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and the Certified Class/Subclasses

*Additional Counsel Listed on Next Page*

**SUPERIOR COURT OF THE STATE OF CALIFORNIA**

**IN AND FOR THE COUNTY OF SAN FRANCISCO**

**(UNLIMITED JURISDICTION)**

COORDINATED PROCEEDINGS SPECIAL  
TITLE [RULE 3.550]

SEPHORA WAGE AND HOUR CASES

Included actions:

*Burnthorne-Martinez v. SEPHORA USA, Inc.*  
(San Francisco OGC-16-55-894)

*Provencio v. SEPHORA USA, Inc.*  
(Santa Clara 16CV294112)

*Hernandez et al. v. SEPHORA USA, Inc.*  
(San Francisco OGC-17-557031)

*Duran v. Sephora USA, Inc.*  
(San Francisco CGC-17-561452)

Judicial Counsel Coordinated Proceeding  
No. 4911

**CLASS ACTION**

***SUPPLEMENTAL DECLARATION OF  
KEVIN R. ALLEN IN SUPPORT OF  
COORDINATED PLAINTIFFS' MOTION  
FOR FINAL APPROVAL OF CLASS  
ACTION SETTLEMENT***

Judge: Hon. Andrew Y.S. Chang  
Dept.: 613

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Attorneys for Representative Plaintiffs Lacey Hernandez, Brenda Morales  
and the Plaintiff Class

1 I, KEVIN R. ALLEN, declare as follows:

2 1. I am the Owner and Principal of Allen Attorney Group PC, an attorney-at-law  
3 licensed and admitted to practice before the courts of the State of California, and am an attorney-  
4 of-record in this action for Plaintiff Rose Provencio and Settlement Class she represents in her  
5 lawsuit against defendant Sephora USA, Inc.

6 2. I have personal knowledge of the facts in this Supplemental Declaration and, if  
7 called as a witness, I could and would testify competently thereto. I make this Declaration in  
8 support of Plaintiffs' Motion for Final Approval of Class Action Settlement and Motion for  
9 Attorneys' fees, Costs and Service Awards.

10 3. The Parties to the above-referenced class action have reached a proposed class  
11 action settlement. A true and correct copy of the Parties' proposed First Amended Class Action  
12 Settlement and Agreement ("Settlement Agreement" or "Settlement"), which was executed by all  
13 Parties on or about November 11, 2021, was attached as **Exhibit "1"** to my declaration filed in  
14 support of Coordinated Plaintiffs' Motion for Attorneys' Fees, Costs and Service Awards.

15 4. On April 5, 2022 the Court issued a TENTATIVE RULING RE: (1) UNOPPOSED  
16 MOTION FOR FINAL JUDGMENT AND ORDER APPROVING CLASS ACTION  
17 SETTLEMENT AND (2) MOTION FOR APPROVAL OF ATTORNEYS' FEES AND COSTS  
18 AND PLAINTIFFS' ENHANCEMENT AWARD ("April 5 Tentative Ruling"). This declaration is  
19 intended to address the issues raised in that tentative.

20 **CY PRES**

21 5. The April 5 Tentative Ruling stated: "The Court must approve the cy pres recipient  
22 now, in the event one is utilized. The Court requires (1) a declaration from someone at Legal Aid at  
23 Work showing why the organization is an appropriate *cy pres* beneficiary; and (2) a declaration  
24 from at least one lawyer at each law firm litigating this case disclosing any relationships between  
25 the individual, firm, or client and Legal Aid at Work."

26 6. Attached as **Exhibit "S1"** is the Declaration of Joan Graff explaining why the  
27 organization is an appropriate *cy pres* beneficiary. I have reviewed her declaration and continue to  
28 believe that it is an appropriate, and deserving, *cy pres* recipient.

7. I do not have any relationship with Legal Aid at Work. I volunteered at their workers' rights clinic once or twice back in 2007 or 2008 (when they were called the Legal Aid Society-Employment Law Clinic). I do not recall any specifics about my volunteer work. I do not refer clients or receive referrals from them and do not have any expectation of benefitting from their appointment.

### **LITIGATION COSTS**

8. The April 5 Tentative Ruling requested additional support for the costs my firm incurred for expert witnesses as well as the mediation. For the Court's convenience I have pasted the concerns/requests from tentative ruling into the body of my declaration below.

9. In preparing these supplemental papers, I understand that Setareh Law Group discovered an error in their previous submission to the Court. In the declarations for Jose Patino and Shaun Setareh they describe having found several discrepancies which, after being corrected, resulted in their litigation costs being reduced by \$17,920.35.<sup>1</sup> This results in their final litigation costs being **\$109,094.56**.

10. **Class Counsel therefore seeks a total costs award from this Settlement in the amount of \$278,747.10.** For the court's convenience the following chart itemizes costs by firm and also provides a supporting citation.

<b>Firm</b>	<b>Litigation Costs</b>	<b>Source<sup>2</sup></b>
Setareh Law Group (Plaintiff Alyssa Burthorne-Martinez)	\$109,094.56 <sup>3</sup>	Decl. of Jose Patino ISO Motion for Final Approval, Exhibit "1."
Deason & Archbold (Plaintiffs Hernandez and Morales)	\$12,808.08	Supplemental Decl. of Matthew F. Archbold ISO Motion for Approval of

<sup>1</sup> Decl. of Jose Patino ISO Motion for Final Approval, ¶¶ 5-8.

<sup>2</sup> Plaintiff Duran's counsel, Alejandro Gutierrez, of the Hathaway Firm, is the only class counsel who is not being required to file a supplemental declaration at this time. Accordingly, the citation below for his firm is to the declaration he filed in support of the February 18, 2022 Motion for Fees, Costs and Service Award.

<sup>3</sup> This is \$17,920.35 less than the amount that Setareh Law Group asked for in the Motion for Fees, Costs and Service Award that was filed February 18, 2022. *See* Decl of Shaun Setareh in Support of Coordinated Motion for Attorneys' Fees, Costs and Service Awards (filed February 18, 2022), ¶ 7 and Exhibit "1."

		Attorney Fees and Litigation Costs, ¶ 6.
The Hathway Law Firm (Plaintiff Jessica Duran)	\$41,687.91	See Decl. of Alejandro Gutierrez in Support of Coordinated Plaintiffs' Motion for Fees, Costs and Service Awards (filed February 18, 2022), ¶ 25 and Exhibit "A."
Palay Hefelfinger APC (Plaintiff Jessica Duran)	\$248.02	Supplemental Decl. of Brian Hefelfinger ISO Final Approval, Fees and Costs, ¶ 5.
Matthew Norton & Associates (Plaintiffs Hernandez and Morales)	\$23,116.79	John M. Norton's Supplemental Declaration ISO Motion for Fees and Service Award, Exhibit "2."
Allen Attorney Group, PC (Plaintiff Rose Provencio)	\$91,791.74	
<b>Total:</b>	<b>\$278,747.10</b>	

11. As was disclosed in the settlement approval paperwork, Class Counsel entered into a cocounseling agreement whereby they agreed to split work and fees received according to the following percentages: 38.25% by Allen Attorney Group PC; 38.25% by the Setareh Law Group; 5% by Hathaway, Perrett, Webster, Powers Chrisman & Gutierrez; 5% by Palay Hefelfinger Law Firm; 13.5% by Matthew Norton & Associates, P.C./Deason & Archbold. Each Class Counsel was also responsible for a proportional share of the costs incurred in the lawsuit. However, we did not require strict compliance with the costs split. Some firms paid more or less than their share since it

1 was not always efficient or practical for every invoice to split into five parts nor for the firms to  
2 pay all of the invoices, especially smaller ones, in five separate parts.

### 3 MEDIATION COSTS

4 ***Rottman Mediation: \$4,223 on 11/2/20. Counsel must provide a declaration addressing***  
5 ***whether this cost was split.***

6 12. The cost was split. Davis A. Rotman invoiced the Parties a \$26,500 fee for a full  
7 day class mediation in September 2020. The Parties agreed to split the cost 50/50 between  
8 Plaintiffs and Defendant, which made Plaintiffs' share \$13,250.

9 13. My firm paid \$4,223.00 of Plaintiff's share via a check dated November 2, 2020.

### 10 EXPERT COSTS

11 14. Before addressing the comments/concerns aimed at the costs for expert, I wanted to  
12 explain globally what work the experts were retained to perform and their role. We initially  
13 retained three experts in mid-2019 in order to design, implement and administer a survey to the  
14 Sephora class members in order to prove class-wide damages at trial. We retained the experts for  
15 purposes of our motion for class certification and to show the court a trial plan that relied on this  
16 representative testimony. Jeff Petersen of Allman & Petersen Economics<sup>4</sup> designed the survey and  
17 opined on the results of the survey. Davis Research<sup>5</sup> administered the actual survey to Class  
18 Members. And Dwight Steward (and others) at EmployStats<sup>6</sup> ensured that the survey was designed  
19 and administered in a scientifically reliably manner and, later, to summarize the results so that  
20 Allman & Petersen could opine on damages.

21 15. The three experts we retained have worked together on prior wage and hour class  
22 actions and, specifically, to design damages surveys. Jeff Petersen recommended Bill Davis and  
23 EmployStats for these specific roles. We believe it was necessary to retain three companies  
24 because of the sheer size of the undertaking. The class exceeded 12,000 employees and the survey  
25 collected information that would be used to opine on damages relating to myriad wage and hour  
26 claims including unpaid wages for time spent in security inspections, makeup application, and

27  
28 <sup>4</sup> <https://www.allmaneconomics.com/> [last visited May 4, 2022].

<sup>5</sup> <https://www.davisresearch.com/our-team/> [last visited May 4, 2022].

<sup>6</sup> <https://employstats.com/wage-and-hour/> [last visited May 4, 2022].

1 costume maintenance. We anticipated that Defendant would wish to depose the experts who  
2 designed, implemented and analyzed the survey. By having a different company perform each of  
3 these roles we ensured that the survey would be designed and implemented properly and that the  
4 experts, come deposition and trial, would be fully prepared to explain what their role was and how  
5 they accomplished it.

6 16. When we agreed to mediate the case, we needed to update the damages analysis to  
7 account for damages after the date of the first report but before the mediation. We asked  
8 EmployStats to update/extrapolate the results of the survey so we would have a better estimate of  
9 damages through the date of our mediation. This was necessary since the prior reports were  
10 performed at the class certification stage and we needed to know what the exposure was after that  
11 date.

12 17. After the Court's tentative ruling at preliminary approval we went back and asked  
13 EmployStats to use the class data to determine the "maximum" value for certain claims that were  
14 not specifically addressed in the prior analysis they performed. This was necessary in order to  
15 provide the maximum exposure analysis that was requested but the Court.

16 18. The charges and payments identified by the Court in its April 5 Tentative Ruling  
17 were all reasonably and necessary to the litigation, both for class certification and ultimately in  
18 negotiating and securing a class settlement.

19 *Allman & Petersen Economics: \$10,778 on 6/19/20. While expert costs may be necessary,*  
20 *the Court does not have sufficient information to determine the reasonableness and necessity.*  
21 *Counsel must provide a declaration addressing why this cost was necessary and what the expert*  
22 *did.*

23 19. The total amount invoiced by (and paid to) Allman & Petersen Economics for their  
24 work was \$37,125. Attached as **Exhibit "S2"** are all of the paid invoices from Allman & Petersen  
25 Economics. On March 20, 2020 I paid \$10,778.00 towards invoice 7763. I had also paid \$5,000.00  
26 deposit on October 16, 2019. The total I paid to Allman & Petersen was \$15,778.

27 20. We retained Allman & Petersen Economics to design the damages survey we would  
28 later submit with our Motion for Class Certification and trial plan. I believe I was involved in every

1 phone call, email and other communication with the company. My primary point of contact was  
2 Jeffrey Petersen, Ph.D.

3 21. We held an initial conference call with Dr. Petersen in September 2019. We  
4 provided him with relevant documents including a copy of the pleadings and discovery responses.  
5 We reviewed the survey he designed and discussed the results of the pilot that was performed by  
6 Bill Davis. We held status calls with Dr. Petersen where he informed us of how the survey was  
7 going and discussed next steps. We provided additional information he requested and assisted him  
8 with whatever he needed in order to draft his report. We discussed his report. We coordinated with  
9 his office regarding his deposition and had a short call afterwards to discuss.

10 22. This work was necessary and reasonable as I do not believe we could obtaine class  
11 certification unless we could show, for example, that class wide damages could be calculated on a  
12 representative basis. I researched several experts before retaining Dr. Petersen. I believe he is one  
13 of the best survey designers in the wage and hour class arena. I also believe that his costs were  
14 reasonable for the services he provided. If the matter had not settled then Dr. Petersen would have  
15 been an integral and important part of our class trial. We could not have succeeded without  
16 evidence of damages. We also could not have settled the case or received settlement approval  
17 without knowing the Defendant's exposure.

18 *EmployStats: While expert costs may be necessary, the Court does not have sufficient*  
19 *information to determine the reasonableness and necessity. Counsel must provide a declaration*  
20 *addressing why this cost was necessary and what the expert did.*

21 *o 6/25/20: \$8,211.56*

22 *o 8/10/20: \$10,214.38*

23 *o 2/4/21: \$1,955.14*

24 *o 1/24/22: \$5,424.81*

25 23. The above payments total \$25,809.89. The total amount invoiced by (and paid to)  
26 EmployStats for work performed in this case is \$76,876.58. Attached hereto as **Exhibit "S3"** are  
27 all of the paid invoices from EmployStats, including those that were paid by my firm (nos. 3295,  
28



3307, 3315, 3377, and 3662).<sup>7</sup> The invoices describe the work that EmployStats performed.

24. This work was necessary and reasonable. We retained EmployStats in 2019 to perform 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. They drafted a report that was used at class certification stage of the case to show how a class action trial would work. Dr. Steward was deposed regarding his report. The class was certified and we believe their work helped achieve that result.

25. When we agreed to attend mediation, we asked EmployStats to update their calculations to account for the time span that occurred after the class was certified up until the mediation. We used their updated calculations as a basis for negotiations at that mediation session.

26. The Court issued a tentative ruling at preliminary approval asking for maximum exposure amounts for each claim being released by the settlement as well as the maximum exposure on PAGA claims being released. We asked EmployStats to clarify and expand on its previous analysis to determine the maximum exposure numbers as requested by the Court. We submitted their findings with explanations, to the Court.

***Davis Research: \$15,125.25 on 12/6/19; \$12,879.63 on 3/2/20; and \$368.75 on 6/20/20. While expert costs may be necessary, the Court does not have sufficient information to determine the reasonableness and necessity. Counsel must provide a declaration addressing why this cost was necessary and what the expert did.***

27. The total amount invoices by (and paid to) Davis Research was \$66,297.75. Attached as **Exhibit “S4”** is a ledger showing all invoices and payments to Davis Research. I paid \$15,125.25 on 12/6/19; \$12,879.63 on 3/2/20; and \$368.75 on 6/20/20.

28. Davis Research administered the survey. In November 2019 I held a conference call with Bill Davis and Jeff Petersen (who designed the survey) where we discussed the case, composition of the class, and the scope of the anticipated survey. In late November and early

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<sup>7</sup> The payments for invoices nos. 3307 (\$9,441.81) and 3315 (\$772.57) were combined into a single entry of \$10,214.38 on my itemized lodestar.

1 December 2019, Davis Research conducted a pilot (or pre-test) where they administered the draft  
2 survey to 50 class members; I understand that the goal of this pilot was to identify/address issues  
3 with how questions were worded and to determine how many class members would need to answer  
4 the survey in order to ensure that the results of the survey were within an acceptable margin of  
5 error. As a result of the pilot, it was determined that the survey would need to be given to at least  
6 500 employees. Davis Research proceeded to administer the survey to 533 participants. After the  
7 survey was conducted Davis Research was consulted again concerning Defendant's intent to  
8 depose the experts responsible for the survey.

9         29. This work was necessary and reasonable as I do not believe we could have obtained  
10 class certification unless we could show, for example, that class wide damages could be calculated  
11 on a representative basis using the survey. If the matter had not settled then Davis Research would  
12 testified regarding his methodology and opinions as part of our class trial.

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

15         Executed on this 5<sup>th</sup> day of May, 2022 in Lake Oswego, Oregon.

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19 KEVIN R. ALLEN  
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# Exhibit 1

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**SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
**IN AND FOR THE COUNTY OF SAN FRANCISCO**  
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COORDINATED PROCEEDINGS SPECIAL  
TITLE [RULE 3.550]

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*Duran v. Sephora USA, Inc.*  
(San Francisco CGC-17-561452)

Judicial Counsel Coordinated Proceeding  
No. 4911

**CLASS ACTION**

**DECLARATION OF JOAN GRAFF**

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- (c) discrimination on account of race, national origin, disability, sex, gender identity, sexual orientation, immigration status and language proficiency; (d) harassment; and (e) failure to comply with equal pay laws and family medical leave laws. Whether in state or federal court, at the trial level or on appeal, nearly all of LAAW's cases impact the law and industry practices, raise community awareness, and change the course the clients' lives.
8. Since 1970, LAAW has defined its mission and devoted its practice to representing low-wage workers in enforcing the full range of their employment rights. I am informed and believe that LAAW is one of very few legal services nonprofits in the country that has this singular purpose.
9. With 25 attorneys, LAAW provides services to low-wage workers statewide and, in select instances, nationwide. LAAW's clients work in sectors in which low-wage work predominates, including caregiving, construction, hospitality, landscaping, retail, and transportation, as well as domestic, food, and janitorial services. Many of LAAW's clients are immigrants, and a significant number of them are monolingual Spanish, Mandarin, or Cantonese speakers or have limited English proficiency.
10. A sampling of wage-and-hour cases LAAW has litigated include the following actions:
- a. An action on behalf of a group of roughly 370 campaign workers who were misclassified as independent contractors by a campaign operator working on the 2019 campaign sponsored by Juul Labs, Inc. to allow for the sale of vaping products in San Francisco. After defeating a motion to compel arbitration and a motion to dismiss the claims against Juul Labs, Inc., Legal Aid at Work, with its co-counsel Leonard Carder, has secured a settlement of \$1.75 million by Juul and the other defendants that is pending approval in the Northern District of California.
  - b. An action on behalf of a group of roughly 25 Filipino workers who were subjected to forced labor in 2012 while working at a hospitality complex in rural Oklahoma. These workers were brought to the United States on H2B visas, and incurred significant debt as part of the visa process. Before coming to the United States, the workers were promised free housing, free meals, reimbursement of visa costs, and a

1 fixed wage. Once they arrived in Oklahoma, they were paid extremely low wages  
2 below the amount promised, and were not provided housing, food or other benefits  
3 promised by the contract. In 2021, Legal Aid at Work won a motion for class  
4 certification, allowing for this case to proceed on a class-wide basis.

- 5 c. An action on behalf of roughly 350 kitchen workers at the Burma Superstar, Burma  
6 Love, and B star restaurants in San Francisco, Oakland and Alameda. The workers  
7 alleged that the chain failed to pay minimum and overtime wages, split shift  
8 premiums, and sick leave, did not provide adequate meal and rest breaks, and  
9 unlawfully retaliated against employees. In 2020, the class settled the claims for  
10 \$1.3 million.

11 11. In addition to litigating cases, LAAW represents clients in administrative proceedings  
12 before state agencies including the California Labor Commissioner (“Labor  
13 Commissioner”) and the California Unemployment Insurance Appeals Board (“CUIAB”).

14 12. LAAW has represented clients in wage-and-hour and anti-retaliation enforcement  
15 proceedings, including:

- 16 a. Three Latino construction workers who were denied any overtime pay, despite  
17 working at least 52 hours most weeks for several years on major building projects  
18 in San Francisco. After the workers were laid off at the start of the pandemic,  
19 LAAW helped them bring claims to recover their wages. LAAW secured a  
20 settlement of approximately \$51,500 for these clients, recovering all of their  
21 overtime wages and the vast majority of penalties owed.
- 22 b. A Latino day laborer in Sonoma County who was owed several weeks of wages.  
23 When he asked his employer to pay him what was owed, the employer threatened to  
24 call Immigration and Customs Enforcement. We helped this worker to file a wage  
25 claim, a bond claim, and a retaliation claim. In response to our efforts to help this  
26 worker enforce his rights, the employer made death threats against our client. We  
27 amended our retaliation claim to include these threats, and won a judgment of  
28 approximately \$90,000. We recovered this judgment in full through a lien that the

1 Labor Commissioner's office placed on the employer's property, less than a year  
2 after the threats were made.

3 c. Three Latina women who worked for a housecleaning company and were paid a  
4 fixed daily salary amount that did not compensate them for the considerable  
5 overtime hours they had to work to clean all the houses that the employer scheduled  
6 them to clean. The workers also had to work non-stop, without breaks, and their  
7 only opportunity to eat during the workday was while driving between assigned  
8 houses. LAAW represented the workers at a California Labor Commissioner  
9 settlement conference and secured a settlement of \$25,000 for the three workers.

10 d. A Chinese-American worker who worked for several years as an on-site property  
11 manager in a residential apartment building in San Francisco, and was paid an  
12 extremely low monthly salary, far below the minimum wage. He also was not paid  
13 at all for six months of work. After a dispute with his employer, the client was fired  
14 and at the same time forced to move out of his home; when he was not able to move  
15 immediately, the building owners filed a lawsuit against him for trespass and  
16 damages. LAAW helped the worker file a claim for unpaid wages with the  
17 California Labor Commissioner, and represented the worker throughout the Labor  
18 Commissioner process. LAAW also took the lead in coordinating with outside  
19 attorneys representing the worker and his family in the housing lawsuit, and in a  
20 complex negotiation with multiple employer entities. We were able to secure a  
21 settlement in which our client received \$25,000 and the dismissal of the lawsuit  
22 against him.

23 e. Approximately 25 employees of a Burger King franchise in San Francisco who  
24 reported a wide array of systemic legal violations—including failure to pay for all  
25 hours worked, overtime, meal, and rest violations—to both the California Labor  
26 Commissioner's Bureau of Field Enforcement and the City of San Francisco's  
27 Office of Labor Standards Enforcement. LAAW has represented workers in  
28 interviews with state and local investigators, and provided legal support to



1           Trabajadores Unidos Workers United, a worker center that has organized workers  
2           and developed a coordinated, worker-led campaign around the case. The dual  
3           government investigations have so far resulted in both a citation and subsequent  
4           settlement with the City of San Francisco for over \$800,000, covering unpaid health  
5           care expenditures for 235 employees; and the state's \$1.9 million citation against  
6           the Burger King franchise, which includes unpaid wages and related penalties for  
7           230 employees.

8           13. LAAW holds Wage Rights Clinics onsite, once a month, at each of the Labor  
9           Commissioner's offices in Oakland, San Francisco and most recently, Santa Rosa. The  
10          Clinics help low-wage workers assess their claims for unpaid wages, calculate the amount  
11          of unpaid wages, and prepare the forms necessary to initiate wage claims before the Labor  
12          Commissioner. From 2017 to 2021, the Clinic assisted over 495 clients, including many  
13          immigrants with limited English proficiency.

14          14. The Wage Protection Program also represents clients at conferences and hearings before  
15          the Labor Commissioner. In 2017-2021, the Wage Protection Program represented 135  
16          workers before the Labor Commissioner's Wage Adjudication Unit, securing \$911,297.39  
17          in settlements and \$925,724.85 in Labor Commissioner awards for wages owed, penalties,  
18          and other available relief.

19          15. Additionally, LAAW's Community Legal Services Program provides advice and  
20          counseling to low-wage workers on the full range of employment law issues they face  
21          through fourteen statewide Workers' Rights Clinic locations: Antioch, Berkeley, East Palo  
22          Alto, Fresno, Los Angeles, Merced, Ontario, Sacramento, San Bernardino, San Diego, San  
23          Francisco, Santa Ana, Visalia, and Watsonville. The Community Legal Services Program  
24          also participates at times in a "Mobile Workers' Rights Clinic," where law students and  
25          LAAW attorneys travel to ex-urban and rural sites throughout California to provide basic  
26          employment-related legal services. Finally, Community Legal Services Program volunteers  
27          respond to calls on the Clinic's toll-free hotline that makes LAAW's services accessible to  
28          low-wage workers in more remote areas that are beyond the reach of Clinic sites.

- 1 16. During the academic year, LAAW also holds a biweekly Workers' Rights Disability Law  
2 Clinic at the Ed Roberts Campus located in Berkeley, California. The clinic provides free  
3 legal counseling, advice, referrals, and limited representation to low-income workers and  
4 job-seekers with disabilities.
- 5 17. In 2017-2021, LAAW's Workers' Rights Clinic assisted approximately 13,500 low-wage  
6 workers from all 52 counties throughout California.
- 7 18. LAAW also represents workers with unemployment insurance claims at the California  
8 Unemployment Insurance Appeals Board. From 2017 to 2021, LAAW represented 77  
9 clients in administrative appeals from denials of unemployment benefits with an over 95%  
10 success rate in overturning denials and securing benefits or reversing overpayments.
- 11 19. LAAW is committed to serving those whose primary language is not English. LAAW  
12 employs multiple bilingual attorneys and other staff who are fluent in English and Spanish,  
13 and a language coordinator who is fluent in Mandarin and Cantonese. The language  
14 coordinator also ensures that interpreters are available when LAAW lacks in-house  
15 language capacity. LAAW also publishes translated versions of its fact sheets and other  
16 legal information on its website in Spanish and Chinese. These tools enhance the reach of  
17 LAAW to workers around the state.
- 18 20. As part of LAAW's statewide activities, its staff engages in extensive outreach, education,  
19 and training initiatives to inform low-wage workers and their communities, grassroots  
20 advocates, and nonprofits organizations—legal and non-legal—about workplace rights. In  
21 particular, LAAW:
- 22 a. Writes a regular employment rights column in the weekly Northern  
23 and Southern California editions of *Sing Tao*, a Chinese newspaper with wide  
24 circulation in the community;
- 25 b. Conducts trainings for domestic violence survivors and service  
26 providers about employment law protections available to survivors;
- 27 c. Provides periodic trainings at the University of California, San  
28 Francisco Medical Center for cancer patients and their caregivers; and

1 d. Provides trainings in collaboration with Swords to Plowshares  
2 focused on women veterans and employment.

3 21. To extend its expertise beyond its doors, LAAW composes and distributes a wide range of  
4 self-help and informational materials. These include: 90 topic-specific “Your Legal  
5 Rights” fact sheets which are drafted in plain language and nearly all are translated into  
6 Chinese and Spanish for use by workers and advocates; the Employment Law Manual, a  
7 complete compendium of California employment laws used as a basic resource and  
8 reference tool by students, attorneys and nonprofit organizations around the state; and a  
9 website providing workplace know-your-rights information.

10 22. LAAW also offers its expertise to other nonprofit organizations—legal and non-legal. For  
11 example, as part of the Coalition of Low-Wage and Immigrant Worker Advocates, LAAW  
12 participates in an annual conference, monthly conference calls, and regular meetings with  
13 administrative agencies such as the Labor Commissioner and the CUIAB. In addition,  
14 LAAW is a leading member of the statewide Work and Family Coalition, a member of the  
15 nationwide Freedom Network, the largest coalition working to ensure that trafficked  
16 persons have access to justice, safety, and the San Francisco’s Mayor’s Anti-Human  
17 Trafficking Taskforce. Finally, LAAW works closely with the Inland Empire Fair Chance  
18 Coalition- providing its members with advice on several Fair Chance cases filed at the  
19 California Department of Fair Employment and Housing and hosting several trainings with  
20 the Coalition.

21 23. Actively participating as *amicus curiae* is an integral part of LAAW’s statewide efforts to  
22 protect the rights of low-wage workers and advance their interests in key appellate court  
23 cases. These cases include *Kirola v. City and County of San Francisco* (Case No. 14-  
24 17521); *Turman v. Koji’s Japan Inc.* (Case No. G051871); *Sonic-Calabasas v. Moreno*  
25 (Case No. S174475) (*Sonic II*); *Harris v. City of Santa Monica* (Case No. S181004);  
26 *Dedinas v. Superior Court, County of Los Angeles* (Case No. S182827); *Paratransit, Inc.,*  
27 *v. Medeiros* (Case No. 204221); *Wills v. Superior Court, County of Orange* (Case No.  
28 G043054); *Law School Admissions Council v. State of California* (Case No. C073187);

1 *Oman, et al. v. Delta Air Lines, Inc.*, Case No. S248726 (Cal. Supreme Court, February  
2 2019); *Skidgel v. California Unemployment Insurance Appeals Board*, Case No. S250149  
3 (Cal. Supreme Court, April 2019); and *Naranjo v. Spectrum Security Services*, Case No.  
4 S258966 (Cal. Supreme Court, March 2022).

5 24. The breadth of LAAW's work throughout California is enhanced immeasurably by *cy pres*  
6 awards. They have assumed an increasingly important place among its revenue sources.  
7 Consistent with the claims of employment class actions these funds are used to protect the  
8 workplace rights of low-wage workers by helping LAAW to maintain programs and  
9 undertake initiatives in response to urgent community needs. *Cy pres* awards have also  
10 enabled us to serve the community of low-wage workers in many specific ways, including:  
11 (a) a training video for student volunteers on how to conduct a client interview in the  
12 Workers' Rights Clinic; (b) translation of dozens of fact sheets into Chinese and Spanish;  
13 and (c) the design and implementation of an online registration system for the more than  
14 100 attorney volunteers who participate annually as supervisors with the Workers' Rights  
15 Clinic sites statewide.

16 25. If awarded *cy pres* monies in this case the funds will be used to advance the underlying  
17 purpose of the plaintiffs and class members by using the tools and strategies set forth in this  
18 declaration to protect, enforce and strengthen the rights of workers to be paid the monies  
19 they rightfully earn.  
20

21  
22 I declare under penalty of perjury pursuant to the laws of the State of California that the  
23 foregoing is true and correct. Executed on this 4<sup>th</sup> day of May, 2022 at San Francisco, California.  
24

25  
26   
27 \_\_\_\_\_  
28

# Exhibit 2

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:

Kevin Allen  
Allen Attorney Group  
2121 N. California Blvd, Suite 290  
Walnut Creek, CA 94596

## Invoice

DATE	INVOICE #	CASE
3/27/2020	7763	Sephora Class Action

DATE	SERVICES RENDERED	HOURS	RATE	AMOUNT
9/20/2019	Phone conference with Kevin Allen.	0.5	550.00	275.00
10/28/2019	Draft survey instrument; review documents.	3.5	550.00	1,925.00
10/29/2019	Draft survey instrument; review documents.	4	550.00	2,200.00
11/1/2019	Draft survey instrument; review documents.	1.5	550.00	825.00
11/4/2019	Draft survey instrument; review documents.	0.5	550.00	275.00
11/6/2019	Draft survey instrument; phone conference with Mr. Allen.	1	550.00	550.00
11/11/2019	Phone conference with Bill Davis; draft survey instrument.	2	550.00	1,100.00
11/12/2019	Draft survey instrument.	1.5	550.00	825.00
11/13/2019	Review and analysis of Crandall declaration.	1	550.00	550.00
11/15/2019	Phone conference with Kevin Allen and Thomas Segal; draft survey instrument.	1	550.00	550.00
11/18/2019	Draft survey instrument.	1	550.00	550.00
11/19/2019	Phone conference with Bill Davis; draft survey instrument.	1	550.00	550.00
11/20/2019	Phone conference with Mr. Allen and Mr. Segal; draft survey instrument.	2	550.00	1,100.00
12/13/2019	Analysis of pilot data; phone conference with Mr. Kerns.	2	550.00	1,100.00
12/16/2019	Analysis of pilot data; phone conference with Mr. Kerns; phone conference with Mr. Allen; revise survey instrument.	1.5	550.00	825.00
12/20/2019	Phone conference with Mr. Kerns; revise survey instrument.	0.5	550.00	275.00
12/31/2019	Analysis of employment records; phone conference with Mr. Davis; send instructions for survey.	1.5	550.00	825.00
1/22/2020	Analysis of survey data.	4	550.00	2,200.00
2/4/2020	Analysis of survey data.	4	550.00	2,200.00

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

**Balance Due:**

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:

Kevin Allen  
Allen Attorney Group  
2121 N. California Blvd, Suite 290  
Walnut Creek, CA 94596

**Invoice**

		DATE	INVOICE #	CASE	
		3/27/2020	7763	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	
3/27/2020	Retainer applied.		-5,000.00	-5,000.00	
	Total charge for report = \$37,125. Apportioned as follows: Allen Attorney Group (42.5%), Setareh Law (42.5%), Matthew Norton & Associates (15%)				

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Federal Tax ID: 20-2053788  
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**Balance Due:**





9:18 AM

04/29/22

**ALLMAN & PETERSEN ECONOMICS**  
**Customer QuickReport**  
All Transactions

Type	Date	Num	Memo	Account	Clr	Split	Amount
<b>Allen, Kevin</b>							
<b>Sephora Class Action</b>							
Sales Receipt	10/22/2019	3158		Undeposited Funds	X	Retainers	5,000.00
Invoice	3/27/2020	7763		Receivable		-SPLIT-	10,778.00
Payment	6/19/2020	117		Undeposited Funds	X	Receivable	10,778.00
Invoice	7/6/2020	7839		Receivable		-SPLIT-	1,928.44
Payment	8/18/2020	148		Undeposited Funds	X	Receivable	1,928.44

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:

Shaun Setareh  
Setareh Law Group  
9454 Wilshire Blvd, Suite 907  
Beverly Hills, CA 90212

## Invoice

DATE	INVOICE #	CASE
3/27/2020	7769	Sephora Class Action

DATE	SERVICES RENDERED	HOURS	RATE	AMOUNT
9/20/2019	Phone conference with Kevin Allen.	0.5	550.00	275.00
10/28/2019	Draft survey instrument; review documents.	3.5	550.00	1,925.00
10/29/2019	Draft survey instrument; review documents.	4	550.00	2,200.00
11/1/2019	Draft survey instrument; review documents.	1.5	550.00	825.00
11/4/2019	Draft survey instrument; review documents.	0.5	550.00	275.00
11/6/2019	Draft survey instrument; phone conference with Mr. Allen.	1	550.00	550.00
11/11/2019	Phone conference with Bill Davis; draft survey instrument.	2	550.00	1,100.00
11/12/2019	Draft survey instrument.	1.5	550.00	825.00
11/13/2019	Review and analysis of Crandall declaration.	1	550.00	550.00
11/15/2019	Phone conference with Kevin Allen and Thomas Segal; draft survey instrument.	1	550.00	550.00
11/18/2019	Draft survey instrument.	1	550.00	550.00
11/19/2019	Phone conference with Bill Davis; draft survey instrument.	1	550.00	550.00
11/20/2019	Phone conference with Mr. Allen and Mr. Segal; draft survey instrument.	2	550.00	1,100.00
12/13/2019	Analysis of pilot data; phone conference with Mr. Kerns.	2	550.00	1,100.00
12/16/2019	Analysis of pilot data; phone conference with Mr. Kerns; phone conference with Mr. Allen; revise survey instrument.	1.5	550.00	825.00
12/20/2019	Phone conference with Mr. Kerns; revise survey instrument.	0.5	550.00	275.00
12/31/2019	Analysis of employment records; phone conference with Mr. Davis; send instructions for survey.	1.5	550.00	825.00
1/22/2020	Analysis of survey data.	4	550.00	2,200.00
2/4/2020	Analysis of survey data.	4	550.00	2,200.00

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

**Balance Due:**

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:

Shaun Setareh  
Setareh Law Group  
9454 Wilshire Blvd, Suite 907  
Beverly Hills, CA 90212

## Invoice

		DATE	INVOICE #	CASE	
		3/27/2020	7769	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 57.5%		-21,347.00	-21,347.00	

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

**Balance Due:** \$15,778.00

12:44 PM

04/29/22

**ALLMAN & PETERSEN ECONOMICS**  
**Customer QuickReport**  
All Transactions

Type	Date	Num	Memo	Account	Clr	Split	Amount
<b>Setareh, Shaun</b>							
<b>Sephora Class Action</b>							
Invoice	3/27/2020	7769		Receivable		-SPLIT-	15,778.00
Payment	6/19/2020	1550		Undeposited Funds	X	Receivable	15,778.00
Invoice	7/6/2020	7840		Receivable		-SPLIT-	1,928.44
Payment	7/20/2020	1585		Undeposited Funds	X	Receivable	1,928.44

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
9/20/2019	Phone conference with Kevin Allen.	0.5	550.00	275.00
10/28/2019	Draft survey instrument; review documents.	3.5	550.00	1,925.00
10/29/2019	Draft survey instrument; review documents.	4	550.00	2,200.00
11/1/2019	Draft survey instrument; review documents.	1.5	550.00	825.00
11/4/2019	Draft survey instrument; review documents.	0.5	550.00	275.00
11/6/2019	Draft survey instrument; phone conference with Mr. Allen.	1	550.00	550.00
11/11/2019	Phone conference with Bill Davis; draft survey instrument.	2	550.00	1,100.00
11/12/2019	Draft survey instrument.	1.5	550.00	825.00
11/13/2019	Review and analysis of Crandall declaration.	1	550.00	550.00
11/15/2019	Phone conference with Kevin Allen and Thomas Segal; draft survey instrument.	1	550.00	550.00
11/18/2019	Draft survey instrument.	1	550.00	550.00
11/19/2019	Phone conference with Bill Davis; draft survey instrument.	1	550.00	550.00
11/20/2019	Phone conference with Mr. Allen and Mr. Segal; draft survey instrument.	2	550.00	1,100.00
12/13/2019	Analysis of pilot data; phone conference with Mr. Kerns.	2	550.00	1,100.00
12/16/2019	Analysis of pilot data; phone conference with Mr. Kerns; phone conference with Mr. Allen; revise survey instrument.	1.5	550.00	825.00
12/20/2019	Phone conference with Mr. Kerns; revise survey instrument.	0.5	550.00	275.00
12/31/2019	Analysis of employment records; phone conference with Mr. Davis; send instructions for survey.	1.5	550.00	825.00
1/22/2020	Analysis of survey data.	4	550.00	2,200.00
2/4/2020	Analysis of survey data.	4	550.00	2,200.00

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

**Balance Due:**

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	
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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	
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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	
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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

12:42 PM

04/29/22

**ALLMAN & PETERSEN ECONOMICS**  
**Customer QuickReport**  
All Transactions

Type	Date	Num	Memo	Account	Clr	Split	Amount
<b>Norton, Matthew</b>							
<b>Sephora Class Action</b>							
Invoice	3/27/2020	7770		Receivable		-SPLIT-	5,569.00
Payment	4/30/2020	2102		Undeposited Funds	X	Receivable	5,569.00
Invoice	7/6/2020	7841		Receivable		-SPLIT-	680.62

# Exhibit 3



<b>Allen Attorney Group</b>			
Invoice	Date Sent	Date Paid	Amount
3295	6/23/2020	6/25/2020	\$8,211.56
3307	7/3/2020	8/31/2020	\$9,441.81
3315	7/29/2020	8/31/2020	\$772.57
3377	11/16/2020	2/4/2021	\$1,955.14
3662	11/22/2021	1/24/2022	\$5,424.81
<b>Total</b>			<b>\$25,805.89</b>

<b>Setareh Law Group</b>			
Invoice	Date Sent	Date Paid	Amount
3297	6/23/2020	6/24/2020	\$8,211.56
3308	7/3/2020	7/24/2020	\$9,441.81
3316	7/29/2020	8/31/2020	\$772.57
3382	11/16/2020	3/9/2021	\$1,955.14
3660	11/22/2021	12/17/2021	\$5,424.81
<b>Total</b>			<b>\$25,805.89</b>

<b>Total for Sephora Cases</b>	
Amount Billed	Amount Paid
\$76,876.58	\$76,876.58

<b>Matthew Norton &amp; Associates</b>			
Invoice	Date Sent	Date Paid	Amount
3294	6/23/2020	6/25/2020	\$2,898.28
3309	7/3/2020	7/20/2020	\$3,332.38
3317	7/29/2020	7/30/2020	\$272.70
3380	11/16/2020	11/16/2020	\$690.05
3661	11/22/2021	12/23/2021	\$1,914.64
<b>Total</b>			<b>\$9,108.05</b>

<b>Alejandro Gutierrez</b>			
Invoice	Date Sent	Date Paid	Amount
3252	3/31/2020	4/3/2020	\$5,193.75
3306	7/3/2020	7/7/2020	\$7,405.35
3314	7/29/2020	7/31/2020	\$605.94
3381	11/16/2020	11/17/2020	\$1,533.46
3663	11/22/2021	11/24/2021	\$1,418.25
<b>Total</b>			<b>\$16,156.75</b>

**EmployStats**

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

**BILL TO**

Alejandro Gutierrez  
5450 Telegraph Rd Ste 200  
Ventura, CA 93003

**INVOICE 3252****DATE** 03/31/2020 **TERMS** 15 Days**DUE DATE** 04/15/2020**PROJECT NAME**

1172.1 Duran v. Sephora USA

DATE	DESCRIPTION	HOURS	RATE	AMOUNT
03/09/2020	Directed organization of case documents - Matt Rigling	0:30	225.00	112.50
03/09/2020	Performed document review - Matt Rigling	0:45	225.00	168.75
03/10/2020	Performed research - Matt Rigling	3:15	225.00	731.25
03/10/2020	Provided analysis support - Matt Rigling	0:15	225.00	56.25
03/10/2020	Research. Planned reasearch - Dwight D Steward	1:30	625.00	937.50
03/11/2020	Research. Planned reasearch - Dwight D Steward	0:30	625.00	312.50
03/11/2020	Case Management - Matt Rigling	0:30	225.00	112.50
03/11/2020	Performed research - Matt Rigling	1:00	225.00	225.00
03/12/2020	Directed organization of case documents - Matt Rigling	0:45	225.00	168.75
03/13/2020	Client Conference - Matt Rigling	0:15	225.00	56.25
03/13/2020	Performed document review - Matt Rigling	0:30	225.00	112.50
03/13/2020	Performed research - Matt Rigling	1:15	225.00	281.25
03/16/2020	Research. Study case documents. Planned research - Dwight D Steward	1:00	625.00	625.00
03/23/2020	Performed research - Matt Rigling	2:15	225.00	506.25
03/23/2020	Performed research - Matt Rigling	2:45	225.00	618.75
03/24/2020	Provided analysis support - Matt Rigling	0:45	225.00	168.75

Total: \$5,193.75

**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.

Steward Research Group, Inc. D/B/A EmployStats Tax ID Number: 74-2826693

**EmployStats**

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

**BILL TO**

Alejandro P Gutierrez  
5450 Telegraph Rd Ste 200  
Ventura, CA 93003

**INVOICE 3306****DATE** 07/03/2020 **TERMS** Due on receipt**DUE DATE** 07/03/2020**PROJECT NAME**

1172.1 Jessica Duran v. Sephora

DATE	DESCRIPTION	HOURS	RATE	AMOUNT
06/01/2020	Analysis Support and Client Conference - Matt Rigling	0:23	225.00	84.38
06/17/2020	Performed research and provided analysis support - Matt Rigling	0:30	225.00	112.50
06/17/2020	Research. Drafted report - Dwight D Steward	0:11	625.00	117.19
06/19/2020	Research. Drafted report - Dwight D Steward	0:08	625.00	78.13
06/23/2020	Research. Drafted report. Supervised and directed research - Dwight D Steward	1:08	625.00	703.13
06/23/2020	Document review. Performed research and provided analysis support - Matt Rigling	1:00	225.00	225.00
06/23/2020	Provided analysis support - Susan Wirtanen	0:11	215.00	40.31
06/24/2020	Provided analysis support. Assisted with expert report - Susan Wirtanen	0:23	215.00	80.63
06/24/2020	Document review. Performed research - Matt Rigling	0:56	225.00	210.94
06/24/2020	Provided analysis support - Carl McClain	0:30	225.00	112.50
06/25/2020	Research. Drafted report. Supervised and directed research - Dwight D Steward	1:41	625.00	1,054.69
06/25/2020	Document Review. Provided analysis support and performed research - Matt Rigling	1:08	225.00	253.13
06/25/2020	Client conference. Provided analysis support - Susan Wirtanen	0:45	215.00	161.25
06/25/2020	Provided analysis support - Carl McClain	0:34	225.00	126.56
06/26/2020	Research. Drafted report. Supervised and directed research - Dwight D Steward	1:49	625.00	1,132.81
06/26/2020	Assisted with expert report. Performed research - Matt Rigling	1:11	225.00	267.19
06/26/2020	Client conference. Assisted with expert report. Provided analysis support - Susan Wirtanen	1:00	215.00	215.00
06/26/2020	Client conference. Provided analysis support - Carl McClain	0:34	225.00	126.56

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Steward Research Group, Inc. D/B/A EmployStats Tax ID Number: 74-2826693

DATE	DESCRIPTION	HOURS	RATE	AMOUNT
06/27/2020	Client conference. Provided analysis support and assisted with expert report - Susan Wirtanen	0:38	215.00	134.38
06/27/2020	Performed research - Matt Rigling	0:56	225.00	210.94
06/27/2020	Client conference. Provided analysis support - Carl McClain	0:23	225.00	84.38
06/27/2020	Research. Drafted report. Supervised and directed research - Dwight D Steward	0:26	625.00	273.44
06/28/2020	Performed research - Matt Rigling	0:15	225.00	56.25
06/28/2020	Research. Drafted report - Dwight D Steward	0:11	625.00	117.19
06/28/2020	Provided analysis support and assisted with expert report - Susan Wirtanen	0:15	215.00	53.75
06/29/2020	Research. Drafted report - Dwight D Steward	0:19	625.00	195.31
06/29/2020	Performed research. Assisted with expert report - Matt Rigling	0:34	225.00	126.56
06/29/2020	Provided analysis support - Carl McClain	0:34	225.00	126.56
06/29/2020	Provided analysis support. Assisted with expert report - Susan Wirtanen	0:34	215.00	120.94
06/30/2020	Prepared for deposition testimony - Dwight D Steward	0:41	625.00	429.69
06/30/2020	Provided deposition preparation support - Carl McClain	0:34	225.00	126.56
06/30/2020	Provided deposition preparation support - Susan Wirtanen	0:34	215.00	120.94
06/30/2020	Provided deposition preparation support - Matt Rigling	0:34	225.00	126.56

The client has been billed at 25% of the total amount due in Sephora Wage and Hour matters which is reflected in the number of hours.

Total: \$7,405.35

<b>TOTAL DUE</b>	<b>\$0.00</b>
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**EmployStats**

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

**BILL TO**

Alejandro Gutierrez  
5450 Telegraph Rd Ste 200  
Ventura, CA 93003

**INVOICE 3314****DATE** 07/29/2020 **TERMS** 15 Days**DUE DATE** 08/13/2020**PROJECT NAME**

1172.1 Jessica Duran v. Sephora

DATE	DESCRIPTION	HOURS	RATE	AMOUNT
07/07/2020	Deposition Preparation Support - Matt Rigling	0:30	225.00	112.50
07/07/2020	Analysis. Prepared for deposition testimony - Dwight D Steward	0:26	625.00	273.44
07/07/2020	Deposition Preparation Support - Susan Wirtanen	0:30	215.00	107.50
07/07/2020	Deposition Preparation Support - Carl McClain	0:30	225.00	112.50

The client has been billed at 25% of the total amount due in Sephora Wage and Hour matters which is reflected in the number of hours.

Total: \$605.94

**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.

Steward Research Group, Inc. D/B/A EmployStats Tax ID Number: 74-2826693

**EmployStats**

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

**BILL TO**

Alejandro P. Gutierrez  
5450 Telegraph Rd Ste 200  
Ventura, CA 93003

**INVOICE 3381****DATE** 11/16/2020 **TERMS** 15 Days**DUE DATE** 12/01/2020**PROJECT NAME**

1172.1 - Duran v. Sephora

DATE	DESCRIPTION	HOURS	RATE	AMOUNT
10/19/2020	Research - Matt Rigling	0:56	225.00	210.94
10/19/2020	Analysis Support - Matt Rigling	0:19	225.00	70.31
10/19/2020	Research - Carl McClain	0:38	225.00	140.63
10/20/2020	Research - Matt Rigling	1:08	225.00	253.13
10/20/2020	Analysis Support - Matt Rigling	0:04	225.00	14.06
10/21/2020	Research - Matt Rigling	0:41	225.00	154.69
10/22/2020	Research - Matt Rigling	0:30	225.00	112.50
10/22/2020	Analysis Support - Matt Rigling	0:08	225.00	28.13
10/22/2020	Provided analysis support - Susan Wirtanen	0:08	215.00	26.88
10/23/2020	Research. Supervised and audited research - Dwight D Steward	0:11	625.00	117.19
10/23/2020	Provided analysis support - Susan Wirtanen	0:30	215.00	107.50
10/26/2020	Research. Supervised and audited research - Dwight D Steward	0:11	625.00	117.19
10/28/2020	Analysis Support - Matt Rigling	0:15	225.00	56.25
10/28/2020	Research - Matt Rigling	0:19	225.00	70.31
10/28/2020	Provided analysis support - Susan Wirtanen	0:15	215.00	53.75

The client has been billed at 25% of the total amount due in Sephora Wage and Hour matters which is reflected in the number of hours.

Total: \$1,533.46

**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.

Steward Research Group, Inc. D/B/A EmployStats Tax ID Number: 74-2826693

**EmployStats**

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

**BILL TO**

Alejandro Gutierrez of Hathaway, Perrett,  
Webster, Powers, Chrisman & Gutierrez  
5450 Telegraph Rd Ste 200  
Ventura, CA 93003

**INVOICE 3663****DATE** 11/22/2021 **TERMS** 15 Days**DUE DATE** 12/07/2021**PROJECT NAME**

1122.1.4 Sephora

DATE	DESCRIPTION	HOURS	RATE	AMOUNT
11/09/2021	Sephora Analysis	1	1,418.25	1,418.25

Please review the total invoice for detailed descriptions. Alejandro Gutierrez of Hathaway, Perrett, Webster, Powers, Chrisman & Gutierrez is responsible for 10% of the total invoice. The total amount is \$14,182.50. If you have any questions, please reach out to Adela Botello at abotello@employstats.com.

Total: \$1,418.25

**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.

Steward Research Group, Inc. D/B/A EmployStats Tax ID Number: 74-2826693

**EmployStats**

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

**BILL TO**

Matt Norton, Esq.  
Matthew Norton & Associates  
5855 E. Naples Plaza, Ste 112  
Long Beach, CA 90803 USA

**INVOICE 3294****DATE** 06/23/2020 **TERMS** Due on receipt**DUE DATE** 06/23/2020**PROJECT NAME**

1122.1 - Sephora

DATE	DESCRIPTION	HOURS	RATE	AMOUNT
09/20/2019	Directed case management - Susan Wirtanen	0.0375	215.00	8.06
11/14/2019	Discussed case update and methodologies - Susan Wirtanen	0.1125	215.00	24.19
11/14/2019	Analysis Support - Matt Rigling	0.0375	225.00	8.44
11/14/2019	Case Management - Carl McClain	0.0375	225.00	8.44
11/15/2019	Analysis Support - Matt Rigling	0.1125	225.00	25.31
11/15/2019	Client Conference - Matt Rigling	0.075	225.00	16.88
11/15/2019	Discussed case methodologies - Susan Wirtanen	0.0375	215.00	8.06
11/15/2019	Client conference and preparation - Susan Wirtanen	0.15	215.00	32.25
11/15/2019	Supervised and directed survey research - Dwight D. Steward	0.225	625.00	140.63
11/19/2019	Discussed case methodologies - Susan Wirtanen	0.1875	215.00	40.31
11/19/2019	Analysis Support - Matt Rigling	0.45	225.00	101.25
11/20/2019	Discussed case methodologies - Susan Wirtanen	0.075	215.00	16.13
11/20/2019	Client Conference - Susan Wirtanen	0.15	215.00	32.25
11/20/2019	Client Conference - Matt Rigling	0.225	225.00	50.63
11/27/2019	Reviewed and audited proposed survey - Susan Wirtanen	0.1125	215.00	24.19
12/10/2019	Research - Matt Rigling	0.30	225.00	67.50
12/11/2019	Case Management - Matt Rigling	0.1125	225.00	25.31
12/11/2019	Research - Matt Rigling	0.30	225.00	67.50
12/12/2019	Research - Matt Rigling	0.375	225.00	84.38
12/13/2019	Analysis Support - Matt Rigling	0.0375	225.00	8.44
12/13/2019	Research - Matt Rigling	0.075	225.00	16.88
12/13/2019	Discussed case methodologies - Susan Wirtanen	0.0375	215.00	8.06
12/16/2019	Discussed case methodologies - Susan Wirtanen	0.075	215.00	16.13

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Steward Research Group, Inc. D/B/A EmployStats Tax ID Number: 74-2826693



DATE	DESCRIPTION	HOURS	RATE	AMOUNT
12/16/2019	Developed program code for data and data reconciliation - Susan Wirtanen	0.4875	215.00	104.81
12/17/2019	Research - Matt Rigling	0.375	225.00	84.38
12/18/2019	Analysis Support - Matt Rigling	0.075	225.00	16.88
12/18/2019	Developed program code for data and data reconciliation - Susan Wirtanen	0.2625	215.00	56.44
12/19/2019	Research - Matt Rigling	0.1125	225.00	25.31
12/19/2019	Developed program code for data and data reconciliation - Susan Wirtanen	0.525	215.00	112.88
12/26/2019	Research - Matt Rigling	0.1875	225.00	42.19
12/30/2019	Research - Matt Rigling	0.1125	225.00	25.31
12/30/2019	Research - Matt Rigling	0.375	225.00	84.38
12/31/2019	Research - Matt Rigling	0.075	225.00	16.88
01/06/2020	Analysis Support - Matt Rigling	0.0375	225.00	8.44
01/06/2020	Research - Matt Rigling	0.45	225.00	101.25
01/06/2020	Analysis Support - Susan Wirtanen	0.075	215.00	16.13
01/07/2020	Analysis Support - Matt Rigling	0.4125	225.00	92.81
01/08/2020	Research - Matt Rigling	0.3375	225.00	75.94
01/09/2020	Document Review - Matt Rigling	0.15	225.00	33.75
01/13/2020	Supervised and directed research - Dwight D. Steward	0.1875	625.00	117.19
01/14/2020	Research. Worked on economic analysis - Dwight D. Steward	0.15	625.00	93.75
01/14/2020	Discussed case methodologies - Susan Wirtanen	0.0375	215.00	8.06
01/22/2020	Discussed case methodologies - Susan Wirtanen	0.0375	215.00	8.06
01/23/2020	Research. Worked on damage model analysis - Dwight D. Steward	0.225	625.00	140.63
02/24/2020	Research - Matt Rigling	0.30	225.00	67.50
03/02/2020	Research. Supervised and directed research - Dwight D. Steward	0.0375	625.00	23.44
03/04/2020	Research - Matt Rigling	0.8625	225.00	194.06
03/04/2020	Analysis Support - Matt Rigling	0.0375	225.00	8.44
03/06/2020	Research - Matt Rigling	0.1875	225.00	42.19
03/06/2020	Analysis Support - Matt Rigling	0.075	225.00	16.88
03/09/2020	Research - Matt Rigling	0.4125	225.00	92.81
03/10/2020	Analysis Support - Matt Rigling	0.075	225.00	16.88
03/10/2020	Research. Supervised and directed research. Studied economic damages - Dwight D. Steward	0.1125	625.00	70.31
03/11/2020	Research. Supervised and directed research. Studied economic damages - Dwight D. Steward	0.075	625.00	46.88
03/13/2020	Research. Supervised and directed research. Studied economic damages - Dwight D. Steward	0.0375	625.00	23.44
03/16/2020	Research. Supervised and directed team research - Dwight D. Steward	0.075	625.00	46.88
03/16/2020	Research - Matt Rigling	0.375	225.00	84.38

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
03/19/2020	Research - Matt Rigling	0.1125	225.00	25.31
03/20/2020	Research - Matt Rigling	0.1125	225.00	25.31
03/25/2020	Analysis Support - Matt Rigling	0.075	225.00	16.88

The client has been billed at 15% of the total amount due and is reflected in the number of hours.

Total: \$2,898.28

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.

Steward Research Group, Inc. D/B/A EmployStats Tax ID Number: 74-2826693

**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

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Steward Research Group, Inc. D/B/A EmployStats Tax ID Number: 74-2826693

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

<b>TOTAL DUE</b>	<b>\$0.00</b>
------------------	---------------

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

**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 3317****DATE** 07/29/2020 **TERMS** 15 Days**DUE DATE** 08/13/2020**PROJECT NAME**

1122.1 - Sephora

DATE	DESCRIPTION	HOURS	RATE	AMOUNT
07/07/2020	Deposition Preparation Support - Matt Rigling	0:14	225.00	50.63
07/07/2020	Analysis. Prepared for deposition testimony - Dwight D Steward	0:12	625.00	123.06
07/07/2020	Deposition Preparation Support - Susan Wirtanen	0:14	215.00	48.38
07/07/2020	Deposition Preparation Support - Carl McClain	0:14	225.00	50.63

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: \$272.70

**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.

Steward Research Group, Inc. D/B/A EmployStats Tax ID Number: 74-2826693

**EmployStats**

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

**BILL TO**

Matt Norton, Esq.  
Matthew Norton & Associates  
5855 E. Naples Plaza, Ste 112  
Long Beach, CA 90803 USA

**INVOICE 3380****DATE** 11/16/2020 **TERMS** 15 Days**DUE DATE** 12/01/2020**PROJECT NAME**

1122.1 - Sephora

DATE	DESCRIPTION	HOURS	RATE	AMOUNT
10/19/2020	Research - Matt Rigling	0:25	225.00	94.92
10/19/2020	Analysis Support - Matt Rigling	0:08	225.00	31.64
10/19/2020	Research - Carl McClain	0:17	225.00	63.28
10/20/2020	Research - Matt Rigling	0:30	225.00	113.91
10/20/2020	Analysis Support - Matt Rigling	0:02	225.00	6.33
10/21/2020	Research - Matt Rigling	0:19	225.00	69.61
10/22/2020	Research - Matt Rigling	0:14	225.00	50.63
10/22/2020	Analysis Support - Matt Rigling	0:03	225.00	12.66
10/22/2020	Provided analysis support - Susan Wirtanen	0:03	215.00	12.09
10/23/2020	Research. Supervised and audited research - Dwight D Steward	0:05	625.00	52.73
10/23/2020	Provided analysis support - Susan Wirtanen	0:14	215.00	48.38
10/26/2020	Research. Supervised and audited research - Dwight D Steward	0:05	625.00	52.73
10/28/2020	Analysis Support - Matt Rigling	0:07	225.00	25.31
10/28/2020	Research - Matt Rigling	0:08	225.00	31.64
10/28/2020	Provided analysis support - Susan Wirtanen	0:07	215.00	24.19

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 billed.

Total: \$690.05

**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.

Steward Research Group, Inc. D/B/A EmployStats Tax ID Number: 74-2826693

**EmployStats**

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

**BILL TO**

Matthew Norton of Norton and Associates  
5855 E. Naples Plaza, Ste 112  
Long Beach, CA 90803 USA

**INVOICE 3661****DATE** 11/22/2021 **TERMS** 15 Days**DUE DATE** 12/07/2021**PROJECT NAME**

1122.1.3 - Sephora

DATE	DESCRIPTION	HOURS	RATE	AMOUNT
11/09/2021	Sephora Analysis	1	1,914.64	1,914.64

Please review the total invoice for detailed descriptions. The Matthew Norton of Norton and Associates is responsible for 13.5% of the total invoice. The total amount is \$14,182.50. If you have any questions, please reach out to Idela Botello at abotello@employstats.com.

Total: \$1,914.64

**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.

Steward Research Group, Inc. D/B/A EmployStats Tax ID Number: 74-2826693

**EmployStats**

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

**BILL TO**

Shaun Setareh  
Thomas Segal  
Setareh Law Group  
9454 Wilshire Boulevard, Suite 907  
Beverly Hills, CA 90212 USA

**INVOICE 3297**

**DATE** 06/23/2020 **TERMS** Due on receipt

**DUE DATE** 06/23/2020

**PROJECT NAME**

1122.1 - Sephora

DATE	DESCRIPTION	HOURS	RATE	AMOUNT
09/20/2019	Directed case management - Susan Wirtanen	0.10625	215.00	22.84
11/14/2019	Discussed case update and methodologies - Susan Wirtanen	0.31875	215.00	68.53
11/14/2019	Analysis Support - Matt Rigling	0.10625	225.00	23.91
11/14/2019	Case Management - Carl McClain	0.10625	225.00	23.91
11/15/2019	Analysis Support - Matt Rigling	0.31875	225.00	71.72
11/15/2019	Client Conference - Matt Rigling	0.2125	225.00	47.81
11/15/2019	Discussed case methodologies - Susan Wirtanen	0.10625	215.00	22.84
11/15/2019	Client conference and preparation - Susan Wirtanen	0.425	215.00	91.38
11/15/2019	Supervised and directed survey research - Dwight D. Steward	0.6375	625.00	398.44
11/19/2019	Discussed case methodologies - Susan Wirtanen	0.53125	215.00	114.22
11/19/2019	Analysis Support - Matt Rigling	1.275	225.00	286.88
11/20/2019	Discussed case methodologies - Susan Wirtanen	0.2125	215.00	45.69
11/20/2019	Client Conference - Susan Wirtanen	0.425	215.00	91.38
11/20/2019	Client Conference - Matt Rigling	0.6375	225.00	143.44
11/27/2019	Reviewed and audited proposed survey - Susan Wirtanen	0.31875	215.00	68.53
12/10/2019	Research - Matt Rigling	0.85	225.00	191.25
12/11/2019	Case Management - Matt Rigling	0.31875	225.00	71.72
12/11/2019	Research - Matt Rigling	0.85	225.00	191.25
12/12/2019	Research - Matt Rigling	1.0625	225.00	239.06
12/13/2019	Analysis Support - Matt Rigling	0.10625	225.00	23.91
12/13/2019	Research - Matt Rigling	0.2125	225.00	47.81
12/13/2019	Discussed case methodologies - Susan Wirtanen	0.10625	215.00	22.84
12/16/2019	Discussed case methodologies - Susan Wirtanen	0.2125	215.00	45.69

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Steward Research Group, Inc. D/B/A EmployStats Tax ID Number: 74-2826693



DATE	DESCRIPTION	HOURS	RATE	AMOUNT
12/16/2019	Developed program code for data and data reconciliation - Susan Wirtanen	1.38125	215.00	296.97
12/17/2019	Research - Matt Rigling	1.0625	225.00	239.06
12/18/2019	Analysis Support - Matt Rigling	0.2125	225.00	47.81
12/18/2019	Developed program code for data and data reconciliation - Susan Wirtanen	0.74375	215.00	159.91
12/19/2019	Research - Matt Rigling	0.31875	225.00	71.72
12/19/2019	Developed program code for data and data reconciliation - Susan Wirtanen	1.4875	215.00	319.81
12/26/2019	Research - Matt Rigling	0.53125	225.00	119.53
12/30/2019	Research - Matt Rigling	0.31875	225.00	71.72
12/30/2019	Research - Matt Rigling	1.0625	225.00	239.06
12/31/2019	Research - Matt Rigling	0.2125	225.00	47.81
01/06/2020	Analysis Support - Matt Rigling	0.10625	225.00	23.91
01/06/2020	Research - Matt Rigling	1.275	225.00	286.88
01/06/2020	Analysis Support - Susan Wirtanen	0.2125	215.00	45.69
01/07/2020	Analysis Support - Matt Rigling	1.16875	225.00	262.97
01/08/2020	Research - Matt Rigling	0.95625	225.00	215.16
01/09/2020	Document Review - Matt Rigling	0.425	225.00	95.63
01/13/2020	Supervised and directed research - Dwight D. Steward	0.53125	625.00	332.03
01/14/2020	Research. Worked on economic analysis - Dwight D. Steward	0.425	625.00	265.63
01/14/2020	Discussed case methodologies - Susan Wirtanen	0.10625	215.00	22.84
01/22/2020	Discussed case methodologies - Susan Wirtanen	0.10625	215.00	22.84
01/23/2020	Research. Worked on damage model analysis - Dwight D. Steward	0.6375	625.00	398.44
02/24/2020	Research - Matt Rigling	0.85	225.00	191.25
03/02/2020	Research. Supervised and directed research - Dwight D. Steward	0.10625	625.00	66.41
03/04/2020	Research - Matt Rigling	2.44375	225.00	549.84
03/04/2020	Analysis Support - Matt Rigling	0.10625	225.00	23.91
03/06/2020	Research - Matt Rigling	0.53125	225.00	119.53
03/06/2020	Analysis Support - Matt Rigling	0.2125	225.00	47.81
03/09/2020	Research - Matt Rigling	1.16875	225.00	262.97
03/10/2020	Analysis Support - Matt Rigling	0.2125	225.00	47.81
03/10/2020	Research. Supervised and directed research. Studied economic damages - Dwight D. Steward	0.31875	625.00	199.22
03/11/2020	Research. Supervised and directed research. Studied economic damages - Dwight D. Steward	0.2125	625.00	132.81
03/13/2020	Research. Supervised and directed research. Studied economic damages - Dwight D. Steward	0.10625	625.00	66.41
03/16/2020	Research. Supervised and directed team research - Dwight D. Steward	0.2125	625.00	132.81
03/16/2020	Research - Matt Rigling	1.0625	225.00	239.06

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
03/19/2020	Research - Matt Rigling	0.31875	225.00	71.72
03/20/2020	Research - Matt Rigling	0.31875	225.00	71.72
03/25/2020	Analysis Support - Matt Rigling	0.2125	225.00	47.81

The client has been billed at 42.5% of the total amount due and is reflected in the number of hours.

Total: \$8,211.56

TOTAL DUE	\$0.00
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We only accept electronic payments. We do not accept paper checks. Please refer to the email accompanying this invoice for payment instructions.

**EmployStats**

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

**BILL TO**

Shaun Setareh  
Thomas Segal  
Setareh Law Group  
9454 Wilshire Boulevard, Suite 907  
Beverly Hills, CA 90212 USA

**INVOICE 3308**

**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	0:29	225.00	107.58
06/17/2020	Performed research and provided analysis support - Matt Rigling	0:38	225.00	143.44
06/17/2020	Research. Drafted report - Dwight D Steward	0:14	625.00	149.41
06/19/2020	Research. Drafted report - Dwight D Steward	0:10	625.00	99.61
06/23/2020	Research. Drafted report. Supervised and directed research - Dwight D Steward	1:26	625.00	896.48
06/23/2020	Document review. Performed research and provided analysis support - Matt Rigling	1:17	225.00	286.88
06/23/2020	Provided analysis support - Susan Wirtanen	0:14	215.00	51.40
06/24/2020	Provided analysis support. Assisted with expert report - Susan Wirtanen	0:29	215.00	102.80
06/24/2020	Document review. Performed research - Matt Rigling	1:12	225.00	268.95
06/24/2020	Provided analysis support - Carl McClain	0:38	225.00	143.44
06/25/2020	Research. Drafted report. Supervised and directed research - Dwight D Steward	2:09	625.00	1,344.73
06/25/2020	Document Review. Provided analysis support and performed research - Matt Rigling	1:26	225.00	322.73
06/25/2020	Client conference. Provided analysis support - Susan Wirtanen	0:57	215.00	205.59
06/25/2020	Provided analysis support - Carl McClain	0:43	225.00	161.37
06/26/2020	Research. Drafted report. Supervised and directed research - Dwight D Steward	2:19	625.00	1,444.34
06/26/2020	Assisted with expert report. Performed research - Matt Rigling	1:31	225.00	340.66
06/26/2020	Client conference. Assisted with expert report. Provided analysis support - Susan Wirtanen	1:17	215.00	274.13
06/26/2020	Client conference. Provided analysis support - Carl McClain	0:43	225.00	161.37

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Steward Research Group, Inc. D/B/A EmployStats Tax ID Number: 74-2826693

DATE	DESCRIPTION	HOURS	RATE	AMOUNT
06/27/2020	Client conference. Provided analysis support and assisted with expert report - Susan Wirtanen	0:48	215.00	171.33
06/27/2020	Performed research - Matt Rigling	1:12	225.00	268.95
06/27/2020	Client conference. Provided analysis support - Carl McClain	0:29	225.00	107.58
06/27/2020	Research. Drafted report. Supervised and directed research - Dwight D Steward	0:33	625.00	348.63
06/28/2020	Performed research - Matt Rigling	0:19	225.00	71.72
06/28/2020	Research. Drafted report - Dwight D Steward	0:14	625.00	149.41
06/28/2020	Provided analysis support and assisted with expert report - Susan Wirtanen	0:19	215.00	68.53
06/29/2020	Research. Drafted report - Dwight D Steward	0:24	625.00	249.02
06/29/2020	Performed research. Assisted with expert report - Matt Rigling	0:43	225.00	161.37
06/29/2020	Provided analysis support - Carl McClain	0:43	225.00	161.37
06/29/2020	Provided analysis support. Assisted with expert report - Susan Wirtanen	0:43	215.00	154.20
06/30/2020	Prepared for deposition testimony - Dwight D Steward	0:53	625.00	547.85
06/30/2020	Provided deposition preparation support - Carl McClain	0:43	225.00	161.37
06/30/2020	Provided deposition preparation support - Susan Wirtanen	0:43	215.00	154.20
06/30/2020	Provided deposition preparation support - Matt Rigling	0:43	225.00	161.37

The client has been billed at 42.5% of the remaining 75% of the total amount due in Sephora Wage and Hour matters which is reflected in the number of hours.

Total: \$9,441.81

**TOTAL DUE**

**\$0.00**

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**EmployStats**

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

**BILL TO**

Shaun Setareh  
Thomas Segal  
Setarah Law Group  
9454 Wilshire Boulevard, Suite 907  
Beverly Hills, CA 90212 USA

**INVOICE 3316****DATE** 07/29/2020 **TERMS** 15 Days**DUE DATE** 08/13/2020**PROJECT NAME**

1122.1 - Sephora

DATE	DESCRIPTION	HOURS	RATE	AMOUNT
07/07/2020	Deposition Preparation Support - Matt Rigling	0:38	225.00	143.44
07/07/2020	Analysis. Prepared for deposition testimony - Dwight D Steward	0:33	625.00	348.63
07/07/2020	Deposition Preparation Support - Susan Wirtanen	0:38	215.00	137.06
07/07/2020	Deposition Preparation Support - Carl McClain	0:38	225.00	143.44

The client has been billed at 42.5% of the remaining 75% of the total amount due in Sephora Wage and Hour matters which is reflected in the number of hours.

Total: \$772.57

**TOTAL DUE****\$0.00**

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Steward Research Group, Inc. D/B/A EmployStats Tax ID Number: 74-2826693

**EmployStats**

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

**BILL TO**

Shaun Setareh & Thomas Segal  
9665 Wilshire Blvd, Suite 430  
Beverly Hills, CA 90212

**INVOICE 3382****DATE** 11/16/2020 **TERMS** 15 Days**DUE DATE** 12/01/2020**PROJECT NAME**

1122.1 - Sephora

DATE	DESCRIPTION	HOURS	RATE	AMOUNT
10/19/2020	Research - Matt Rigling	1:12	225.00	268.95
10/19/2020	Analysis Support - Matt Rigling	0:24	225.00	89.65
10/19/2020	Research - Carl McClain	0:48	225.00	179.30
10/20/2020	Research - Matt Rigling	1:26	225.00	322.73
10/20/2020	Analysis Support - Matt Rigling	0:05	225.00	17.93
10/21/2020	Research - Matt Rigling	0:53	225.00	197.23
10/22/2020	Research - Matt Rigling	0:38	225.00	143.44
10/22/2020	Analysis Support - Matt Rigling	0:10	225.00	35.86
10/22/2020	Provided analysis support - Susan Wirtanen	0:10	215.00	34.27
10/23/2020	Research. Supervised and audited research - Dwight D Steward	0:14	625.00	149.41
10/23/2020	Provided analysis support - Susan Wirtanen	0:38	215.00	137.06
10/26/2020	Research. Supervised and audited research - Dwight D Steward	0:14	625.00	149.41
10/28/2020	Analysis Support - Matt Rigling	0:19	225.00	71.72
10/28/2020	Research - Matt Rigling	0:24	225.00	89.65
10/28/2020	Provided analysis support - Susan Wirtanen	0:19	215.00	68.53

The client has been billed at 42.5% of the remaining 75% of the total amount due in Sephora Wage and Hour matters which is reflected in the number of hours billed.

Total: \$1,955.14

**TOTAL DUE****\$0.00**

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Steward Research Group, Inc. D/B/A EmployStats Tax ID Number: 74-2826693

**EmployStats**

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

**BILL TO**

Setareh Law Group  
9665 Wilshire Blvd, Suite 430  
Beverly Hills, CA 90212 USA

**INVOICE 3660****DATE** 11/22/2021 **TERMS** 15 Days**DUE DATE** 12/07/2021**PROJECT NAME**

1122.1.2 - Sephora

DATE	DESCRIPTION	HOURS	RATE	AMOUNT
11/11/2021	Sephora Analysis	1	5,424.81	5,424.81

Please review the total invoice for detailed descriptions. The Setareh Law Group is responsible for 38.25% of the total invoice. The total amount is \$14,182.50. If you have any questions, please reach out to Adam Bortello at abotello@employstats.com.

Total: \$5,424.81

**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.

Steward Research Group, Inc. D/B/A EmployStats Tax ID Number: 74-2826693

**EmployStats**

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

**BILL TO**

Kevin R. Allen, Esq.  
Allen Attorney Group  
2121 N. California Blvd  
Suite 290  
Walnut Creek, CA 94596

**INVOICE 3295****DATE** 06/23/2020 **TERMS** Due on receipt**DUE DATE** 06/23/2020**PROJECT NAME**

1122.1 - Sephora

DATE	DESCRIPTION	HOURS	RATE	AMOUNT
09/20/2019	Directed case management - Susan Wirtanen	0.10625	215.00	22.84
11/14/2019	Discussed case update and methodologies - Susan Wirtanen	0.31875	215.00	68.53
11/14/2019	Analysis Support - Matt Rigling	0.10625	225.00	23.91
11/14/2019	Case Management - Carl McClain	0.10625	225.00	23.91
11/15/2019	Analysis Support - Matt Rigling	0.31875	225.00	71.72
11/15/2019	Client Conference - Matt Rigling	0.2125	225.00	47.81
11/15/2019	Discussed case methodologies - Susan Wirtanen	0.10625	215.00	22.84
11/15/2019	Client conference and preparation - Susan Wirtanen	0.425	215.00	91.38
11/15/2019	Supervised and directed survey research - Dwight D. Steward	0.6375	625.00	398.44
11/19/2019	Discussed case methodologies - Susan Wirtanen	0.53125	215.00	114.22
11/19/2019	Analysis Support - Matt Rigling	1.275	225.00	286.88
11/20/2019	Discussed case methodologies - Susan Wirtanen	0.2125	215.00	45.69
11/20/2019	Client Conference - Susan Wirtanen	0.425	215.00	91.38
11/20/2019	Client Conference - Matt Rigling	0.6375	225.00	143.44
11/27/2019	Reviewed and audited proposed survey - Susan Wirtanen	0.31875	215.00	68.53
12/10/2019	Research - Matt Rigling	0.85	225.00	191.25
12/11/2019	Case Management - Matt Rigling	0.31875	225.00	71.72
12/11/2019	Research - Matt Rigling	0.85	225.00	191.25
12/12/2019	Research - Matt Rigling	1.0625	225.00	239.06
12/13/2019	Analysis Support - Matt Rigling	0.10625	225.00	23.91
12/13/2019	Research - Matt Rigling	0.2125	225.00	47.81
12/13/2019	Discussed case methodologies - Susan Wirtanen	0.10625	215.00	22.84
12/16/2019	Discussed case methodologies - Susan Wirtanen	0.2125	215.00	45.69

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Steward Research Group, Inc. D/B/A EmployStats Tax ID Number: 74-2826693



DATE	DESCRIPTION	HOURS	RATE	AMOUNT
12/16/2019	Developed program code for data and data reconciliation - Susan Wirtanen	1.38125	215.00	296.97
12/17/2019	Research - Matt Rigling	1.0625	225.00	239.06
12/18/2019	Analysis Support - Matt Rigling	0.2125	225.00	47.81
12/18/2019	Developed program code for data and data reconciliation - Susan Wirtanen	0.74375	215.00	159.91
12/19/2019	Research - Matt Rigling	0.31875	225.00	71.72
12/19/2019	Developed program code for data and data reconciliation - Susan Wirtanen	1.4875	215.00	319.81
12/26/2019	Research - Matt Rigling	0.53125	225.00	119.53
12/30/2019	Research - Matt Rigling	0.31875	225.00	71.72
12/30/2019	Research - Matt Rigling	1.0625	225.00	239.06
12/31/2019	Research - Matt Rigling	0.2125	225.00	47.81
01/06/2020	Analysis Support - Matt Rigling	0.10625	225.00	23.91
01/06/2020	Research - Matt Rigling	1.275	225.00	286.88
01/06/2020	Analysis Support - Susan Wirtanen	0.2125	215.00	45.69
01/07/2020	Analysis Support - Matt Rigling	1.16875	225.00	262.97
01/08/2020	Research - Matt Rigling	0.95625	225.00	215.16
01/09/2020	Document Review - Matt Rigling	0.425	225.00	95.63
01/13/2020	Supervised and directed research - Dwight D. Steward	0.53125	625.00	332.03
01/14/2020	Research. Worked on economic analysis - Dwight D. Steward	0.425	625.00	265.63
01/14/2020	Discussed case methodologies - Susan Wirtanen	0.10625	215.00	22.84
01/22/2020	Discussed case methodologies - Susan Wirtanen	0.10625	215.00	22.84
01/23/2020	Research. Worked on damage model analysis - Dwight D. Steward	0.6375	625.00	398.44
02/24/2020	Research - Matt Rigling	0.85	225.00	191.25
03/02/2020	Research. Supervised and directed research - Dwight D. Steward	0.10625	625.00	66.41
03/04/2020	Research - Matt Rigling	2.44375	225.00	549.84
03/04/2020	Analysis Support - Matt Rigling	0.10625	225.00	23.91
03/06/2020	Research - Matt Rigling	0.53125	225.00	119.53
03/06/2020	Analysis Support - Matt Rigling	0.2125	225.00	47.81
03/09/2020	Research - Matt Rigling	1.16875	225.00	262.97
03/10/2020	Analysis Support - Matt Rigling	0.2125	225.00	47.81
03/10/2020	Research. Supervised and directed research. Studied economic damages - Dwight D. Steward	0.31875	625.00	199.22
03/11/2020	Research. Supervised and directed research. Studied economic damages - Dwight D. Steward	0.2125	625.00	132.81
03/13/2020	Research. Supervised and directed research. Studied economic damages - Dwight D. Steward	0.10625	625.00	66.41
03/16/2020	Research. Supervised and directed team research - Dwight D. Steward	0.2125	625.00	132.81
03/16/2020	Research - Matt Rigling	1.0625	225.00	239.06

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
03/19/2020	Research - Matt Rigling	0.31875	225.00	71.72
03/20/2020	Research - Matt Rigling	0.31875	225.00	71.72
03/25/2020	Analysis Support - Matt Rigling	0.2125	225.00	47.81

The client has been billed at 42.5% of the total amount due and is reflected in the number of hours.

Total: \$8,211.56

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.

**EmployStats**

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

**BILL TO**

Kevin Allen  
2121 N. California Blvd  
Suite 290  
Walnut Creek, CA 94596

**INVOICE 3307****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	0:29	225.00	107.58
06/17/2020	Performed research and provided analysis support - Matt Rigling	0:38	225.00	143.44
06/17/2020	Research. Drafted report - Dwight D Steward	0:14	625.00	149.41
06/19/2020	Research. Drafted report - Dwight D Steward	0:10	625.00	99.61
06/23/2020	Research. Drafted report. Supervised and directed research - Dwight D Steward	1:26	625.00	896.48
06/23/2020	Document review. Performed research and provided analysis support - Matt Rigling	1:17	225.00	286.88
06/23/2020	Provided analysis support - Susan Wirtanen	0:14	215.00	51.40
06/24/2020	Provided analysis support. Assisted with expert report - Susan Wirtanen	0:29	215.00	102.80
06/24/2020	Document review. Performed research - Matt Rigling	1:12	225.00	268.95
06/24/2020	Provided analysis support - Carl McClain	0:38	225.00	143.44
06/25/2020	Research. Drafted report. Supervised and directed research - Dwight D Steward	2:09	625.00	1,344.73
06/25/2020	Document Review. Provided analysis support and performed research - Matt Rigling	1:26	225.00	322.73
06/25/2020	Client conference. Provided analysis support - Susan Wirtanen	0:57	215.00	205.59
06/25/2020	Provided analysis support - Carl McClain	0:43	225.00	161.37
06/26/2020	Research. Drafted report. Supervised and directed research - Dwight D Steward	2:19	625.00	1,444.34
06/26/2020	Assisted with expert report. Performed research - Matt Rigling	1:31	225.00	340.66
06/26/2020	Client conference. Assisted with expert report. Provided analysis support - Susan Wirtanen	1:17	215.00	274.13
06/26/2020	Client conference. Provided analysis support - Carl McClain	0:43	225.00	161.37

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

Steward Research Group, Inc. D/B/A EmployStats Tax ID Number: 74-2826693

DATE	DESCRIPTION	HOURS	RATE	AMOUNT
06/27/2020	Client conference. Provided analysis support and assisted with expert report - Susan Wirtanen	0:48	215.00	171.33
06/27/2020	Performed research - Matt Rigling	1:12	225.00	268.95
06/27/2020	Client conference. Provided analysis support - Carl McClain	0:29	225.00	107.58
06/27/2020	Research. Drafted report. Supervised and directed research - Dwight D Steward	0:33	625.00	348.63
06/28/2020	Performed research - Matt Rigling	0:19	225.00	71.72
06/28/2020	Research. Drafted report - Dwight D Steward	0:14	625.00	149.41
06/28/2020	Provided analysis support and assisted with expert report - Susan Wirtanen	0:19	215.00	68.53
06/29/2020	Research. Drafted report - Dwight D Steward	0:24	625.00	249.02
06/29/2020	Performed research. Assisted with expert report - Matt Rigling	0:43	225.00	161.37
06/29/2020	Provided analysis support - Carl McClain	0:43	225.00	161.37
06/29/2020	Provided analysis support. Assisted with expert report - Susan Wirtanen	0:43	215.00	154.20
06/30/2020	Prepared for deposition testimony - Dwight D Steward	0:53	625.00	547.85
06/30/2020	Provided deposition preparation support - Carl McClain	0:43	225.00	161.37
06/30/2020	Provided deposition preparation support - Susan Wirtanen	0:43	215.00	154.20
06/30/2020	Provided deposition preparation support - Matt Rigling	0:43	225.00	161.37

The client has been billed at 42.5% of the remaining 75% of the total amount due in Sephora Wage and Hour matters which is reflected in the number of hours.

Total: \$9,441.81

**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.

**EmployStats**

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

**BILL TO**

Kevin Allen  
2121 N. California Blvd  
Suite 290  
Walnut Creek, CA 94596

**INVOICE 3315****DATE** 07/29/2020 **TERMS** 15 Days**DUE DATE** 08/13/2020**PROJECT NAME**

1122.1 - Sephora

DATE	DESCRIPTION	HOURS	RATE	AMOUNT
07/07/2020	Deposition Preparation Support - Matt Rigling	0:38	225.00	143.44
07/07/2020	Analysis. Prepared for deposition testimony - Dwight D Steward	0:33	625.00	348.63
07/07/2020	Deposition Preparation Support - Susan Wirtanen	0:38	215.00	137.06
07/07/2020	Deposition Preparation Support - Carl McClain	0:38	225.00	143.44

The client has been billed at 42.5% of the remaining 75% of the total amount due in Sephora Wage and Hour matters which is reflected in the number of hours.

Total: \$772.57

**TOTAL DUE****\$0.00**

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Steward Research Group, Inc. D/B/A EmployStats Tax ID Number: 74-2826693

**EmployStats**

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

**BILL TO**

Kevin R. Allen, Esq.  
Allen Attorney Group  
2121 N. California Blvd  
Suite 290  
Walnut Creek, CA 94596

**INVOICE 3377****DATE** 11/16/2020 **TERMS** 15 Days**DUE DATE** 12/01/2020**PROJECT NAME**

1122.1 - Sephora

DATE	DESCRIPTION	HOURS	RATE	AMOUNT
10/19/2020	Research - Matt Rigling	1:12	225.00	268.95
10/19/2020	Analysis Support - Matt Rigling	0:24	225.00	89.65
10/19/2020	Research - Carl McClain	0:48	225.00	179.30
10/20/2020	Research - Matt Rigling	1:26	225.00	322.73
10/20/2020	Analysis Support - Matt Rigling	0:05	225.00	17.93
10/21/2020	Research - Matt Rigling	0:53	225.00	197.23
10/22/2020	Research - Matt Rigling	0:38	225.00	143.44
10/22/2020	Analysis Support - Matt Rigling	0:10	225.00	35.86
10/22/2020	Provided analysis support - Susan Wirtanen	0:10	215.00	34.27
10/23/2020	Research. Supervised and audited research - Dwight D Steward	0:14	625.00	149.41
10/23/2020	Provided analysis support - Susan Wirtanen	0:38	215.00	137.06
10/26/2020	Research. Supervised and audited research - Dwight D Steward	0:14	625.00	149.41
10/28/2020	Analysis Support - Matt Rigling	0:19	225.00	71.72
10/28/2020	Research - Matt Rigling	0:24	225.00	89.65
10/28/2020	Provided analysis support - Susan Wirtanen	0:19	215.00	68.53

The client has been billed at 42.5% of the remaining 75% of the total amount due in Sephora Wage and Hour matters which is reflected in the number of hours billed.

Total: \$1,955.14

**TOTAL DUE****\$0.00**

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Steward Research Group, Inc. D/B/A EmployStats Tax ID Number: 74-2826693

**EmployStats**

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

**BILL TO**

Kevin R. Allen of Allen Attorney Group PC  
2121 N. California Blvd  
Suite 290  
Walnut Creek, CA 94596

**INVOICE 3662****DATE** 11/22/2021 **TERMS** 15 Days**DUE DATE** 12/07/2021**PROJECT NAME**

1122.1.1 - Sephora

DATE	DESCRIPTION	HOURS	RATE	AMOUNT
11/09/2021	Sephora Analysis	1	5,424.81	5,424.81

Please review the total invoice for detailed descriptions. The Kevin R. Allen of Allen Attorney Group PC is responsible for 38.25% of the total invoice. The total amount is \$14,182.50. If you have any questions, please reach out to Idela Botello at abotello@employstats.com.

Total: \$5,424.81

**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.

Steward Research Group, Inc. D/B/A EmployStats Tax ID Number: 74-2826693

# Exhibit 4



12:43 PM

05/02/22

**Davis Research LLC**  
**Customer QuickReport**  
**All Transactions**

Type	Date	Num	Account	Split	Amount
<b>Allman &amp; Petersen Economics, LLC</b>					
<b>19-0126 Sephora Survey</b>					
Invoice	11/18/2019	525.417	110 · Accounts Rec...	260 · Custome...	35,624.00
Payment	12/09/2019	10447	1499 · Undeposited ...	110 · Accounts...	5,347.50
Payment	12/12/2019	1249	1499 · Undeposited ...	110 · Accounts...	15,151.25
Payment	12/16/2019	205	1499 · Undeposited ...	110 · Accounts...	15,125.25
Invoice	12/30/2019	525.431	110 · Accounts Rec...	-SPLIT-	0.00
Invoice	01/23/2020	525.476	110 · Accounts Rec...	-SPLIT-	30,305.00
Payment	03/04/2020	139	1499 · Undeposited ...	110 · Accounts...	12,879.63
Payment	03/09/2020	10489	1499 · Undeposited ...	110 · Accounts...	4,545.75
Invoice	03/26/2020	525.510	110 · Accounts Rec...	390 · Project M...	368.75
Payment	04/01/2020	1453	1499 · Undeposited ...	110 · Accounts...	12,879.62
Payment	06/25/2020	142	1499 · Undeposited ...	110 · Accounts...	368.75