

1 Kevin R. Allen, SBN 237994
2 **ALLEN ATTORNEY GROUP PC**
3 2121 North California Avenue, Suite 290
4 Walnut Creek, California 94596
5 Tel. (925) 695-4913
6 Fax (925) 334-7477
7 kevin@allenattorneygroup.com

8 Attorneys for Representative Plaintiff Rose Provencio
9 and the Certified Class/Subclasses

10 *Additional Counsel Listed on Next Page*

11 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

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

13 **(UNLIMITED JURISDICTION)**

14 COORDINATED PROCEEDINGS SPECIAL
15 TITLE [RULE 3.550]

16 SEPHORA WAGE AND HOUR CASES

17 Included actions:

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

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

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

24 *Duran v. Sephora USA, Inc.*
25 (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

1 Shaun Setareh, SBN 204514
2 Thomas Segal, SBN 222791
3 **SETAREH LAW GROUP**
4 9454 Wilshire Boulevard, Suite 907
5 Beverly Hills, California 90212
6 Telephone: (310) 888-7771
7 Facsimile: (310) 888-0109
8 shaun@setarehlaw.com
9 thomas@setarehlaw.com

10 Attorneys for Representative Plaintiff Alyssa Burnthorne-Martinez
11 and the Plaintiff Class

12 Alejandro P. Gutierrez, SBN 107688
13 **THE HATHAWAY LAW FIRM, LLP**
14 200 Hathaway Building
15 5450 Telegraph Road, Suite 200
16 Post Office Box 3577
17 Ventura, CA 93006-3577
18 Telephone: (805) 644-7111
19 Facsimile: (805) 644-8296
20 E-mail: agutierrez@hathawaylawfirm.com

21 Daniel J. Palay, SBN 159348
22 Brian D. Hefelfinger, SBN 253054
23 **PALAY HEFELFINGER, APC**
24 1484 E. Main Street
25 Suite 105-B
26 Ventura, CA 93001
27 Telephone: (805) 628-8220
28 Facsimile: (805) 765-8600
E-mail: djp@calemploymentcounsel.com

Attorneys for Plaintiff JESSICA DURAN, the Plaintiff Class and the Certified Subclasses

John Matthew Norton (SBN 158937)
MATTHEW NORTON & ASSOCIATES, P.C.
5855 E. Naples Plaza, Suite 112
Long Beach, CA 90803
Telephone: (562) 433-3208
E-mail: Matt@Matthew-Norton.com

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

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.

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

6 LITIGATION COSTS

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

10 9. In preparing these supplemental papers, I understand that Setareh Law Group
11 discovered an error in their previous submission to the Court. In the declarations for Jose Patino
12 and Shaun Setareh they describe having found several discrepancies which, after being corrected,
13 resulted in their litigation costs being reduced by \$17,920.35.¹ This results in their final litigation
14 costs being **\$109,094.56**.

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

Firm	Litigation Costs	Source ²
Setareh Law Group (Plaintiff Alyssa Burthorne-Martinez)	\$109,094.56 ³	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

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

² 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.

³ 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	
Total:	\$278,747.10	

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 Economics⁴ designed the survey and
17 opined on the results of the survey. Davis Research⁵ administered the actual survey to Class
18 Members. And Dwight Steward (and others) at EmployStats⁶ 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

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

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

⁶ <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

1 3307, 3315, 3377, and 3662).⁷ The invoices describe the work that EmployStats performed.

2 24. This work was necessary and reasonable. We retained EmployStats in 2019 to
3 perform all of the mathematical calculations relating to the surveys including determining the
4 number of surveys needed to obtain a scientifically reliable sample for the class and extrapolating
5 results from the survey to calculate class-wide damages. They drafted a report that was used at
6 class certification stage of the case to show how a class action trial would work. Dr. Steward was
7 deposed regarding his report. The class was certified and we believe their work helped achieve that
8 result.

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

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

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

21 27. The total amount invoices by (and paid to) Davis Research was \$66,297.75.
22 Attached as **Exhibit “S4”** is a ledger showing all invoices and payments to Davis Research. I paid
23 \$15,125.25 on 12/6/19; \$12,879.63 on 3/2/20; and \$368.75 on 6/20/20.

24 28. Davis Research administered the survey. In November 2019 I held a conference call
25 with Bill Davis and Jeff Petersen (who designed the survey) where we discussed the case,
26 composition of the class, and the scope of the anticipated survey. In late November and early
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28 ⁷ 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 east
6 500 employees. Davis Research proceeded to administer the survey to 533 participants. After the
7 survey was conducted Davis Ressearch 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 5th day of May, 2022 in Lake Oswego, Oregon.

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17 _____
18 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
(UNLIMITED JURISDICTION)

COORDINATED PROCEEDINGS SPECIAL
TITLE [RULE 3.550]

Judicial Counsel Coordinated Proceeding
No. 4911

SEPHORA WAGE AND HOUR CASES

CLASS ACTION

Included actions:

DECLARATION OF JOAN GRAFF

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)

DECLARATION OF JOAN GRAFF

I, **Joan Graff**, declare as follows:

1. The facts set forth in this declaration are true and correct and are known to me personally except those matters stated on information and belief. If called as a witness, I could and would testify competently thereto under oath.
2. I am an attorney licensed to practice before the courts of the State of California.
3. Since 1981, I have served as President of Legal Aid at Work (“LAAW”), formerly known as the Legal Aid Society-Employment Law Center.
4. LAAW was founded in 1916 as the Legal Aid Society of San Francisco and is a nonprofit organization providing civil legal services to the indigent consistent with California Code of Civil Procedure section 384. For over 100 years, LAAW has provided continuous service with the aim of offering free and high-quality legal assistance to those who are unable to afford legal representation. For more than four decades, LAAW has primarily devoted its resources to protecting the workplace rights of California’s low-wage workers. LAAW’s nonprofit status and work providing services to the indigent make it an appropriate designee of *cy pres* funds. LAAW is a CCP § 384 organization as described more specifically below.
5. As a nonprofit organization, LAAW funds its programs and projects from a diverse base of support: (a) donations from individuals, law firms, and businesses; (b) foundation and government grants; (c) allocations of monies from the Legal Services Trust Fund; and (d) *cy pres* distributions.
6. LAAW addresses the full range of employment issues that low-wage workers confront through the following seven programs: (a) Community Legal Services; (b) Disability Rights; (c) Gender and LGBT Equity; (d) National Origin and Immigrants’ Rights; (e) Racial Economic Equity; (f) Wage Protection; and (g) Work and Family.
7. The core of LAAW’s work is providing free legal services to low-wage workers with employment law claims. It litigates cases that address an array of issues important to low-wage workers, including (a) violations of wage-and-hour laws; (b) workplace retaliation;

1 (c) discrimination on account of race, national origin, disability, sex, gender identity, sexual
2 orientation, immigration status and language proficiency; (d) harassment; and (e) failure to
3 comply with equal pay laws and family medical leave laws. Whether in state or federal
4 court, at the trial level or on appeal, nearly all of LAAW's cases impact the law and
5 industry practices, raise community awareness, and change the course the clients' lives.

6 8. Since 1970, LAAW has defined its mission and devoted its practice to representing low-
7 wage workers in enforcing the full range of their employment rights. I am informed and
8 believe that LAAW is one of very few legal services nonprofits in the country that has this
9 singular purpose.

10 9. With 25 attorneys, LAAW provides services to low-wage workers statewide and, in select
11 instances, nationwide. LAAW's clients work in sectors in which low-wage work
12 predominates, including caregiving, construction, hospitality, landscaping, retail, and
13 transportation, as well as domestic, food, and janitorial services. Many of LAAW's clients
14 are immigrants, and a significant number of them are monolingual Spanish, Mandarin, or
15 Cantonese speakers or have limited English proficiency.

16 10. A sampling of wage-and-hour cases LAAW has litigated include the following actions:

17 a. An action on behalf of a group of roughly 370 campaign workers who were
18 misclassified as independent contractors by a campaign operator working on the
19 2019 campaign sponsored by Juul Labs, Inc. to allow for the sale of vaping
20 products in San Francisco. After defeating a motion to compel arbitration and a
21 motion to dismiss the claims against Juul Labs, Inc., Legal Aid at Work, with its co-
22 counsel Leonard Carder, has secured a settlement of \$1.75 million by Juul and the
23 other defendants that is pending approval in the Northern District of California.

24 b. An action on behalf of a group of roughly 25 Filipino workers who were subjected
25 to forced labor in 2012 while working at a hospitality complex in rural Oklahoma.
26 These workers were brought to the United States on H2B visas, and incurred
27 significant debt as part of the visa process. Before coming to the United States, the
28 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
9 13. LAAW holds Wage Rights Clinics onsite, once a month, at each of the Labor
10 Commissioner's offices in Oakland, San Francisco and most recently, Santa Rosa. The
11 Clinics help low-wage workers assess their claims for unpaid wages, calculate the amount
12 of unpaid wages, and prepare the forms necessary to initiate wage claims before the Labor
13 Commissioner. From 2017 to 2021, the Clinic assisted over 495 clients, including many
14 immigrants with limited English proficiency.

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

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

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

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

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

I declare under penalty of perjury pursuant to the laws of the State of California that the foregoing is true and correct. Executed on this 4th day of May, 2022 at San Francisco, California.



Exhibit 2

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:

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%)			

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
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: \$10,778.00

ALLMAN & PETERSEN ECONOMICS
Customer QuickReport
All Transactions

Type	Date	Num	Memo	Account	Clr	Split	Amount
Allen, Kevin							
Sephora Class Action							
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

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:

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

ALLMAN & PETERSEN ECONOMICS
Customer QuickReport
 All Transactions

Type	Date	Num	Memo	Account	Clr	Split	Amount
Setareh, Shaun							
Sephora Class Action							
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

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:

TO:

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

Invoice

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

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

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

Balance Due: \$5,569.00

ALLMAN & PETERSEN ECONOMICS
Customer QuickReport
All Transactions

Type	Date	Num	Memo	Account	Clr	Split	Amount
Norton, Matthew							
Sephora Class Action							
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

Allen Attorney Group			
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
Total			\$25,805.89

Setareh Law Group			
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
Total			\$25,805.89

Total for Sephora Cases	
Amount Billed	Amount Paid
\$76,876.58	\$76,876.58

Matthew Norton & Associates			
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
Total			\$9,108.05

Alejandro Gutierrez			
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
Total			\$16,156.75

EmployStats

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

**INVOICE 3252**

DATE 03/31/2020 **TERMS** 15 Days

DUE DATE 04/15/2020

BILL TO

Alejandro Gutierrez
 5450 Telegraph Rd Ste 200
 Ventura, CA 93003

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.

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

PAID

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

DATE	DESCRIPTION	HOURS	RATE	AMOUNT
06/27/2020	Client conference. Provided analysis support and assisted with expert report - Susan Wirtanen	0:38	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

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**

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

PAID

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**

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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 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

PAID

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.

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**

PAID

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

**INVOICE 3294**

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

DUE DATE 06/23/2020

BILL TO

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

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

PAID

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
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

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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

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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**

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

PAID

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

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

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

Total: \$3,332.38

TOTAL DUE

\$0.00

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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

PAID

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

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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

PAID

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.

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

PAID

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**

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

PAID

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
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.

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 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

PAID

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

DATE	DESCRIPTION	HOURS	RATE	AMOUNT
06/27/2020	Client conference. Provided analysis support and assisted with expert report - Susan Wirtanen	0:48	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**

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

PAID

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

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
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

PAID

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

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

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 due is \$14,182.50. If you have any questions, please reach out to Adam Bortolotto at abotello@employstats.com.

PAID

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.

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

PAID

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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

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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.

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 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

PAID

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

DATE	DESCRIPTION	HOURS	RATE	AMOUNT
06/27/2020	Client conference. Provided analysis support and assisted with expert report - Susan Wirtanen	0:48	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

PAID

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

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 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

PAID

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**

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 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 Adela Botello at abotello@employstats.com.

PAID

Total: \$5,424.81

TOTAL DUE \$0.00

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Exhibit 4

Davis Research LLC
Customer QuickReport
All Transactions

Type	Date	Num	Account	Split	Amount
Allman & Petersen Economics, LLC					
19-0126 Sephora Survey					
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