

**ILG Legal Office, P.C.**  
Tel: (415) 580-2574 Fax: (415) 735-3454

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**ILG Legal Office, P.C.**  
Stephen Noel Ilg (SBN 275599)  
Sydney Wilberton (SBN 345803)  
Nicolas Jupillat (SBN 335559)  
156 South Spruce Avenue, Unit 206A  
South San Francisco, CA 94080  
Tel: (415) 580-2574  
Fax: (415) 735-3454  
Email: silg@ilglegal.com  
Email: swilberton@ilglegal.com  
Email: njupillat@ilglegal.com

*(Additional Counsel Listed on Following Page)*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

IRMA FRAUSTO, individually, and on behalf of  
all others similarly situated,

Plaintiff,

v.

BANK OF AMERICA, NATIONAL  
ASSOCIATION, a business entity, form  
unknown; and DOES 1 through 10, inclusive,

Defendants

Case No. 3:18-cv-01983-LB (*Frausto*)  
Case No. 3:18-cv-01202-LB (*Suarez*)

**DECLARATION OF STPEHEN NOEL  
ILG IN SUPPORT OF PLAINTIFFS'  
MOTION FOR ATTORNEYS' FEES  
AND COSTS**

Date: January 11, 2024  
Time: 9:30 a.m.  
Courtroom: B – 15th Floor  
(Videoconference)  
Judge: Hon. Laurel Beeler

ARIANNA SUAREZ, individually and on behalf  
of all others similarly situated,

Plaintiff,

v.

BANK OF AMERICA, N.A. and DOES 1  
through 100, inclusive,

Defendants

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1 Bobby Saadian (SBN 250377)  
2 bobby@wilshirelawfirm.com  
3 Justin F. Marquez (SBN 262417)  
4 justin@wilshirelawfirm.com  
5 Nicol E. Hajjar (SBN 303102)  
6 nicol@wilshirelawfirm.com  
7 Thiago M. Coelho (SBN 324715)  
8 thiago@wilshirelawfirm.com  
9 **WILSHIRE LAW FIRM, PLC**  
10 3055 Wilshire Blvd., 12<sup>th</sup> Floor  
11 Los Angeles, California 90010  
12 Telephone: (213) 381-9988  
13 Facsimile: (213) 381-9989  
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28 Attorneys for Plaintiffs

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**DECLARATION OF STEPHEN NOEL ILG**

1  
2 1. I am an attorney duly licensed to practice law in the State of California and before this  
3 Court. I am an attorney with ILG Legal Office, P.C., attorneys of record for Plaintiffs and the  
4 Class (“Class Counsel”). I have personal knowledge of the matters stated herein and, if called  
5 upon to testify as a witness, could and would competently testify thereto. I submit this declaration  
6 in support of Plaintiffs’ Motion for Attorneys’ Fees and Costs.

7 2. Attached please find the following exhibits:

- 8 • Attached as Exhibit A are true and correct copies of the unreimbursed legal costs  
9 my law firm has advanced on behalf of this class action.
- 10 • Attached as Exhibit B are true and correct copies of my timekeeping records for  
11 purposes of assessing the lodestar total. Note that these timekeeping records omit  
12 several timekeepers that performed small amounts of work over the last several  
13 years including two attorneys and three paralegals. Thus, the lodestar total for  
14 my law firm is very conservative compared to the actual work performed for this  
15 class action.

16 3. My law firm currently has \$8,458.67 in unreimbursed case costs. The costs journal shows  
17 approximately \$14,000 in total expenses incurred, but certain expenses have been reimbursed.

18 4. I have spent approximately one hundred (100) hours prosecuting the claims in this class  
19 action. More specifically, the timekeeping records show 94.30 hours. My hourly rate is \$750.00  
20 per hour which equates to a lodestar total of \$70,725.

21 5. My hourly rate of \$750 is appropriate for an attorney with my level of experience and  
22 accomplishments, working on complex matters such as this case. I have a proven track record in  
23 the courtroom and in a variety of legal settings which justifies my hourly rate.

24 6. I have been practicing for more than twelve (12) years with a focus on employment class  
25 actions. I have worked on hundreds of employment civil lawsuits. I have served as Lead Counsel  
26 for one employment class action trial (a “PAGA” claim), Lead Defense Counsel for a multi-  
27 plaintiff administrative trial, and Co-Lead Defense Counsel for a class action and PAGA trial.

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1 7. In 2022, I was named as one of the Top Labor and Employment Attorneys by the Los  
2 Angeles and San Francisco Daily Journal. I have received numerous awards throughout my  
3 career. For instance, in 2011 and 2013, the San Francisco Bar Association named me Outstanding  
4 Volunteer in Public Service. In 2015 and 2016, I received Avvo’s Client Choice Award in  
5 Employment Law. For 2016, the American Institute of Legal Counsel named me as “10 Best”  
6 California employment law attorneys in client satisfaction. In 2018, the American Society of  
7 Legal Advocates named me a Top 40 Under 40 Labor & Employment Lawyer in the State of  
8 California.

9 8. This year, in 2023, I prevailed on a writ of mandate on March 23, 2023 in *Arriaga &*  
10 *Associates, Inc. et al., v. The Superior Court Of Santa Clara County*, Case No. H050712, Sixth  
11 District of the California Court of Appeal, regarding a “170.6” challenge to a Superior Court  
12 Judge. I also defeated a motion to compel arbitration by Samsung Research America, Inc. which  
13 was covered by the Daily Journal; the case has received press coverage from news sources around  
14 the world. I am currently litigating a gender discrimination class action against Sony Interactive  
15 Entertainment LLC and have been quoted in publications such as Forbes’ online managize. I am  
16 regularly consulted by the media for insight into changes in the Silicon Valley employment  
17 market.

18 9. After several years serving as a Guest Editor for the California Employment Lawyer’s  
19 Association’s monthly Bulletin, I was selected this year to serve as Co-Editor based on my skills  
20 analyzing and distilling California Employment laws.

21 10. I have been a Professor at the Peoples College of the Law since 2021. I currently teach a  
22 course on Employment Law. I was elected to join the law school’s Board of Directors in 2023.

23 11. I have been counsel of record for over \$70 million of approved employment class action  
24 settlements in the last twelve (12) years including \$10 million in and after 2022.

25 12. In 2018, I became the first attorney to prevail in a PAGA trial regarding unlawful  
26 employment of minors. I have several years of experience litigating wage and hour class action  
27 cases, particularly employment class actions.

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1 13. For instance, I was counsel on the following class action employment cases which is a  
2 non-exhaustive list:

- 3 a. *National Stores, Inc., Cases*, JCCP No. 4634 (Los Angeles County Superior Court) and  
4 included case *Nettis v. National Stores, Inc.*, RG10498628 (Alameda County Superior  
5 Court) coordinated with LA cases BC430295 and BC435441. Wage and hour class action  
6 on behalf of hourly retail employees alleging that defendant (1) misclassified its  
7 California Store Managers as exempt from overtime pay and compensation for missed  
8 meal and rest periods and (2) failed to provide meal and rest periods to its hourly retail  
9 employees. The Court approved a class settlement of \$950,000.
- 10 b. *Aguilar v. Grassroots Campaigns, Inc.*, No. 3:13-CV-01566-MMA-RBB (U.S. District  
11 Court for the Southern District of California). Wage and hour class action alleging  
12 violations of California law for unpaid wages (including overtime wages) on behalf of  
13 Grassroots Campaigns, Inc.’s canvas directors and canvas assistant directors. The lawsuit  
14 also contained claims for failure to provide meal and rest periods. The Court approved a  
15 class settlement of \$325,000.
- 16 c. *Croul v. Kohl’s Department Stores, Inc.*, No. 3:10-CV-02304-JSW (N.D.CAL.). Wage  
17 and hour class action on behalf of Assistant Store Managers alleging violations of  
18 overtime pay and meal and rest breaks. The Court approved a class settlement of  
19 \$700,000.
- 20 d. *Fruithof v. The Men’s Wearhouse, Inc.*, No. BC475568 (Los Angeles County Superior  
21 Court). Wage and hour class action alleging violations of California law for failure to pay  
22 overtime to its salaried managers. It is also alleged that the company denied these  
23 managers meal and rest periods and required them to incur unreimbursed business  
24 expenses. The Court approved a class settlement of \$246,500.
- 25 e. *Dailey v. Performant Financial Corporation*, No. RG10493644 (Alameda County  
26 Superior Court). Wage and hour class action on behalf of the company’s non-exempt  
27 employees seeking wages for alleged violations of California law for unpaid overtime  
28

1 and denial of meal and/or rest periods. The Court approved a class settlement of \$1.2  
2 million.

- 3 f. *Chavez v. Vivint Solar*, No. 37-2013-81345-CU-OE-CTL (San Diego County Superior  
4 Court). Wage and hour class action on behalf of employees for unpaid overtime wages  
5 on behalf of Vivint Solar's California-based Sales Representatives, Sales Managers,  
6 and/or similar positions who were classified as independent contractors and/or direct  
7 sellers. The lawsuit also contained a claim for failure to provide meal and rest periods,  
8 and for failure to provide reimbursement for business expenses. The Court approved a  
9 class settlement of \$425,000
- 10 g. *In re Walgreen Co. Wage and Hour Litigation*, No. 11-cv-7664-PSG(FFMx) (U.S.  
11 District Court for the Central District of California). Wage and hour class action on behalf  
12 of employees who missed meal and rest breaks, worked off-the-clock, were not  
13 reimbursed for business-related expenses and were subject to security searches. The  
14 Court approved a class settlement of \$23 Million reversionary.
- 15 h. *Constanza v. K&R Transportation LLC*, No. CIVDS1615424 (San Bernardino County  
16 Superior Court). Wage and hour class action on behalf of 57 truck drivers allegedly  
17 misclassified as independent contractors and alleging that Defendant denied them  
18 mandated meal and rest periods, and failed to compensate them for all hours worked,  
19 provide accurate semimonthly wage statements, reimburse for business-related expenses,  
20 and provide all compensation due promptly upon termination of employment and,  
21 furthermore, that Defendant unlawfully deducted money from paychecks. The Court  
22 approved a class settlement of \$469,482.00.
- 23 i. *Whitten v. Tilly's, Inc.*, No. BC458252 (Los Angeles County Superior Court). Settlement  
24 on behalf of Tilly's, Inc's California-based non-exempt retail employees, seeking  
25 damages for alleged violations of California law for unpaid wages, including overtime  
26 wages, and for time spent in security searches. The lawsuit also contained claims for  
27 failure to provide meal and rest periods. The Court approved a class settlement of \$2.8  
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- 1 million.
- 2 j. *Amaya v. WinWin Logistics, Inc.*, No. BC573629 (Los Angeles County Superior Court).  
3 Wage and hour class action on behalf of 418 truck drivers allegedly misclassified as  
4 independent contractors and alleging that Defendant denied them mandated meal and rest  
5 periods, and failed to compensate them for all hours worked, provide accurate  
6 semimonthly wage statements, reimburse for business-related expenses, and provide all  
7 compensation due promptly upon termination of employment and, furthermore, that  
8 Defendant unlawfully deducted money from paychecks. The Court approved a class  
9 settlement of \$5 million.
- 10 k. *Rouch v. Active Sports Clubs, LLC*, No. CGC-15-544629 (San Francisco County Superior  
11 Court). Wage and hour class action on behalf of non-exempt employees alleging that  
12 Defendant permitted and/or required class members to work overtime hours without  
13 overtime compensation, denied them mandated meal and rest periods, and failed to  
14 compensate them for all hours worked, provide accurate semimonthly wage statements,  
15 reimburse for business-related expenses, and provide all compensation due promptly  
16 upon termination of employment. The Court approved a class settlement of \$182,500.
- 17 l. *Khan v. Urban Outfitters, Inc.*, No. 4:13-cv-2628-JSW (U.S. District Court for the  
18 Northern District of California). Wage and hour class action on behalf of non-exempt  
19 employees alleging that Defendant permitted and/or required class members to work  
20 overtime hours without overtime compensation, denied them mandated meal and rest  
21 periods, and failed to compensate them for all hours worked, provide accurate  
22 semimonthly wage statements, reimburse for business-related expenses, and provide all  
23 compensation due promptly upon termination of employment. The Court approved a class  
24 settlement of \$5 million.
- 25 m. *Kudrna v. Propark America West LLC*, No. CGC-10-498142 (San Francisco County  
26 Superior Court). Wage and hour class action on behalf of non-exempt parking attendants  
27 alleging that Defendant permitted and/or required class members to work overtime hours  
28

- 1 without overtime compensation, denied them mandated meal and rest periods, and failed  
2 to compensate them for all hours worked, provide accurate semimonthly wage statements,  
3 reimburse for business-related expenses, and provide all compensation due promptly  
4 upon termination of employment. The Court approved a class settlement of \$250,000.
- 5 n. *Donald v. Xanitos*, 14-CV-05416 (United States District Court, N.D. Cal., Date Final  
6 Approval was granted April 27, 2017). Wage and hour class action alleging that  
7 Defendant misclassified its environmental services supervisors as exempt employees and  
8 independent contractors. The Court approved a class settlement of \$500,000; Attorneys  
9 fees of \$150,000; litigation costs of \$9,500; Administration expenses of \$15,000; \$2,500  
10 for service payment; \$5000 to LWDA; and at least \$303,000 distributed to class members.
- 11 o. *Dilliehunt v. Togos*, RG14750133 (Superior Court of the State of California for the  
12 County of Alameda, Date Final Approval was granted January 26, 2017). The Court  
13 approved a \$300,000 checks-made class settlement for a class of hourly employees  
14 alleging meal period violations and derivative claims; attorneys fees of \$82,500;  
15 administration expenses of \$14,500; \$3,500 as service payment; \$5,000 PAGA penalties.
- 16 p. *Brewer v. General Nutrition Corporation*, 11-CV-03587-YGR (United States District  
17 Court, N.D. Cal., Sep. 2, 2016). Wage and hour class action on behalf of non-exempt  
18 sales associates and assistant managers alleging that Defendant permitted and/or required  
19 class members to work overtime hours without overtime compensation, denied them  
20 mandated meal and rest periods, and failed to compensate them for all hours worked,  
21 provide accurate semimonthly wage statements, reimburse for business-related expenses,  
22 and provide all compensation due promptly upon termination of employment. The Court  
23 approved a class settlement of \$9,020,000.
- 24 q. *Villanueva v. Morpho Detection*, 13-CV-05390-HSG (United States District Court, N.D.  
25 Cal.). Wage and hour class action on behalf of service technicians alleging off-the-clock,  
26 missed meal/rest periods, and related violations. The Court approved a class settlement  
27 of \$245,000.



- 1        *r. Amenity v. Henry Industries*, RG15754205 (Superior Court of the State of California for  
2        the County of Alameda). Class action on behalf of drivers classified as independent  
3        contractors. Various wage and hour claims were asserted as a result of alleged  
4        misclassification. The Court approved a class settlement.
- 5        *s. Buck v. Saputo Cheese USA*, VCU 256347 (Superior Court of the State of California for  
6        the County of Tulare, Date Final Approval was granted March 17, 2016). Wage and hour  
7        class action on behalf of non-exempt plant production employees alleging off-the-clock  
8        violations, meal and rest period violations, and derivative claims. The Court approved a  
9        class settlement of \$750,000 for hourly employees; Attorneys fees of \$250,000; Litigation  
10       costs of \$10,636.39; \$20,000 administration expenses; \$7,500 for Service payment;  
11       \$5,000 to LWDA.
- 12       *t. Carranza v. Arctic Glacier USA*, RG13692993 (Superior Court of the State of California  
13       for the County of Alameda, Date Final Approval was granted July 5, 2016). The Court  
14       approved a \$350,000 claims-made settlement for hourly employees; Attorneys fees of  
15       \$97,500; Litigation costs of \$6,765.60; Administration expenses of \$11,500; \$2,500 for  
16       Service payment; \$5,000 PAGA penalties) Wage and hour class action on behalf of  
17       drivers and other non-exempt hourly employees alleging off-the-clock, meal period, rest  
18       period and derivative violations.
- 19       *u. Martinez v. Occidental Petroleum Corporation*, S-1500-CV-282523-TSC (Superior  
20       Court of the State of California for the County of Kern, Date Final Approval was granted  
21       Jan 18, 2018). (\$575,000 checks mailed settlement for 101 non-exempt gas plant  
22       operators alleging off-the-clock, meal period, rest period, and derivative violations;  
23       Attorneys fees of \$191,666.67; litigation costs of \$15,000; administration expenses of  
24       \$11,150.00; \$7,000 for service payment). The Court granted final approval of a class  
25       settlement.
- 26       *v. Luna v. Central Coast Restaurant*, 16-CV-02320 (Santa Cruz Superior Court), hybrid  
27       case including PAGA claims for child labor violations. Settled on the third day of trial  
28

1 after a portion of Plaintiff's case-in-chief.

2 w. *Flores v. Knight Transportation, Inc.*, CV-15-01817-PHX-SRB (U.S. District Court for  
3 the District of Arizona, Nov. 5, 2018) (\$1.5 million claims-made settlement for 605  
4 drivers alleging misclassification claims; attorney fees of \$330,000; litigation costs of  
5 \$20,959.65; administration expenses of \$13,419.70; \$10,000 service payment to each of  
6 three plaintiffs; \$20,000 PAGA penalties with \$15,000 sent to LWDA; 85 submitted  
7 claim forms, 0 objectors, 170 opt-outs). Stephen Noel Ilg's hourly rate of \$525.00  
8 approved. *See id.* (Dkt. 134, 135) (Orders entered November 15, 2018). Wage and hour  
9 class action on behalf of truck drivers alleging misclassification as independent  
10 contractors, meal period, rest period, reimbursement, and other violations.

11 x. *Martinez v. California Multimodal, LLC*, No. BC583858 (Superior Court of the State of  
12 California for the County of Los Angeles, May 4, 2017) (\$3,442,560 claims-made  
13 reversionary settlement for 573 truck drivers alleging misclassification with 93,289  
14 aggregate workweeks; attorney fees of \$900,000; reimbursement of litigation costs of  
15 \$9,963.75; administration expenses of \$16,000; \$5,000 for service payment; \$6,000  
16 PAGA penalties with \$4,500 sent to LWDA or 0.13%; 365 submitted claim forms  
17 [63.70% of Class Members which accounted for 72.5% of the overall workweeks], 7  
18 objectors, 20 opt-outs).

19 y. *Constanza v. K&R Transportation LLC*, CIVDS1615424 (Superior Court of the State of  
20 California for the County of San Bernardino, June 7, 2017) (\$469,480 claims-made  
21 reversionary settlement for 57 drivers alleging misclassification with aggregate of 14,461  
22 workweeks; attorney fees of \$117,370 or 25%; litigation costs of \$5,000; administration  
23 costs of \$8,000; \$30,000 to each of two Plaintiffs; \$6,000 PAGA penalties with \$4,500  
24 sent to LWDA; 25 submitted claim forms accounting for 63.12% workweeks, 24 opt-  
25 outs, and 0 objections). Wage and hour class action on behalf of truck drivers alleging  
26 misclassification as independent contractors, meal period, rest period, reimbursement,  
27 and other violations. The Court granted final approval of a class settlement.

28

- 1       z. *Garcia v. ULS Express, Inc.*, BC626882 (Superior Court of the State of California of the  
 2       County of Los Angeles, Nov. 28, 2018). Settlement of \$400,000 for Wage and hour class  
 3       action on behalf of truck drivers alleging misclassification as independent contractors,  
 4       meal period, rest period, reimbursement, and other violations; \$130,520 in attorney fees  
 5       or 32.63%; \$3,000 allocated to PAGA penalties; \$6,500 service payment awarded to each  
 6       of two named Plaintiffs. The Court granted final approval of a class settlement.
- 7       aa. *Talavera v. QTS, Inc.*, BC501571 (Superior Court of the State of California for the County  
 8       of Los Angeles, May 17, 2017) (Settlement of \$5,000,000 with half up-front and the rest  
 9       over five years; \$1,250,000 in attorney fees or 25%; \$10,000 allocated to PAGA with  
 10      \$7,500 paid to the LWDA; \$9,000 service payment to each of twelve plaintiffs). Wage  
 11      and hour class action on behalf of truck drivers alleging misclassification as independent  
 12      contractors, meal period, rest period, reimbursement, and other violations. The Court  
 13      granted final approval of a class settlement.
- 14      bb. *James v. Park 'N Fly Service, LLC et al.*, 17-CIV-05465 (Superior Court of the State of  
 15      California for the County of San Mateo, Apr. 5, 2019) (Settlement of \$700,000 paid over  
 16      three years; \$233,333.33 or one-third in attorney fees awarded; \$20,000 allocated as  
 17      PAGA penalties; \$5,000 service payment to the single named Plaintiff; 869 Class  
 18      Members with 57,420 workweeks; average rate of pay of \$11.57 per hour; maximum  
 19      damages of \$3,109,715.90; zero objections or opt-outs). Wage and hour class action on  
 20      behalf of hourly employees working as parking attendants, alleging unpaid wages, meal  
 21      period, rest period, reimbursement, and other violations.
- 22      cc. *Newman v. All-Pro Bail Bonds, Inc.*, RG16825571 (Superior Court of the State of  
 23      California for the County of Alameda, Nov. 13, 2018) (Settlement of \$421,000.00 for  
 24      hourly Bail Agents from August 1, 2012 to July 30, 2018 alleging wage and hour claims;  
 25      \$140,000 in attorneys fee awarded; \$20,000 allocated to PAGA penalties; \$5,000 service  
 26      payment to each of the two named Plaintiffs).
- 27      dd. *Sampino v. Versace USA, Inc.*, 4:16-cv-07198-JSW (U.S. District Court for the Northern  
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- 1 District of California) (Settlement of \$300,000 on behalf of all hourly retail salesperson  
2 working in California from November 16, 2012 to September 21, 2018, preliminary  
3 approval granted January 23, 2019).
- 4 *ee. Jorge Casas et al. v. Staples Energy Services, LLC*, 17CV002262 (Superior Court of the  
5 State of California for the County of Monterey, October 8, 2019) (Settlement of  
6 \$275,000.00 for Residential Energy Specialists alleging wage and hour claims).
- 7 *ff. Calzada v. Integrated Building Services, LLC. et al.*, 17CV02227 (Santa Cruz Superior  
8 Court) (final approval of class action settlement of \$275,000.00 granted on March 3,  
9 2020)
- 10 *gg. Gonzalez et al. v. Matsui Nursery, Inc.*, 18CV001689 (Monterey County Superior Court)  
11 (final approval of class action settlement of \$350,000.00 granted at hearing on September  
12 15, 2020 for class of approximately 450 people focused on unpaid overtime).
- 13 *hh. Victor Cortes Arrellano et al v. XPO Logistics Port Services, LLC, et al.*, 2:18-cv-08220-  
14 RGK-E (U.S. District Court for the Central District of California [Dkt 101] September  
15 16, 2020) (certification granted for class of 215 truck drivers for claims involving  
16 misclassification as an independent contractor, meal breaks, rest breaks, wage statements,  
17 final pay). As "Of Counsel" to Gomez Law Group, settled a \$9.5 million class action case  
18 in federal court on the eve of trial; final approval was granted February 10, 2022.
- 19 *ii. Cruz et al. v. Trans Ocean Carrier, Inc.*, BC634606 (Los Angeles Superior Court)  
20 (preliminary approval of class action settlement of \$1.3 million paid over three years  
21 granted February 10, 2021 for class of 128 truck drivers for claims involving  
22 misclassification as an independent contractor, meal breaks, rest breaks, wage statements,  
23 final pay)
- 24 *jj. As "Of Counsel" to Gomez Law Group, settled a \$1.2 million class action case in .*  
25 *Cabuyales v. Transport Express, Inc.*, final approval tentatively granted November 30,  
26 2021 (Los Angeles Superior Court Case No. BC665998).
- 27 *kk. As "Of Counsel" to Gomez Law Group, settled for \$9.5 million in a class action on behalf*  
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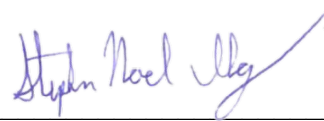
1 of 215 truck drivers for claims regarding their alleged misclassification as independent  
2 contractors. *Arrellano et al. v. XPO Logistics Port Services LLC et al.*, 2:18- cv-08220  
3 (C.D. Cal., final approval granted February 10, 2022)

4 ll. *Badachi et al. v. Taisuco America Corporation*, 19CV004396 (Monterey County  
5 Superior Court) (final approval granted October 6, 2023 of \$500,000 class action  
6 settlement to resolve claims related to failure to pay overtime rates after eight hours of  
7 work in a day)

8  
9 14. I believe the proposed class action settlement is fair, adequate and reasonable and  
10 warrants approval.

11  
12  
13 I declare under penalty of perjury under the laws of California and the United States of  
14 America that the foregoing is true and correct.

15 Executed at South San Francisco, California, this 20th day of November 2023

16  
17 

18 \_\_\_\_\_  
19 Stephen Noel Ilg

# EXHIBIT A

Type: All transactions & Status: All statuses

Date	Client	Memo	Total		TOTAL COSTS
					<b>TOTAL COSTS</b> <b>\$ 13,905.17</b>
		CHECK 1101			
	Bank of America (Rivera)	\$4,800.00 Invoice re 6.30.19 Mediation (BofA) with no markup	4,800.00		
06/17/2019				REIMB'D PREVIOUSLY	-5446.5
		CHECK 1102			
	Bank of America (Rivera)	\$2,680.60 First Legal Fee for 5-21-19 Depo (BofA) with no markup	2,680.60		
07/18/2019				<b>UNREIMB COSTS</b>	<b>\$ 8,458.67</b>
		RCD CIVIL SUPERIOR COURT \$1510.00 Complex Fees & Filing Complaint (Bank of America) with no markup	1,000.00		
01/26/2018	Bank of America (Rivera)				
		\$700.30 Check 1141 re Invoice for Depos to Atkinson (BofA) with no markup	700.30		
08/04/2021	Bank of America (Rivera)				
		RCD CIVIL SUPERIOR COURT \$1510.00 Complex Fees & Filing Complaint (Bank of America) with no markup	510.00		
01/26/2018	Bank of America (Rivera)				
		SOUTHWES 5262475399761 \$260.96 Flight for PMK Depo 5-28-19 (BofA) with no markup	260.96		
05/15/2019	Bank of America (Rivera)				
		SOUTHWES 5262479741294 \$250.98 flight for PMK Depo 5-28-19 (BofA) with no markup	250.98		
05/29/2019	Bank of America (Rivera)				

01/03/2020	Bank of America (Rivera)	Filing of Appeal (BofA) with no markup	230.00
11/29/2018	Bank of America (Rivera)	\$100 One Legal Invoice_11542576 Process Serving Obj Ntc Dep & POS (BofA) with no markup	100.00
11/28/2018	Bank of America (Rivera)	\$100 One Legal Invoice 11540895 Process Serving Obj to Ntc Deposition & POS (BofA) with no markup	100.00
05/29/2019	Bank of America (Rivera)	SQ *ALFRED GONZALES \$68.25 Taxi to PMK depo 5-28- 19 (BofA) with no markup	68.25
01/22/2019	Bank of America (Rivera)	COURTCALL *#9553790 \$51 CourtCallConfirmation_ 9553790_Hearing 1-17- 19 (BofA) with no markup	51.00
08/01/2019	Bank of America (Rivera)	\$43.27 Uber for Mediation 7-31-19 (BofA) with no markup	43.27
01/30/2018	Bank of America (Rivera)	11195545_\$39.95 One Legal Service of Initial Docs (Bank of America) with no markup	39.95
07/31/2019	Bank of America (Rivera)	\$35.76 Uber for Mediation 7-31-19 (BofA) with no markup	35.76



05/23/2019	Bank of America (Rivera)	IMPARK00270075A 5/21- parking for bank of america deposition with no markup	35.00
05/30/2019	Bank of America (Rivera)	LAZ PKG OAKLAND \$34 Parking for PMK Depo 5-28-19 (BofA) with no markup	34.00
02/04/2019	Bank of America (Rivera)	\$33.75 One Legal Invoice_11642703 Courtesy Copy Req to File Unilateral Brief re Discovery Dispute (BofA) with no markup	33.75
08/21/2018	Bank of America (Rivera)	\$30 One Legal Invoice_11422080 Courtesy Copy ADR Certification (BOA) with no markup	30.00
07/23/2018	Bank of America (Rivera)	\$30 OneLegal Invoice_11388586 Courtsey Copy Memo in Support Opposition to MTD-Strike Amend. Comp. (BOA) with no markup	30.00
07/19/2019	Bank of America (Rivera)	UBER *TRIP \$29.50 Uber for CMC (BofA) with no markup	29.50
09/30/2018	Bank of America (Rivera)	IMPARK00270200A Parking for CMC with no markup	29.00

06/04/2019	Bank of America (Rivera)	George- Driving to San Francisco for Bank of America Client Deposition = 45 miles with no markup	26.10
10/10/2019	Bank of America (Rivera)	Driving to San Francisco for Bank of America MSJ = 42.1 miles 9-26-19-George with no markup	25.00
07/21/2019	Bank of America (Rivera)	UBER *TRIP Uber for CMC (BofA) with no markup	23.34
05/30/2019	Bank of America (Rivera)	ONTARIO AIRPORT \$23.21 Food for PMK Depo 5-28-19 (BofA) with no markup	23.21
05/22/2019	Bank of America (Rivera)	GOLDEN GATEWAY GARAGE \$20 Parking for Plft Depo with no markup	20.00
05/23/2019	Bank of America (Rivera)	CHIPOTLE 1566 5/21- Food for bank of america deposition with no markup	19.42
05/19/2019	Bank of America (Rivera)	IMPARK00270200A \$18 Parking for Hearing 5-16-19 (BofA) with no markup	18.00
11/18/2018	Bank of America (Rivera)	IMPARK00270200A \$18 Parking for Mediation 11-15-18- Stephen (BofA) with no markup	18.00

11/18/2018	Bank of America (Rivera)	IMPARK00270200A \$18 Parking for 11-15-18 Hearing (BofA) with no markup	18.00
02/02/2018	Bank of America (Rivera)	11200548_\$15.95 One Legal File POS (Bank of America) with no markup	15.95
05/29/2019	Bank of America (Rivera)	SQ *PEETS COFFEE OAK AIRP \$14.62 Food for PMK Depo 5-28-19 (BofA) with no markup	14.62
09/29/2019	Bank of America (Rivera)	\$12 Parking for MSJ Hearing 9/26/19 with no markup	12.00
09/29/2019	Bank of America (Rivera)	\$12 Parking for MSJ Hearing 9-26-19 (BofA) with no markup	12.00
07/19/2019	Bank of America (Rivera)	\$5.71 Food for CMC 7-18-19 (BofA) with no markup	5.71
03/17/2019	Bank of America (Rivera)	IMPARK00270200A \$3 Parking for CMC Hearing 3-14-19 (BofA) with no markup	3.00
02/01/2018	Bank of America (Rivera)	RCD CIVIL SUPERIOR COURT \$3.00 Fax Filing Alameda (Bank of America) with no markup	3.00
02/06/2020	Bank of America (Rivera)	\$100.00 Refund Mediation fee Check 313856 (BofA) with no markup	-100.00

5/22/2019	Bank of America (Rivera)	Simpluris Fee for Post- Privacy Notice Letter to Class Members	1,450.00
4/16/2019	Bank of America (Rivera)	Simpluris Fee for Privacy Mailing	\$1,205.50

# EXHIBIT B

Date	Timekeeper	Time (Hrs)	Hourly Rate	Description	Lodestar	TOTAL LODESTAR
	0 Stephen N. Ilg	0	\$ 750.00	[Leave Blank]	\$ -	\$ 70,725.00
1/15/2018	Stephen N. Ilg	3.2	\$ 750.00	Prep initial complaint; Calls with Cl	\$ 2,400.00	
1/25/2018	Stephen N. Ilg	0.7	\$ 750.00	Revise Complaint	\$ 525.00	TOTAL HOURS
3/18/2018	Stephen N. Ilg	5.7	\$ 750.00	Draft and revise Opp to Def MTD	\$ 4,275.00	94.30
3/19/2018	Stephen N. Ilg	3.4	\$ 750.00	Revise Opp to Def MTD	\$ 2,550.00	
6/19/2018	Stephen N. Ilg	0.6	\$ 750.00	Draft FAC	\$ 450.00	
7/16/2018	Stephen N. Ilg	3.8	\$ 750.00	Draft and revise Opp to Def MTD r	\$ 2,850.00	
7/18/2018	Stephen N. Ilg	4.1	\$ 750.00	Research Opp; Revise Opp re MT	\$ 3,075.00	
8/16/2018	Stephen N. Ilg	0.6	\$ 750.00	Review Def Answer	\$ 450.00	
9/27/2018	Stephen N. Ilg	0.4	\$ 750.00	Hrg re CMC	\$ 300.00	
10/1/2018	Stephen N. Ilg	1.4	\$ 750.00	Review Def disco reqs	\$ 1,050.00	
10/14/2018	Stephen N. Ilg	2.8	\$ 750.00	Prep responses to Def disco reqs	\$ 2,100.00	
10/26/2018	Stephen N. Ilg	2.2	\$ 750.00	Finalize draft resps to Def disco re	\$ 1,650.00	
10/26/2018	Stephen N. Ilg	1.3	\$ 750.00	Revise Pltf RPDs and SROGS	\$ 975.00	
11/7/2018	Stephen N. Ilg	0.2	\$ 750.00	JCMCS	\$ 150.00	
11/14/2018	Stephen N. Ilg	0.3	\$ 750.00	Review Def initial disclosures	\$ 225.00	
11/27/2018	Stephen N. Ilg	0.9	\$ 750.00	Prep initial disclosures	\$ 675.00	
12/20/2018	Stephen N. Ilg	0.3	\$ 750.00	Stip & Prot Ord	\$ 225.00	
1/29/2019	Stephen N. Ilg	1.2	\$ 750.00	Research Jt Ltr re Disco Dispute; I	\$ 900.00	
2/1/2019	Stephen N. Ilg	0.4	\$ 750.00	Revise Ltr Brief	\$ 300.00	
2/8/2019	Stephen N. Ilg	0.7	\$ 750.00	Def Subp of Records	\$ 525.00	
3/6/2019	Stephen N. Ilg	0.4	\$ 750.00	Def Subp of Records	\$ 300.00	
3/15/2019	Stephen N. Ilg	0.8	\$ 750.00	Revise PMK Depo Ntc	\$ 600.00	
4/15/2019	Stephen N. Ilg	5.4	\$ 750.00	Review docs to prepare for PMK C	\$ 4,050.00	
4/19/2019	Stephen N. Ilg	6.2	\$ 750.00	Create outline for PMK Depo; Rev	\$ 4,650.00	
5/8/2019	Stephen N. Ilg	0.2	\$ 750.00	Joint CMCS	\$ 150.00	
5/11/2019	Stephen N. Ilg	3.2	\$ 750.00	Review docs to prepare for witnes:	\$ 2,400.00	
5/15/2019	Stephen N. Ilg	1.6	\$ 750.00	Prepare Pltf for Deposition	\$ 1,200.00	
5/21/2019	Stephen N. Ilg	9.1	\$ 750.00	Final Prep for Pltf Depo; Pltf Depo	\$ 6,825.00	
7/26/2019	Stephen N. Ilg	3.1	\$ 750.00	Review Def MSJ; Research	\$ 2,325.00	
8/1/2019	Stephen N. Ilg	6.2	\$ 750.00	Review docs to create plan for Op	\$ 4,650.00	
8/2/2019	Stephen N. Ilg	4.7	\$ 750.00	Draft and revise Opp to MSJ	\$ 3,525.00	
8/3/2019	Stephen N. Ilg	4	\$ 750.00	Research re Def MSJ	\$ 3,000.00	
8/4/2019	Stephen N. Ilg	5.6	\$ 750.00	Revise Opp to MSJ	\$ 4,200.00	
9/24/2019	Stephen N. Ilg	3.3	\$ 750.00	Review Def Reply Brief and plan fr	\$ 2,475.00	
9/26/2019	Stephen N. Ilg	1.4	\$ 750.00	Final Prep for Hrg; Hrg re MSJ	\$ 1,050.00	
10/31/2019	Stephen N. Ilg	0.6	\$ 750.00	Review Ct Ord re Def MSJ; Resea	\$ 450.00	
11/7/2019	Stephen N. Ilg	1.1	\$ 750.00	Motion Hrg	\$ 825.00	
12/3/2019	Stephen N. Ilg	0.3	\$ 750.00	Review Ord re MCC	\$ 225.00	
3/26/2020	Stephen N. Ilg	0.1	\$ 750.00	JCMCS	\$ 75.00	
4/12/2021	Stephen N. Ilg	1.2	\$ 750.00	Review Def Mtn Reconsideration M	\$ 900.00	
6/17/2021	Stephen N. Ilg	0.2	\$ 750.00	Hrg via Zoom re Mtn	\$ 150.00	
6/17/2021	Stephen N. Ilg	0.8	\$ 750.00	Review Ord Denying MCC	\$ 600.00	
9/7/2023	Stephen N. Ilg	0.4	\$ 750.00	Review Ord re MPA	\$ 300.00	
11/14/2023	Stephen N. Ilg	0.2	\$ 750.00	Review MFA Papers	\$ 150.00	