 625 | \$375.00 |
| 12/21/2018 | G. Shimoda | Partner Case Status meeting; Discuss POA and upcoming deadlines; Forecast case priorities | 0.1 | 725 | \$72.50 |
| 1/2/2019 | G. Shimoda | Request PRA be opened; Emails to DLSE. | 0.8 | 725 | \$580.00 |
| 1/2/2019 | G. Shimoda | Review email exchange and Proposed draft Motion to remand per Clerk's direction, edits; Email exchange with opposing counsel regarding vacating scheduling order | 2 | 725 | \$1,450.00 |
| 1/3/2019 | G. Shimoda | Review notes regarding call with opposing counsel regarding extension for remand hearing, tolling issue regarding PAGA, discuss POA. | 0.8 | 725 | \$580.00 |
| 1/3/2019 | J. Rodriguez | Call with opposing counsel | 0.3 | 625 | \$187.50 |
| 1/3/2019 | J. Rodriguez | Call with client regarding status | 0.2 | 625 | \$125.00 |
| 1/4/2019 | G. Shimoda | Review notes regarding call with opposing counsel regarding moving remand, requested Mediation, discuss POA. | 0.6 | 725 | \$435.00 |
| 1/4/2019 | J. Rodriguez | Call with opposing counsel regarding remand hearing; call with client regarding status update | 0.6 | 625 | \$375.00 |
| 1/7/2019 | J. Rodriguez | Email with opposing counsel regarding remand hearing | 0.1 | 625 | \$62.50 |
| 1/7/2019 | J. Rodriguez | Emails with opposing counsel; Draft/finalize stipulation to continue hearing | 0.4 | 625 | \$250.00 |
| 1/7/2019 | J. Rodriguez | Review/revise stipulation to continue remand hearing | 0.4 | 625 | \$250.00 |
| 1/7/2019 | J. Rodriguez | Review opposing counsel edits and get ready for filing. | 0.9 | 625 | \$562.50 |
| 1/8/2019 | G. Shimoda | Review notes regarding call with Client | 0.1 | 725 | \$72.50 |
| 1/8/2019 | J. Rodriguez | Call with client regarding status update and discovery questionnaire | 0.3 | 625 | \$187.50 |
| 1/11/2019 | G. Shimoda | Partner Case Status meeting; Discuss POA and upcoming deadlines; Forecast case priorities | 0.1 | 725 | \$72.50 |
| 1/18/2019 | G. Shimoda | Partner Case Status meeting; Discuss POA and upcoming deadlines; Forecast case priorities | 0.1 | 725 | \$72.50 |
| 1/21/2019 | G. Shimoda | Review TR for Status Conference. | 0.1 | 725 | \$72.50 |
| 1/22/2019 | G. Shimoda | Discuss firm discovery process with client, discuss POA. | 0.5 | 725 | \$362.50 |
| 1/22/2019 | J. Rodriguez | Review client responses to firm discovery | 0.4 | 625 | \$250.00 |
| 1/25/2019 | G. Shimoda | Partner Case Status meeting; Discuss POA and upcoming deadlines; Forecast case priorities | 0.1 | 725 | \$72.50 |
| 1/25/2019 | G. Shimoda | Review notes regarding call with opposing counsel regarding individual settlement, pushing remand; Speak with J. Rodriguez. | 0.3 | 725 | \$217.50 |
| 1/25/2019 | J. Rodriguez | Call with opposing counsel regarding ADR and options; Call with client regarding status update | 0.5 | 625 | \$312.50 |
| 1/31/2019 | J. Rodriguez | Review correspondence with DLSE regarding PRA request payment | 0.2 | 625 | \$125.00 |
| 1/31/2019 | J. Rodriguez | Review opposition/draft reply brief | 4.6 | 625 | \$2,875.00 |
| 2/1/2019 | B. Berzin | Review client's firm discovery responses | 0.3 | 425 | \$127.50 |
| 2/1/2019 | G. Shimoda | Partner Case Status meeting; Discuss POA and upcoming deadlines; Forecast case priorities | 0.1 | 725 | \$72.50 |
| 2/1/2019 | J. Rodriguez | Review Sac Superior notice and order regarding complex case determination | 0.1 | 625 | \$62.50 |
| 2/4/2019 | B. Berzin | Review JR call notes with opposing counsel regarding tolling | 0.1 | 425 | \$42.50 |
| 2/4/2019 | G. Shimoda | Review notes regarding call with opposing counsel regarding waiving arguments on remand, tolling agreement, possible mediation; Speak with J. Rodriguez | 0.3 | 725 | \$217.50 |
| 2/4/2019 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.1 | 625 | \$62.50 |
| 2/4/2019 | J. Rodriguez | Call with opposing counsel regarding tolling, PAGA claims, potential mediation | 0.4 | 625 | \$250.00 |
| 2/4/2019 | J. Rodriguez | Review Sac Superior minute order regarding case assignment; Emails to opposing counsel | 0.2 | 625 | \$125.00 |
| 2/7/2019 | B. Berzin | Review JR call notes with opposing counsel regarding tolling | 0.1 | 425 | \$42.50 |
| 2/7/2019 | G. Shimoda | Review notes regarding call with opposing counsel regarding PAGA & Answer extension; Speak with J. Rodriguez. | 0.4 | 725 | \$290.00 |
| 2/7/2019 | J. Rodriguez | Call with opposing counsel regarding tolling and PAGA claims | 0.2 | 625 | \$125.00 |
| 2/8/2019 | B. Berzin | Review JR call notes with opposing counsel regarding tolling | 0.1 | 425 | \$42.50 |
| 2/8/2019 | G. Shimoda | Partner Case Status meeting; Discuss POA and upcoming deadlines; Forecast case priorities | 0.1 | 725 | \$72.50 |
| 2/8/2019 | J. Rodriguez | Call with opposing counsel regarding tolling and PAGA claims | 0.1 | 625 | \$62.50 |

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| 2/11/2019 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.1 | 625 | \$62.50 |
| 2/11/2019 | J. Rodriguez | Emails with opposing counsel regarding tolling & PAGA claims | 0.3 | 625 | \$187.50 |
| 2/12/2019 | J. Rodriguez | Review tolling agreement/edit; Email opposing counsel | 0.5 | 625 | \$312.50 |
| 2/13/2019 | B. Berzin | Review call notes with opposing counsel regarding stipulation and mediation | 0.1 | 425 | \$42.50 |
| 2/13/2019 | G. Shimoda | Review notes regarding call with opposing counsel regarding stipulation, mediation possibility. | 0.1 | 725 | \$72.50 |
| 2/13/2019 | J. Rodriguez | Call with opposing counsel regarding tolling and PAGA claims and ADR | 0.3 | 625 | \$187.50 |
| 2/14/2019 | B. Berzin | Review call notes with opposing counsel regarding mediation | 0.1 | 425 | \$42.50 |
| 2/14/2019 | G. Shimoda | Review notes regarding call with opposing counsel regarding mediation. | 0.3 | 725 | \$217.50 |
| 2/14/2019 | J. Rodriguez | Call with opposing counsel regarding ADR | 0.5 | 625 | \$312.50 |
| 2/14/2019 | J. Rodriguez | Research regarding Deft's Business Structure as management company & scope of class issues - site vs. statewide | 2.7 | 625 | \$1,687.50 |
| 2/15/2019 | B. Berzin | Review call notes with opposing counsel regarding tolling | 0.1 | 425 | \$42.50 |
| 2/15/2019 | G. Shimoda | Partner Case Status meeting; Discuss POA and upcoming deadlines; Forecast case priorities | 0.3 | 725 | \$217.50 |
| 2/15/2019 | G. Shimoda | Review notes regarding call with opposing counsel regarding tolling agreement, draft | 0.3 | 725 | \$217.50 |
| 2/15/2019 | J. Rodriguez | Call with opposing counsel regarding tolling agreement | 0.2 | 625 | \$125.00 |
| 2/15/2019 | J. Rodriguez | Email opposing counsel | 0.1 | 625 | \$62.50 |
| 2/15/2019 | J. Rodriguez | Research regarding Deft's Business Structure as management company & scope of class issues - site vs. statewide | 1.5 | 625 | \$937.50 |
| 2/18/2019 | G. Shimoda | Review research re business structure and scope of class issues | 0.5 | 725 | \$362.50 |
| 2/19/2019 | G. Shimoda | Review of PRA Request, overview of filing; Call with client re status | 0.5 | 725 | \$362.50 |
| 2/19/2019 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.1 | 625 | \$62.50 |
| 2/19/2019 | J. Rodriguez | Draft/finalize tolling agreement | 0.4 | 625 | \$250.00 |
| 2/21/2019 | B. Berzin | Review J. Rodriguez call notes with opposing counsel regarding mediation | 0.1 | 425 | \$42.50 |
| 2/21/2019 | G. Shimoda | Review of notes regarding call with opposing counsel regarding limiting scope of class; Speak with J. Rodriguez | 0.3 | 725 | \$217.50 |
| 2/21/2019 | J. Rodriguez | Call with opposing counsel regarding site/state scope issue | 0.2 | 625 | \$125.00 |
| 2/22/2019 | G. Shimoda | Partner Case Status meeting; Discuss POA and upcoming deadlines; Forecast case priorities | 0.1 | 725 | \$72.50 |
| 2/22/2019 | J. Rodriguez | Partner Case Status meeting; Discuss POA and upcoming deadlines; Forecast case priorities | 0.1 | 625 | \$62.50 |
| 3/6/2019 | J. Rodriguez | Review PRA document productions; Emails regarding PRA document productions | 1.7 | 625 | \$1,062.50 |
| 3/8/2019 | G. Shimoda | Partner Case Status meeting; Discuss POA and upcoming deadlines; Forecast case priorities | 0.1 | 725 | \$72.50 |
| 3/11/2019 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.1 | 625 | \$62.50 |
| 5/10/2019 | G. Shimoda | Partner Case Status meeting; Discuss POA and upcoming deadlines; Forecast case priorities | 0.1 | 725 | \$72.50 |
| 5/13/2019 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.1 | 625 | \$62.50 |
| 5/14/2019 | J. Rodriguez | Draft CMC statement for Sac Superior Hearing | 0.2 | 625 | \$125.00 |
| 5/17/2019 | G. Shimoda | Partner Case Status meeting; Discuss POA and upcoming deadlines; Forecast case priorities | 0.1 | 725 | \$72.50 |
| 5/20/2019 | B. Berzin | Review e-mail from opposing counsel regarding CMC in state court | 0.1 | 425 | \$42.50 |
| 5/20/2019 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.1 | 625 | \$62.50 |
| 5/20/2019 | J. Rodriguez | Review file; Email opposing counsel; Research re state Court proceedings while removed | 0.7 | 625 | \$437.50 |
| 5/24/2019 | G. Shimoda | Partner Case Status meeting; Discuss POA and upcoming deadlines; Forecast case priorities | 0.1 | 725 | \$72.50 |
| 5/24/2019 | G. Shimoda | Review of Tentative Ruling. | 0.1 | 725 | \$72.50 |
| 5/24/2019 | J. Rodriguez | Email with opposing counsel regarding tentative rulings | 0.1 | 625 | \$62.50 |
| 5/28/2019 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.1 | 625 | \$62.50 |
| 5/29/2019 | J. Rodriguez | Emails with client regarding facts and status; Call with client regarding status | 0.5 | 625 | \$312.50 |
| 5/31/2019 | G. Shimoda | Partner Case Status meeting; Discuss POA and upcoming deadlines; Forecast case priorities | 0.1 | 725 | \$72.50 |
| 6/3/2019 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.1 | 625 | \$62.50 |
| 7/19/2019 | J. Rodriguez | Emails and Call client regarding facts and status | 0.2 | 625 | \$125.00 |

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| 7/22/2019 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.1 | 625 | \$62.50 |
| 7/26/2019 | G. Shimoda | Partner Case Status meeting; Discuss POA and upcoming deadlines; Forecast case priorities | 0.1 | 725 | \$72.50 |
| 11/8/2019 | G. Shimoda | Partner Case Status meeting; Discuss POA and upcoming deadlines; Forecast case priorities | 0.1 | 725 | \$72.50 |
| 11/12/2019 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.1 | 625 | \$62.50 |
| 11/14/2019 | B. Berzin | Draft CMC statement for Sac Superior Hearing | 0.3 | 425 | \$127.50 |
| 11/15/2019 | G. Shimoda | Partner Case Status meeting; Discuss POA and upcoming deadlines; Forecast case priorities | 0.1 | 725 | \$72.50 |
| 11/15/2019 | J. Rodriguez | Revise CMC statement for Sac Superior Hearing; Call with client | 0.2 | 625 | \$125.00 |
| 11/18/2019 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.1 | 625 | \$62.50 |
| 12/2/2019 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.1 | 625 | \$62.50 |
| 12/2/2019 | J. Rodriguez | Email with opposing counsel regarding tentative ruling | 0.1 | 625 | \$62.50 |
| 12/6/2019 | G. Shimoda | Partner Case Status meeting; Discuss POA and upcoming deadlines; Forecast case priorities | 0.1 | 725 | \$72.50 |
| 12/6/2019 | J. Rodriguez | Review minute order/service to opposing counsel of minute order regarding Sac Superior CMC hearing | 0.3 | 625 | \$187.50 |
| 12/9/2019 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.1 | 625 | \$62.50 |
| 12/13/2019 | G. Shimoda | Partner Case Status meeting; Discuss POA and upcoming deadlines; Forecast case priorities | 0.1 | 725 | \$72.50 |
| 3/6/2020 | G. Shimoda | Partner Case Status meeting; Discuss POA and upcoming deadlines; Forecast case priorities | 0.1 | 725 | \$72.50 |
| 3/8/2020 | G. Shimoda | Review of PRA request response; Call with client | 0.5 | 725 | \$362.50 |
| 3/9/2020 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.1 | 625 | \$62.50 |
| 3/10/2020 | J. Rodriguez | Review minute order/service to opposing counsel of minute order regarding Sac Superior complex assignment | 0.3 | 625 | \$187.50 |
| 3/13/2020 | G. Shimoda | Partner Case Status meeting; Discuss POA and upcoming deadlines; Forecast case priorities | 0.1 | 725 | \$72.50 |
| 3/16/2020 | G. Shimoda | Review remand filings; Speak with J. Rodriguez re hearing | 1.8 | 725 | \$1,305.00 |
| 3/16/2020 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.3 | 625 | \$187.50 |
| 3/16/2020 | J. Rodriguez | Review remand filings and research regarding remand; Prep for hearing | 2.8 | 625 | \$1,750.00 |
| 3/17/2020 | J. Rodriguez | Prep for and attend remand motion hearing | 1.5 | 625 | \$937.50 |
| 3/20/2020 | G. Shimoda | Review remand denial; Research re appealable and/or reconsideration issues; Speak to J. Rodriguez re status and strategy | 1.6 | 725 | \$1,160.00 |
| 3/20/2020 | J. Rodriguez | Review remand denial with G. Shimoda; Discuss status and strategy | 0.7 | 625 | \$437.50 |
| 3/23/2020 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.2 | 625 | \$125.00 |
| 3/25/2020 | B. Berzin | Draft FAC | 1.5 | 425 | \$637.50 |
| 3/25/2020 | G. Shimoda | Call with client regarding status update | 0.3 | 725 | \$217.50 |
| 3/26/2020 | J. Rodriguez | Email opposing counsel regarding status for amendment | 0.1 | 625 | \$62.50 |
| 3/27/2020 | B. Berzin | Email opposing counsel regarding e-service | 0.1 | 425 | \$42.50 |
| 3/27/2020 | G. Shimoda | Partner Case Status meeting; Discuss POA and upcoming deadlines; Forecast case priorities | 0.2 | 725 | \$145.00 |
| 3/30/2020 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.1 | 625 | \$62.50 |
| 4/1/2020 | G. Shimoda | Review notes regarding call with opposing counsel regarding Hotel closure; Speak with J. Rodriguez | 0.5 | 725 | \$362.50 |
| 4/1/2020 | J. Rodriguez | Call with opposing counsel regarding ADR and Deft Operations relating to scope issues and litigation status; Review research | 0.7 | 625 | \$437.50 |
| 4/2/2020 | J. Rodriguez | Call with client regarding status update | 0.6 | 625 | \$375.00 |
| 4/2/2020 | J. Rodriguez | Email opposing counsel regarding PAGA amendment | 0.1 | 625 | \$62.50 |
| 4/2/2020 | J. Rodriguez | Draft/Revise stip to amend re PAGA | 0.3 | 625 | \$187.50 |
| 4/3/2020 | G. Shimoda | Partner Case Status meeting; Discuss POA and upcoming deadlines; Forecast case priorities | 0.1 | 725 | \$72.50 |
| 4/3/2020 | J. Rodriguez | Review edits to stip to amend re PAGA | 0.1 | 625 | \$62.50 |
| 4/3/2020 | J. Rodriguez | Review stipulation to stay re pandemic | 0.3 | 625 | \$187.50 |

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| 4/6/2020 | G. Shimoda | Review emails regarding electronic service, stay, and status report; Review stipulations to amend and stay | 0.6 | 725 | \$435.00 |
| 4/6/2020 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.2 | 625 | \$125.00 |
| 4/6/2020 | J. Rodriguez | Emails with opposing counsel regarding status report filing & stay | 0.2 | 625 | \$125.00 |
| 4/6/2020 | J. Rodriguez | Draft/revise/finalize stipulation to amend for FAC | 0.5 | 625 | \$312.50 |
| 5/8/2020 | J. Rodriguez | Review CMC Minute order/service to opposing counsel | 0.2 | 625 | \$125.00 |
| 6/19/2020 | G. Shimoda | Partner Case Status meeting; Discuss POA and upcoming deadlines; Forecast case priorities | 0.1 | 725 | \$72.50 |
| 6/22/2020 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.2 | 625 | \$125.00 |
| 6/24/2020 | B. Berzin | Email with opposin counsel regarding discovery | 0.1 | 425 | \$42.50 |
| 6/25/2020 | J. Rodriguez | Review/revise draft joint status report | 0.4 | 625 | \$250.00 |
| 6/26/2020 | B. Berzin | Read opposing counsel email regarding joint report | 0.1 | 425 | \$42.50 |
| 6/26/2020 | J. Rodriguez | Revise joint status report; Review case file | 0.2 | 625 | \$125.00 |
| 6/26/2020 | J. Rodriguez | Emails with opposing counsel regarding joint status report and discovery | 0.3 | 625 | \$187.50 |
| 7/17/2020 | G. Shimoda | Partner Case Status meeting; Discuss POA and upcoming deadlines; Forecast case priorities | 0.1 | 725 | \$72.50 |
| 7/20/2020 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.1 | 625 | \$62.50 |
| 7/22/2020 | B. Berzin | Review joint report draft from opposing counsel & opposing counsel email | 0.2 | 425 | \$85.00 |
| 7/22/2020 | J. Rodriguez | Emails with opposing counsel re joint status report | 0.1 | 625 | \$62.50 |
| 7/24/2020 | B. Berzin | Read emails re setting call per opposing counsel request | 0.1 | 425 | \$42.50 |
| 7/24/2020 | G. Shimoda | Partner Case Status meeting; Discuss POA and upcoming deadlines; Forecast case priorities | 0.2 | 725 | \$145.00 |
| 7/24/2020 | G. Shimoda | Review notes regarding call with opposing counsel regarding merits of case, class parameters. | 0.3 | 725 | \$217.50 |
| 7/24/2020 | J. Rodriguez | Email and call with opposing counsel; review/edit joint status report | 0.4 | 625 | \$250.00 |
| 7/26/2020 | J. Rodriguez | Research regarding availability of pre certification MSJ/MSA in fed Court | 0.3 | 625 | \$187.50 |
| 7/27/2020 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.2 | 625 | \$125.00 |
| 7/31/2020 | G. Shimoda | Partner Case Status meeting; Discuss POA and upcoming deadlines; Forecast case priorities | 0.1 | 725 | \$72.50 |
| 8/3/2020 | B. Berzin | Call with client re status update | 0.9 | 425 | \$382.50 |
| 8/3/2020 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.1 | 625 | \$62.50 |
| 8/10/2020 | B. Berzin | Draft initial disclosure | 1.5 | 425 | \$637.50 |
| 8/10/2020 | B. Berzin | Draft SROG and POD response | 3.5 | 425 | \$1,487.50 |
| 8/10/2020 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.1 | 625 | \$62.50 |
| 8/11/2020 | G. Shimoda | Review Defendant's Discovery Requests. | 0.6 | 725 | \$435.00 |
| 8/11/2020 | J. Rodriguez | Review correspondence from opposing counsel and discovery requests; speak with staff | 0.4 | 625 | \$250.00 |
| 8/12/2020 | B. Berzin | Review notice from related action (Crump) | 0.2 | 425 | \$85.00 |
| 8/12/2020 | B. Berzin | Review overlap b/t our case and Crump case | 1.5 | 425 | \$637.50 |
| 8/12/2020 | J. Rodriguez | Review correspondence to client regarding discovery requests | 0.1 | 625 | \$62.50 |
| 8/12/2020 | J. Rodriguez | Review Crump filings and status of case; Research regarding stay/overlap issues; Reach out to Crump counsel | 4.2 | 625 | \$2,625.00 |
| 8/13/2020 | B. Berzin | Review Crump action for overlap between claims and draft chart | 0.3 | 425 | \$127.50 |
| 8/13/2020 | G. Shimoda | Review Crump FAC, discuss POA; review research regarding Crump overlap | 1.8 | 725 | \$1,305.00 |
| 8/13/2020 | J. Rodriguez | Emails regarding Crump status/filings | 0.1 | 625 | \$62.50 |
| 8/14/2020 | B. Berzin | E-mail client regarding documents to collect | 0.1 | 425 | \$42.50 |
| 8/14/2020 | B. Berzin | Emails with client regarding paystubs | 0.3 | 425 | \$127.50 |
| 8/14/2020 | G. Shimoda | Partner Case Status meeting; Discuss POA and upcoming deadlines; Forecast case priorities | 0.1 | 725 | \$72.50 |
| 8/14/2020 | J. Rodriguez | Speak to client regarding status and discovery requests; emails with client and review documents | 1.6 | 625 | \$1,000.00 |
| 8/15/2020 | B. Berzin | Draft responses to POD and SROG | 6.8 | 425 | \$2,890.00 |
| 8/17/2020 | B. Berzin | Draft discovery responses and initial disclosure; Speak with client re discovery | 7 | 425 | \$2,975.00 |
| 8/17/2020 | G. Shimoda | Review research regarding Crump case; Email Crump counsel re conference call | 3.1 | 725 | \$2,247.50 |
| 8/17/2020 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.1 | 625 | \$62.50 |
| 8/17/2020 | J. Rodriguez | Call with Crump counsel regarding status and overlap | 0.5 | 625 | \$312.50 |
| 8/20/2020 | B. Berzin | Emails with opposing counsel regarding initial disclosures | 0.2 | 425 | \$85.00 |

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|------------|--------------|--|-----|-----|----------|
| 8/20/2020 | J. Rodriguez | Email with opposing counsel regarding disclosure and depositions | 0.1 | 625 | \$62.50 |
| 8/20/2020 | J. Rodriguez | Emails/Calls with client regarding responses to special interrogatories and status | 0.8 | 625 | \$500.00 |
| 8/21/2020 | G. Shimoda | Partner Case Status meeting; Discuss POA and upcoming deadlines; Forecast case priorities | 0.1 | 725 | \$72.50 |
| 8/21/2020 | J. Rodriguez | Emails with client regarding discovery responses and documents | 0.3 | 625 | \$187.50 |
| 8/23/2020 | B. Berzin | Review e-mail from client regarding discovery | 0.1 | 425 | \$42.50 |
| 8/23/2020 | J. Rodriguez | Emails with client re additional documents; Call with client | 0.4 | 625 | \$250.00 |
| 8/24/2020 | G. Shimoda | Emails with Crump counsel re status of case and conference call | 0.5 | 725 | \$362.50 |
| 8/25/2020 | B. Berzin | Call with client regarding discovery | 0.3 | 425 | \$127.50 |
| 8/25/2020 | B. Berzin | Review client responses to SROG & corresponding documents provided | 1.6 | 425 | \$680.00 |
| 8/25/2020 | G. Shimoda | Review notes regarding call with Client regarding discovery responses; Review notes & documents from client | 0.4 | 725 | \$290.00 |
| 8/25/2020 | J. Rodriguez | Review client call notes re discovery | 0.1 | 625 | \$62.50 |
| 8/26/2020 | B. Berzin | Read notes from call with counsel in Crump action | 0.1 | 425 | \$42.50 |
| 8/26/2020 | G. Shimoda | Call with Crump counsel regarding complaint allegations, resolution of cases, overlap claims; Discuss status with J. Rodriguez | 1.2 | 725 | \$870.00 |
| 8/26/2020 | G. Shimoda | Call with client re status update | 0.6 | 725 | \$435.00 |
| 8/26/2020 | J. Rodriguez | Call with Crump counsel regarding complaint allegations, resolution of cases, overlap claims; Discuss status with G. Shimoda | 1.2 | 625 | \$750.00 |
| 8/28/2020 | J. Rodriguez | Emails with client regarding discovery responses and documents | 0.3 | 625 | \$187.50 |
| 8/31/2020 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.1 | 625 | \$62.50 |
| 9/1/2020 | B. Berzin | Finalize discovery responses | 2 | 425 | \$850.00 |
| 9/2/2020 | B. Berzin | Call with client regarding discovery | 0.2 | 425 | \$85.00 |
| 9/2/2020 | G. Shimoda | Review notes regarding job duties, time records, conversation with client. | 0.6 | 725 | \$435.00 |
| 9/2/2020 | J. Rodriguez | Review client call notes regarding discovery and documents | 0.1 | 625 | \$62.50 |
| 9/3/2020 | B. Berzin | Draft verifications for discovery responses | 0.2 | 425 | \$85.00 |
| 9/3/2020 | J. Rodriguez | Review discovery response drafts; Call with client | 1.1 | 625 | \$687.50 |
| 9/4/2020 | G. Shimoda | Partner Case Status meeting; Discuss POA and upcoming deadlines; Forecast case priorities | 0.1 | 725 | \$72.50 |
| 9/8/2020 | B. Berzin | Call with client regarding verifications | 0.1 | 425 | \$42.50 |
| 9/8/2020 | B. Berzin | Email to client regarding discovery verifications | 0.1 | 425 | \$42.50 |
| 9/8/2020 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.1 | 625 | \$62.50 |
| 9/8/2020 | J. Rodriguez | Review client call notes regarding discovery and documents | 0.1 | 625 | \$62.50 |
| 9/8/2020 | J. Rodriguez | Review discovery verifications | 0.1 | 625 | \$62.50 |
| 9/9/2020 | B. Berzin | Draft discovery - SROG, POD | 1.6 | 425 | \$680.00 |
| 9/9/2020 | B. Berzin | Finalize documents to produce | 0.9 | 425 | \$382.50 |
| 9/9/2020 | B. Berzin | Update finals per J. Rodriguez notes | 1.5 | 425 | \$637.50 |
| 9/9/2020 | G. Shimoda | Call with Crump counsel; Emails re conference call | 0.5 | 725 | \$362.50 |
| 9/9/2020 | G. Shimoda | Review Initial Disclosures, discuss POA. | 0.8 | 725 | \$580.00 |
| 9/9/2020 | J. Rodriguez | Review finals of initial disclosures and discovery responses for service | 0.8 | 625 | \$500.00 |
| 9/11/2020 | G. Shimoda | Partner Case Status meeting; Discuss POA and upcoming deadlines; Forecast case priorities | 0.1 | 725 | \$72.50 |
| 9/14/2020 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.1 | 625 | \$62.50 |
| 9/18/2020 | G. Shimoda | Partner Case Status meeting; Discuss POA and upcoming deadlines; Forecast case priorities | 0.1 | 725 | \$72.50 |
| 9/18/2020 | J. Rodriguez | Review finals of discovery requests to opposing counsel for service | 0.9 | 625 | \$562.50 |
| 9/21/2020 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.2 | 625 | \$125.00 |
| 9/25/2020 | G. Shimoda | Partner Case Status meeting; Discuss POA and upcoming deadlines; Forecast case priorities | 0.1 | 725 | \$72.50 |
| 9/28/2020 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.1 | 625 | \$62.50 |
| 10/20/2020 | B. Berzin | Emails with opposing counsel regarding discovery | 0.1 | 425 | \$42.50 |
| 10/26/2020 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.1 | 625 | \$62.50 |
| 10/30/2020 | G. Shimoda | Partner Case Status meeting; Discuss POA and upcoming deadlines; Forecast case priorities | 0.2 | 725 | \$145.00 |
| 10/30/2020 | J. Rodriguez | Emails with opposing counsel regarding discovery responses and extensions | 0.3 | 625 | \$187.50 |
| 11/2/2020 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.2 | 625 | \$125.00 |

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|------------|--------------|---|-----|-----|------------|
| 11/5/2020 | G. Shimoda | Review Defendant's Responses to Discovery; Research re objections; Speak to J. Rodriguez | 3.7 | 725 | \$2,682.50 |
| 11/5/2020 | J. Rodriguez | Initial review of Deft's discovery responses; Speak to G. Shimoda | 0.7 | 625 | \$437.50 |
| 11/6/2020 | G. Shimoda | Partner Case Status meeting; Discuss POA and upcoming deadlines; Forecast case priorities | 0.1 | 725 | \$72.50 |
| 11/9/2020 | B. Berzin | Review Defendant's responses to SROG and POD; Draft memo re discovery plan/outline | 1.9 | 425 | \$807.50 |
| 11/9/2020 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.1 | 625 | \$62.50 |
| 11/13/2020 | G. Shimoda | Partner Case Status meeting; Discuss POA and upcoming deadlines; Forecast case priorities | 0.1 | 725 | \$72.50 |
| 11/16/2020 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.1 | 625 | \$62.50 |
| 11/20/2020 | G. Shimoda | Partner Case Status meeting; Discuss POA and upcoming deadlines; Forecast case priorities | 0.1 | 725 | \$72.50 |
| 11/20/2020 | G. Shimoda | Review notice of unavailability. | 0.2 | 725 | \$145.00 |
| 11/22/2020 | J. Rodriguez | Review Deft's discovery responses; Draft discovery plan and M/C outline | 2.8 | 625 | \$1,750.00 |
| 11/29/2020 | G. Shimoda | Review research regarding discovery, privileged documents; Speak to J. Rodriguez | 0.8 | 725 | \$580.00 |
| 11/29/2020 | J. Rodriguez | Research regarding meet and confer issues relating to discovery and initial disclosures in fed court; Speak to G. Shimoda | 4.2 | 625 | \$2,625.00 |
| 11/30/2020 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.1 | 625 | \$62.50 |
| 12/1/2020 | B. Berzin | Motion to Compel draft Points and Authorities | 5 | 425 | \$2,125.00 |
| 12/1/2020 | J. Rodriguez | Emails with opposing counsel regarding discovery | 0.3 | 625 | \$187.50 |
| 12/2/2020 | B. Berzin | Draft joint statement re motion to compel | 9.5 | 425 | \$4,037.50 |
| 12/3/2020 | B. Berzin | Read JR email to opposing counsel regarding Belaire | 0.1 | 425 | \$42.50 |
| 12/3/2020 | J. Rodriguez | Emails regarding Crump status/Belaire notice | 0.3 | 625 | \$187.50 |
| 12/4/2020 | B. Berzin | Update/Revise joint statement for motion to compel | 4.5 | 425 | \$1,912.50 |
| 12/4/2020 | B. Berzin | Revise joint statement draft | 0.2 | 425 | \$85.00 |
| 12/4/2020 | G. Shimoda | Partner Case Status meeting; Discuss POA and upcoming deadlines; Forecast case priorities | 0.1 | 725 | \$72.50 |
| 12/4/2020 | J. Rodriguez | Review motion to compel joint statement and points and authorities; Research regarding discovery issues | 2.4 | 625 | \$1,500.00 |
| 12/4/2020 | J. Rodriguez | Emails regarding joint statement | 0.2 | 625 | \$125.00 |
| 12/7/2020 | B. Berzin | Emails regarding joint statement | 0.1 | 425 | \$42.50 |
| 12/7/2020 | B. Berzin | Review JR call notes with opposing counsel regarding discovery meet and confer | 0.1 | 425 | \$42.50 |
| 12/7/2020 | G. Shimoda | Review notes regarding call with opposing counsel regarding produced documents in Crumb, Belaire. | 0.3 | 725 | \$217.50 |
| 12/7/2020 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.1 | 625 | \$62.50 |
| 12/7/2020 | J. Rodriguez | Emails regarding joint statement | 0.1 | 625 | \$62.50 |
| 12/7/2020 | J. Rodriguez | Revise/Draft Joint statement regarding discovery dispute; call with opposing counsel regarding Belaire | 3.8 | 625 | \$2,375.00 |
| 12/11/2020 | G. Shimoda | Partner Case Status meeting; Discuss POA and upcoming deadlines; Forecast case priorities | 0.1 | 725 | \$72.50 |
| 12/11/2020 | J. Rodriguez | Email with opposing counsel regarding Belaire notice | 0.1 | 625 | \$62.50 |
| 12/14/2020 | B. Berzin | Emails with opposing counsel regarding state court status | 0.1 | 425 | \$42.50 |
| 12/14/2020 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.1 | 625 | \$62.50 |
| 12/14/2020 | J. Rodriguez | Emails with opposing counsel regarding state court CMC status | 0.2 | 625 | \$125.00 |
| 12/16/2020 | J. Rodriguez | Email opposing counsel regarding discovery | 0.1 | 625 | \$62.50 |
| 12/16/2020 | J. Rodriguez | Call with client regarding status update | 0.4 | 625 | \$250.00 |
| 12/17/2020 | B. Berzin | Read email from opposing counsel regarding scope of discovery sample | 0.1 | 425 | \$42.50 |
| 12/17/2020 | B. Berzin | Review TR | 0.1 | 425 | \$42.50 |
| 12/18/2020 | G. Shimoda | Partner Case Status meeting; Discuss POA and upcoming deadlines; Forecast case priorities | 0.1 | 725 | \$72.50 |
| 12/18/2020 | G. Shimoda | Review court's TR regarding vacating Status Conference. | 0.1 | 725 | \$72.50 |
| 12/21/2020 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.2 | 625 | \$125.00 |
| 12/21/2020 | J. Rodriguez | Review CMC Minute order/service to opposing counsel | 0.3 | 625 | \$187.50 |
| 12/22/2020 | B. Berzin | Review call notes with opposing counsel regarding ownership of Sac Hyatt | 0.1 | 425 | \$42.50 |
| 12/22/2020 | G. Shimoda | Review notes regarding call with opposing counsel regarding Hyatt owned hotels, discovery. | 0.3 | 725 | \$217.50 |
| 12/22/2020 | J. Rodriguez | Call with opposing counsel regarding discovery | 0.2 | 625 | \$125.00 |

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|------------|--------------|--|-----|-----|------------|
| 12/22/2020 | J. Rodriguez | Research regarding scope of Defts operations site/statewide; Research issues regarding joint employers and class scope | 4.2 | 625 | \$2,625.00 |
| 1/4/2021 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.1 | 625 | \$62.50 |
| 1/5/2021 | B. Berzin | Emails regarding size of class with opposing counsel | 0.1 | 425 | \$42.50 |
| 1/6/2021 | B. Berzin | Review Belaire quote | 0.2 | 425 | \$85.00 |
| 1/6/2021 | J. Rodriguez | Emails with administrators to get bids for Belaire notice | 0.4 | 625 | \$250.00 |
| 1/8/2021 | B. Berzin | Emails with opposing counsel regarding Belaire | 0.1 | 425 | \$42.50 |
| 1/8/2021 | G. Shimoda | Partner Case Status meeting; Discuss POA and upcoming deadlines; Forecast case priorities | 0.1 | 725 | \$72.50 |
| 1/11/2021 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.1 | 625 | \$62.50 |
| 1/11/2021 | J. Rodriguez | Emails with opposing counsel regarding sample | 0.4 | 625 | \$250.00 |
| 1/12/2021 | B. Berzin | Emails with opposing counsel regarding discovery | 0.1 | 425 | \$42.50 |
| 1/12/2021 | B. Berzin | Review call notes with opposing counsel regarding Belaire | 0.1 | 425 | \$42.50 |
| 1/12/2021 | G. Shimoda | Review notes regarding call with opposing counsel regarding final master list timeline. | 0.3 | 725 | \$217.50 |
| 1/12/2021 | J. Rodriguez | Call with opposing counsel regarding Belaire, sample, depositions | 0.3 | 625 | \$187.50 |
| 1/13/2021 | J. Rodriguez | Draft/revise belaire notice | 0.6 | 625 | \$375.00 |
| 1/13/2021 | J. Rodriguez | Emails regarding stipulation to continue discovery and Belaire notice | 0.2 | 625 | \$125.00 |
| 1/13/2021 | J. Rodriguez | Revise/Draft stipulation to continue discovery deadline | 0.2 | 625 | \$125.00 |
| 1/15/2021 | B. Berzin | Email with opposing counsel regarding Belaire | 0.1 | 425 | \$42.50 |
| 1/15/2021 | G. Shimoda | Partner Case Status meeting; Discuss POA and upcoming deadlines; Forecast case priorities | 0.1 | 725 | \$72.50 |
| 1/15/2021 | J. Rodriguez | Email with opposing counsel regarding stats for Belaire notice and protective order | 0.1 | 625 | \$62.50 |
| 1/19/2021 | B. Berzin | Emails with opposing counsel regarding protective order | 0.1 | 425 | \$42.50 |
| 1/19/2021 | G. Shimoda | Review Stip & Protective Order | 0.5 | 725 | \$362.50 |
| 1/19/2021 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.1 | 625 | \$62.50 |
| 1/19/2021 | J. Rodriguez | Emails with opposing counsel regarding stats for Belaire notice and protective order | 0.3 | 625 | \$187.50 |
| 1/22/2021 | G. Shimoda | Partner Case Status meeting; Discuss POA and upcoming deadlines; Forecast case priorities | 0.1 | 725 | \$72.50 |
| 1/22/2021 | J. Rodriguez | Email with opposing counsel regarding sample and Belaire notice | 0.2 | 625 | \$125.00 |
| 1/25/2021 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.1 | 625 | \$62.50 |
| 1/25/2021 | J. Rodriguez | Email with opposing counsel regarding sample | 0.1 | 625 | \$62.50 |
| 1/29/2021 | G. Shimoda | Partner Case Status meeting; Discuss POA and upcoming deadlines; Forecast case priorities | 0.3 | 725 | \$217.50 |
| 2/1/2021 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.1 | 625 | \$62.50 |
| 2/2/2021 | B. Berzin | Review call with opposing counsel regarding Belaire | 0.1 | 425 | \$42.50 |
| 2/2/2021 | G. Shimoda | Review notes regarding call with opposing counsel regarding individual settlement, protective order, informal discovery; Speak with J. Rodriguez | 0.5 | 725 | \$362.50 |
| 2/2/2021 | J. Rodriguez | Call with opposing counsel regarding sample group, ADR, and IDC; Speak with G. Shimoda | 0.9 | 625 | \$562.50 |
| 2/5/2021 | G. Shimoda | Review notes regarding call with Court deputy regarding IDC. | 0.3 | 725 | \$217.50 |
| 2/5/2021 | J. Rodriguez | Call Court regarding IDC procedures to request and secure IDC | 0.2 | 625 | \$125.00 |
| 2/5/2021 | J. Rodriguez | Email opposing counsel regarding IDC dates | 0.2 | 625 | \$125.00 |
| 2/8/2021 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.2 | 625 | \$125.00 |
| 2/10/2021 | B. Berzin | Draft PMK deposition notice; Review file/discovery | 2 | 425 | \$850.00 |
| 2/10/2021 | J. Rodriguez | Draft joint request for IDC | 0.3 | 625 | \$187.50 |
| 2/10/2021 | J. Rodriguez | Emails with opposing counsel regarding setting IDC | 0.2 | 625 | \$125.00 |
| 2/11/2021 | B. Berzin | Draft/revise PMK deposition notice | 0.5 | 425 | \$212.50 |
| 2/12/2021 | G. Shimoda | Partner Case Status meeting; Discuss POA and upcoming deadlines; Forecast case priorities | 0.2 | 725 | \$145.00 |
| 2/16/2021 | B. Berzin | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.1 | 425 | \$42.50 |
| 2/16/2021 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.1 | 625 | \$62.50 |
| 2/16/2021 | J. Rodriguez | Email opposing counsel regarding class list and sample | 0.1 | 625 | \$62.50 |
| 2/17/2021 | B. Berzin | Emails with opposing counsel regarding sample | 0.1 | 425 | \$42.50 |
| 2/17/2021 | J. Rodriguez | Call/email with opposing counsel regarding IDC brief; draft/finalize IDC brief; speak with staff regarding filing | 2.6 | 625 | \$1,625.00 |

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| 2/19/2021 | G. Shimoda | Partner Case Status meeting; Discuss POA and upcoming deadlines; Forecast case priorities | 0.1 | 725 | \$72.50 |
| 2/19/2021 | J. Rodriguez | Draft stipulation and order to continue discovery deadline | 0.4 | 625 | \$250.00 |
| 2/19/2021 | J. Rodriguez | Review class list | 0.4 | 625 | \$250.00 |
| 2/23/2021 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.1 | 625 | \$62.50 |
| 2/25/2021 | B. Berzin | Read notes from call with opposing counsel regarding sample for discovery | 0.1 | 425 | \$42.50 |
| 2/25/2021 | G. Shimoda | Review notes regarding call with opposing counsel regarding sample, wage statements, eta on wage statements. | 0.1 | 725 | \$72.50 |
| 2/25/2021 | J. Rodriguez | Call opposing counsel regarding sample issues and need for correction and/or repull | 0.2 | 625 | \$125.00 |
| 2/25/2021 | J. Rodriguez | Review/Analyze data sample | 5.2 | 625 | \$3,250.00 |
| 2/26/2021 | B. Berzin | Emails with opposing counsel regarding joint statement | 0.1 | 425 | \$42.50 |
| 2/26/2021 | G. Shimoda | Partner Case Status meeting; Discuss POA and upcoming deadlines; Forecast case priorities | 0.1 | 725 | \$72.50 |
| 2/26/2021 | J. Rodriguez | Draft joint request to vacate IDC | 0.2 | 625 | \$125.00 |
| 2/26/2021 | J. Rodriguez | Email with Opposing counsel; Review opposing counsel edits to stipulation to continue discovery deadline | 0.3 | 625 | \$187.50 |
| 2/26/2021 | J. Rodriguez | Review/Analyze data sample | 2.9 | 625 | \$1,812.50 |
| 3/1/2021 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.1 | 625 | \$62.50 |
| 3/2/2021 | B. Berzin | Draft declarant questionnaire; Speak with J. Rodriguez re questionnaire | 1.7 | 425 | \$722.50 |
| 3/2/2021 | J. Rodriguez | Review questionnaire draft; Speak with B. Berzin re questionnaire | 0.4 | 625 | \$250.00 |
| 3/3/2021 | B. Berzin | Revise witness questionnaire; Review discovery & documents | 1 | 425 | \$425.00 |
| 3/3/2021 | B. Berzin | Email with client re work status | 0.1 | 425 | \$42.50 |
| 3/3/2021 | G. Shimoda | Reviewcall notes with Client regarding facts, discuss POA. | 0.5 | 725 | \$362.50 |
| 3/3/2021 | J. Rodriguez | Call with client regarding discovery/additional facts for claims | 1.5 | 625 | \$937.50 |
| 3/3/2021 | J. Rodriguez | Email client regarding status/update | 0.1 | 625 | \$62.50 |
| 3/5/2021 | G. Shimoda | Partner Case Status meeting; Discuss POA and upcoming deadlines; Forecast case priorities | 0.2 | 725 | \$145.00 |
| 3/8/2021 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.1 | 625 | \$62.50 |
| 3/8/2021 | J. Rodriguez | Emails with class members | 0.6 | 625 | \$375.00 |
| 3/8/2021 | J. Rodriguez | Emails/call with client regarding status update | 0.4 | 625 | \$250.00 |
| 3/8/2021 | J. Rodriguez | Review witness questionnaire | 0.3 | 625 | \$187.50 |
| 3/12/2021 | G. Shimoda | Partner Case Status meeting; Discuss POA and upcoming deadlines; Forecast case priorities | 0.1 | 725 | \$72.50 |
| 3/15/2021 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.1 | 625 | \$62.50 |
| 3/17/2021 | J. Rodriguez | Call/email opposing counsel regarding wage report updates | 0.3 | 625 | \$187.50 |
| 3/19/2021 | G. Shimoda | Partner Case Status meeting; Discuss POA and upcoming deadlines; Forecast case priorities | 0.1 | 725 | \$72.50 |
| 3/22/2021 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.2 | 625 | \$125.00 |
| 3/24/2021 | J. Rodriguez | Call opposing counsel regarding sample issues and need for correction and/or re-pull | 0.2 | 625 | \$125.00 |
| 3/29/2021 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.1 | 625 | \$62.50 |
| 3/30/2021 | B. Berzin | Draft/further revisions to questionnaire for witnesses | 0.3 | 425 | \$127.50 |
| 3/30/2021 | B. Berzin | Calls/interviews with class members regarding facts | 0.8 | 425 | \$340.00 |
| 3/31/2021 | B. Berzin | Calls/interviews with class members regarding facts | 0.7 | 425 | \$297.50 |
| 4/1/2021 | B. Berzin | Calls/interviews with class members regarding facts | 0.9 | 425 | \$382.50 |
| 4/1/2021 | B. Berzin | Call with expert re status of report | 0.2 | 425 | \$85.00 |
| 4/5/2021 | B. Berzin | Calls/interviews with class members regarding facts | 1.4 | 425 | \$595.00 |
| 4/5/2021 | B. Berzin | Calls/interviews with class members regarding facts | 1.2 | 425 | \$510.00 |
| 4/5/2021 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.1 | 625 | \$62.50 |
| 4/5/2021 | J. Rodriguez | Calls/interviews with class members regarding facts | 0.8 | 625 | \$500.00 |
| 4/6/2021 | B. Berzin | Calls/interviews with class members regarding facts | 1.1 | 425 | \$467.50 |
| 4/6/2021 | J. Rodriguez | Calls/interviews with class members regarding facts | 1.3 | 625 | \$812.50 |
| 4/7/2021 | B. Berzin | Calls/interviews with class members regarding facts | 0.5 | 425 | \$212.50 |
| 4/7/2021 | B. Berzin | Read emails to class members regarding sending documents | 0.2 | 425 | \$85.00 |
| 4/8/2021 | J. Rodriguez | Calls/interviews with class members regarding facts | 2.4 | 625 | \$1,500.00 |
| 4/9/2021 | B. Berzin | Calls/interviews with class members regarding facts | 0.5 | 425 | \$212.50 |
| 4/9/2021 | G. Shimoda | Partner Case Status meeting; Discuss POA and upcoming deadlines; Forecast case priorities | 0.1 | 725 | \$72.50 |

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| 4/12/2021 | G. Shimoda | Review Class Members interview notes, paystubs and research; Speak with J. Rodriguez | 2.2 | 725 | \$1,595.00 |
| 4/12/2021 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.1 | 625 | \$62.50 |
| 4/12/2021 | J. Rodriguez | Calls/interviews with class members regarding facts | 0.9 | 625 | \$562.50 |
| 4/12/2021 | J. Rodriguez | Speak with G. Shimoda re declaration/interview status | 0.6 | 625 | \$375.00 |
| 4/14/2021 | B. Berzin | Calls/interviews with class members regarding facts | 0.3 | 425 | \$127.50 |
| 4/16/2021 | G. Shimoda | Partner Case Status meeting; Discuss POA and upcoming deadlines; Forecast case priorities | 0.1 | 725 | \$72.50 |
| 4/16/2021 | J. Rodriguez | Calls/interviews with class members regarding facts | 0.6 | 625 | \$375.00 |
| 4/19/2021 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.1 | 625 | \$62.50 |
| 4/19/2021 | J. Rodriguez | Calls/interviews with class members regarding facts | 1.6 | 625 | \$1,000.00 |
| 4/20/2021 | B. Berzin | Calls/interviews with class members regarding facts | 0.4 | 425 | \$170.00 |
| 4/22/2021 | B. Berzin | Emails with OC regarding discovery | 0.1 | 425 | \$42.50 |
| 4/22/2021 | J. Rodriguez | Calls/interviews with class members regarding facts | 0.2 | 625 | \$125.00 |
| 4/22/2021 | J. Rodriguez | Draft/revise PMK Depo notice; Research PMK subject issues and potential objections | 1.8 | 625 | \$1,125.00 |
| 4/22/2021 | J. Rodriguez | Review BB completed interview notes | 0.9 | 625 | \$562.50 |
| 4/23/2021 | G. Shimoda | Partner Case Status meeting; Discuss POA and upcoming deadlines; Forecast case priorities | 0.1 | 725 | \$72.50 |
| 4/23/2021 | J. Rodriguez | Calls/interviews with class members regarding facts | 1.6 | 625 | \$1,000.00 |
| 4/26/2021 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.1 | 625 | \$62.50 |
| 4/26/2021 | J. Rodriguez | Calls/interviews with class members regarding facts | 0.7 | 625 | \$437.50 |
| 4/27/2021 | B. Berzin | Calls/interviews with class members regarding facts | 2.1 | 425 | \$892.50 |
| 4/27/2021 | B. Berzin | Emails with opposing counsel regarding discovery | 0.1 | 425 | \$42.50 |
| 4/27/2021 | J. Rodriguez | Calls/interviews with class members regarding facts | 1.3 | 625 | \$812.50 |
| 4/28/2021 | B. Berzin | Emails with opposing counsel regarding discovery | 0.1 | 425 | \$42.50 |
| 4/29/2021 | B. Berzin | Calls/interviews with class members regarding facts | 1 | 425 | \$425.00 |
| 4/30/2021 | B. Berzin | Review witness interview notes; Calls/interviews with class members regarding facts | 1.2 | 425 | \$510.00 |
| 4/30/2021 | G. Shimoda | Partner Case Status meeting; Discuss POA and upcoming deadlines; Forecast case priorities | 0.1 | 725 | \$72.50 |
| 4/30/2021 | J. Rodriguez | Review updated samples by paycodes; Analyze data | 3.8 | 625 | \$2,375.00 |
| 5/3/2021 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.1 | 625 | \$62.50 |
| 5/4/2021 | B. Berzin | Review call notes with opposing counsel | 0.1 | 425 | \$42.50 |
| 5/4/2021 | G. Shimoda | Review notes regarding call with OC | 0.2 | 725 | \$145.00 |
| 5/4/2021 | J. Rodriguez | Call with opposing counsel regarding pay code issue, sample, and depositions | 0.4 | 625 | \$250.00 |
| 5/7/2021 | G. Shimoda | Partner Case Status meeting; Discuss POA and upcoming deadlines; Forecast case priorities | 0.1 | 725 | \$72.50 |
| 5/10/2021 | B. Berzin | Read notes for call with opposing counsel regarding deposition notice | 0.1 | 425 | \$42.50 |
| 5/10/2021 | G. Shimoda | Review notes regarding call with OC regarding Notice of Deposition PMK. | 0.3 | 725 | \$217.50 |
| 5/10/2021 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.2 | 625 | \$125.00 |
| 5/10/2021 | J. Rodriguez | Call with opposing counsel regarding deposition categories | 0.3 | 625 | \$187.50 |
| 5/10/2021 | J. Rodriguez | Correspondence with client regarding deposition; Call with client | 0.3 | 625 | \$187.50 |
| 5/10/2021 | J. Rodriguez | Review correspondence with client regarding deposition | 0.1 | 625 | \$62.50 |
| 5/10/2021 | J. Rodriguez | Update/revise PMK deposition notice | 0.2 | 625 | \$125.00 |
| 5/11/2021 | B. Berzin | Emails with opposing counsel regarding discovery | 0.2 | 425 | \$85.00 |
| 5/14/2021 | G. Shimoda | Partner Case Status meeting; Discuss POA and upcoming deadlines; Forecast case priorities | 0.1 | 725 | \$72.50 |
| 5/17/2021 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.1 | 625 | \$62.50 |
| 5/21/2021 | G. Shimoda | Partner Case Status meeting; Discuss POA and upcoming deadlines; Forecast case priorities | 0.1 | 725 | \$72.50 |
| 5/24/2021 | B. Berzin | Read notes from call with opposing counsel regarding data | 0.1 | 425 | \$42.50 |
| 5/24/2021 | G. Shimoda | Review notes regarding call with OC regarding delay in producing data. | 0.1 | 725 | \$72.50 |
| 5/24/2021 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.1 | 625 | \$62.50 |
| 5/24/2021 | J. Rodriguez | Call with opposing counsel regarding data | 0.2 | 625 | \$125.00 |
| 5/25/2021 | B. Berzin | Speak with J. Rodriguez re interview follow up questions for declarants | 0.5 | 425 | \$212.50 |
| 5/25/2021 | J. Rodriguez | Review completed interview notes; Research regarding certification issues from interviews; Speak with B. Berzin re interview follow up questions | 2.9 | 625 | \$1,812.50 |

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| 6/2/2021 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.1 | 625 | \$62.50 |
| 6/4/2021 | G. Shimoda | Partner Case Status meeting; Discuss POA and upcoming deadlines; Forecast case priorities | 0.1 | 725 | \$72.50 |
| 6/14/2021 | B. Berzin | Review updated Crump case status | 2 | 425 | \$850.00 |
| 6/14/2021 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.1 | 625 | \$62.50 |
| 6/14/2021 | J. Rodriguez | Review Crump certification motion filings and opposition; Review Crump docket | 2.4 | 625 | \$1,500.00 |
| 6/15/2021 | B. Berzin | Read notes from call with opposing counsel regarding data and mediation in a related case | 0.1 | 425 | \$42.50 |
| 6/15/2021 | G. Shimoda | Review notes regarding call with OC regarding status/data | 0.3 | 725 | \$217.50 |
| 6/15/2021 | J. Rodriguez | Call with opposing counsel regarding data and ADR | 0.4 | 625 | \$250.00 |
| 6/18/2021 | G. Shimoda | Partner Case Status meeting; Discuss POA and upcoming deadlines; Forecast case priorities | 0.2 | 725 | \$145.00 |
| 6/21/2021 | J. Rodriguez | Review CMC Minute order/service to opposing counsel | 0.2 | 625 | \$125.00 |
| 6/22/2021 | J. Rodriguez | Speak with Crump counsel regarding overlap of claims | 0.4 | 625 | \$250.00 |
| 6/23/2021 | B. Berzin | Read notes from call with counsel in related case | 0.1 | 425 | \$42.50 |
| 6/23/2021 | G. Shimoda | Call with Crump counsel regarding status of case, overlap, and settlement | 0.5 | 725 | \$362.50 |
| 6/23/2021 | G. Shimoda | Review of notes regarding call with opposing counsel regarding mediation deadline, deposition transcript. | 0.3 | 725 | \$217.50 |
| 6/23/2021 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.3 | 625 | \$187.50 |
| 6/23/2021 | J. Rodriguez | Call with Crump counsel regarding status of case, overlap, and settlement | 0.5 | 625 | \$312.50 |
| 6/25/2021 | G. Shimoda | Partner Case Status meeting; Discuss POA and upcoming deadlines; Forecast case priorities | 0.1 | 725 | \$72.50 |
| 6/28/2021 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.1 | 625 | \$62.50 |
| 7/1/2021 | B. Berzin | Read notes from call with opposing counsel regarding data | 0.1 | 425 | \$42.50 |
| 7/1/2021 | J. Rodriguez | Call with opposing counsel regarding updated data pull and status | 0.2 | 625 | \$125.00 |
| 7/2/2021 | J. Rodriguez | Call with client regarding status update | 0.4 | 625 | \$250.00 |
| 7/2/2021 | J. Rodriguez | Draft amended PMK deposition notice | 0.2 | 625 | \$125.00 |
| 7/6/2021 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.1 | 625 | \$62.50 |
| 7/6/2021 | J. Rodriguez | Review correspondence with client regarding deposition | 0.1 | 625 | \$62.50 |
| 7/16/2021 | G. Shimoda | Review notes regarding call with opposing counsel regarding extension, opposing counsel waiting for timeline from client on wage statement. | 0.1 | 725 | \$72.50 |
| 7/16/2021 | J. Rodriguez | Call with opposing counsel regarding wage statement production and discovery deadline extension | 0.2 | 625 | \$125.00 |
| 7/19/2021 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.1 | 625 | \$62.50 |
| 7/23/2021 | G. Shimoda | Partner Case Status meeting; Discuss POA and upcoming deadlines; Forecast case priorities | 0.1 | 725 | \$72.50 |
| 7/26/2021 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.1 | 625 | \$62.50 |
| 7/27/2021 | G. Shimoda | Review notes regarding calls with opposing counsel regarding discovery vendor, stipulation. | 0.1 | 725 | \$72.50 |
| 7/27/2021 | J. Rodriguez | Calls with opposing counsel regarding wage statement production and timeline | 0.3 | 625 | \$187.50 |
| 7/29/2021 | J. Rodriguez | Draft stipulation and order to continue discovery deadline | 0.3 | 625 | \$187.50 |
| 7/30/2021 | G. Shimoda | Partner Case Status meeting; Discuss POA and upcoming deadlines; Forecast case priorities | 0.1 | 725 | \$72.50 |
| 8/2/2021 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.1 | 625 | \$62.50 |
| 8/20/2021 | G. Shimoda | Partner Case Status meeting; Discuss POA and upcoming deadlines; Forecast case priorities | 0.1 | 725 | \$72.50 |
| 8/30/2021 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.1 | 625 | \$62.50 |
| 9/1/2021 | J. Rodriguez | Email opposing counsel regarding deposition notice | 0.1 | 625 | \$62.50 |
| 9/3/2021 | G. Shimoda | Partner Case Status meeting; Discuss POA and upcoming deadlines; Forecast case priorities | 0.1 | 725 | \$72.50 |
| 9/3/2021 | J. Rodriguez | Call with client regarding status update | 0.3 | 625 | \$187.50 |
| 9/7/2021 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.1 | 625 | \$62.50 |
| 9/10/2021 | G. Shimoda | Partner Case Status meeting; Discuss POA and upcoming deadlines; Forecast case priorities | 0.1 | 725 | \$72.50 |

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| 9/13/2021 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.1 | 625 | \$62.50 |
| 9/14/2021 | J. Rodriguez | Email opposing counsel regarding discovery call | 0.1 | 625 | \$62.50 |
| 9/16/2021 | G. Shimoda | Review notes regarding call with opposing counsel regarding data completion. | 0.1 | 725 | \$72.50 |
| 9/16/2021 | J. Rodriguez | call with opposing counsel regarding wage statement production and deposition notice | 0.2 | 625 | \$125.00 |
| 9/17/2021 | G. Shimoda | Partner Case Status meeting; Discuss POA and upcoming deadlines; Forecast case priorities | 0.1 | 725 | \$72.50 |
| 9/20/2021 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.1 | 625 | \$62.50 |
| 9/21/2021 | G. Shimoda | Review of Class Member interviews and declaration status; Speak with J. Rodriguez re status and documents produced | 2.1 | 725 | \$1,522.50 |
| 9/21/2021 | J. Rodriguez | Speak with G. Shimoda re status of declarations/interviews and documents | 0.6 | 625 | \$375.00 |
| 9/22/2021 | J. Rodriguez | Research needs for subclasses and related pleading issues | 3.4 | 625 | \$2,125.00 |
| 9/23/2021 | B. Berzin | Research regarding subclasses | 0.5 | 425 | \$212.50 |
| 9/24/2021 | G. Shimoda | Partner Case Status meeting; Discuss POA and upcoming deadlines; Forecast case priorities | 0.1 | 725 | \$72.50 |
| 9/27/2021 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.2 | 625 | \$125.00 |
| 9/29/2021 | B. Berzin | Revise PMK deposition notice | 0.3 | 425 | \$127.50 |
| 9/29/2021 | G. Shimoda | Speak with J. Rodriguez regarding Crump settlement, investigation. | 1.2 | 725 | \$870.00 |
| 9/29/2021 | J. Rodriguez | Emails with Crump counsel regarding Crump settlement and overlap of claims | 0.2 | 625 | \$125.00 |
| 9/29/2021 | J. Rodriguez | Speak with G. Shimoda regarding Crump settlement, investigation. | 1.2 | 625 | \$750.00 |
| 9/29/2021 | J. Rodriguez | Review correspondence with client regarding deposition | 0.1 | 625 | \$62.50 |
| 10/1/2021 | G. Shimoda | Partner Case Status meeting; Discuss POA and upcoming deadlines; Forecast case priorities | 0.4 | 725 | \$290.00 |
| 10/4/2021 | B. Berzin | Research related case requirements | 1.2 | 425 | \$510.00 |
| 10/4/2021 | G. Shimoda | Emails re Crump settlement; Review related case filing research | 0.8 | 725 | \$580.00 |
| 10/4/2021 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.1 | 625 | \$62.50 |
| 10/7/2021 | G. Shimoda | Review notes of call with opposing counsel regarding settlement; Review case status re discovery and depositions | 0.4 | 725 | \$290.00 |
| 10/7/2021 | J. Rodriguez | Call with OC regarding Crump settlement | 0.5 | 625 | \$312.50 |
| 10/7/2021 | J. Rodriguez | Call with client regarding Crump settlement | 0.4 | 625 | \$250.00 |
| 10/14/2021 | B. Berzin | Draft stipulation and order | 1.3 | 425 | \$552.50 |
| 10/15/2021 | G. Shimoda | Partner Case Status meeting; Discuss POA and upcoming deadlines; Forecast case priorities | 0.1 | 725 | \$72.50 |
| 10/18/2021 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.1 | 625 | \$62.50 |
| 10/25/2021 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.1 | 625 | \$62.50 |
| 10/26/2021 | J. Rodriguez | Research regarding related cases issues and procedures; Review B. Berzin research | 1.5 | 625 | \$937.50 |
| 10/26/2021 | J. Rodriguez | Review/revise drafts of notice of related actions | 0.3 | 625 | \$187.50 |
| 10/29/2021 | G. Shimoda | Partner Case Status meeting; Discuss POA and upcoming deadlines; Forecast case priorities | 0.2 | 725 | \$145.00 |
| 11/1/2021 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.1 | 625 | \$62.50 |
| 11/15/2021 | J. Rodriguez | Review public request for regarding Crump action; speak with staff | 0.1 | 625 | \$62.50 |
| 11/22/2021 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.1 | 625 | \$62.50 |
| 11/29/2021 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.1 | 625 | \$62.50 |
| 12/3/2021 | G. Shimoda | Partner Case Status meeting; Discuss POA and upcoming deadlines; Forecast case priorities | 0.1 | 725 | \$72.50 |
| 12/6/2021 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.1 | 625 | \$62.50 |
| 12/17/2021 | G. Shimoda | Partner Case Status meeting; Discuss POA and upcoming deadlines; Forecast case priorities | 0.1 | 725 | \$72.50 |
| 12/17/2021 | G. Shimoda | Review of Status Conference Stmt, Corporation docs. | 0.3 | 725 | \$217.50 |
| 12/17/2021 | J. Rodriguez | Review CMC Minute order/service to opposing counsel for Sac Superior | 0.1 | 625 | \$62.50 |
| 12/20/2021 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.2 | 625 | \$125.00 |
| 12/21/2021 | J. Rodriguez | Review Crump docket report notice | 0.1 | 625 | \$62.50 |
| 12/22/2021 | G. Shimoda | Review email exchange regarding Corporation Report | 0.3 | 725 | \$217.50 |

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| 1/3/2022 | J. Rodriguez | Review Crump docket report notice | 0.1 | 625 | \$62.50 |
| 1/4/2022 | G. Shimoda | Review notes of call to opposing counsel regarding Covid, Crump settlement, moving deadline | 0.3 | 725 | \$217.50 |
| 1/4/2022 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.1 | 625 | \$62.50 |
| 1/4/2022 | J. Rodriguez | Call with opposing counsel regarding status of discovery production and potential effect of Crump settlement on our case | 0.5 | 625 | \$312.50 |
| 1/6/2022 | J. Rodriguez | Emails regarding stipulation to continue discovery | 0.2 | 625 | \$125.00 |
| 1/7/2022 | G. Shimoda | Partner Case Status meeting; Discuss POA and upcoming deadlines; Forecast case priorities | 0.1 | 725 | \$72.50 |
| 1/7/2022 | G. Shimoda | Review filed Corporation Report | 0.3 | 725 | \$217.50 |
| 1/10/2022 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.1 | 625 | \$62.50 |
| 1/14/2022 | G. Shimoda | Partner Case Status meeting; Discuss POA and upcoming deadlines; Forecast case priorities | 0.1 | 725 | \$72.50 |
| 1/18/2022 | G. Shimoda | Review email exchange regarding changes to Stipulation and Order amending pretiral schedule. | 0.1 | 725 | \$72.50 |
| 1/18/2022 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.1 | 625 | \$62.50 |
| 1/18/2022 | J. Rodriguez | Emails regarding stipulation to continue discovery | 0.2 | 625 | \$125.00 |
| 1/19/2022 | G. Shimoda | Review filed Stipulation and Order amending pretiral schedule. | 0.2 | 725 | \$145.00 |
| 1/21/2022 | G. Shimoda | Partner Case Status meeting; Discuss POA and upcoming deadlines; Forecast case priorities | 0.1 | 725 | \$72.50 |
| 1/24/2022 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.1 | 625 | \$62.50 |
| 2/1/2022 | J. Rodriguez | Review Crump Docket report | 0.1 | 625 | \$62.50 |
| 2/7/2022 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.1 | 625 | \$62.50 |
| 2/9/2022 | J. Rodriguez | Review Crump Docket report; review Crump motion for preliminary approval | 1.2 | 625 | \$750.00 |
| 2/10/2022 | B. Berzin | Review Crump preliminary approval motion; Draft Memo to file | 2.4 | 425 | \$1,020.00 |
| 2/10/2022 | J. Rodriguez | Email regarding Crump settlement agreement and overlap issues | 0.1 | 625 | \$62.50 |
| 2/10/2022 | J. Rodriguez | Review Crump settlement and potential overlap; Research re res judicata issues | 1.4 | 625 | \$875.00 |
| 2/13/2022 | G. Shimoda | Call with client regarding status | 0.2 | 725 | \$145.00 |
| 2/14/2022 | B. Berzin | Review payroll documents | 4.5 | 425 | \$1,912.50 |
| 2/14/2022 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.1 | 625 | \$62.50 |
| 2/18/2022 | G. Shimoda | Partner Case Status meeting; Discuss POA and upcoming deadlines; Forecast case priorities | 0.2 | 725 | \$145.00 |
| 2/18/2022 | J. Rodriguez | Review Harstein Action for overlap and res judicata issues; | 1.6 | 625 | \$1,000.00 |
| 2/19/2022 | B. Berzin | Res judicata research | 5.5 | 425 | \$2,337.50 |
| 2/21/2022 | J. Rodriguez | Review/Research res judicata issues from Crump settlement | 1.3 | 625 | \$812.50 |
| 2/22/2022 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.1 | 625 | \$62.50 |
| 2/23/2022 | J. Rodriguez | Review Doc production; Review file/research; RROP calculation analysis | 7.8 | 625 | \$4,875.00 |
| 2/24/2022 | B. Berzin | Call with expert re sample production and claims | 0.6 | 425 | \$255.00 |
| 2/24/2022 | G. Shimoda | Review notes regarding call with opposing counsel regarding paystubs, protective order, possible conflict. | 0.5 | 725 | \$362.50 |
| 2/24/2022 | J. Rodriguez | Review call notes with expert | 0.1 | 625 | \$62.50 |
| 2/25/2022 | G. Shimoda | Partner Case Status meeting; Discuss POA and upcoming deadlines; Forecast case priorities | 0.1 | 725 | \$72.50 |
| 2/25/2022 | J. Rodriguez | Emails with expert regarding data sample findings | 0.4 | 625 | \$250.00 |
| 2/28/2022 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.1 | 625 | \$62.50 |
| 3/4/2022 | B. Berzin | Call with exper re updated report and calculations | 0.4 | 425 | \$170.00 |
| 3/4/2022 | G. Shimoda | Partner Case Status meeting; Discuss POA and upcoming deadlines; Forecast case priorities | 0.1 | 725 | \$72.50 |
| 3/4/2022 | G. Shimoda | Review notes regarding call with opposing counsel conflict, agent for service, protective order. | 0.3 | 725 | \$217.50 |
| 3/4/2022 | J. Rodriguez | Review call notes with expert | 0.1 | 625 | \$62.50 |
| 3/6/2022 | G. Shimoda | Review email exchange regarding scheduling a call with opposing counsel regarding discovery/depositions. | 0.3 | 725 | \$217.50 |
| 3/7/2022 | G. Shimoda | Review notes regarding call with opposing counsel regarding deposition timeline, Crump claims. | 0.3 | 725 | \$217.50 |

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| 3/7/2022 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.1 | 625 | \$62.50 |
| 3/7/2022 | J. Rodriguez | Call with opposing counsel regarding deposition and Crump settlement | 0.3 | 625 | \$187.50 |
| 3/7/2022 | J. Rodriguez | Correspond with expert regarding protective order and signature | 0.2 | 625 | \$125.00 |
| 3/14/2022 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.1 | 625 | \$62.50 |
| 3/21/2022 | B. Berzin | Call with expert re status of report | 0.3 | 425 | \$127.50 |
| 3/21/2022 | G. Shimoda | Review notes regarding call with opposing counsel regarding completing analysis of data timeline. | 0.1 | 725 | \$72.50 |
| 3/21/2022 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.1 | 625 | \$62.50 |
| 3/21/2022 | J. Rodriguez | Review call notes with expert | 0.1 | 625 | \$62.50 |
| 3/23/2022 | B. Berzin | Followed up with opposing counsel to ask for PMK deposition dates | 0.1 | 425 | \$42.50 |
| 3/25/2022 | G. Shimoda | Partner Case Status meeting; Discuss POA and upcoming deadlines; Forecast case priorities | 0.1 | 725 | \$72.50 |
| 3/28/2022 | G. Shimoda | Review notes regarding call with opposing counsel regarding deposition dates. | 0.3 | 725 | \$217.50 |
| 3/28/2022 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.1 | 625 | \$62.50 |
| 3/28/2022 | J. Rodriguez | Email with opposing counsel regarding depositions | 0.1 | 625 | \$62.50 |
| 4/1/2022 | G. Shimoda | Review email follow-up to OC regarding deposition dates, review call notes. | 0.4 | 725 | \$290.00 |
| 4/1/2022 | J. Rodriguez | Review call notes with expert | 0.1 | 625 | \$62.50 |
| 4/1/2022 | J. Rodriguez | Call with client re status update | 0.3 | 625 | \$187.50 |
| 4/4/2022 | G. Shimoda | Review notes of call to Client regarding Crump notice and opt out. | 0.3 | 725 | \$217.50 |
| 4/4/2022 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.1 | 625 | \$62.50 |
| 4/5/2022 | B. Berzin | Call with expert regarding status of report | 0.5 | 425 | \$212.50 |
| 4/6/2022 | G. Shimoda | Review notes of call to Client regarding completion of data prep. | 0.3 | 725 | \$217.50 |
| 4/7/2022 | J. Rodriguez | Email with opposing counsel regarding setting call | 0.1 | 625 | \$62.50 |
| 4/8/2022 | G. Shimoda | Review notes of call to Client regarding scheduling depositions. | 0.3 | 725 | \$217.50 |
| 4/8/2022 | J. Rodriguez | Cal with opposing counsel regarding deposition and certification briefing schedule | 0.2 | 625 | \$125.00 |
| 4/11/2022 | G. Shimoda | Emails regarding set call to discuss depositions, review call notes. | 0.5 | 725 | \$362.50 |
| 4/12/2022 | J. Rodriguez | Emails regarding stipulation to continue phase 1 discovery | 0.2 | 625 | \$125.00 |
| 4/14/2022 | J. Rodriguez | Review Crump docket report | 0.1 | 625 | \$62.50 |
| 4/15/2022 | G. Shimoda | Review emails regarding draft stip and order continuing the Phase 1 Discovery. | 0.1 | 725 | \$72.50 |
| 4/15/2022 | J. Rodriguez | Review final of stipulation to continue discovery filing/service package | 0.3 | 625 | \$187.50 |
| 4/18/2022 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.1 | 625 | \$62.50 |
| 4/22/2022 | B. Berzin | Call with expert re status of report; Call with iBridge re converting PDFs into more usable formats | 0.8 | 425 | \$340.00 |
| 4/22/2022 | G. Shimoda | Partner Case Status meeting; Discuss POA and upcoming deadlines; Forecast case priorities | 0.1 | 725 | \$72.50 |
| 4/22/2022 | G. Shimoda | Review of email exchange regarding draft stip and order to continue discovery; review notes regarding call to opposing counsel regarding converted data; review notes regarding call to opposing counsel regarding data points, document requests. | 0.3 | 725 | \$217.50 |
| 4/22/2022 | J. Rodriguez | Review call notes with Expert regarding using iBridge to convert PDF wage statements | 0.1 | 625 | \$62.50 |
| 4/25/2022 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.1 | 625 | \$62.50 |
| 4/26/2022 | B. Berzin | Call with iBridge re status of services and scope of work for project | 0.4 | 425 | \$170.00 |
| 4/26/2022 | G. Shimoda | Review notes from call to Ibridge, paystubs, Protective Order. | 0.3 | 725 | \$217.50 |
| 4/27/2022 | G. Shimoda | Review notes regarding Call to Ethan regarding deductions. | 0.2 | 725 | \$145.00 |
| 4/28/2022 | B. Berzin | Research re expert discovery; Call with iBridge re upload of files | 0.8 | 425 | \$340.00 |
| 4/28/2022 | G. Shimoda | Review notes regarding Call to Ethan regarding uploaded documents and quote. | 0.2 | 725 | \$145.00 |
| 4/28/2022 | J. Rodriguez | Review call notes regarding iBridge | 0.1 | 625 | \$62.50 |
| 4/28/2022 | J. Rodriguez | Review Crump docket report | 0.1 | 625 | \$62.50 |
| 4/29/2022 | G. Shimoda | Partner Case Status meeting; Discuss POA and upcoming deadlines; Forecast case priorities | 0.2 | 725 | \$145.00 |
| 5/2/2022 | G. Shimoda | Review scope of work and agreement regarding Ibridge data. | 0.8 | 725 | \$580.00 |
| 5/2/2022 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.1 | 625 | \$62.50 |
| 5/4/2022 | G. Shimoda | Review notes regarding Call to iBridge regarding uploaded documents and quote; review email exchange regarding client notification of deposition; review notes regarding calls to Client regarding deposition date. | 0.8 | 725 | \$580.00 |
| 5/6/2022 | B. Berzin | Revise PMK deposition notice | 0.5 | 425 | \$212.50 |

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| 5/6/2022 | J. Rodriguez | Review correspondence with client regarding deposition | 0.1 | 625 | \$62.50 |
| 5/7/2022 | J. Rodriguez | Review file for deposition exhibits; Research certification issues regarding substantive claims | 4.8 | 625 | \$3,000.00 |
| 5/9/2022 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.1 | 625 | \$62.50 |
| 5/10/2022 | J. Rodriguez | Review iBridge productions for payroll/timecard PDFs | 1.8 | 625 | \$1,125.00 |
| 5/13/2022 | B. Berzin | Revise PMK deposition notice | 0.1 | 425 | \$42.50 |
| 5/16/2022 | B. Berzin | Call with expert regarding status of report | 0.4 | 425 | \$170.00 |
| 5/16/2022 | G. Shimoda | Review notes from call with opposing counsel regarding pay periods, data. | 0.1 | 725 | \$72.50 |
| 5/16/2022 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.1 | 625 | \$62.50 |
| 5/16/2022 | J. Rodriguez | Review call notes with expert | 0.1 | 625 | \$62.50 |
| 5/18/2022 | G. Shimoda | Review call notes with client | 0.2 | 725 | \$145.00 |
| 5/18/2022 | J. Rodriguez | Call with client re status update and depositions | 0.6 | 625 | \$375.00 |
| 5/20/2022 | G. Shimoda | Review email exchange regarding set date for deposition of PMK. | 0.3 | 725 | \$217.50 |
| 5/23/2022 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.1 | 625 | \$62.50 |
| 5/31/2022 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.2 | 625 | \$125.00 |
| 6/3/2022 | G. Shimoda | Partner Case Status meeting; Discuss POA and upcoming deadlines; Forecast case priorities | 0.1 | 725 | \$72.50 |
| 6/6/2022 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.1 | 625 | \$62.50 |
| 6/8/2022 | B. Berzin | Call with expert regarding status of report & initial findings; Speak with J. Rodriguez | 1.4 | 425 | \$595.00 |
| 6/8/2022 | J. Rodriguez | Review call notes and speak with B. Berzin re expert findings | 0.5 | 625 | \$312.50 |
| 6/9/2022 | G. Shimoda | Review of converted data. | 0.5 | 725 | \$362.50 |
| 6/9/2022 | J. Rodriguez | Review Crump docket report and supplementary approval motion filings in Crump case | 0.4 | 625 | \$250.00 |
| 6/10/2022 | G. Shimoda | Partner Case Status meeting; Discuss POA and upcoming deadlines; Forecast case priorities | 0.1 | 725 | \$72.50 |
| 6/13/2022 | B. Berzin | Call with expert re bates numbered documents for examples illustrating analysis | 0.6 | 425 | \$255.00 |
| 6/13/2022 | G. Shimoda | Review emails regarding scheduling deposition of PMK; Review emails regarding data analysis; Review emails regarding Deposition of PMK; Review notes of call with opposing counsel regarding documents; Review file re cited documents | 1.5 | 725 | \$1,087.50 |
| 6/13/2022 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.1 | 625 | \$62.50 |
| 6/13/2022 | J. Rodriguez | Email with opposing counsel regarding deposition dates | 0.2 | 625 | \$125.00 |
| 6/13/2022 | J. Rodriguez | Review call notes with expert | 0.1 | 625 | \$62.50 |
| 6/15/2022 | J. Rodriguez | Review Crump docket report | 0.1 | 625 | \$62.50 |
| 6/16/2022 | G. Shimoda | Review email exchange regarding scheduling depositions, possible extensions. | 0.3 | 725 | \$217.50 |
| 6/16/2022 | J. Rodriguez | Emails with opposing counsel regarding deposition dates | 0.2 | 625 | \$125.00 |
| 6/17/2022 | G. Shimoda | Partner Case Status meeting; Discuss POA and upcoming deadlines; Forecast case priorities | 0.2 | 725 | \$145.00 |
| 6/17/2022 | J. Rodriguez | Review Crump docket report & order of preliminary approval | 0.2 | 625 | \$125.00 |
| 6/22/2022 | G. Shimoda | Review of email exchange regarding moving deposition. | 0.3 | 725 | \$217.50 |
| 6/27/2022 | G. Shimoda | Review of emails regarding PMK deposition | 0.3 | 725 | \$217.50 |
| 6/27/2022 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.1 | 625 | \$62.50 |
| 6/27/2022 | J. Rodriguez | Email with opposing counsel regarding deposition dates | 0.1 | 625 | \$62.50 |
| 6/27/2022 | J. Rodriguez | Review Crump docket report | 0.1 | 625 | \$62.50 |
| 6/29/2022 | G. Shimoda | Review email request to opposing counsel to change location of deposition. | 0.3 | 725 | \$217.50 |
| 7/1/2022 | G. Shimoda | Partner Case Status meeting; Discuss POA and upcoming deadlines; Forecast case priorities | 0.1 | 725 | \$72.50 |
| 7/5/2022 | G. Shimoda | Review email response from opposing counsel regarding deposition location. | 0.2 | 725 | \$145.00 |
| 7/5/2022 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.1 | 625 | \$62.50 |
| 7/7/2022 | G. Shimoda | Review email follow-up to opposing counsel regarding deposition location; review notes from call with client regarding possible deposition and status. | 0.5 | 725 | \$362.50 |
| 7/7/2022 | J. Rodriguez | Call with client regarding status of case and opt out procedures for Crump action | 0.8 | 625 | \$500.00 |
| 7/8/2022 | G. Shimoda | Partner Case Status meeting; Discuss POA and upcoming deadlines; Forecast case priorities | 0.1 | 725 | \$72.50 |
| 7/8/2022 | G. Shimoda | Review email exchange with opposing counsel regarding stip to continue discovery. | 0.3 | 725 | \$217.50 |
| 7/11/2022 | G. Shimoda | Review notes from call with OC regarding PMK location and date. | 0.3 | 725 | \$217.50 |
| 7/11/2022 | J. Rodriguez | Call with opposing counsel regarding designating new PMK for depo | 0.4 | 625 | \$250.00 |

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| 7/12/2022 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.2 | 625 | \$125.00 |
| 7/12/2022 | J. Rodriguez | Review final of stipulation to continue discovery filing/service package | 0.1 | 625 | \$62.50 |
| 7/14/2022 | B. Berzin | Call with client re deposition status and prep | 0.4 | 425 | \$170.00 |
| 7/14/2022 | G. Shimoda | Review notes regarding call with Client regarding notice of deposition. | 0.2 | 725 | \$145.00 |
| 7/15/2022 | G. Shimoda | Partner Case Status meeting; Discuss POA and upcoming deadlines; Forecast case priorities | 0.2 | 725 | \$145.00 |
| 7/18/2022 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.1 | 625 | \$62.50 |
| 7/22/2022 | B. Berzin | Review case file & draft checklist for certification | 6.1 | 425 | \$2,592.50 |
| 7/22/2022 | G. Shimoda | Partner Case Status meeting; Discuss POA and upcoming deadlines; Forecast case priorities | 0.2 | 725 | \$145.00 |
| 7/22/2022 | J. Rodriguez | Emails regarding Vigil action and overlap; Review Vigil Complaint for overlap | 0.9 | 625 | \$562.50 |
| 7/22/2022 | J. Rodriguez | Emails with client regarding Crump action | 0.3 | 625 | \$187.50 |
| 7/22/2022 | J. Rodriguez | Review Brumbach Action for overlap and res judicata issues; | 1.6 | 625 | \$1,000.00 |
| 7/22/2022 | J. Rodriguez | Review call notes with client regarding deposition | 0.1 | 625 | \$62.50 |
| 7/22/2022 | J. Rodriguez | Review Crump docket report | 0.1 | 625 | \$62.50 |
| 7/22/2022 | J. Rodriguez | Review Vigil action filing/docket; research regarding overlap issues and res judicata; Reach out to Vigil opposing counsel | 2.4 | 625 | \$1,500.00 |
| 7/25/2022 | B. Berzin | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.2 | 425 | \$85.00 |
| 7/25/2022 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.2 | 625 | \$125.00 |
| 7/25/2022 | J. Rodriguez | Email opposing counsel regarding rescheduling deposition | 0.1 | 625 | \$62.50 |
| 7/29/2022 | G. Shimoda | Partner Case Status meeting; Discuss POA and upcoming deadlines; Forecast case priorities | 0.1 | 725 | \$72.50 |
| 8/1/2022 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.1 | 625 | \$62.50 |
| 8/3/2022 | J. Rodriguez | Call with client regarding deposition prep | 0.6 | 625 | \$375.00 |
| 8/5/2022 | G. Shimoda | Partner Case Status meeting; Discuss POA and upcoming deadlines; Forecast case priorities | 0.1 | 725 | \$72.50 |
| 8/8/2022 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.1 | 625 | \$62.50 |
| 8/12/2022 | G. Shimoda | Partner Case Status meeting; Discuss POA and upcoming deadlines; Forecast case priorities | 0.3 | 725 | \$217.50 |
| 8/15/2022 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.1 | 625 | \$62.50 |
| 8/15/2022 | J. Rodriguez | Call with client regarding deposition prep | 1.5 | 625 | \$937.50 |
| 8/16/2022 | B. Berzin | Confirm PMK deposition date/location | 0.2 | 425 | \$85.00 |
| 8/16/2022 | B. Berzin | E-mail client re Crump action and her depo | 0.1 | 425 | \$42.50 |
| 8/16/2022 | B. Berzin | E-mail to client re claims/documents for deposition prep | 0.6 | 425 | \$255.00 |
| 8/16/2022 | B. Berzin | Research to find who settlement administrator is in Crump action | 0.4 | 425 | \$170.00 |
| 8/16/2022 | G. Shimoda | Review notes regarding call with Client regarding deposition procedure. | 0.1 | 725 | \$72.50 |
| 8/16/2022 | J. Rodriguez | Review client call notes regarding deposition | 0.1 | 625 | \$62.50 |
| 8/17/2022 | B. Berzin | Revise letter to client regarding depo | 0.1 | 425 | \$42.50 |
| 8/17/2022 | J. Rodriguez | Emails with client regarding opt out for Crump | 0.3 | 625 | \$187.50 |
| 8/17/2022 | J. Rodriguez | Review client call notes regarding Crump settlement notice opt out | 0.1 | 625 | \$62.50 |
| 8/17/2022 | J. Rodriguez | Review client call notes regarding deposition | 0.1 | 625 | \$62.50 |
| 8/17/2022 | J. Rodriguez | Review deposition notice; Speak to client re status | 0.5 | 625 | \$312.50 |
| 8/18/2022 | G. Shimoda | Review notes regarding call regarding exclusion text; Call with client regarding opting out | 0.5 | 725 | \$362.50 |
| 8/18/2022 | J. Rodriguez | Call with client regarding deposition prep | 1.3 | 625 | \$812.50 |
| 8/19/2022 | G. Shimoda | Partner Case Status meeting; Discuss POA and upcoming deadlines; Forecast case priorities | 0.1 | 725 | \$72.50 |
| 8/19/2022 | G. Shimoda | Receipt and review of job titles for the full class list. | 1.5 | 725 | \$1,087.50 |
| 8/19/2022 | J. Rodriguez | Call with opposing counsel regarding deposition and notice objections | 0.6 | 625 | \$375.00 |
| 8/19/2022 | J. Rodriguez | Call with opposing counsel regarding deposition; Prep for deposition; Review file & pull exhibits | 5.4 | 625 | \$3,375.00 |
| 8/21/2022 | J. Rodriguez | Review exhibits/file; Prep for deposition | 3.2 | 625 | \$2,000.00 |
| 8/22/2022 | G. Shimoda | Review email to Client regarding special interrogatories and initial disclosure; review research re legal issues for deposition, review notes regarding call with opposing counsel regarding depositions; review of Amended Notice of Deposition (Client); review notes from call with iBridge regarding declaration. | 1.6 | 725 | \$1,160.00 |

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| 8/22/2022 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.2 | 625 | \$125.00 |
| 8/22/2022 | J. Rodriguez | Prep for deposition; Review all witness interview notes; Pull exhibits and draft calculations; Call with opposing counsel | 14 | 625 | \$8,750.00 |
| 8/23/2022 | J. Rodriguez | PMK deposition; speak with client; prepare for defending deposition | 8.9 | 625 | \$5,562.50 |
| 8/24/2022 | J. Rodriguez | Speak with client; Attend client deposition; Speak with opposing counsel regarding discovery and case status | 9.3 | 625 | \$5,812.50 |
| 8/25/2022 | G. Shimoda | Review email exchange with opposing counsel regarding possible mediation. | 0.4 | 725 | \$290.00 |
| 8/25/2022 | J. Rodriguez | Review iBridge declaration regarding expert authentication | 0.2 | 625 | \$125.00 |
| 8/26/2022 | G. Shimoda | Partner Case Status meeting; Discuss POA and upcoming deadlines; Forecast case priorities | 0.1 | 725 | \$72.50 |
| 8/26/2022 | G. Shimoda | Review email reminder to opposing counsel regarding follow up of possible Mediation and data. | 0.2 | 725 | \$145.00 |
| 8/29/2022 | G. Shimoda | Review email exchange with opposing counsel regarding drafting stipulation to continue fact discovery. | 0.3 | 725 | \$217.50 |
| 8/29/2022 | G. Shimoda | Review of notes re Crump opt out. | 0.3 | 725 | \$217.50 |
| 8/29/2022 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.3 | 625 | \$187.50 |
| 8/29/2022 | J. Rodriguez | Draft stipulation to continue discovery deadlines | 0.4 | 625 | \$250.00 |
| 8/29/2022 | J. Rodriguez | Emails with admin to confirm opt out for Plaintiff received | 0.3 | 625 | \$187.50 |
| 8/30/2022 | G. Shimoda | Email exchange with opposing counsel regarding possible mediators. | 0.3 | 725 | \$217.50 |
| 8/30/2022 | G. Shimoda | Review Stipulation and Order to Amend Court's pretrial scheduling order. | 0.5 | 725 | \$362.50 |
| 8/30/2022 | J. Rodriguez | Review final of stipulation to continue discovery filing/service package | 0.1 | 625 | \$62.50 |
| 8/31/2022 | J. Rodriguez | Emails with opposing counsel regarding setting mediation | 0.2 | 625 | \$125.00 |
| 9/1/2022 | G. Shimoda | Review notes from call with opposing counsel re possible mediation, hotel ownership, stipulation and order timeline. | 0.3 | 725 | \$217.50 |
| 9/1/2022 | J. Rodriguez | Call with opposing counsel regarding setting mediaiton | 0.3 | 625 | \$187.50 |
| 9/1/2022 | J. Rodriguez | Call with client regarding status update | 0.4 | 625 | \$250.00 |
| 9/2/2022 | G. Shimoda | Partner Case Status meeting; Discuss POA and upcoming deadlines; Forecast case priorities | 0.1 | 725 | \$72.50 |
| 9/6/2022 | G. Shimoda | Review email exchange with opposing counsel regarding status of mediation. | 0.3 | 725 | \$217.50 |
| 9/6/2022 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.2 | 625 | \$125.00 |
| 9/8/2022 | G. Shimoda | Review of email to Client with Deposition transcript; review of notes regarding call with Veritext regarding deposition transcript due date; review of email regarding Deposition transcript, review of transcript. | 3.3 | 725 | \$2,392.50 |
| 9/9/2022 | G. Shimoda | Partner Case Status meeting; Discuss POA and upcoming deadlines; Forecast case priorities | 0.1 | 725 | \$72.50 |
| 9/12/2022 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.1 | 625 | \$62.50 |
| 9/13/2022 | J. Rodriguez | Review deposition transcript and exhibits | 1.6 | 625 | \$1,000.00 |
| 9/14/2022 | G. Shimoda | Emails regarding Mediator dates available. | 0.3 | 725 | \$217.50 |
| 9/16/2022 | G. Shimoda | Partner Case Status meeting; Discuss POA and upcoming deadlines; Forecast case priorities | 0.1 | 725 | \$72.50 |
| 9/19/2022 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.1 | 625 | \$62.50 |
| 9/23/2022 | G. Shimoda | Partner Case Status meeting; Discuss POA and upcoming deadlines; Forecast case priorities | 0.1 | 725 | \$72.50 |
| 9/23/2022 | G. Shimoda | Email exchange regarding Mediator dates available. | 0.3 | 725 | \$217.50 |
| 9/23/2022 | J. Rodriguez | Emails/calls with opposing counsel regarding setting mediation | 0.6 | 625 | \$375.00 |
| 9/26/2022 | G. Shimoda | Email exchange regarding availability to set Mediation. | 0.3 | 725 | \$217.50 |
| 9/27/2022 | G. Shimoda | Email exchange regarding setting Mediation; review email exchange with Counsel re Sacramento location exclusion. | 0.6 | 725 | \$435.00 |
| 9/27/2022 | J. Rodriguez | Emails/Call with Vigil opposing counsel regarding status and overlap of claims | 0.8 | 625 | \$500.00 |
| 9/28/2022 | G. Shimoda | Review email exchange with opposing counsel regarding mediation preferences. | 0.2 | 725 | \$145.00 |
| 9/28/2022 | J. Rodriguez | Emails regardng opposing counsel regarding setting mediation and logistics | 0.5 | 625 | \$312.50 |
| 9/30/2022 | G. Shimoda | Partner Case Status meeting; Discuss POA and upcoming deadlines; Forecast case priorities | 0.1 | 725 | \$72.50 |
| 10/3/2022 | G. Shimoda | Speak with J. Rodriguez regarding status of mediation | 0.3 | 725 | \$217.50 |
| 10/3/2022 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.1 | 625 | \$62.50 |
| 10/7/2022 | G. Shimoda | Partner Case Status meeting; Discuss POA and upcoming deadlines; Forecast case priorities | 0.1 | 725 | \$72.50 |
| 10/7/2022 | J. Rodriguez | Call with client regarding deposition transcript changes | 0.4 | 625 | \$250.00 |

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| 10/10/2022 | G. Shimoda | Review of notes regarding call with Veritext regarding deposition corrections and call with Client regarding deposition changes. | 0.4 | 725 | \$290.00 |
| 10/10/2022 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.2 | 625 | \$125.00 |
| 10/10/2022 | J. Rodriguez | Review Crump Docket report and final approval filing | 0.5 | 625 | \$312.50 |
| 10/10/2022 | J. Rodriguez | Review deposition transcript change & client call regarding changes | 0.6 | 625 | \$375.00 |
| 10/14/2022 | G. Shimoda | Partner Case Status meeting; Discuss POA and upcoming deadlines; Forecast case priorities | 0.2 | 725 | \$145.00 |
| 10/17/2022 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.1 | 625 | \$62.50 |
| 10/17/2022 | J. Rodriguez | Email regarding pushing discovery deadline pending mediation | 0.1 | 625 | \$62.50 |
| 10/18/2022 | B. Berzin | Reviewing filing of stipulation and order to continue discovery deadline | 0.2 | 425 | \$85.00 |
| 10/18/2022 | G. Shimoda | Review of email exchange with opposing counsel regarding Caption Page of Service List, changes. | 0.5 | 725 | \$362.50 |
| 10/18/2022 | J. Rodriguez | Review final of stipulation to continue discovery filing/service package | 0.1 | 625 | \$62.50 |
| 10/18/2022 | J. Rodriguez | Speak to opposing counsel regarding data request and issues for mediation production; Speak to B. Berzin regarding lists | 0.7 | 625 | \$437.50 |
| 10/18/2022 | J. Rodriguez | Stip/Order regarding extending deadline for cert discovery; Emails to opposing counsel; speak with staff regarding filing | 0.4 | 625 | \$250.00 |
| 10/19/2022 | B. Berzin | Review court order extending deadline for discovery and calendaring new deadlines | 0.3 | 425 | \$127.50 |
| 10/20/2022 | B. Berzin | Review email regarding items needed for mediation | 0.1 | 425 | \$42.50 |
| 10/20/2022 | J. Rodriguez | Review file; Draft informal production list for mediation; Email opposing counsel | 0.8 | 625 | \$500.00 |
| 10/21/2022 | G. Shimoda | Partner Case Status meeting; Discuss POA and upcoming deadlines; Forecast case priorities | 0.1 | 725 | \$72.50 |
| 10/24/2022 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.1 | 625 | \$62.50 |
| 10/25/2022 | B. Berzin | Fix westlaw alert regarding Vigil actions | 0.4 | 425 | \$170.00 |
| 10/28/2022 | G. Shimoda | Partner Case Status meeting; Discuss POA and upcoming deadlines; Forecast case priorities | 0.1 | 725 | \$72.50 |
| 10/31/2022 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.1 | 625 | \$62.50 |
| 11/2/2022 | B. Berzin | Review Vigil/Crump dockets | 0.2 | 425 | \$85.00 |
| 11/4/2022 | B. Berzin | Review docs in case file for any required supplemental production | 1 | 425 | \$425.00 |
| 11/7/2022 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.1 | 625 | \$62.50 |
| 11/10/2022 | J. Rodriguez | Review Crump Docket report | 0.1 | 625 | \$62.50 |
| 11/14/2022 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.1 | 625 | \$62.50 |
| 11/16/2022 | B. Berzin | Draft notice of related actions (Eastern district) | 0.4 | 425 | \$170.00 |
| 11/18/2022 | B. Berzin | File notice of related action with EVR (in Vigil case) | 0.4 | 425 | \$170.00 |
| 11/18/2022 | G. Shimoda | Partner Case Status meeting; Discuss POA and upcoming deadlines; Forecast case priorities | 0.1 | 725 | \$72.50 |
| 11/18/2022 | J. Rodriguez | Emails regarding notice of related action filing in Vigil | 0.1 | 625 | \$62.50 |
| 11/18/2022 | J. Rodriguez | Review notice of related action service email | 0.1 | 625 | \$62.50 |
| 11/21/2022 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.1 | 625 | \$62.50 |
| 11/28/2022 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.1 | 625 | \$62.50 |
| 11/30/2022 | J. Rodriguez | Emails with Vigil Counsel regarding status of case and potential overlap | 0.2 | 625 | \$125.00 |
| 11/30/2022 | J. Rodriguez | Review file; Review Crump Settlement and carve out terms; Email/call Vigil counsel regarding carve out | 0.8 | 625 | \$500.00 |
| 12/2/2022 | G. Shimoda | Partner Case Status meeting; Discuss POA and upcoming deadlines; Forecast case priorities | 0.1 | 725 | \$72.50 |
| 12/2/2022 | J. Rodriguez | Emails with Vigil Counsel regarding settlement and potential overlap | 0.3 | 625 | \$187.50 |
| 12/5/2022 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.1 | 625 | \$62.50 |
| 12/6/2022 | J. Rodriguez | Review Vigil Docket report | 0.1 | 625 | \$62.50 |
| 12/7/2022 | J. Rodriguez | Review Vigil Docket report | 0.1 | 625 | \$62.50 |
| 12/9/2022 | G. Shimoda | Partner Case Status meeting; Discuss POA and upcoming deadlines; Forecast case priorities | 0.1 | 725 | \$72.50 |
| 12/9/2022 | J. Rodriguez | Review Crump docket report | 0.1 | 625 | \$62.50 |
| 12/12/2022 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.1 | 625 | \$62.50 |

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| 12/16/2022 | G. Shimoda | Partner Case Status meeting; Discuss POA and upcoming deadlines; Forecast case priorities | 0.1 | 725 | \$72.50 |
| 1/6/2023 | G. Shimoda | Partner Case Status meeting; Discuss POA and upcoming deadlines; Forecast case priorities | 0.1 | 725 | \$72.50 |
| 1/6/2023 | G. Shimoda | Email exchange with opposing counsel regarding request of Mediation Data. | 0.3 | 725 | \$217.50 |
| 1/6/2023 | J. Rodriguez | Email opposing counsel regarding mediation data | 0.1 | 625 | \$62.50 |
| 1/9/2023 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.1 | 625 | \$62.50 |
| 1/13/2023 | G. Shimoda | Partner Case Status meeting; Discuss POA and upcoming deadlines; Forecast case priorities | 0.1 | 725 | \$72.50 |
| 1/17/2023 | G. Shimoda | Review email from opposing counsel saying regarding data. | 0.1 | 725 | \$72.50 |
| 1/17/2023 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.2 | 625 | \$125.00 |
| 1/17/2023 | J. Rodriguez | Email opposing counsel regarding mediation data | 0.1 | 625 | \$62.50 |
| 2/7/2023 | G. Shimoda | Review of email exchange with opposing counsel requesting verification of class data. | 0.1 | 725 | \$72.50 |
| 2/7/2023 | J. Rodriguez | Call client regarding status update and mediation | 0.4 | 625 | \$250.00 |
| 2/7/2023 | J. Rodriguez | Email opposing counsel regarding mediation data | 0.1 | 625 | \$62.50 |
| 2/9/2023 | G. Shimoda | Review of email exchange with Mediator regarding balance and confirmation of Mediation. | 0.1 | 725 | \$72.50 |
| 2/9/2023 | J. Rodriguez | Email mediator office regarding status and logistics | 0.2 | 625 | \$125.00 |
| 2/10/2023 | B. Berzin | Emails with opposing counsel regarding class data | 0.1 | 425 | \$42.50 |
| 2/10/2023 | G. Shimoda | Partner Case Status meeting; Discuss POA and upcoming deadlines; Forecast case priorities | 0.1 | 725 | \$72.50 |
| 2/10/2023 | G. Shimoda | Review of Data, spreadsheets, discuss inter-firm. | 1.8 | 725 | \$1,305.00 |
| 2/10/2023 | J. Rodriguez | Emails with opposing counsel regarding mediation data | 0.2 | 625 | \$125.00 |
| 2/11/2023 | J. Rodriguez | Review of Data production spreadsheets and analysis | 4.5 | 625 | \$2,812.50 |
| 2/15/2023 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.2 | 625 | \$125.00 |
| 2/15/2023 | J. Rodriguez | Review Crump docket report | 0.1 | 625 | \$62.50 |
| 2/17/2023 | G. Shimoda | Partner Case Status meeting; Discuss POA and upcoming deadlines; Forecast case priorities | 0.1 | 725 | \$72.50 |
| 2/20/2023 | J. Rodriguez | Review Crump docket report | 0.1 | 625 | \$62.50 |
| 2/21/2023 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.3 | 625 | \$187.50 |
| 2/24/2023 | G. Shimoda | Partner Case Status meeting; Discuss POA and upcoming deadlines; Forecast case priorities | 0.2 | 725 | \$145.00 |
| 2/27/2023 | B. Berzin | Review emails with opposing counsel regarding data and setting a call to discuss. | 0.1 | 425 | \$42.50 |
| 2/27/2023 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.3 | 625 | \$187.50 |
| 2/27/2023 | J. Rodriguez | Email regarding call to discuss data for mediation | 0.1 | 625 | \$62.50 |
| 2/28/2023 | G. Shimoda | Status of Mediation payment, investigate. | 0.4 | 725 | \$290.00 |
| 3/1/2023 | J. Rodriguez | Call with opposing counsel regarding data and scope of mediation | 0.5 | 625 | \$312.50 |
| 3/1/2023 | J. Rodriguez | Review file/data request; Review updated sample; Prep/call with opposing counsel regarding data and status for mediation | 3.4 | 625 | \$2,125.00 |
| 3/3/2023 | G. Shimoda | Partner Case Status meeting; Discuss POA and upcoming deadlines; Forecast case priorities | 0.3 | 725 | \$217.50 |
| 3/6/2023 | B. Berzin | Draft mediation brief | 5.3 | 425 | \$2,252.50 |
| 3/6/2023 | B. Berzin | Reviewing documents for mediation | 3.4 | 425 | \$1,445.00 |
| 3/6/2023 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.2 | 625 | \$125.00 |
| 3/6/2023 | J. Rodriguez | Emails with opposing counsel regarding mediation data; Review documents | 0.9 | 625 | \$562.50 |
| 3/7/2023 | J. Rodriguez | Review client call notes regarding mediation | 0.1 | 625 | \$62.50 |
| 3/8/2023 | B. Berzin | Draft MOU | 0.3 | 425 | \$127.50 |
| 3/8/2023 | G. Shimoda | Review email string regarding flight. | 0.6 | 725 | \$435.00 |
| 3/8/2023 | J. Rodriguez | Email opposing counsel regarding mediating in person | 0.1 | 625 | \$62.50 |
| 3/9/2023 | B. Berzin | Speak with J. Rodriguez regarding supplemental document production. | 0.2 | 425 | \$85.00 |
| 3/9/2023 | J. Rodriguez | Draft/finalize working draft of MOU for mediation | 0.5 | 625 | \$312.50 |
| 3/9/2023 | J. Rodriguez | Review opposing counsel MOU draft; Email opposing counsel regarding MOU and deposition transcript | 0.6 | 625 | \$375.00 |
| 3/10/2023 | B. Berzin | Emails with opposing counsel regarding deposition; MOU for mediation. | 0.2 | 425 | \$85.00 |
| 3/13/2023 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.2 | 625 | \$125.00 |
| 3/13/2023 | J. Rodriguez | Review Crump settlement agreement and final approval order for overlap; research res judicata issues | 1.2 | 625 | \$750.00 |

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|-----------|--------------|--|------|-----|------------|
| 3/13/2023 | J. Rodriguez | Speak with client regarding mediation prep | 0.6 | 625 | \$375.00 |
| 3/14/2023 | J. Rodriguez | Review updates spreadsheets and class data for mediation; research; perform RROP & damages calculation analysis | 6.3 | 625 | \$3,937.50 |
| 3/15/2023 | B. Berzin | Review emails with opposing counsel regarding mediation brief. | 0.1 | 425 | \$42.50 |
| 3/15/2023 | G. Shimoda | Review email regarding mediation brief. | 0.3 | 725 | \$217.50 |
| 3/15/2023 | J. Rodriguez | Review updates spreadsheets and class data for mediation; research; perform RROP & damages calculation analysis; Revise/finalize mediation brief | 6.9 | 625 | \$4,312.50 |
| 3/16/2023 | B. Berzin | Draft supplemental brief for mediation | 0.3 | 425 | \$127.50 |
| 3/16/2023 | J. Rodriguez | Speak with client regarding mediation prep | 0.9 | 625 | \$562.50 |
| 3/17/2023 | G. Shimoda | Partner Case Status meeting; Discuss POA and upcoming deadlines; Forecast case priorities | 0.3 | 725 | \$217.50 |
| 3/17/2023 | G. Shimoda | Review Mediation Confidentiality Agreement. | 0.3 | 725 | \$217.50 |
| 3/17/2023 | J. Rodriguez | Review client call notes regarding mediation facts/data | 0.2 | 625 | \$125.00 |
| 3/17/2023 | J. Rodriguez | Updates to spreadsheets and class data for mediation; Research penalty issues; RROP & damages calculation analysis | 9.2 | 625 | \$5,750.00 |
| 3/19/2023 | G. Shimoda | Review email string regarding negative covid results for scheduled mediation. | 0.9 | 725 | \$652.50 |
| 3/19/2023 | J. Rodriguez | Prep for and travel to mediation | 5.8 | 625 | \$3,625.00 |
| 3/19/2023 | J. Rodriguez | Speak with client regarding mediation prep | 0.4 | 625 | \$250.00 |
| 3/20/2023 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.2 | 625 | \$125.00 |
| 3/20/2023 | J. Rodriguez | Attend mediation/travel back from mediation | 13.8 | 625 | \$8,625.00 |
| 3/21/2023 | B. Berzin | Review email from ILYM group regarding settlement admin quote. | 0.1 | 425 | \$42.50 |
| 3/21/2023 | G. Shimoda | Review email string regarding stipulation to amend and to vacate the scheduling order deadlines. | 0.6 | 725 | \$435.00 |
| 3/21/2023 | J. Rodriguez | Review MOU with client; update on status and procedures | 1.5 | 625 | \$937.50 |
| 3/22/2023 | B. Berzin | Review email from ILYM Group with administration quote | 0.2 | 425 | \$85.00 |
| 3/22/2023 | G. Shimoda | Review quote from ILYM group | 0.3 | 725 | \$217.50 |
| 3/23/2023 | G. Shimoda | Review mediation calculations | 0.3 | 725 | \$217.50 |
| 3/24/2023 | B. Berzin | Draft long form settlement agreement | 4.1 | 425 | \$1,742.50 |
| 3/24/2023 | G. Shimoda | Review email with requested quote. | 0.3 | 725 | \$217.50 |
| 3/25/2023 | B. Berzin | Draft class notice | 1.5 | 425 | \$637.50 |
| 3/27/2023 | B. Berzin | Draft PAM | 8.5 | 425 | \$3,612.50 |
| 3/28/2023 | B. Berzin | Draft PAM | 3.4 | 425 | \$1,445.00 |
| 3/28/2023 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.1 | 625 | \$62.50 |
| 3/29/2023 | B. Berzin | Updates to class notice | 0.5 | 425 | \$212.50 |
| 3/30/2023 | B. Berzin | Draft amended PAGA letter | 0.2 | 425 | \$85.00 |
| 3/30/2023 | J. Rodriguez | Draft stipulation to vacate discovery deadlines | 0.4 | 625 | \$250.00 |
| 3/30/2023 | J. Rodriguez | Draft/revise SAC and Stipulation to amend | 1.5 | 625 | \$937.50 |
| 3/30/2023 | J. Rodriguez | emails with opposing counsel regarding fully executed MOU | 0.3 | 625 | \$187.50 |
| 3/30/2023 | J. Rodriguez | Review scheduling order timeline; Email opposing counsel regarding signed MOU, Administrator quotes, and class representative waiver | 0.4 | 625 | \$250.00 |
| 3/30/2023 | J. Rodriguez | Review/revise amended PAGA letter | 0.8 | 625 | \$500.00 |
| 4/3/2023 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.1 | 625 | \$62.50 |
| 4/3/2023 | J. Rodriguez | Emails with opposing counsel regarding stipulation to vacation scheduling order pending settlement approval | 0.3 | 625 | \$187.50 |
| 4/4/2023 | B. Berzin | Review email to judge regarding stip and proposed order to vacate pretrial scheduling order. | 0.1 | 425 | \$42.50 |
| 4/4/2023 | J. Rodriguez | Draft amended PAGA; Email opposing counsel regarding amended PAGA | 0.5 | 625 | \$312.50 |
| 4/4/2023 | J. Rodriguez | Review final stipulation and order to vacate discovery deadline filing/service package | 0.2 | 625 | \$125.00 |
| 4/5/2023 | J. Rodriguez | Review Vigil Docket report | 0.1 | 625 | \$62.50 |
| 4/6/2023 | J. Rodriguez | Review/finalize amended PAGA letter; speak to staff regarding filing; review notice filing documents | 1.4 | 625 | \$875.00 |
| 4/24/2023 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.1 | 625 | \$62.50 |
| 4/28/2023 | G. Shimoda | Partner Case Status meeting; Discuss POA and upcoming deadlines; Forecast case priorities | 0.1 | 725 | \$72.50 |
| 5/1/2023 | B. Berzin | Revise class notice | 2.2 | 425 | \$935.00 |
| 5/1/2023 | B. Berzin | Revise long form settlement agreement | 5.1 | 425 | \$2,167.50 |
| 5/1/2023 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.1 | 625 | \$62.50 |
| 5/1/2023 | J. Rodriguez | Review/compare class administrator bids | 0.3 | 625 | \$187.50 |
| 5/2/2023 | J. Rodriguez | Revisions to PAM | 6.9 | 625 | \$4,312.50 |

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|-----------|--------------|--|-----|-----|------------|
| 5/3/2023 | B. Berzin | Call with client regarding settlement status | 0.3 | 425 | \$127.50 |
| 5/3/2023 | B. Berzin | Review email to OC regarding long form and class notice. | 0.1 | 425 | \$42.50 |
| 5/3/2023 | J. Rodriguez | Call/emails with client regarding status update and amended PAGA letter | 0.3 | 625 | \$187.50 |
| 5/3/2023 | J. Rodriguez | Review/revise class notice | 0.7 | 625 | \$437.50 |
| 5/3/2023 | J. Rodriguez | Review/revise long form agreement | 3.2 | 625 | \$2,000.00 |
| 5/8/2023 | B. Berzin | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.2 | 425 | \$85.00 |
| 5/8/2023 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.2 | 625 | \$125.00 |
| 5/10/2023 | J. Rodriguez | Emails with opposing counsel regarding edits to settlement documents | 0.2 | 625 | \$125.00 |
| 5/11/2023 | B. Berzin | Read emails with opposing counsel regarding long form | 0.1 | 425 | \$42.50 |
| 5/12/2023 | G. Shimoda | Partner Case Status meeting; Discuss POA and upcoming deadlines; Forecast case priorities | 0.1 | 725 | \$72.50 |
| 5/15/2023 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.1 | 625 | \$62.50 |
| 5/17/2023 | B. Berzin | Email opposing counsel regarding long form status | 0.1 | 425 | \$42.50 |
| 5/17/2023 | J. Rodriguez | Email with opposing counsel regarding edits to settlement documents | 0.1 | 625 | \$62.50 |
| 5/19/2023 | J. Rodriguez | Review Vigil Docket report and approval motion filing for potential overlap of claims and res judicata issues | 0.9 | 625 | \$562.50 |
| 5/22/2023 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.1 | 625 | \$62.50 |
| 5/23/2023 | B. Berzin | Correspondence with client regarding long form settlement | 0.1 | 425 | \$42.50 |
| 5/23/2023 | B. Berzin | Read email from opposing counsel regarding long form status | 0.1 | 425 | \$42.50 |
| 5/23/2023 | B. Berzin | Review email from OC regarding edits to settlement agreement and class notice. | 0.1 | 425 | \$42.50 |
| 5/23/2023 | J. Rodriguez | Review client call notes | 0.1 | 625 | \$62.50 |
| 5/24/2023 | B. Berzin | Email opposing counsel regarding revisions to long form | 0.1 | 425 | \$42.50 |
| 5/24/2023 | B. Berzin | Email to opposing counsel regarding revisions for status update; review opposing counsel response regarding the same. | 0.2 | 425 | \$85.00 |
| 5/25/2023 | J. Rodriguez | Review final status report filing/service package | 0.1 | 625 | \$62.50 |
| 5/26/2023 | G. Shimoda | Partner Case Status meeting; Discuss POA and upcoming deadlines; Forecast case priorities | 0.1 | 725 | \$72.50 |
| 5/26/2023 | J. Rodriguez | Review Vigil action preliminary approval filing; review Vigil settlement agreement for overlap | 1.3 | 625 | \$812.50 |
| 5/30/2023 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.1 | 625 | \$62.50 |
| 6/1/2023 | B. Berzin | Email to opposing counsel regarding settlement agreement edits | 0.2 | 425 | \$85.00 |
| 6/2/2023 | B. Berzin | Email to client with update regarding settlement agreement; review email response from client | 0.2 | 425 | \$85.00 |
| 6/2/2023 | J. Rodriguez | Emails with client regarding status updates | 0.2 | 625 | \$125.00 |
| 6/5/2023 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.1 | 625 | \$62.50 |
| 6/7/2023 | B. Berzin | Email to opposing counsel regarding edits to settlement agreement and class notice. | 0.2 | 425 | \$85.00 |
| 6/12/2023 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.1 | 625 | \$62.50 |
| 6/19/2023 | B. Berzin | Review email to opposing counsel regarding settlement agreement and class notice. | 0.1 | 425 | \$42.50 |
| 6/19/2023 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.1 | 625 | \$62.50 |
| 6/19/2023 | J. Rodriguez | Email/calls regarding status of Deft edits to settlement documents | 0.2 | 625 | \$125.00 |
| 6/20/2023 | B. Berzin | Review email from opposing counsel regarding status of settlement documents. | 0.1 | 425 | \$42.50 |
| 6/22/2023 | B. Berzin | Email to OC to follow up regarding settlement agreement and class notice. | 0.2 | 425 | \$85.00 |
| 6/27/2023 | J. Rodriguez | Email regarding status of Deft edits to settlement documents | 0.1 | 625 | \$62.50 |
| 7/5/2023 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.1 | 625 | \$62.50 |
| 7/5/2023 | J. Rodriguez | Email regarding status of Deft edits to settlement documents | 0.1 | 625 | \$62.50 |
| 7/10/2023 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.1 | 625 | \$62.50 |
| 7/24/2023 | J. Rodriguez | Research regarding approval motion items | 0.8 | 625 | \$500.00 |
| 7/26/2023 | J. Rodriguez | Email regarding status of Deft edits to settlement documents | 0.1 | 625 | \$62.50 |
| 7/27/2023 | J. Rodriguez | Review opposing counsel edits to long form/class notice; review individual agreement; research regarding conflict issues | 2.2 | 625 | \$1,375.00 |
| 7/31/2023 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.1 | 625 | \$62.50 |
| 8/7/2023 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.1 | 625 | \$62.50 |

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|------------|--------------|---|-----|-----|------------|
| 8/9/2023 | J. Rodriguez | Emails with opposing counsel regarding status update to Court regarding approval motion filing | 0.2 | 625 | \$125.00 |
| 8/9/2023 | J. Rodriguez | Redline further changes to long form and individual agreement; email opposing counsel | 0.8 | 625 | \$500.00 |
| 8/11/2023 | G. Shimoda | Partner Case Status meeting; Discuss POA and upcoming deadlines; Forecast case priorities | 0.1 | 725 | \$72.50 |
| 8/14/2023 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.1 | 625 | \$62.50 |
| 8/18/2023 | G. Shimoda | Partner Case Status meeting; Discuss POA and upcoming deadlines; Forecast case priorities | 0.1 | 725 | \$72.50 |
| 8/21/2023 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.2 | 625 | \$125.00 |
| 8/22/2023 | J. Rodriguez | Email client regarding status update | 0.1 | 625 | \$62.50 |
| 8/25/2023 | G. Shimoda | Partner Case Status meeting; Discuss POA and upcoming deadlines; Forecast case priorities | 0.1 | 725 | \$72.50 |
| 8/25/2023 | J. Rodriguez | Review Vigil Docket report | 0.1 | 625 | \$62.50 |
| 8/28/2023 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.3 | 625 | \$187.50 |
| 8/28/2023 | J. Rodriguez | Emails with opposing counsel regarding status of edits to settlement documents | 0.2 | 625 | \$125.00 |
| 8/29/2023 | J. Rodriguez | Review additional changes/edits by opposing counsel to long form; research; emails with opposing counsel; call opposing counsel | 1.2 | 625 | \$750.00 |
| 9/1/2023 | G. Shimoda | Partner Case Status meeting; Discuss POA and upcoming deadlines; Forecast case priorities | 0.1 | 725 | \$72.50 |
| 9/5/2023 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.1 | 625 | \$62.50 |
| 9/6/2023 | J. Rodriguez | Emails with opposing counsel regarding settlement agreement edits | 0.2 | 625 | \$125.00 |
| 9/7/2023 | J. Rodriguez | Review Vigil Docket report | 0.1 | 625 | \$62.50 |
| 9/8/2023 | G. Shimoda | Partner Case Status meeting; Discuss POA and upcoming deadlines; Forecast case priorities | 0.2 | 725 | \$145.00 |
| 9/11/2023 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.1 | 625 | \$62.50 |
| 9/15/2023 | G. Shimoda | Partner Case Status meeting; Discuss POA and upcoming deadlines; Forecast case priorities | 0.1 | 725 | \$72.50 |
| 9/18/2023 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.1 | 625 | \$62.50 |
| 9/19/2023 | J. Rodriguez | Finalize documents for signature | 0.4 | 625 | \$250.00 |
| 9/19/2023 | J. Rodriguez | Further updates and edits to long form and individual agreement; emails with opposing counsel | 0.9 | 625 | \$562.50 |
| 9/19/2023 | J. Rodriguez | Review final stipulation to continue filing deadline for approval motion filing/service package | 0.1 | 625 | \$62.50 |
| 9/22/2023 | G. Shimoda | Partner Case Status meeting; Discuss POA and upcoming deadlines; Forecast case priorities | 0.1 | 725 | \$72.50 |
| 9/26/2023 | J. Rodriguez | Call with client regarding long form settlement agreement and individual agreement | 1.2 | 625 | \$750.00 |
| 9/28/2023 | J. Rodriguez | Speak to client regarding status and agreements; Revise agreements and email OC | 1.6 | 625 | \$1,000.00 |
| 9/29/2023 | J. Rodriguez | Speak to client regarding finals of agreement for signature | 0.8 | 625 | \$500.00 |
| 9/30/2023 | J. Rodriguez | Draft/Revise preliminary approval motion paperwork per settlement agreement updates; Research | 6.4 | 625 | \$4,000.00 |
| 10/2/2023 | J. Rodriguez | Assoc. Case Status meeting; Discuss POA and upcoming deadlines; Set tasks for the Week | 0.1 | 625 | \$62.50 |
| 10/2/2023 | J. Rodriguez | Draft/Revise preliminary approval motion paperwork; research | 2.8 | 625 | \$1,750.00 |
| 10/4/2023 | J. Rodriguez | Draft/Revise preliminary approval motion paperwork; speak to client; email opposing counsel regarding filings | 9.6 | 425 | \$4,080.00 |
| 10/5/2023 | B. Berzin | Review Case List | 0.1 | 425 | \$42.50 |
| 10/25/2023 | B. Berzin | Emails with opposing counsel regarding new arb agreement | 0.4 | 425 | \$170.00 |
| 10/25/2023 | B. Berzin | Call with client regarding arb agreement | 0.2 | 425 | \$85.00 |
| 11/29/2023 | B. Berzin | Call with client | 0.2 | 425 | \$85.00 |
| 3/28/2024 | J. Rodriguez | Emial re CAFA notice | 0.2 | 625 | \$125.00 |
| 3/28/2024 | R. Konini | follow up with admin regarding class list and formatted notice. | 0.1 | 425 | \$42.50 |
| 3/28/2024 | R. Konini | Review settlement admin timeline, review PAM docs, research CAFA requirements for nd | 2 | 425 | \$850.00 |
| 4/3/2024 | J. Rodriguez | Emails with administrator re status and notice | 0.3 | 625 | \$187.50 |
| 4/4/2024 | J. Rodriguez | Review calculations for notice to class | 0.4 | 625 | \$250.00 |
| 4/8/2024 | J. Rodriguez | Review updates to notice and spanish translations | 0.8 | 625 | \$500.00 |
| 4/8/2024 | R. Konini | follow up with admin regarding Spanish class notice. | 0.1 | 425 | \$42.50 |
| 4/9/2024 | J. Rodriguez | Emails with administrator re status and notice | 0.2 | 625 | \$125.00 |

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|-----------|--------------|---|-------|-----|--------------|
| 4/17/2024 | J. Rodriguez | Emails re class member submissions | 0.2 | 625 | \$125.00 |
| 4/18/2024 | R. Konini | Draft Fee Motion regarding class action settlement. | 6.3 | 425 | \$2,677.50 |
| 4/21/2024 | R. Konini | Draft Memo regarding Probate procedure when CM deceased re settlement amount. | 4.3 | 425 | \$1,827.50 |
| 5/1/2024 | R. Konini | Draft client declaration for Attorney Fee Motion. | 2.5 | 425 | \$1,062.50 |
| 5/6/2024 | J. Rodriguez | Review administrator declaration and calculations; Email revisions to administrator | 0.7 | 625 | \$437.50 |
| 5/7/2024 | J. Rodriguez | Revise Fee Motion | 6.9 | 625 | \$4,312.50 |
| 5/9/2024 | J. Rodriguez | Finalize and File Fee Motion | 5.6 | 625 | \$3,500.00 |
| Total: | | | 674.3 | | \$396,947.50 |

EXHIBIT B

Insixiengmay v. Hyatt Corporation dba Hyatt Regency of Sacramento - Costs

| Date | Description | Amount |
|------------|---|-------------|
| 10-05-2018 | Service Fee to Court - Complaint | \$ 40.00 |
| 10-05-2018 | Payment to Court - Complaint Fee Superior Court | \$ 435.00 |
| 10-05-2018 | Payment to LWDA - PAGA Filing Fee | \$ 75.00 |
| 10-05-2018 | Payment to Court - Complex fee | \$ 1,000.00 |
| 10-05-2018 | Certified Mail - PAGA Letter to Employers | \$ 24.60 |
| 10-06-2018 | Administration/Copy Fee - Class Action | \$ 500.00 |
| 10/16/2018 | One Legal Fee - Serve Complaint | \$ 40.00 |
| 10-23-2018 | Service Fee to Court- POSOS | \$ 40.00 |
| 01-31-2019 | Payment to DLSE for Records - documents for cases filed against Hyatt | \$ 143.64 |
| 05-14-2019 | Service Fee to Court - Case Management Statement | \$ 40.00 |
| 11-15-2019 | Service Fee Court - Case Management Statement | \$ 40.00 |
| 09-09-2020 | Priority Mail - Plaintiff's Discovery Responses | \$ 7.15 |
| 12-03-2020 | Service Fee to Court - Case Management Statement | \$ 40.00 |
| 06-15-2021 | Payment for Records - related case documents (Crump v. Hyatt) | \$ 16.90 |
| 11-30-2021 | Service Fee to Court - Case Management Statement | \$ 40.00 |
| 07-19-2022 | Payment to iBridge for converting PDF data to Excel | \$ 8,692.10 |
| 08-14-2022 | Mediation - Mediation Fee to Gig Kyriacou | \$ 9,750.00 |
| 08-29-2022 | Transcript for Valerie Saito July 27, 2022 Deposition | \$ 1,121.74 |
| 09-14-2022 | Transcript for Janice Insixiengmay July 28, 2022 Deposition | \$ 864.50 |
| 10-04-2022 | Berger Consulting Invoice - Data & Damages Analysis | \$ 5,375.00 |
| 03-13-2023 | Payment for Records - related case documents (Vigil v. Hyatt) | \$ 17.70 |
| 03-20-2023 | Payment for Records - related case documents (Vigil v. Hyatt) | \$ 0.70 |
| 03-20-2023 | Hotel for Mediation | \$ 234.66 |
| 03-20-2023 | Flight for Mediation | \$ 387.96 |
| 03-20-2023 | Airport Parking for Mediation | \$ 36.00 |
| 03-20-2023 | Transportation for Mediation | \$ 81.83 |
| 03-24-2023 | Payment for Records - related case documents (Vigil v. Hyatt) | \$ 0.60 |
| 03-29-2023 | Payment for Records - related case documents (Crump v. Hyatt) | \$ 1.00 |
| 04-06-2023 | Certified Mail - Amended PAGA Letter | \$ 4.99 |

TOTAL: \$ 29,051.07

EXHIBIT C



SUPERIOR COURT OF CALIFORNIA

COUNTY OF SACRAMENTO

Superior Court of California, County of Sacramento

720 Ninth Street
Sacramento, CA 95814-1311

PAYMENT RECEIPT

Receipt #: 932746

Clerk ID: jmora

Transaction No: 2011815

Transaction Date: 10/05/2018

Transaction Time: 04:22:18 PM

| Case Number | Fee Type | Qty | Fee Amount\$ | Balance Due | Amount Paid | Remaining Balance |
|----------------------------|------------------------------------|-----|--------------|-------------|-------------------|-------------------------------|
| 34-2018-00241994-CU-OE-GDS | 194 - Complaint or other 1st paper | 1 | \$435.00 | \$435.00 | \$435.00 | \$0.00 |
| 34-2018-00241994-CU-OE-GDS | 34 - Complex case fee plaintiff | 1 | \$1,000.00 | \$1,000.00 | \$1,000.00 | \$0.00 |
| Sales Tax: | | | | | \$0.00 | |
| Total: | | | | | \$1,435.00 | Total Rem. Bal: \$0.00 |

Online Credit Card: \$1,435.00

Cardholder Name: Galen Shimoda
 Credit Card Type: Visa
 Credit Card Number: XXXXXXXXXXXX [REDACTED]
 Authorization Number: 06946D

Cardholder Signature: _____

Total Amount Tended: \$1,435.00

Change Due: \$0.00

Balance: \$0.00

ORIGINAL

Insixengway - Complaint



SHIMODA LAW CORP.
9401 E. STOCKTON BLVD.
SUITE 200
ELK GROVE, CA 95624
916-525-0716

RIVER CITY BANK
7127 ELK GROVE BLVD. SUITE 103
ELK GROVE, CA 95758
90-3341/1211

10/05/2018

PAY TO THE ORDER OF Labor and Workforce Development Agency

75.00

\$

Seventy-Five and 00/100

DOLLARS

SHIMODA LAW CORP.

MEMO

Insixiengmay v. Hyatt Corporation, et al.: PAGA Filing Fee

[Handwritten Signature]
AUTHORIZED SIGNATURE



SHIMODA LAW CORP.

6070

Labor and Workforce Development Agency

6x4.10
75

10/05/2018

\$75.00

Insixiengmay v. Hyatt Corporation, et al.: PAGA Filing Fee

DB

GS COPY

ER (Margaret Egan)
Patricia Smith
Mark Huplan

SHIMODA LAW CORP.

6070

Labor and Workforce Development Agency

10/05/2018

\$75.00

Insixiengmay v. Hyatt Corporation, et al.: PAGA Filing Fee

FILE COPY



504 Redwood Blvd. Suite 223
 Novato CA 94947
 1-800-938-8815 ext. 1
 TIN: 26-0259046

Credit Card Sale

Date 10/16/2018
 Customer 0058237
 Credit Sale 01581836
 Amount Due \$40.00

Bill To
 Shimoda Law Corp.
 Accounting
 9401 E. Stockton Blvd.
 Suite 200
 Elk Grove CA 95624

| | |
|--------------------------|---|
| Order Number | 12399603 |
| Contact | |
| Attorney | Justin Rodriguez |
| Billing Code | |
| Case Title | Janice Insixiengmay, et al. |
| Court | Superior Court of California, Sacramento County |
| Court Transaction Number | |
| Case Number | 34-2018-00241994 |
| Documents | Summons, Additional Parties Attachment, Complaint, Civil Case Cover Sheet, Alternative Dispute Resolu |

| ONE LEGAL FEES | AMOUNT |
|---|----------------|
| Service on a Registered Agent (CT or CSC) | \$40.00 |
| SUBTOTAL | \$40.00 |

| FEES SUMMARY | AMOUNT |
|----------------------|----------------|
| One Legal Fees | \$40.00 |
| TOTAL CHARGED | \$40.00 |

Handwritten initials

Handwritten initials

Past due balance may be charged a late payment fee and/or a late charge of up to 1.5% per month (18% per annum)



SHIMODA LAW CORP.
 9401 E. STOCKTON BLVD.
 SUITE 200
 ELK GROVE, CA 95624
 916-525-0716

RIVER CITY BANK
 912 ELK GROVE SUITE 100
 ELK GROVE, CA 95758
 90-3341/1211

6149

01/31/19

PAY TO THE ORDER OF DLSE

\$ 143.64

One Hundred Forty-Three Dollars and 64/100

DOLLARS

SHIMODA LAW CORP.

AUTHORIZED SIGNATURE

MEMO PRA0316300



SHIMODA LAW CORP.

6149

DLSE

01/31/19

\$143.64

PRA0316300

GALEN's COPY

SHIMODA LAW CORP.

6149

DLSE

01/31/19

\$143.64

PRA0316300

FILE COPY

Insixianama4

Security Features Included

stamps
endicia

Shipping Label Receipt

Tracking Number:

9405 5118 9956 4858 3981 35

PRIORITY MAIL 2-DAY with Tracking *
Electronic Service Fee: \$0.00
Total Postage and Fees: \$7.15
Weight: 0 lbs 14 oz
Print Date: 09/09/2020

Mailing Date: 09/09/2020

From: SHIMODA LAW CORP.
9401 E. Stockton Blvd., Ste. 120
Elk Grove CA 95624

To: J. Scott Carr
KABAT CHAPMAN & OZMER LLP
333 S. Grand Ave., Ste. 2225
Los Angeles CA 90071-3490

USPS
Postmark
Here

FOR UPS SHIPPING ONLY

*Regular PRIORITY MAIL 2-DAY Service postage rates apply. There is no fee for Tracking service on PRIORITY MAIL 2-DAY services with use of this electronic shipping label. Postmark required if fee refund requested. Delivery information is not available by phone for the electronic option.

Instructions:

1. Adhere shipping label to package with tape or glue - DO NOT TAPE OVER BARCODE. Be sure all edges are secured. Self-adhesive label is recommended.
2. Place the label so it does not wrap around the edge of the package.
3. This package may be deposited in any collection box, handed to your mail carrier, or presented to a clerk at your local Post Office.
4. Each confirmation number is unique and can be used only once - DO NOT PHOTOCOPY.
5. You must mail this package on the "mail date" that is specified on this label.

Incivipromay Disc. Resp. to OC

iBridge LLC
12725 SW Millikan Way, Suite 300
Beaverton, OR 97005 US
(503)906-3930
accounting@ibridgellc.com



INVOICE

BILL TO

Shimoda & Rodriguez Law,
P.C.
9401 E Stockton Blvd.,
Suite 120, Elk Grove,
CA 95624

INVOICE # 6774

DATE 05/14/2022

DUE DATE 06/13/2022

TERMS Net 30

JOB NAME

Insixiengmay v. Hyatt Corporati

| DESCRIPTION | QTY | RATE | AMOUNT |
|---------------------------------|--------|-------|----------|
| Single Entry timecards, per row | 86,671 | 0.10 | 8,667.10 |
| Signed Declaration | 1 | 25.00 | 25.00 |
| Delivered 5/07/2022 | | | |
| QD2222-02 | | | |

Attn: Sook-Mei Shimoda

BALANCE DUE

\$8,692.10

A late payment fee may be charged at 1.5% per month
on any unpaid amount past the payment terms.

GIG KYRIACOU
 Mediator
KYRIACOU MEDIATION

246 North Pass Avenue • Burbank, CA 91505
 Telephone 818-861-7100 • Fax 818-861-7102
 E-mail gigk@mediate.com • Web www.gigkmediate.com

DEPOSIT INVOICE
 No. 800a2166
 September 28, 2022

Galen T. Shimoda, Esq.
 Justin P. Rodriguez, Esq.
 Brittany V. Berzin, Esq.
 Joseph W. Ozmer II, Esq.
 J. Scott Carr, Esq.

BJ
 2/24/23
 E/A 3/2/23

Re: Insixiengmay, et al. v. Hyatt Corporation, et al.

| Date | Professional Services Rendered | Rate | Amount |
|---|--------------------------------|-------------------------------|-------------------|
| 03/20/23 | Deposit for full day session | Full Day Rate Class Action | \$19,500.00 |
| Deposit balance due from each side – 50% | | | \$9,750.00 |

Note: The flat rate for this class action mediation is \$19,500.00. The flat rate includes review of written briefs and documents, if any, submitted by the parties, and the mediation conference up to 10 hours. Follow up communications and negotiations (beyond 10 hours or on subsequent days) are billed separately at the rate of \$1,200.00 per hour. The participating parties share the fees proportionately unless otherwise agreed. The parties and their counsel are jointly and severally liable for the payment of their respective share of the mediation fees and costs. There are no administrative fees.

Deposit payments are due 14 days prior to the mediation.

FOR YOUR ACCOUNTING RECORDS, OUR EIN IS 95-4806572

Carol Nygard & Associates
 2295 Gateway Oaks Dr. Suite 170
 Sacramento, CA 95833
 Phone: 877-438-7787

CAROL NYGARD
& ASSOCIATES
DEPOSITION REPORTERS

Justin *Rodriguez
 Shimoda Law Corp.
 9401 E Stockton Blvd., Suite 120
 Elk Grove, CA 95624

Invoice #113277

| Date | Terms |
|------------|----------------|
| 08/25/2022 | Due on receipt |

Job #65208 on 08/23/2022

Case: Insixiengmay v. Hyatt Corporation Delivery Type: Normal
 Court Case#:

| Description | Amount |
|---|-------------|
| Deposition of Valerie, PMK Saito | |
| Appearance Fee | \$ 315.00 |
| Original & One Certified Copy | \$ 742.95 |
| B&W Exhibits | \$ 18.45 |
| Production | \$ 15.00 |
| Shipping and Handling (Original) | \$ 29.00 |
| | \$ 1,120.40 |

Subtotal: \$ 1,120.40

Tax: \$ 1.34

Amount Due: \$ 1,121.74

Paid: \$ 0.00

75

| | |
|---------------------|---------------------|
| Balance Due: | \$ 1,121.74 |
| Payment Due: | Upon Receipt |

Veritext, LLC - Southeast Region

Tel. 770-343-9696 Email: billing-ga@veritext.com
 Fed. Tax ID: 20-3132569



Bill To: Justin Rodriguez
 Shimoda Law Corporation
 9401 East Stockton Blvd
 Suite 200
 Elk Grove, CA, 95624

Invoice #: 6023219
 Invoice Date: 9/8/2022
 Balance Due: \$864.50

Case: Insixiengmay, Janice v. Hyatt Corporation (218CV02993TLNDB)

Proceeding Type: Depositions

Job #: 5327173 | Job Date: 8/24/2022 | Delivery: Normal

Location: Sacramento, CA

Billing Atty: Justin Rodriguez

Scheduling Atty: Scott Carr Esq | Kabat Chapman & Ozmer LLP

Witness: Janice Junita Insixiengmay

Amount

Transcript Services - Certified Transcript

\$864.50

Notes:

Invoice Total: \$864.50
Payment: \$0.00
Credit: \$0.00
Interest: \$0.00
Balance Due: \$864.50

TERMS: Payable upon receipt. Accounts 30 days past due will bear a finance charge of 1.5% per month. Accounts unpaid after 90 days agree to pay all collection costs, including reasonable attorney's fees. Contact us to correct payment errors. No adjustments will be made after 90 days. For more information on charges related to our services please consult <http://www.veritext.com/services/all-services/services-information>

Amex

Pay by Check - Remit to:
 Veritext
 P.O. Box 71303
 Chicago IL 60694-1303
 Fed. Tax ID: 20-3132569

Pay By ACH (Include invoice numbers):
A/C Name: Veritext
Bank Name: BMO Harris Bank
Bank Addr: 311 W. Monroe Chicago, IL 60606
Account No: 4353454 **ABA:** 071000288
Swift: HATRUS44

Invoice #: 6023219
Invoice Date: 9/8/2022
Balance Due: \$864.50

Pay by Credit Card: www.veritext.com



Berger Consulting Group
P.O. Box 261954
Encino, CA 91426

DATE: 8/14/2022
INVOICE # 6616
FOR: *Insixiengmay v
Hyatt*

Bill To:
Shimoda Law Corp.

| DESCRIPTION | AMOUNT |
|--|--------------------|
| Insixiengmay v Hyatt (21.50 hours @ 250/hr Rate) | \$ 5,375.00 |
| TOTAL | \$ 5,375.00 |

****** Our mailing address has changed to P.O. Box 261954, Encino, CA 91426 ******

Please make all checks payable to: Berger Consulting Group, LLC
P.O. Box 261954
Encino, CA 91426

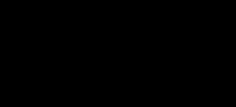
Thank you for your business.

INVOICE



401 S SAN FERNANDO BLVD
 BURBANK, CA 91502
 United States of America
 TELEPHONE 818-509-7964 • FAX 818-509-7965
 Reservations
 www.hilton.com or 1 800 HILTONS

SHIMODA, GALEN



UNITED STATES OF AMERICA

Room No: 648/K1
 Arrival Date: 3/19/2023 9:55:00 PM
 Departure Date: 3/20/2023 2:02:00 PM
 Adult/Child: 2/0
 Cashier ID: KHUTCHINSON7
 Room Rate: 211.00
 AL:
 HH #
 VAT #
 Folio No/Che 374014 A

Confirmation Number: 3345209844

HILTON GARDEN INN BURBANK DOWNTOWN 3/20/2023 2:01:00 PM

| DATE | REF NO | DESCRIPTION | CHARGES |
|-------------|---------|----------------------------|------------|
| 3/19/2023 | 1615461 | GUEST ROOM | \$211.00 |
| 3/19/2023 | 1615461 | OCCUPANCY TAX | \$21.10 |
| 3/19/2023 | 1615461 | CA TOURISM FEE | \$0.41 |
| 3/19/2023 | 1615461 | CA TOURISM FEE TAX | \$0.04 |
| 3/19/2023 | 1615461 | BURBANK TOURISM ASSESSMENT | \$2.11 |
| 3/20/2023 | 1615747 | AX | (\$234.66) |
| **BALANCE** | | | \$0.00 |

Hilton Honors(R) stays are posted within 72 hours of checkout. To check your earnings or book your next stay at more than 6,500+ hotels and resorts in 119 countries, please visit Honors.com

CREDIT CARD DETAIL

APPR CODE 141985
 CARD NUMBER AX *2001
 TRANSACTION ID 1615747

MERCHANT ID 6049417561
 EXP DATE 01/28
 TRANS TYPE Sale

Insixiengmay, Janice
Plus flight SW
387.96
AB 75 F

Confirmation # **30TKXA**

Confirmation date: 03/07/2023

PASSENGER Justin Rodriguez

RAPID REWARDS # XXXXXXXXXX

TICKET # 5262428224699

EST. POINTS EARNED 1,948

Rapid Rewards® points are only estimations.

Your itinerary

Flight 1: Sunday, 03/19/2023 Est. Travel Time: 1h 15m Wanna Get Away®

| | DEPARTS | | ARRIVES |
|---------------|----------------------------------|--------------------------|-------------------------------|
| FLIGHT # 3537 | SMF 08:20PM Sacramento | <input type="checkbox"/> | BUR 09:35PM Burbank |

Flight 2: Monday, 03/20/2023 Est. Travel Time: 3h 55m Wanna Get Away®

| | DEPARTS | | ARRIVES |
|---------------|-------------------------------|--------------------------|---------------------------------|
| FLIGHT # 1010 | BUR 07:55PM Burbank | <input type="checkbox"/> | LAS 09:00PM Las Vegas |

Stop: Change planes

| | DEPARTS | | ARRIVES |
|---------------|---------------------------------|--------------------------|----------------------------------|
| FLIGHT # 3485 | LAS 10:20PM Las Vegas | <input type="checkbox"/> | SMF 11:50PM Sacramento |

Payment information

Total cost

| | | |
|-----------------------------|-----------|---------------|
| Air - 30TKXA | | |
| Base Fare | \$ | 324.52 |
| U.S. Transportation Tax | \$ | 24.34 |
| U.S. 9/11 Security Fee | \$ | 11.20 |
| U.S. Flight Segment Tax | \$ | 14.40 |
| U.S. Passenger Facility Chg | \$ | 13.50 |
| Total | \$ | 387.96 |

Payment

Amer Express ending in 2001
Date: March 7, 2023

Payment Amount: \$387.96

Fare rules: If you decide to make a change to your current itinerary it may result in a fare increase.

Your ticket number: 5262428224699



8/31410669/170948400/089494

DAILY GARAGE

03/19/23 19:01

EN 69

8UYT452

03/21/23 00:44 522 VISA

\$36.00

| | |
|--------------|----------------|
| Total | \$15.95 |
|--------------|----------------|

| | |
|-----------|--------|
| Trip fare | \$6.14 |
|-----------|--------|

| | |
|-----------------------|---------------|
| Subtotal | \$6.14 |
| TBD | \$2.46 |
| BUR Airport Surcharge | \$3.50 |
| Access for All Fee | \$0.10 |
| CA Driver Benefits | \$0.75 |
| Tips | \$3.00 |

Payments

| | |
|---|---------|
|  Visa ••• [REDACTED] | \$12.95 |
| 3/21/23 5:09 AM | |
|  Visa ••• [REDACTED] | \$3.00 |
| 3/21/23 10:45 AM | |

[Visit the trip page](#) for more information, including invoices (where available)

You rode with Jane

UberX 3.35 miles | 9 min

6:14 PM | 259 N Pass Ave, Burbank, CA 91505, US

6:23 PM | 2627 N Hollywood Way, Burbank, CA 91505, US

Fare does not include fees that may be charged by your bank. Please contact your bank directly for inquiries.

| | |
|--------------|----------------|
| Total | \$12.93 |
|--------------|----------------|

| | |
|-----------|--------|
| Trip fare | \$6.69 |
|-----------|--------|

| | |
|--------------------|---------------|
| Subtotal | \$6.69 |
| TBD | \$2.39 |
| Access for All Fee | \$0.10 |
| CA Driver Benefits | \$0.75 |
| Tips | \$3.00 |

Payments

| | |
|--|---------------|
|  Visa **** [REDACTED] | \$9.93 |
| 3/20/23 9:25 AM | |
|  Visa *** [REDACTED] | \$3.00 |
| 3/20/23 6:07 PM | |

A temporary hold of \$9.93 was placed on your payment method **** 9884. This is not a charge and will be removed. It should disappear from your bank statement shortly.

[Visit the trip page](#) for more information, including invoices (where available)

You rode with PAN

UberX 3.42 miles | 12 min

■ 9:11 AM | 401 S San Fernando Blvd, Burbank, CA 91502, US

■ 9:23 AM | 246 N Pass Ave, Burbank, CA 91505, US

Fare does not include fees that may be charged by your bank. Please contact your bank directly for inquiries.

| | |
|--------------|----------------|
| Total | \$19.97 |
|--------------|----------------|

| | |
|-----------|---------|
| Trip fare | \$10.10 |
|-----------|---------|

| | |
|-----------------------|----------------|
| Subtotal | \$10.10 |
| TBD | \$2.52 |
| BUR Airport Surcharge | \$3.50 |
| Access for All Fee | \$0.10 |
| CA Driver Benefits | \$0.75 |
| Tips | \$3.00 |

Payments

| | |
|--|----------------|
|  Visa **** [REDACTED] | \$16.97 |
| 3/19/23 9:54 PM | |
|  Visa **** [REDACTED] | \$3.00 |
| 3/21/23 10:36 AM | |

A temporary hold of \$16.97 was placed on your payment method **** 9884. This is not a charge and will be removed. It should disappear from your bank statement shortly.

[Visit the trip page](#) for more information, including invoices (where available)

You rode with Mike

UberX 3.40 miles | 8 min

■ 9:45 PM | 2627 N Hollywood Way, Burbank, CA 91505, USA

■ 9:54 PM | 401 S San Fernando Blvd, Burbank, CA 91502, US

Fare does not include fees that may be charged by your bank. Please contact your bank directly for inquiries.