

Matthew Norton & Associates, APC  
12839 S. Wakial Loop  
Phoenix, Arizona 85044

1 John Matthew Norton, Esq., (SBN 158937)  
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2 Matthew Norton & Associates  
12839 S. Wakial Loop,  
3 Phoenix, Arizona 85044  
Telephone: 562/433-3208  
4 Facsimile:562/683-2726

5 Matthew F. Archbold (CA SBN 210369)  
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6 David D. Deason (SBN 207733)  
e-mail: david@yourlaborlawyers.com  
7 DEASON & ARCHBOLD  
17011 Beach Blvd., Suite 900  
8 Huntington Beach, CA 92647  
Telephone: (949) 794-9560

9 Attorneys for Representative Plaintiffs

10 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
11 FOR THE COUNTY OF SAN FRANCISCO  
12 (UNLIMITED JURISDICTION)  
13

14 COORDINATION  
15 PROCEEDING SPECIAL TITLE  
[RULE 3.550]

) Judicial Council Coordination Proceeding  
No.: 4911

17 **SEPHORA WAGE AND HOUR  
18 CASES**

) [CLASS ACTION PURSUANT TO CODE  
OF CIVIL PROCEDURE §382]

19 Included actions:

) JOHN M. NORTON'S **SUPPLEMENTAL  
DECLARATION IN SUPPORT OF  
MOTION FOR ATTORNEYS FEES AND  
SERVICE AWARD**

20 *Burnthorne-Martinez v. Sephora  
USA, Inc.*  
(San Francisco CGC 16-550894)

) Date: May 5, 2022  
Time: 9:00 a.m.  
Dept: 613

21 *Provencio v. Sephora USA, Inc.*  
22 (Santa Clara 16CV294112)

23 *Hernandez v. Sephora USA, Inc.*  
24 (San Francisco CGC-17-557031)

25 I, John Matthew Norton, swear and affirm as true the following:

- 26 1. I am an attorney at law, licensed to practice in the trial and appellate courts  
27 for the States of California and Arizona. I am a shareholder and principal in  
28

1 the law firm of Matthew Norton and Associates attorneys for Plaintiff Lacey  
2 Hernandez s and Brenda Morales in the above-captioned matter. If called on,  
3 I would and could testify truthfully and completely as to the following facts:  
4 2. This Declaration is offered to supplement the earlier declaration I filed and  
5 served. In the original declaration, I attached and incorporated Exhibits 1  
6 and 2. Attached hereto is Exhibit 2 which is a true and correct copy of my  
7 costs bill.

8 **CY PRES**

- 9 3. As noted above, I am the sole shareholder at Matthew Norton & Associates  
10 and the only lawyer litigating this case from Matthew Norton & Associates.  
11 4. Neither I nor this firm has any relationship with Legal Aid at Work.  
12 5. I have been informed and believe and so state on information and belief that  
13 neither Lacey Hernandez nor Brenda Morales has had or currently has any  
14 relationship with Legal Aid at Work.

15 **Coordination and Cost Sharing**

- 16 6. In 2017, the Court ordered the coordination of three complaints, with a  
17 fourth added later, with Duran Complaint added later.  
18 7. When the court ordered the coordination of four different complaints,  
19 plaintiffs' counsels agreed to coordinate efforts and costs.  
20 a. Pursuant to express agreement with counsel for Burnthorne-Martinez  
21 and Provencio, we agreed to confer on the necessity for experts, what  
22 areas, and how we proceed strategically. We also agreed to share the  
23 costs, with Hernandez and Morales originally agreeing to pay 15% of  
24 expert costs.  
25 b. When the Duran was added to the litigation, our percentage of costs  
26 was eventually reduced to 13.5%.  
27 c. This percentage was further adjusted for the mediator, as follows  
28 below.

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8. With that, let me address each question posed by the Court as follows:
- a. Rottman (mediator) costs: \$1,491 paid to Rottman by this office was not split. The mediator invoiced Plaintiffs' counsel a total of \$13,250.00. Our allocated percentage was 11.25%, and mediator required payment to the nearest dollar. Exhibit 3 attached hereto is a true and correct copy of the email from Kevin Allen to Rottman's office. In that email, Rottman's office is instructed that our office will pay 11.25% of the mediator's fee. Thus, we paid \$1,491.00 to Rottman for the mediation.
  - b. Davis Research Experts: \$5,347.50 on 12/3/19 and \$4,545.75 on 1/31/20: The Court asks why this cost was necessary and what the expert did.
    - i. Expert's assignment – Davis Research administered the actual survey to Class Members. Further explanation is set forth in the Supplemental Declaration Kevin Allen at paragraphs 12-20.
    - ii. Cost was necessary – As stated in the Allen Supplemental Declaration, the total invoiced amount for Davis Research was \$66,297.75 (Allen Supp. Decl., ¶25).
      - (1) On or about December 1, 2019 we were notified that Davis would require deposit of \$35,624.00. Our agreed-to contribution was \$5,347.50, which we paid on 12/3/2019. (See Exhibit 4, highlighted portion hereto.)
      - (2) On or about January 23, 2020 we were notified that in order to complete the survey, Davis would require an additional of \$30,305, of which we paid \$4,545.75 on 1/31/2020. (Norton Supp. Decl, Exh. 4)
  - c. Allman Expert Costs: \$885.33. The Court asks why this cost was necessary and what this expert did.

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- i. Expert’s assignment – Allman was retained to *design* the damages survey. Further explanation is set forth in the Supplemental Declaration Kevin Allen at paragraphs 12-20.
  - ii. Cost was necessary – As stated in the Allen Supplemental Declaration, the total invoiced amount for Allman Experts was \$37,125.00. (Allen Supp. Decl., ¶17, Exh. S2). On 3/27/2020, Allman invoiced Plaintiffs’ counsel \$5,569.00 of which we paid \$885.33 as our percentage . (Norton Supp. Decl, Exh. 5).
- d. Employee Stat-Expert: \$3,332.28. The Court asks why this cost was necessary and what this expert did.
- i. Expert’s Assignment – EmployStats performed all of the mathematical calculations relating to the surveys including determining the number of surveys needed to obtain a scientifically reliable sample for the class and extrapolating results from the survey to calculate class-wide damages. Dwight Steward with Employee Stats was deposed. Further explanation is set forth in the Supplemental Declaration of Kevin Allen, who explains the need for such experts. (Allen Supp. Decl. ¶¶22-25)
  - ii. Cost was necessary – As stated in the Allen Supplemental Declaration, the total invoiced amount for Allman Experts was \$76,876.58. (Allen Supp. Decl., ¶17, Exh. S3). On July 3, 2020, Employee Stats issued Invoice No. 3309 for the period of June 1, 2020 to June 30, 2020 when they completed their report and prepared for expert deposition. Based on Invoice 3309, we were invoiced and paid \$3,332.28 on 7/20/2020. (Norton Supp. Decl, Exh. 6, page 2).

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iii. Deason & Archbold reimbursed our office for certain costs, as noted in Exhibit 2 of the Declaration of John M. Norton which was submitted with the initial filing for the Motion for Attorneys Fees. Deason & Archbold reimbursed this office as follows:

- (1) On July 23, 2020 -- \$3,115.3 which represented one-half of two payments (\$2,898.18 and \$3,332.28) to Employee Stats, which had billed me directly and our office paid. Exhibit 2 sets forth these payments by Deason & Archbold.

**Hotel Expenses for Plaintiffs Hernandez and Morales**

- 9. Originally, Defendant set the Deposition of Plaintiffs Hernandez and Morales in San Francisco.
- 10. Exhibit 7 attached hereto are true and correct copy of the original deposition notices for Plaintiffs Hernandez and Morales.
- 11. Both Plaintiffs reside in the Fresno area of the Central Valley, more than 75 miles from the deposition location. (Hernandez Decl, ¶7 and signature block; Morales Decl.¶7, and signature block).
- 12. I objected to the location of the depositions, noting that pursuant to the California **Code of Civil Procedure**, depositions must be within 75 miles of the deponents location.
- 13. Defendant Sephora replied with a compromise – the depositions go forward in Los Angeles, in exchange defendant would not object to expenses on resolution associated with the Los Angeles deposition.
- 14. If the depositions had been held in Fresno, all counsel (plaintiff and defendant) would bill for travel and meals to Fresno, thus increasing the overall cost of litigation.

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15. As a compromise, and to avoid any motion work, plus the savings in attorneys fees related to travel to San Francisco or Fresno, my clients and I agreed to the Plaintiffs’ depositions in Los Angeles.

16. Thus, Plaintiffs Morales and Hernandez traveled to Los Angeles.

17. We did not bill for parking, dinner or mileage; however, we billed for the Plaintiffs lunch time meal.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct and was executed on May 5, 2022 at Phoenix, Arizona.

*John M. Norton*  
\_\_\_\_\_  
John M. Norton, Declarant

EXHIBIT 2

Matthew Norton & Associates, A  
Professional Corporation

12839 S. Wakial Loop  
Phoenix, AZ

Federal Tax Identification No. [REDACTED]

# Statement

Date

2/4/2022

Bill To

Sephora U.S.A., Inc.--  
Hernandez v. Sephora USA, Inc. (San Francisco CGC-17-557031)

Date	Description	Qty	Rate	Amount	Balance
12/31/2015	Balance forward				0.00
02/15/2017	court call attendance to related case hearing	1	86.00	86.00	86.00
03/03/2017	Court Call for CMC	1	86.00	86.00	172.00
05/31/2017	Travel to San Francisco for cmc -- airline tickets	1	75.00	75.00	247.00
06/01/2017	Hotel La Quinta for CMC	139.5	1.00	139.50	386.50
06/12/2017	Lunch for client	48.5	1.00	48.50	435.00
06/13/2017	Hernandez hotel for state court depo	1	257.33	257.33	692.33
06/13/2017	Morales Hotel state court depo	1	257.33	257.33	949.66
10/23/2017	Court Call for CMC	1	86.00	86.00	1,035.66
01/26/2018	Court Call for CMC	1	86.00	86.00	1,121.66
03/08/2018	Attend Motion to Compel	1	86.00	86.00	1,207.66
07/10/2018	Airline tickets to Cert Moion Hearing	1	252.00	252.00	1,459.66
09/11/2018	Second Hearing on Cert - Airline tickets	1	256.32	256.32	1,715.98
11/03/2018	Court Call for CMC	1	86.00	86.00	1,801.98
11/21/2018	Court Call for CMC	1	86.00	86.00	1,887.98
09/25/2019	Court Call for CMC	1	86.00	86.00	1,973.98
10/08/2019	Reimbursement to Kevin Allen for Survey	1	1,275.00	1,275.00	3,248.98
	Expert Costs				
12/03/2019	Davis Research Expert	1	5,347.50	5,347.50	8,596.48
12/04/2019	PMT Payment by D&A			-2,673.75	5,922.73
01/31/2020	Second Davis Research Expert	1	4,545.75	4,545.75	10,468.48
05/29/2020	Depo Cost with Exhibits	1	3,114.04	3,114.04	13,582.52
06/26/2020	Employee Stats	1	2,898.18	2,898.18	16,480.70
07/10/2020	Allman -- expert costs	1	885.33	885.33	17,366.03
07/20/2020	Employee Stat -- Expert	1	3,332.28	3,332.28	20,698.31
07/23/2020	PMT 1/2 of Employ Stat (expert) invoice			-3,115.33	17,582.98
07/30/2020	CPT	1	272.70	272.70	17,855.68
09/15/2020	Rottman Mediation	1	1,491.00	1,491.00	19,346.68
02/05/2021	CPT	1	1,761.47	1,761.47	21,108.15
09/07/2021	Court call for Motion for Preapproval	1	94.00	94.00	21,202.15
12/23/2021	Employee Stat	1	1,914.64	1,914.64	23,116.79
02/04/2022	Amount Due				23,116.79



EXHIBIT 3

## Re: Sephora Wage & Hour Cases JCCP 4911

From: Kevin Allen (kevin@allenattorneygroup.com)

To: Karen@davidrotman.net

Cc: agutierrez@hathawaylawfirm.com; thomas@setarehlaw.com; shaun@setarehlaw.com; lauren@setarehlaw.com; farrah@setarehlaw.com; calendar@setarehlaw.com; djp@calemploymentcounsel.com; david@yourlaborlawyers.com; Matt@matthew-norton.com; ebyerly@hathawaylawfirm.com; matthew@yourlaborlawyers.com; cdeleon@hathawaylawfirm.com

Date: Wednesday, September 9, 2020, 01:10 PM MST

Hi Karen,

The fee split amongst Plaintiff's counsel is as follows:

1. Duran (Alejandro Gutierrez of Hathaway): 25%
2. Provencio (Kevin Allen of Allen Attorney Group): 31.875%
3. Burthorne-Martinez (Setareh): 31.875%
4. Hernandez (Matt Norton): 11.25%

Sorry for the inconvenience of issuing four invoices but it works cleaner for us if you can handle this way. Thank you!

Thank you,

Kevin R. Allen, Esq.

**ALLEN ATTORNEY GROUP**

2121 N. California Blvd, Suite 290

Walnut Creek, CA 94596

Ph: .925.695.4913

Fax: 925.334.7477

E-mail: [kevin@allenattorneygroup.com](mailto:kevin@allenattorneygroup.com)

[www.allenattorneygroup.com](http://www.allenattorneygroup.com)

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CONFIDENTIALITY NOTICE: This communication constitutes an electronic communication within the meaning of the Electronic Communications Privacy Act, 18 USC 2510, and its disclosure is strictly limited to the recipient intended by the sender of this message. This communication may contain confidential and privileged material for the sole use of the intended recipient and receipt by anyone other than the intended recipient does not constitute a loss of the confidential or privileged nature of the communication. Any review or distribution by others is strictly prohibited. If you are not the intended recipient please contact the sender by return electronic mail and delete all copies of this communication.

On Sep 9, 2020, at 11:43 AM, Karen Kukla <[Karen@davidrotman.net](mailto:Karen@davidrotman.net)> wrote:

Counsel - your mediation date is not confirmed until plaintiffs' counsels agree on a fee split among them. To preserve your mediation date, we need you to work this out by the end of the week.

Thanks Much,  
Karen

On Wed, Sep 2, 2020 at 12:31 PM Alejandro Gutierrez <[agutierrez@hathawaylawfirm.com](mailto:agutierrez@hathawaylawfirm.com)> wrote:

No worries. Dan Palay will also attend the mediation on behalf of Jessica Duran.

EXHIBIT 4



Date	Invoice #
1/23/2020	19-0126B

**BILL TO**

Allen Attorney Group  
 Attn: Accounts Payable  
 2121 N. California St Suite 290  
 Walnut Creek, CA 94596

P.O. Number	Project Contact	Terms	Project Description
None	Kevin Allen	Due upon receipt	Sephora Survey

Description	Quantity	Unit Price	Amount
Set-up, project management, documentation and data files			\$9,000.00
Pre Test (50 surveys)			\$5,000.00
500 surveys			\$44,000.00
Survey Incentives (17 declined, 533 @ \$13)			\$6,929.00
Spanish Survey Option			\$1,000.00
Project Advance			-\$35,624.00
<b>TOTAL DUE:</b>			<b>\$30,305.00</b>

Handwritten blue brackets highlighting the Project Advance amount and the TOTAL DUE amount.

1.5% Interest will be charged on balance remaining after 30 days

Thank you for your business,

Bill Davis

EXHIBIT 5

PHILLIP H. ALLMAN, Ph.D.  
 JEFFREY S. PETERSEN, Ph.D.  
 MAX D. ALLMAN, M.A., CFA

**ALLMAN & PETERSEN ECONOMICS**

7677 Oakport Street, Suite 610  
 Oakland, CA 94621

TEL: (510) 382-1550  
 FAX: (510) 382-1472

TO:

Norton, Matthew  
 Matthew Norton & Associates  
 5855 E. Naples Plaza, Suite 112  
 Long Beach, CA 90803

**Invoice**

DATE	INVOICE #	CASE
3/27/2020	7770	Sephora Class Action

DATE	SERVICES RENDERED	HOURS	RATE	AMOUNT
2/5/2020	Analysis of survey data.	2	550.00	1,100.00
2/6/2020	Analysis of survey data.	2.5	550.00	1,375.00
2/12/2020	Analysis of survey data; report preparation.	2	550.00	1,100.00
2/14/2020	Analysis of survey data; report preparation.	2	550.00	1,100.00
2/18/2020	Analysis of survey data; report preparation.	1.5	550.00	825.00
2/19/2020	Analysis of survey data; report preparation.	1	550.00	550.00
2/20/2020	Analysis of survey data; report preparation.	1.5	550.00	825.00
2/21/2020	Analysis of survey data; report preparation.	1	550.00	550.00
2/24/2020	Phone conference with Kevin Allen; report preparation.	1	550.00	550.00
2/26/2020	Phone conference with Tomas Segal; report preparation.	1.5	550.00	825.00
3/10/2020	Analysis of survey data; report preparation.	3	550.00	1,650.00
3/11/2020	Analysis of survey data; report preparation.	1	550.00	550.00
3/19/2020	Analysis of survey data; report preparation.	2	550.00	1,100.00
3/20/2020	Analysis of survey data; report preparation.	2.5	550.00	1,375.00
3/23/2020	Analysis of survey data; report preparation.	1.5	550.00	825.00
3/24/2020	Analysis of survey data; report preparation.	2	550.00	1,100.00
3/25/2020	Analysis of survey data; report preparation.	3	550.00	1,650.00
3/26/2020	Analysis of survey data; report preparation.	2.5	550.00	1,375.00
	Total charge for report = \$37,125. Apportioned as follows: Allen Attorney Group (42.5%), Setareh Law (42.5%), Matthew Norton & Associates (15%)			
3/27/2020	Adjustment for proportional share: \$37,125 x 85%		-31,556.00	-31,556.00

Please make check payable to Allman & Petersen Economics, LLC.  
 Federal Tax ID: 20-2053788  
 BALANCE DUE UPON RECEIPT

**Balance Due:** \$5,569.00

EXHIBIT 6

**EmployStats**

1920 E. Riverside Dr. Ste A-120 #260  
 Austin, TX 78741  
 (512) 476-3711  
 accounting@employstats.com

**BILL TO**

Matt Norton  
 5855 E. Naples Plaza, Ste 112  
 Long Beach, CA 90803 USA

**INVOICE 3309**

DATE 07/03/2020 TERMS Due on receipt

DUE DATE 07/03/2020

**PROJECT NAME**

1122.1 Sephora

DATE	DESCRIPTION	HOURS	RATE	AMOUNT
06/01/2020	Analysis Support and Client Conference - Matt Rigling	0:10	225.00	37.97
06/17/2020	Performed research and provided analysis support - Matt Rigling	0:14	225.00	50.63
06/17/2020	Research. Drafted report - Dwight D Steward	0:05	625.00	52.73
06/19/2020	Research. Drafted report - Dwight D Steward	0:03	625.00	35.16
06/23/2020	Research. Drafted report. Supervised and directed research - Dwight D Steward	0:30	625.00	316.41
06/23/2020	Document review. Performed research and provided analysis support - Matt Rigling	0:27	225.00	101.25
06/23/2020	Provided analysis support - Susan Wirtanen	0:05	215.00	18.14
06/24/2020	Provided analysis support. Assisted with expert report - Susan Wirtanen	0:10	215.00	36.28
06/24/2020	Document review. Performed research - Matt Rigling	0:25	225.00	94.92
06/24/2020	Provided analysis support - Carl McClain	0:14	225.00	50.63
06/25/2020	Research. Drafted report. Supervised and directed research - Dwight D Steward	0:46	625.00	474.61
06/25/2020	Document Review. Provided analysis support and performed research - Matt Rigling	0:30	225.00	113.91
06/25/2020	Client conference. Provided analysis support - Susan Wirtanen	0:20	215.00	72.56
06/25/2020	Provided analysis support - Carl McClain	0:15	225.00	56.95
06/26/2020	Research. Drafted report. Supervised and directed research - Dwight D Steward	0:49	625.00	509.77
06/26/2020	Assisted with expert report. Performed research - Matt Rigling	0:32	225.00	120.23
06/26/2020	Client conference. Assisted with expert report. Provided analysis support - Susan Wirtanen	0:27	215.00	96.75
06/26/2020	Client conference. Provided analysis support - Carl McClain	0:15	225.00	56.95

We only accept electronic payments. We do not accept paper checks. Please refer to the email accompanying this invoice for payment instructions.



DATE	DESCRIPTION	HOURS	RATE	AMOUNT
06/27/2020	Client conference. Provided analysis support and assisted with expert report - Susan Wirtanen	0:17	215.00	60.47
06/27/2020	Performed research - Matt Rigling	0:25	225.00	94.92
06/27/2020	Client conference. Provided analysis support - Carl McClain	0:10	225.00	37.97
06/27/2020	Research. Drafted report. Supervised and directed research - Dwight D Steward	0:12	625.00	123.05
06/28/2020	Performed research - Matt Rigling	0:07	225.00	25.31
06/28/2020	Research. Drafted report - Dwight D Steward	0:05	625.00	52.73
06/28/2020	Provided analysis support and assisted with expert report - Susan Wirtanen	0:07	215.00	24.19
06/29/2020	Research. Drafted report - Dwight D Steward	0:08	625.00	87.89
06/29/2020	Performed research. Assisted with expert report - Matt Rigling	0:15	225.00	56.95
06/29/2020	Provided analysis support - Carl McClain	0:15	225.00	56.95
06/29/2020	Provided analysis support. Assisted with expert report - Susan Wirtanen	0:15	215.00	54.42
06/30/2020	Prepared for deposition testimony - Dwight D Steward	0:19	625.00	193.36
06/30/2020	Provided deposition preparation support - Carl McClain	0:15	225.00	56.95
06/30/2020	Provided deposition preparation support - Susan Wirtanen	0:15	215.00	54.42
06/30/2020	Provided deposition preparation support - Matt Rigling	0:15	225.00	56.95

The client has been billed at 15% of the remaining 75% of the total amount due in Sephora Wage and Hour matters which is reflected in the number of hours.

Total: \$3,332.38

TOTAL DUE

\$0.00

We only accept electronic payments. We do not accept paper checks. Please refer to the email accompanying this invoice for payment instructions.

EXHIBIT 7

1 ANDREW R. LIVINGSTON (SBN 148646)  
alivingston@orrick.com  
2 ALEXANDRA H. STATHOPOULOS (SBN 286681)  
astathopoulos@orrick.com  
3 ALEXANDRA HEIFETZ (SBN 301002)  
aheifetz@orrick.com  
4 ORRICK, HERRINGTON & SUTCLIFFE LLP  
5 The Orrick Building  
405 Howard Street  
6 San Francisco, California 94105-2669  
7 Telephone: +1-415-773-5700  
Facsimile: +1-415-773-5759

8 Attorneys for Defendant  
9 SEPHORA USA, INC.

10 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
11 FOR THE COUNTY OF SAN FRANCISCO  
12

13 LACEY HERNANDEZ; and BRENDA  
14 MORALES,

15 Plaintiffs,

16 v.

17 SEPHORA USA, INC., a Delaware  
corporation; and DOES 1 through 10,  
18 inclusive,

19 Defendants.  
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Case No. CGC-17-557031

CLASS ACTION

**DEFENDANT SEPHORA USA, INC.'S  
NOTICE OF DEPOSITION OF  
PLAINTIFF LACEY HERNANDEZ**

Date: June 14, 2017

Time: 9:30 a.m.

Location: 405 Howard Street, 10th Floor  
San Francisco, California 94105

OHSUSA:766823156.1

1 **TO PLAINTIFF LACEY HERNANDEZ AND HER ATTORNEYS OF RECORD:**

2 PLEASE TAKE NOTICE THAT, pursuant to California Code of Civil Procedure sections  
3 2019.010 *et seq.* and 2025.010 *et seq.*, Defendant Sephora USA, Inc. (“Defendant”), through its  
4 attorneys of record, Orrick, Herrington & Sutcliffe LLP, will take the oral deposition of Plaintiff  
5 Lacey Hernandez (“Plaintiff”) before an officer authorized to administer oaths and to conduct  
6 depositions. The deposition will commence at 9:30 a.m. on June 14, 2017, at the offices of  
7 Orrick, Herrington & Sutcliffe LLP, 405 Howard Street, 10th Floor, San Francisco, California  
8 94105. The deposition will continue on June 15, 2017 until it is completed or as otherwise agreed  
9 by counsel. The deposition may be recorded by audio and/or video technology as well as  
10 stenographically and may be recorded by a machine using instantaneous or “real time”  
11 transcription. Defendant reserves the right to use a video recording of the deposition testimony at  
12 trial.

13 Dated: May 9, 2017

ORRICK, HERRINGTON & SUTCLIFFE LLP



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ALEXANDRA H. STATHOPOULOS  
Attorneys for Defendant  
SEPHORA USA, INC.

28 OHSUSA:766823156.1

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**PROOF OF SERVICE BY FEDERAL EXPRESS AND EMAIL**

I am over the age of eighteen years and not a party to the within-entitled action. My business address is Orrick, Herrington & Sutcliffe LLP, The Orrick Building, 405 Howard Street, San Francisco, CA 94105-2669.

On May 9, 2017, I served the following document(s):

**DEFENDANT SEPHORA USA, INC.'S NOTICE OF DEPOSITION OF PLAINTIFF LACEY HERNANDEZ**

on the interested parties in this action by placing a true and correct copy thereof in a sealed package designated by Federal Express for that purpose, with such package addressed for delivery as follows:

Matthew F. Archbold David D. Deason Deason & Archbold 17011 Beach Blvd., Suite 900 Huntington Beach, CA 92647 Telephone: (949) 794-9560 Email: matthew@yourlaborlawyers.com; david@yourlaborlawyers.com	Matthew Norton & Associates John M. Norton 4105 E. Broadway, Suite 190 Long Beach, CA 90803 Telephone: (562) 433-3208 Email: matt@matthew-norton.com
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On the date indicated above, I caused the sealed package to be delivered to a courier or driver authorized by Federal Express to receive documents, with the delivery fees paid or provided for by the sender.

Additionally, I caused to be transmitted the document(s) listed above via electronic mail from the address vholdridge@orrick.com in Adobe PDF format to the electronic addresses set forth above.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on May 9, 2017, at San Francisco, California.

  
Victoria T. Holdridge

1 ANDREW R. LIVINGSTON (SBN 148646)  
alivingston@orrick.com  
2 ALEXANDRA H. STATHOPOULOS (SBN 286681)  
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5 The Orrick Building  
405 Howard Street  
6 San Francisco, California 94105-2669  
7 Telephone: +1-415-773-5700  
Facsimile: +1-415-773-5759  
8  
9 Attorneys for Defendant  
SEPHORA USA, INC.

10 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
11 FOR THE COUNTY OF SAN FRANCISCO  
12

13 LACEY HERNANDEZ; and BRENDA  
14 MORALES,

15 Plaintiffs,

16 v.

17 SEPHORA USA, INC., a Delaware  
18 corporation; and DOES 1 through 10,  
inclusive,

19 Defendants.  
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Case No. CGC-17-557031

CLASS ACTION

**DEFENDANT SEPHORA USA, INC.'S  
NOTICE OF DEPOSITION OF  
PLAINTIFF BRENDA MORALES**

Date: June 12, 2017

Time: 9:30 a.m.

Location: 405 Howard Street, 10th Floor  
San Francisco, California 94105

OHSUSA:766823198.1

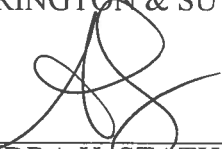
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**TO PLAINTIFF BRENDA MORALES AND HER ATTORNEYS OF RECORD:**

PLEASE TAKE NOTICE THAT, pursuant to California Code of Civil Procedure sections 2019.010 *et seq.* and 2025.010 *et seq.*, Defendant Sephora USA, Inc. (“Defendant”), through its attorneys of record, Orrick, Herrington & Sutcliffe LLP, will take the oral deposition of Plaintiff Brenda Morales (“Plaintiff”) before an officer authorized to administer oaths and to conduct depositions. The deposition will commence at 9:30 a.m. on June 12, 2017, at the offices of Orrick, Herrington & Sutcliffe LLP, 405 Howard Street, 10th Floor, San Francisco, California 94105. The deposition will continue on June 13, 2017 until it is completed or as otherwise agreed by counsel. The deposition may be recorded by audio and/or video technology as well as stenographically and may be recorded by a machine using instantaneous or “real time” transcription. Defendant reserves the right to use a video recording of the deposition testimony at trial.

Dated: May 9, 2017

ORRICK, HERRINGTON & SUTCLIFFE LLP



\_\_\_\_\_  
ALEXANDRA H. STATHOPOULOS  
Attorneys for Defendant  
SEPHORA USA, INC.

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**PROOF OF SERVICE BY FEDERAL EXPRESS AND EMAIL**

I am over the age of eighteen years and not a party to the within-entitled action. My business address is Orrick, Herrington & Sutcliffe LLP, The Orrick Building, 405 Howard Street, San Francisco, CA 94105-2669.

On May 9, 2017, I served the following document(s):

**DEFENDANT SEPHORA USA, INC.'S NOTICE OF DEPOSITION OF PLAINTIFF BRENDA MORALES**

on the interested parties in this action by placing a true and correct copy thereof in a sealed package designated by Federal Express for that purpose, with such package addressed for delivery as follows:

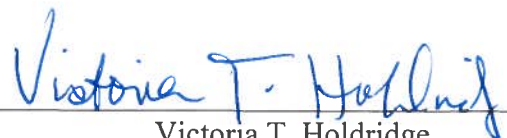
Matthew F. Archbold David D. Deason Deason & Archbold 17011 Beach Blvd., Suite 900 Huntington Beach, CA 92647 Telephone: (949) 794-9560 Email: matthew@yourlaborlawyers.com; david@yourlaborlawyers.com	Matthew Norton & Associates John M. Norton 4105 E. Broadway, Suite 190 Long Beach, CA 90803 Telephone: (562) 433-3208 Email: matt@matthew-norton.com
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I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on May 9, 2017, at San Francisco, California.

  
Victoria T. Holdridge