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

14 COORDINATION
15 PROCEEDING SPECIAL TITLE
[RULE 3.550]

) Judicial Council Coordination Proceeding
No.: 4911

16 **SEPHORA WAGE AND HOUR**
17 **CASES**

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

18 Included actions:

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

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

) Date: April 6, 2022
Time: 2:00 a.m.
Dept: 613

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

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

24
25 I, John Matthew Norton, swear and affirm as true the following:

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

1 Hernandez s and Brenda Morales in the above-captioned matter. If called on,
2 I would and could testify truthfully and completely as to the following facts:

3 2. This Declaration is offered in support of Plaintiffs’ Motion for Motion for
4 Attorneys Fees and Service Award and as part of the Motion for Final
5 Approval of Settlement in the above-referenced case.

6 **Our Work in This Matter**

7 3. In about May of 2016, I initially spoke with Plaintiff, Lacey Hernandez
8 regarding her employment with Defendant, Sephora U.S.A. Subsequently, I
9 spoke with Plaintiff, Brenda Morales who further detailed her employment
10 with Defendant, Sephora U.S.A.

11 4. Thereafter, I investigated Ms. Hernandez’ and Ms. Morales’ employment
12 including claims of failure to pay wages as required under the California
13 **Labor Code.**

14 5. I was retained by both Ms. Hernandez and Ms. Morales in relation to their
15 employment by Sephora.

16 6. Following my initial investigation, I researched and analyzed the
17 applicability of the claims by Ms. Hernandez and Ms. Morales to the broad
18 category of current and former employees.

19 7. Subsequently, I requested that Sephora provide Ms. Hernandez and Ms.
20 Morales personnel and payroll records. After delivery, I reviewed
21 numerous documents provided by the Plaintiffs and by Sephora in analyzing
22 this matter.

23 8. I also interviewed the Plaintiffs close to their homes in Fresno so as to
24 develop the myriad theories of relief set forth in the Complaint.

25 9. Thereafter, I contacted co-counsel, Matthew Archobold (of Deason &
26 Archobold) to discuss the issues of wage and hour class action litigation
27 against Sephora.

28

1 10. I worked with co-counsel to develop the various theories, drafted and edited
2 pleadings and discovery. Following much research and analysis, I drafted
3 the Notice of Violation to the California Department of Labor Standards
4 Enforcement.

5 11. In the months leading up to the instant settlement, I have actively been
6 involved in all aspects of the litigation, including but not limited to the
7 following:

- 8 a. Investigating my clients' claims and evidence in support thereof;
- 9 b. Contact with the California Department of Labor Standards
10 Enforcement;
- 11 c. The development of the Complaint filed in this Court;
- 12 d. Drafting discovery to Defendant;
- 13 e. The responses to four separate sets of written discovery (including
14 interrogatories and requests for production) propounded by Sephora;
- 15 f. Representing my clients regarding and during their depositions;
- 16 g. Representing various Class Members when Sephora took their
17 depositions;
- 18 h. The retention and involvement of the experts used in this matter;
- 19 i. Drafting and then editing sections of the Plaintiffs' Motions for
20 Summary; Judgment/Summary Adjudication, as well as my clients'
21 declarations;
- 22 j. Attending the hearings in this matter, as well as the days-long
23 mediation which lead up to the instant resolution;
- 24 k. Attending settlement negotiations, including the mediation;
- 25 l. Reporting to and answering questions from my clients.

26 12. I reviewed the subsequent settlement with the clients, addressing their
27 various questions and concerns.
28

1 13. Regardless, my clients and I were prepared, ready and able to take this
2 matter to trial.

3 *Participation by Lacey Hernandez*

4 14. I first met with Ms. Hernandez in 2016. In this initial meeting, Ms.
5 Hernandez spent many hours over several days explaining her experience at
6 Sephora

7 15. After this initial meeting, Ms. Hernandez exchanged many, many emails
8 after reviewing her files for documents related to her employment.
9 Thereafter, she produced numerous documents, and then expended
10 considerable time explaining the documents and the inner workings of the
11 retailer. Ms. Hernandez also assisted in identifying potential witnesses who
12 had previously worked for Sephora.

13 16. Ms. Hernandez also strongly assisted in the discovery process. For instance,
14 Sephora uses its own terminology for the employment relationship (i.e.,
15 “Animations” to explain various makeup looks, and “backstage” to refer to
16 the back room of each store). Ms. Hernandez and Ms. Morales explained
17 these various terms, and how they were used in various Handbooks, as well
18 as how Sephora implemented the policies using these terms.

19 17. Ms. Hernandez drove to Los Angeles from her home outside of Fresno for
20 her deposition (about four-hour drive). She then spent considerable time
21 preparing for her deposition and of course, Ms. Hernandez sat for her
22 deposition, and then reviewed the transcript for errors.

23 18. In addition, Ms.Hernandez expended considerable time in reviewing
24 Sephora’s written discovery, assisting with the draft responses, reviewing
25 the responses, making further edits, and finally executing the verifications.

26 19. In addition, Ms. Hernandez was instrumental in assisting in the various
27 motions, including the outstanding Motions for Summary
28 Judgment/Summary Adjudication. This Court designated Ms. Hernandez a
Class Representative.

1 20. I believe that given Ms. Hernandez’ participation and the risks involved to
2 her career and pocketbook, I believe the application for \$20,000.00 service
3 award as Class Representative is warranted and reasonable.

4 **Participation by Brenda Morales**

5 21. Similarly, I was retained by Ms. Morales in 2016. We spoke many times
6 over the telephone. During these conversations, Ms. Morales spent
7 considerable time explaining her numerous years as both an hourly
8 employee and manager.

9 22. Ms. Morales spent considerable time explaining certain nuances of the
10 Sephora policies, as explained above as well as the use of paycards. It was
11 this insight into the actual operations that made Sephora easier to understand
12 and thus the litigation more effective.

13 23. Ms. Morales also sent and replied to numerous emails regarding the case.

14 24. Ms. Morales also strongly assisted in the discovery process. For instance,
15 Ms. Morales’ many years with Sephora put the various Handbooks into
16 perspective, which in turn allowed for better discovery and responses to
17 discovery.

18 25. In addition, Ms. Morales drove to Los Angeles from her home in the Central
19 Valley for her deposition (a three-to-four hour drive). She then spent
20 considerable time preparing for her deposition and of course, Ms. Morales
21 sat for her deposition, and then reviewed the transcript for errors.

22 26. In addition, Ms. Morales expended considerable time in reviewing
23 Sephora’s written discovery, preparing draft responses, reviewing the
24 responses, making further edits, and finally executing.

25 27. In addition, Ms. Morales was instrumental in assisting in the various
26 motions, including the outstanding Motions for Summary
27 Judgment/Summary Adjudication. This Court also designated Ms. Morales
28 a Class Representative.

1 28. Given Ms. Morales considerable participation and the risks (including to her
2 pocketbook) involved, I believe the application for \$20,000.00 service
3 award as Class Representative is warranted and reasonable.

4 **Qualifications**

5 29. The Court previously designated me as Class Counsel; however, we reiterate
6 our qualifications.

7 30. On June 6, 1992 I was licensed to practice by the California Bar Association.
8 In 2010, I was admitted to practice law by the State Bar of Arizona.

9 31. I have focused my practice on employment matters, including but not limited
10 to wage and hour issues.

11 32. In 1998, I formed my own practice, Matthew Norton & Associates. As a
12 sole practioner, I have litigated numerous matters in state and federal court.

13 33. I am a member of California Bar Association, Labor and Employment
14 Section since 2002.

15 34. To augment that focus, I have taken numerous classes in wage and hour and
16 employment issues, including but not limited to the following: The State Bar
17 of California’s Fourth Annual Advanced Wage and Hour Conference –
18 Wage and Hour Update; The State Bar of California’s Fourth Annual
19 Advanced Wage and Hour Conference – PAGA Perspectives; Litigating
20 Disability Discrimination Cases – Session Four: Trials and Settlement
21 Issues.

22 35. I have also been designated class counsel in the following cases: **Young v.**
23 **Nordstrom, Inc.** (Nordstrom Commission Cases), JCCP No. 4419; **Samora**
24 **v. Make It Work** OCSC Case No.: 30-2010-003379331-CU-OE-CXC;
25 **Gallardo v. KIPP Foundation**, U.S. District Court, Northern District of
26 California: Case No.: 4:12-cv-05017-YGR; **Hernandez and Morales v.**
27 **Sephora USA, Inc.** Case No.: 16-CV-05392-WHO (the federal companion
28 to this case), and of course, was designated class counsel in this matter.

1 **Billing – Attorneys Fees and Costs**

2 36. Attorneys at Matthew Norton and Associates record their time directly onto
3 a computer-generated billing spreadsheet. The time sheets show the activity
4 and time spent on that activity for each case. Time is recorded to the closest
5 tenth of an hour. The total amount of fees is determined by multiplying the
6 number of hours worked by the hourly rate.

7 37. Over the course of the current litigation, I billed \$650.00 per hour for
8 attorney services. In my experience, the rate is consistent with, or below,
9 rates for attorneys performing similar litigation in the State of California,
10 and in particular in Counties of San Francisco and Los Angeles.

11 38. From January of 2017 (for my clients’ state court Complaint) to February 4,
12 2022, I have billed 354.2 hours of attorney time on this matter which equals
13 \$230,230.00 in the prosecution of this action. This time and charges were
14 necessary and integral to that prosecution. A true and correct copy of our
15 redacted time records are attached hereto as Exhibit 1.

16 39. To date I have incurred costs totaling \$23,116.79, which represents the
17 retention of experts, travel costs (to Fresno, California to interview witnesses
18 and meet with clients, and to San Francisco for the hearings with the Court),
19 and deposition transcript costs. These costs were necessary and integral to
20 that prosecution. A true and correct copy of our redacted costs bill is
21 attached hereto as Exhibit 2.

22 I declare under penalty of perjury under the laws of the State of California
23 that the above is true and correct and was executed on February 16, 2022 at
24 Phoenix, Arizona.

25 
26 John M. Norton, Declarant

EXHIBIT 1

Matthew Norton & Associates, A
Professional Corporation

12839 S. Wakial Loop
Phoenix, Az 85044

Statement

Date

2/14/2022

Bill To

Sephora U.S.A., Inc.--
Hernandez v. Sephora USA, Inc.
(S.F.S.C. Case No. CGC-17-557031)

Date	Description	Qty	Rate	Amount	Balance
12/31/2016	Balance forward				0.00
01/26/2017	Review state court complaint pending dismissal of some federal claims	0.8	650.00	520.00	520.00
01/27/2017	Draft email regarding [REDACTED]	0.2	650.00	130.00	650.00
02/15/2017	Attend via Court Call CMC in related case	0.8	650.00	520.00	1,170.00
02/15/2017	Draft memo to file regarding hearing	0.3	650.00	195.00	1,365.00
02/15/2017	Research application for complex and joinder re Judicial Council	0.8	650.00	520.00	1,885.00
02/17/2017	Draft application to be designated as complex and joined with related case	1.4	650.00	910.00	2,795.00
02/21/2017	Finalize Application for Complex/Coordination	1.1	650.00	715.00	3,510.00
03/03/2017	Attend via Court Call Hearing on Petition	0.5	650.00	325.00	3,835.00
04/26/2017	Review Order designating case as complex etc.	0.4	650.00	260.00	4,095.00
04/26/2017	Draft email to co counsel re discovery and pleadings in other case	0.2	650.00	130.00	4,225.00
05/10/2017	Review RFP and Depo notice to clients	1.1	650.00	715.00	4,940.00
05/10/2017	Draft email to clients regarding [REDACTED]	0.3	650.00	195.00	5,135.00
05/24/2017	Review Sephora Propounded Discovery to Plaintiffs	2.2	650.00	1,430.00	6,565.00
05/27/2017	Teleconference with clients regarding [REDACTED]	0.8	650.00	520.00	7,085.00
05/31/2017	Travel to San Francisco for CMC	3.3	650.00	2,145.00	9,230.00
06/01/2017	Attend CMC	0.5	650.00	325.00	9,555.00
06/01/2017	Return to Long Beach following CMC	3.3	650.00	2,145.00	11,700.00
06/01/2017	Conference with c-counsel re status	0.7	650.00	455.00	12,155.00
06/02/2017	Draft confirmation regarding moving depo dates and locations to 12-13 and Los Angeles	0.3	650.00	195.00	12,350.00
06/05/2017	Review documents for production	1.1	650.00	715.00	13,065.00
06/06/2017	Draft confirmation regarding hotel in Los Angeles for [REDACTED]	0.3	650.00	195.00	13,260.00
06/06/2017	Draft confirmation to Morales regarding [REDACTED]	0.3	650.00	195.00	13,455.00
06/07/2017	Draft initial responses to RFP	0.9	650.00	585.00	14,040.00
06/10/2017	Prepare responses by clients to [REDACTED]	1.8	650.00	1,170.00	15,210.00
06/10/2017	Draft email to clients regarding [REDACTED]	0.2	650.00	130.00	15,340.00
06/11/2017	Plan and prepare with clients for deposition	3.2	650.00	2,080.00	17,420.00
06/11/2017	Teleconference with Morales regarding [REDACTED]	0.3	650.00	195.00	17,615.00

Date

2/14/2022

Bill To

Sephora U.S.A., Inc.--
Hernandez v. Sephora USA, Inc.
(S.F.S.C. Case No. CGC-17-557031)

Date	Description	Qty	Rate	Amount	Balance
06/11/2017	Teleconference with Hernandez regarding [REDACTED]	0.2	650.00	130.00	17,745.00
06/12/2017	Assemble Responses and documents with signatures by clients for production to Def	0.8	650.00	520.00	18,265.00
06/12/2017	Draft Notice of Production	0.7	650.00	455.00	18,720.00
06/12/2017	Travel to, appear and attend Deposition of Brenda Morales	10.3	650.00	6,695.00	25,415.00
06/13/2017	Travel to, appear and attend Deposition of Lacey Hernandez	11	650.00	7,150.00	32,565.00
06/25/2017	Review prior discovery provided by co-counsel (Martinez) including Form Roggs-General, Form Roggs-Employment and RFP plus RFA /Roggs/RFP to Sephora with Docs produced	5.6	650.00	3,640.00	36,205.00
07/19/2017	Draft emails to clients regarding [REDACTED]	0.5	650.00	325.00	36,530.00
09/05/2017	Attend CMC via Court Call	0.5	650.00	325.00	36,855.00
09/05/2017	Draft memo to file regarding hearing	0.2	650.00	130.00	36,985.00
09/15/2017	Draft email to clients regarding [REDACTED]	0.8	650.00	520.00	37,505.00
10/05/2017	Attend CMC via Court Call	0.3	650.00	195.00	37,700.00
10/05/2017	Draft memo to file regarding hearing	0.2	650.00	130.00	37,830.00
10/23/2017	Attend CMC via Court Call	0.5	650.00	325.00	38,155.00
10/23/2017	Draft Memo to file	0.2	650.00	130.00	38,285.00
01/04/2018	Review Sephora Second RFP to Clients	1.1	650.00	715.00	39,000.00
01/04/2018	Draft email to clients regarding [REDACTED]	0.3	650.00	195.00	39,195.00
01/06/2018	Teleconference with Hernandez re [REDACTED]	1.7	650.00	1,105.00	40,300.00
01/11/2018	Teleconference with Brenda Morales re: [REDACTED]	0.8	650.00	520.00	40,820.00
01/26/2018	Attend CMC via court call	1.1	650.00	715.00	41,535.00
01/26/2018	Draft memo to file regarding hearing	0.2	650.00	130.00	41,665.00
02/06/2018	Review third set of discovery	2.2	650.00	1,430.00	43,095.00
02/06/2018	Draft email to client regarding [REDACTED]	0.2	650.00	130.00	43,225.00
02/07/2018	Review thrid set of discovery from defendant to clients	1.8	650.00	1,170.00	44,395.00
02/07/2018	Draft email to clients regarding [REDACTED]	0.8	650.00	520.00	44,915.00
02/26/2018	Teleconference with Hernandez regarding [REDACTED]	0.6	650.00	390.00	45,305.00

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2/14/2022

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Sephora U.S.A., Inc.--
Hernandez v. Sephora USA, Inc.
(S.F.S.C. Case No. CGC-17-557031)

Date	Description	Qty	Rate	Amount	Balance
02/28/2018	Teleconference with Brenda Morales re [REDACTED]	0.7	650.00	455.00	45,760.00
03/03/2018	Draft responses to second and third set of discovery from Sephora	4.3	650.00	2,795.00	48,555.00
03/05/2018	Edit discovery responses	0.9	650.00	585.00	49,140.00
03/05/2018	Draft email [REDACTED] to clients	0.2	650.00	130.00	49,270.00
03/08/2018	Attend Motion to Compel via Court Call	0.5	650.00	325.00	49,595.00
03/08/2018	Draft memo to file regarding Motion to Compel	0.3	650.00	195.00	49,790.00
03/08/2018	Review correspondence from clients re: [REDACTED]	0.3	650.00	195.00	49,985.00
04/03/2018	Draft outline of declarations for cert motions	1.4	650.00	910.00	50,895.00
04/03/2018	Draft declarations for cert motions	2.7	650.00	1,755.00	52,650.00
04/04/2018	Teleconference with clients regarding [REDACTED]	0.4	650.00	260.00	52,910.00
04/08/2018	Edit declarations	1.4	650.00	910.00	53,820.00
04/08/2018	Draft email with declarations	0.2	650.00	130.00	53,950.00
04/08/2018	Review [REDACTED] from clients regarding [REDACTED]	0.4	650.00	260.00	54,210.00
04/08/2018	Teleconference with clients regarding [REDACTED]	0.6	650.00	390.00	54,600.00
04/08/2018	Finalize client declarations re Cert Motions	1.4	650.00	910.00	55,510.00
04/09/2018	Assemble cert motion declarations with signatures	0.7	650.00	455.00	55,965.00
04/09/2018	Draft email to B Morales re [REDACTED]	0.3	650.00	195.00	56,160.00
05/01/2018	Review deposition notices and arrange for appearance downtown LA on Monday	0.2	650.00	130.00	56,290.00
05/04/2018	Issue check to CPT	0.3	650.00	195.00	56,485.00
07/09/2018	Review and prepare for Cert Motion Hearing	1.6	650.00	1,040.00	57,525.00
07/09/2018	Travel to San Francisco for Cert Motion Hearing	3.3	650.00	2,145.00	59,670.00
07/10/2018	Conference with other counsel prior to hearing	1.1	650.00	715.00	60,385.00
07/10/2018	Attend Cert Motion Hearing	1.4	650.00	910.00	61,295.00
07/10/2018	Post-hearing conference with other counsel re further submissions	0.5	650.00	325.00	61,620.00
07/10/2018	Travel from San Francisco	4.1	650.00	2,665.00	64,285.00
07/28/2018	Review draft supplemental brief and note changes	1.5	650.00	975.00	65,260.00
07/30/2018	Draft list of changes to supplemental brief	0.4	650.00	260.00	65,520.00

Date

2/14/2022

Bill To

Sephora U.S.A., Inc.--
Hernandez v. Sephora USA, Inc.
(S.F.S.C. Case No. CGC-17-557031)

Date	Description	Qty	Rate	Amount	Balance
08/03/2018	Draft emails with former employee regarding [REDACTED]	0.7	650.00	455.00	65,975.00
09/26/2018	Travel to Second Hearing in San Francisco	4.8	650.00	3,120.00	69,095.00
09/26/2018	Plan and Prepare for Second Hearing on Cert	3.8	650.00	2,470.00	71,565.00
09/26/2018	Attend second hearing on Cert	1.8	650.00	1,170.00	72,735.00
10/23/2018	Draft report to clients on [REDACTED]	0.4	650.00	260.00	72,995.00
10/31/2018	Review and edit proposed order	0.7	650.00	455.00	73,450.00
11/01/2018	Review revised order in preparation for conference call	0.2	650.00	130.00	73,580.00
11/01/2018	Teleconference with opposing counsel regarding proposed order	0.7	650.00	455.00	74,035.00
11/13/2018	Attend via court call cmc	0.7	650.00	455.00	74,490.00
11/13/2018	Draft memo to file regarding hearing	0.2	650.00	130.00	74,620.00
11/21/2018	Attend via court call CMC	0.4	650.00	260.00	74,880.00
11/21/2018	Draft memo to file regarding hearing	0.2	650.00	130.00	75,010.00
02/15/2019	Review email from CPT re notice and reply card	0.2	650.00	130.00	75,140.00
02/15/2019	Review email from OPC re notice and reply card	0.3	650.00	195.00	75,335.00
02/18/2019	Review email from CPT and co-counsel re notice and reply card and address	0.5	650.00	325.00	75,660.00
02/19/2019	Review email from OPC to CPT re notice and reply card postage	0.3	650.00	195.00	75,855.00
02/19/2019	Review order and email from co-counsel on prepaid postage and notice and reply card order	0.6	650.00	390.00	76,245.00
02/20/2019	Review email from OPC to CPT re notice and reply card prepaid postage	0.3	650.00	195.00	76,440.00
02/22/2019	Review CMC statement and edits including email string from co-counsel and OPC	1.1	650.00	715.00	77,155.00
02/26/2019	Review edits offered by co-counsel and sign	0.4	650.00	260.00	77,415.00
02/27/2019	Review email from CPT re notice and reply card mailing date and calendar	0.3	650.00	195.00	77,610.00
03/01/2019	Review email from co-counsel regarding client consent to co-counsel agreement	0.3	650.00	195.00	77,805.00
03/01/2019	Draft email to clients regarding [REDACTED]	0.3	650.00	195.00	78,000.00
03/04/2019	Review Co-counsel agreement and signatures by clients	0.4	650.00	260.00	78,260.00
03/04/2019	Review email from OPC re mailing notice and reply card	0.2	650.00	130.00	78,390.00

Matthew Norton & Associates, A
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Statement

Date

2/14/2022

Bill To

Sephora U.S.A., Inc.--
Hernandez v. Sephora USA, Inc.
(S.F.S.C. Case No. CGC-17-557031)

Date	Description	Qty	Rate	Amount	Balance
03/06/2019	Review email from CPT re notice and reply card actual mailing	0.2	650.00	130.00	78,520.00
03/07/2019	Review email from OPC re Geoola case and petition to coordinate	0.4	650.00	260.00	78,780.00
03/07/2019	Review and analyze CMO for 2/2019 CMC	0.7	650.00	455.00	79,235.00
03/07/2019	Review proposed order setting hearing date for petition to coordinate Geoola case	0.5	650.00	325.00	79,560.00
03/08/2019	Review CMO, sign and return to OPC	0.2	650.00	130.00	79,690.00
04/03/2019	Review email from CM regarding current address;	0.3	650.00	195.00	79,885.00
04/03/2019	Draft email to CPT re CM chagne of address	0.3	650.00	195.00	80,080.00
04/05/2019	Review CPT weekly report	0.6	650.00	390.00	80,470.00
04/11/2019	Review email regarding deceased CM [REDACTED]	0.7	650.00	455.00	80,925.00
04/26/2019	Review CPT report	0.4	650.00	260.00	81,185.00
05/09/2019	Review email string regarding Allman survey	0.6	650.00	390.00	81,575.00
05/15/2019	Review proposed discovery to OPC	0.9	650.00	585.00	82,160.00
05/15/2019	Draft email regarding additional form roggs	0.4	650.00	260.00	82,420.00
05/16/2019	Review email from co-counsel regarding liason with KA	0.2	650.00	130.00	82,550.00
05/16/2019	Draft email to KA	0.1	650.00	65.00	82,615.00
05/20/2019	Review email string on CMC statement teleconference	0.2	650.00	130.00	82,745.00
05/22/2019	Review corrected and amended CMC statement	0.4	650.00	260.00	83,005.00
06/08/2019	Analyze four co-plaintiff PAGA letters in comparison to issues by Defendant	2.9	650.00	1,885.00	84,890.00
06/10/2019	Review email on issues with PAGA claims	0.2	650.00	130.00	85,020.00
06/11/2019	Review Trial Plan and discovery plan to determine whether PAGA claims adequately addressed	0.8	650.00	520.00	85,540.00
06/12/2019	Attend via court call Case Management Conference	0.8	650.00	520.00	86,060.00
06/12/2019	Draft email to co counsel regarding Discovery Plan	0.5	650.00	325.00	86,385.00
06/12/2019	Draft list of elements for violation of 212	0.7	650.00	455.00	86,840.00
06/19/2019	Review CSO re issues on PAGA discovery	0.6	650.00	390.00	87,230.00
06/19/2019	Draft proposed language to CMO	0.4	650.00	260.00	87,490.00
06/19/2019	Teleconference with K. Allen re CMO	0.1	650.00	65.00	87,555.00
06/20/2019	Review K. Allen's markup of CMO and sign	0.4	650.00	260.00	87,815.00

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Bill To

Sephora U.S.A., Inc.--
Hernandez v. Sephora USA, Inc.
(S.F.S.C. Case No. CGC-17-557031)

Date	Description	Qty	Rate	Amount	Balance
06/26/2019	Review discovery provided by co-counsel (Martinez)	1.8	650.00	1,170.00	88,985.00
06/26/2019	Review documents previously produced to co-counsel (Martinez)	2.2	650.00	1,430.00	90,415.00
06/26/2019	Review proposed CMO and sign	0.4	650.00	260.00	90,675.00
06/29/2019	Review Sephora Handbook editions (4) for changes	1.3	650.00	845.00	91,520.00
07/10/2019	Review email from co-counsel on availability for mediation of clients	0.1	650.00	65.00	91,585.00
07/27/2019	Review Sephora Handbook editions (4) for changes	1.2	650.00	780.00	92,365.00
07/27/2019	Review Sephora Handbook editions (4) for changes	0.9	650.00	585.00	92,950.00
07/29/2019	Draft memo re differences in Sephora Handbook	1.3	650.00	845.00	93,795.00
09/12/2019	Review proposed class discovery	1.1	650.00	715.00	94,510.00
09/17/2019	Review list of violations for PAGA portion of case as well as the proposed discovery on each	0.8	650.00	520.00	95,030.00
09/17/2019	Draft email to co-counsel regarding proposed discovery	0.3	650.00	195.00	95,225.00
09/18/2019	Review expert damages agreement	0.2	650.00	130.00	95,355.00
09/18/2019	Review 9-25 CMC statement	0.3	650.00	195.00	95,550.00
09/18/2019	Review email from co-counsel regarding contribution and issue check	0.3	650.00	195.00	95,745.00
09/20/2019	Review estimate of costs for damages expert	0.4	650.00	260.00	96,005.00
09/20/2019	Draft email to co-counsel re damages expert	0.3	650.00	195.00	96,200.00
09/20/2019	Teleconference regarding execution of JCMS	0.1	650.00	65.00	96,265.00
09/20/2019	Review email from co-counsel confirming execution	0.1	650.00	65.00	96,330.00
09/20/2019	Review email from co-counsel regarding costs of survey including calculation of costs	0.4	650.00	260.00	96,590.00
09/23/2019	Teleconference with co-counsel regarding costs and request for direct conversation with expert	0.3	650.00	195.00	96,785.00
09/25/2019	Attend (David Oken) via Court Call	0.8	650.00	520.00	97,305.00
09/25/2019	Draft memo to file regarding hearing	0.2	650.00	130.00	97,435.00
09/27/2019	Review draft stipulation regarding briefing schedule for dispositive motions	0.4	650.00	260.00	97,695.00
10/07/2019	Draft list using Exhibit A with Paga Letters listing LC violations	1.9	650.00	1,235.00	98,930.00

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Sephora U.S.A., Inc.--
Hernandez v. Sephora USA, Inc.
(S.F.S.C. Case No. CGC-17-557031)

Date	Description	Qty	Rate	Amount	Balance
10/07/2019	Teleconference with opposing counsel regarding PAGA claims	0.3	650.00	195.00	99,125.00
10/07/2019	Teleconference with co-counsel regarding Defendant's list of issues	0.4	650.00	260.00	99,385.00
10/07/2019	Review email re Paga and issues regarding penalties	0.8	650.00	520.00	99,905.00
10/08/2019	Review email re costs from Kevin Allen and issue check	0.4	650.00	260.00	100,165.00
10/18/2019	Review email regarding Def request to dismiss certain PAGA claims for failure to exhaust and review Plaintiffs notice of violation (4) and notes from teleconference	0.7	650.00	455.00	100,620.00
10/23/2019	Review meet and confer with Sephora regarding dismissal of certain PAGA claims	0.4	650.00	260.00	100,880.00
10/29/2019	Review co-counsel email regarding failure to exhaust and dismissal of certain PAGA claims in relation to 4 Paga notice letters	0.5	650.00	325.00	101,205.00
10/30/2019	Review co-counsel email regarding current costs of survey expert	0.3	650.00	195.00	101,400.00
10/31/2019	Review email exchange regarding costs of survey expert	0.3	650.00	195.00	101,595.00
11/06/2019	Review co-counselemail regarding trial strategy, bench trial, jury trial etc.	0.2	650.00	130.00	101,725.00
11/06/2019	Draft email to co-counsel regarding teleconference and issues of trial	0.3	650.00	195.00	101,920.00
11/06/2019	Teleconference with co-counsel regarding trial issues	0.4	650.00	260.00	102,180.00
11/06/2019	Review revised Joint CMC Statement in conjunction with Trial Plan	0.2	650.00	130.00	102,310.00
11/06/2019	Revised suggestion regarding removal of section V.C.	0.4	650.00	260.00	102,570.00
11/07/2019	Review email and proposed survey	0.8	650.00	520.00	103,090.00
11/07/2019	Review proposed Joint CMC Statement and execute	0.7	650.00	455.00	103,545.00
11/13/2019	Review co-counsel email re survey and respond	0.3	650.00	195.00	103,740.00
11/13/2019	Review co-counsel with CM depos and proposed dates in conjunction with actual notices	0.7	650.00	455.00	104,195.00
11/13/2019	Review email string regarding right/duty to defend CM depos and strategy	0.2	650.00	130.00	104,325.00

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Date	Description	Qty	Rate	Amount	Balance
11/14/2019	Review email string regarding teleconference with expert	0.3	650.00	195.00	104,520.00
11/20/2019	Review Sephora noticed depositions	0.6	650.00	390.00	104,910.00
11/20/2019	Review email with experts re assignments	0.2	650.00	130.00	105,040.00
11/20/2019	Draft email re survey expert costs a(Davis Group)	0.4	650.00	260.00	105,300.00
11/22/2019	Review coverage for CM depos	0.3	650.00	195.00	105,495.00
11/25/2019	Draft email regarding CM [REDACTED]	0.4	650.00	260.00	105,755.00
11/26/2019	Teleconference with co-counsel regarding CM depos and coverage for San Diego and Irvine	0.6	650.00	390.00	106,145.00
11/26/2019	Draft email regarding our coverage of CM depo	0.4	650.00	260.00	106,405.00
12/02/2019	Review Statistical Expert Agreement and Execute	0.4	650.00	260.00	106,665.00
12/02/2019	Draft email regarding coverage of Fresno CM depos	0.3	650.00	195.00	106,860.00
12/02/2019	Draft email regarding payment of expert costs	0.2	650.00	130.00	106,990.00
12/02/2019	Draft email regarding teleconference on issues of CM depos	0.5	650.00	325.00	107,315.00
12/02/2019	Review order assigning Judge Cheng to case	0.3	650.00	195.00	107,510.00
12/03/2019	Review invoice for Davis Research	0.2	650.00	130.00	107,640.00
12/03/2019	Issue check to Davis Research (expert)	0.1	650.00	65.00	107,705.00
12/05/2019	Review deposition notices, create list of dates and possible coverage along with issues concerning such	1.4	650.00	910.00	108,615.00
12/05/2019	Research locations of Class Member depositions for appearances	0.8	650.00	520.00	109,135.00
12/06/2019	Draft email regarding teleconference on depo issues	0.3	650.00	195.00	109,330.00
12/06/2019	Teleconference with co-counsel regarding coverage for CM depos	0.6	650.00	390.00	109,720.00
12/07/2019	Draft meet and confer regarding CM depos, rescheduling and difficulties establishing contact	0.8	650.00	520.00	110,240.00
12/09/2019	Review email from KA regarding Sephora download	0.1	650.00	65.00	110,305.00
12/09/2019	Review Sephora download	0.8	650.00	520.00	110,825.00
12/11/2019	Draft email to co-counsel regarding teleconference on coordination with Sephora	0.3	650.00	195.00	111,020.00
12/11/2019	Review email and forwarded expert text on surveys	0.3	650.00	195.00	111,215.00

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Bill To

Sephora U.S.A., Inc.--
Hernandez v. Sephora USA, Inc.
(S.F.S.C. Case No. CGC-17-557031)

Date	Description	Qty	Rate	Amount	Balance
12/12/2019	Review OPC email with CM Deposition list and renew attempt to contact deponent	0.8	650.00	520.00	111,735.00
12/13/2019	Teleconference with co-counsel regarding discovery issues and assignments	0.7	650.00	455.00	112,190.00
12/13/2019	Teleconference with Class Member regarding [REDACTED]	0.2	650.00	130.00	112,320.00
12/13/2019	Draft letter to Class Members [REDACTED]	0.2	650.00	130.00	112,450.00
12/13/2019	Review withdrawn discovery for discovery that we may wish to serve	1.1	650.00	715.00	113,165.00
12/13/2019	Review current responses from OPC regarding RFPs served in October.	1.8	650.00	1,170.00	114,335.00
12/13/2019	Review report on teleconference with survey expert and results	0.8	650.00	520.00	114,855.00
12/13/2019	Review Def responses to RFP set 1 (sic)	0.9	650.00	585.00	115,440.00
12/13/2019	Review instructions to review most recent responses in dropbox	0.2	650.00	130.00	115,570.00
12/16/2019	Review OPC email regarding CM depo locations	0.4	650.00	260.00	115,830.00
12/16/2019	Draft email regarding follow up discovery	0.3	650.00	195.00	116,025.00
12/17/2019	Review email regarding teleconference on CM depo coordination	0.2	650.00	130.00	116,155.00
12/17/2019	Draft email to co-counsel regarding teleconference and call in number	0.3	650.00	195.00	116,350.00
12/17/2019	Review calendar invitation for teleconference	0.2	650.00	130.00	116,480.00
12/17/2019	Teleconference on various issues including allegations in certain notice letters	0.5	650.00	325.00	116,805.00
12/17/2019	Draft follow up email with paycard issues and particular language from PAGA notice	0.6	650.00	390.00	117,195.00
12/17/2019	Review co-counsel notices regarding strategy and assignments	0.7	650.00	455.00	117,650.00
12/18/2019	Review email and survey (again) with notes to co-counsel	0.7	650.00	455.00	118,105.00
12/19/2019	Teleconference with CM regarding [REDACTED]	0.2	650.00	130.00	118,235.00
12/19/2019	Draft email to OPC regarding moving depo date to January 13	0.3	650.00	195.00	118,430.00
12/19/2019	Review co-counsel meet and confer letter to OPC and note no changes	0.3	650.00	195.00	118,625.00

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(S.F.S.C. Case No. CGC-17-557031)

Date	Description	Qty	Rate	Amount	Balance
12/26/2019	Review email and zip file from OPC with discovery	0.8	650.00	520.00	119,145.00
12/26/2019	Draft request for extension of time to respond to discovery based on our office closure	0.3	650.00	195.00	119,340.00
12/26/2019	Review expert email and spreadsheet regarding employees missing	0.7	650.00	455.00	119,795.00
12/30/2019	Review email from OPC regarding where missing employee info may be found	0.4	650.00	260.00	120,055.00
12/30/2019	Review email from OPC re new date for Jemma Potter depo	0.3	650.00	195.00	120,250.00
01/02/2020	Review emails regarding scheduling of emails including Amended Deposition Notice for Jemma Potter	0.3	650.00	195.00	120,445.00
01/03/2020	Review email and Rossman voicemail re availability	0.3	650.00	195.00	120,640.00
01/06/2020	Review email string from OPC and co-counsel regarding extension of dates and CMC on subject	0.3	650.00	195.00	120,835.00
01/06/2020	Draft email on extension and request for word versions of discovery	0.2	650.00	130.00	120,965.00
01/07/2020	Review co-counsel's notes on CM depo he defended; Draft list of areas for defense of CM depos	0.7	650.00	455.00	121,420.00
01/08/2020	Analyze co-counsel notes on survey expert issues with certain survey questions	0.4	650.00	260.00	121,680.00
01/08/2020	Review list of CM depos in comparison to schedule for CM depos I can cover	0.9	650.00	585.00	122,265.00
01/09/2020	Draft email request for teleconference on coverage for the CM depos	0.1	650.00	65.00	122,330.00
01/15/2020	Draft email regarding conference call on coverage of CM depos	0.1	650.00	65.00	122,395.00
01/15/2020	Tele Conference with co-counsel regarding discovery coordination	0.6	650.00	390.00	122,785.00
01/20/2020	Teleconference with Class Member re [REDACTED]	1.4	650.00	910.00	123,695.00
01/20/2020	Teleconference with Class Member re [REDACTED]	0.4	650.00	260.00	123,955.00
01/20/2020	Draft contact with Class Member re [REDACTED]	0.2	650.00	130.00	124,085.00

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Date	Description	Qty	Rate	Amount	Balance
01/21/2020	Attend deposition of Class Member re reprerentation	4.8	650.00	3,120.00	127,205.00
01/22/2020	Review emails regarding CMC	0.2	650.00	130.00	127,335.00
01/22/2020	Draft email to cocounsel regarding Friday depo	0.1	650.00	65.00	127,400.00
01/22/2020	Draft email to OPC regarding Friday depo	0.1	650.00	65.00	127,465.00
01/23/2020	Draft email introduction and review emails from Shroff re employment and representation	0.9	650.00	585.00	128,050.00
01/24/2020	Attend deposition of Carla Beckwith	1.8	650.00	1,170.00	129,220.00
01/28/2020	Attend J. Escobar deposition, with witness as no show.	0.9	650.00	585.00	129,805.00
01/29/2020	Review Jeanette Shroff [REDACTED]	1.1	650.00	715.00	130,520.00
01/29/2020	Attend deposition of Schoff depo	3.1	650.00	2,015.00	132,535.00
01/31/2020	Draft outline of PMK notice	1.1	650.00	715.00	133,250.00
01/31/2020	Draft outline of discovery responses dealing with pay cards	1.7	650.00	1,105.00	134,355.00
01/31/2020	Research evidence for discovery responses dealing with pay cards	2.1	650.00	1,365.00	135,720.00
01/31/2020	Analyze Sephora disovery regarding various PAGA issues and separate pay card issues.	0.9	650.00	585.00	136,305.00
01/31/2020	Review Davis Research Invoice	0.2	650.00	130.00	136,435.00
01/31/2020	Draft check to Davis Research (expert0	0.1	650.00	65.00	136,500.00
02/04/2020	Review co-counsel's responses to discovery for verifications by Hernandez and Morales	1.5	650.00	975.00	137,475.00
02/04/2020	Draft six sets of verifications for the various discovery drafted by co-counsel	0.8	650.00	520.00	137,995.00
02/04/2020	Draft final response to request for production for pay card subclass	1.3	650.00	845.00	138,840.00
02/04/2020	Draft email to clients regarding [REDACTED]	0.2	650.00	130.00	138,970.00
02/04/2020	Draft email to clients regarding [REDACTED]	0.3	650.00	195.00	139,165.00
02/04/2020	Draft email to clients regarding [REDACTED]	0.5	650.00	325.00	139,490.00
02/10/2020	Review discovery responses to Supplemental Interrogatories and RFP	0.8	650.00	520.00	140,010.00
02/10/2020	Draft email to clients regarding [REDACTED]	0.3	650.00	195.00	140,205.00
02/13/2020	Finalize discovery responses for Hernandez	0.7	650.00	455.00	140,660.00

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Date	Description	Qty	Rate	Amount	Balance
02/13/2020	Finalize discovery responses for Morales	0.9	650.00	585.00	141,245.00
02/17/2020	Review KA responses for Roggs on Security Class	0.4	650.00	260.00	141,505.00
02/17/2020	Draft email to clients regarding [REDACTED]	0.2	650.00	130.00	141,635.00
02/26/2020	Plan and prepare for Sephora PMK	4.9	650.00	3,185.00	144,820.00
03/05/2020	Plan and Prepare for hearing with co-counsel regarding discovery	1.8	650.00	1,170.00	145,990.00
03/05/2020	Teleconference with co-counsel regarding omnibus reply to meet and confer	0.8	650.00	520.00	146,510.00
03/05/2020	Draft email to co-counsel with our responses	0.5	650.00	325.00	146,835.00
05/21/2020	Review report on latest offer by Sephora	1.1	650.00	715.00	147,550.00
07/20/2020	Review Employee Stats invoice	0.2	650.00	130.00	147,680.00
07/20/2020	Issue check to Employee Stats (expert)	0.1	650.00	65.00	147,745.00
07/22/2020	Edit Plaintiffs msj for changes	3.2	650.00	2,080.00	149,825.00
07/22/2020	Draft list of possible damages set forth by expert	2.5	650.00	1,625.00	151,450.00
07/22/2020	Draft list of possible civil penalties under paga with estimate of penalties by expert	1.8	650.00	1,170.00	152,620.00
07/22/2020	Teleconference with co-counsel regarding preparation for trial	1.1	650.00	715.00	153,335.00
07/24/2020	Review Stipulation draft from OPC	0.4	650.00	260.00	153,595.00
07/24/2020	Review comments from Duran to stipulation	0.2	650.00	130.00	153,725.00
07/24/2020	Teleconference with Duran counsel regarding productions	0.3	650.00	195.00	153,920.00
07/24/2020	Plan and prepare discovery for upload to repository	1.4	650.00	910.00	154,830.00
07/24/2020	Teleconference with Duran paralegal regarding use of repository	0.2	650.00	130.00	154,960.00
07/25/2020	Analyze prior suits PAGA claims in contrast to current claims for potential argument re: repeated/intentional nature of violations	1.7	650.00	1,105.00	156,065.00
07/29/2020	Review Notice of Depo	0.4	650.00	260.00	156,325.00
07/29/2020	Draft email regarding original pmk	0.7	650.00	455.00	156,780.00
07/29/2020	Review original pmk depo for areas covered	1.8	650.00	1,170.00	157,950.00
07/29/2020	Draft email to co-counsel regarding documents to be provided	0.2	650.00	130.00	158,080.00
07/29/2020	Review email string regarding areas to be covered	0.8	650.00	520.00	158,600.00

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07/29/2020	Draft email regarding court conference on production	0.2	650.00	130.00	158,730.00
07/29/2020	Draft outline of pmk, and compare with amended notice categories	1.9	650.00	1,235.00	159,965.00
07/30/2020	Review first pmk depo on issues of procedure	1.8	650.00	1,170.00	161,135.00
07/30/2020	Review documents produced for paycard material and exemplars	2.1	650.00	1,365.00	162,500.00
07/30/2020	Plan and prepare for deposition by assembling possible exhibits of paycard materials, placing them in order and arranging for scanning	3.1	650.00	2,015.00	164,515.00
07/30/2020	Teleconference with co-counsel regarding what they want for deposition	0.8	650.00	520.00	165,035.00
07/30/2020	Teleconference with co-counsel	0.8	650.00	520.00	165,555.00
07/31/2020	Plan and Prepare for pmk depo	1.1	650.00	715.00	166,270.00
07/31/2020	Attend pmk depo	2.8	650.00	1,820.00	168,090.00
07/31/2020	Draft report on pmk depo	0.9	650.00	585.00	168,675.00
08/01/2020	Research documents produced under various cases	0.8	650.00	520.00	169,195.00
08/03/2020	Teleconference with co-counsel regarding msa and assignments	1	650.00	650.00	169,845.00
08/03/2020	Review latest edits by Satereh law firm	0.8	650.00	520.00	170,365.00
08/03/2020	Draft basic pleading for separate statement	1.8	650.00	1,170.00	171,535.00
08/03/2020	Draft edit to MSA as separate document	0.7	650.00	455.00	171,990.00
08/03/2020	Teleconference with co-counsel regarding experience with sephora settlement discussions	1.1	650.00	715.00	172,705.00
08/05/2020	Edit MPA	1.8	650.00	1,170.00	173,875.00
08/05/2020	Review Compendium of Evidence	0.3	650.00	195.00	174,070.00
08/05/2020	Teleconference with the Court regarding July 21 Order and time for hearing on dispositive orders	0.2	650.00	130.00	174,200.00
08/05/2020	Review Pohlman depo for key testimony	0.9	650.00	585.00	174,785.00
08/06/2020	Edit section of MPA re payroll cards instructions.	1.9	650.00	1,235.00	176,020.00
08/06/2020	Teleconference with co-counsel regarding drafts of MSJ docs	0.7	650.00	455.00	176,475.00
08/06/2020	Edit argument regarding use of DLSE opinion letter	2.8	650.00	1,820.00	178,295.00
08/06/2020	Edit argument to add citations to final	1.1	650.00	715.00	179,010.00
08/06/2020	Draft argument regarding underlying requests for DLSE opinion letter and paucity of facts	1.5	650.00	975.00	179,985.00

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Date	Description	Qty	Rate	Amount	Balance
08/07/2020	Plan and Prepare for FILING of MSA and related documents	6.3	650.00	4,095.00	184,080.00
08/07/2020	Edit MSA	1.8	650.00	1,170.00	185,250.00
08/07/2020	Edit Separate Statement	0.9	650.00	585.00	185,835.00
08/07/2020	Finalize MSA, MPA, Separate Statement	3.9	650.00	2,535.00	188,370.00
09/15/2020	Draft email to clients regarding ██████████ n	0.9	650.00	585.00	188,955.00
09/15/2020	Review ██████████	0.2	650.00	130.00	189,085.00
09/15/2020	Issue check to David Rotman (mediator)	0.1	650.00	65.00	189,150.00
09/23/2020	Review mediation agreement confidentiality provision	0.5	650.00	325.00	189,475.00
09/23/2020	Draft email to clients regarding ██████████	0.2	650.00	130.00	189,605.00
10/28/2020	Draft outline for inserts in to Mediation Brief on pay roll cards	2.6	650.00	1,690.00	191,295.00
11/09/2020	Draft reminder email to clients ██████████	0.3	650.00	195.00	191,490.00
11/11/2020	Attend mediation Zoom	10.3	650.00	6,695.00	198,185.00
11/13/2020	Review email string regarding exchanges following mediation	0.3	650.00	195.00	198,380.00
11/16/2020	Draft check for EmployeeStats premediation work	0.2	650.00	130.00	198,510.00
11/19/2020	Review report from KA re conversation with OPC re settlement discussions	0.3	650.00	195.00	198,705.00
12/11/2020	Review KA report on call with mediator re half day session	0.2	650.00	130.00	198,835.00
12/18/2020	Report from KA re settlement negotiations	0.3	650.00	195.00	199,030.00
01/04/2021	Review KA report on mediator's conversation	0.2	650.00	130.00	199,160.00
01/04/2021	Draft email regarding mediator suggestion re firm offer from Defendant	0.3	650.00	195.00	199,355.00
01/05/2021	Review Mediator's Proposal	0.2	650.00	130.00	199,485.00
01/05/2021	Draft reply to Mediator's Proposal	0.1	650.00	65.00	199,550.00
01/07/2021	Review stipulation to continue dates	0.3	650.00	195.00	199,745.00
01/07/2021	Draft email and sign stipulation	0.1	650.00	65.00	199,810.00
01/07/2021	Draft KA signature on authorization	0.2	650.00	130.00	199,940.00
01/07/2021	Assemble stipulation signatures and forward to OPC	0.4	650.00	260.00	200,200.00
01/08/2021	Review email with request for further extension	0.3	650.00	195.00	200,395.00
01/11/2021	Draft sign the new stip for additional time	0.2	650.00	130.00	200,525.00

Matthew Norton & Associates, A
Professional Corporation

12839 S. Wakial Loop
Phoenix, Az 85044

Statement

Date

2/14/2022

Bill To

Sephora U.S.A., Inc.--
Hernandez v. Sephora USA, Inc.
(S.F.S.C. Case No. CGC-17-557031)

Date	Description	Qty	Rate	Amount	Balance
01/11/2021	Review OPC email on filing of stip and proposed order	0.1	650.00	65.00	200,590.00
01/14/2021	Review email from department clerk and calendar new dates	0.2	650.00	130.00	200,720.00
01/14/2021	Review 2nd email from clerk re vacate CMC	0.1	650.00	65.00	200,785.00
01/20/2021	Review clerk's email regarding new CMC and appearance via CourtCall	0.2	650.00	130.00	200,915.00
02/02/2021	Research use of ATM's by day laborors and DLSE opinion letter on practice	0.4	650.00	260.00	201,175.00
02/04/2021	Review mediator's report	0.2	650.00	130.00	201,305.00
02/08/2021	Review report from mediator	0.2	650.00	130.00	201,435.00
02/08/2021	Review KA report re OPC	0.2	650.00	130.00	201,565.00
02/11/2021	Review latest report on movement from Defendant	0.2	650.00	130.00	201,695.00
02/15/2021	Draft email to co-counsel regarding oppositions	0.3	650.00	195.00	201,890.00
02/17/2021	Review report on latest actions by Defendant	0.2	650.00	130.00	202,020.00
02/18/2021	Review report on Defendant actions and offer to extend oppositions	0.2	650.00	130.00	202,150.00
02/19/2021	Review report on mediator, defendant and stipulation for additional 30 days for opposition and add to trial date	0.4	650.00	260.00	202,410.00
02/22/2021	Draft signature to new stip for 30 day extension to opposition due dates and five-year sol	0.2	650.00	130.00	202,540.00
02/24/2021	Review email to Dept Clerk regarding Stip and approaching opposition deadlines	0.2	650.00	130.00	202,670.00
02/25/2021	Reeview signed Order regarding oppositions but with new date of May 27, and then calendar	0.3	650.00	195.00	202,865.00
03/03/2021	Review voice mail message that mediator was ill	0.2	650.00	130.00	202,995.00
03/17/2021	Review report that parties are stipulating to move oppositions out an additional 30 days	0.1	650.00	65.00	203,060.00
03/17/2021	Review stip for new oppositions, new trial date in August and execute and calendar	0.3	650.00	195.00	203,255.00
03/26/2021	Review report on issues with filing and noting agreement by OPC not to file oppositions pending filing	0.1	650.00	65.00	203,320.00
03/29/2021	Review report on mediator's medical condition	0.1	650.00	65.00	203,385.00
04/01/2021	Review report from co-counsel on conversation with OPC re moves while mediator recovers	0.2	650.00	130.00	203,515.00

Date

2/14/2022

Bill To

Sephora U.S.A., Inc.--
Hernandez v. Sephora USA, Inc.
(S.F.S.C. Case No. CGC-17-557031)

Date	Description	Qty	Rate	Amount	Balance
04/16/2021	Review email report on current movement and readiness for opposition/trial	0.1	650.00	65.00	203,580.00
04/19/2021	Review report on latest Defense movement	0.1	650.00	65.00	203,645.00
04/20/2021	Draft analysis email regarding issues surrounding slow movement on settlement discussions, and five-year rule	0.6	650.00	390.00	204,035.00
04/21/2021	Review and agree with proposal for two more weeks	0.1	650.00	65.00	204,100.00
04/23/2021	Edit stip provided by co-counsel and circulate	0.4	650.00	260.00	204,360.00
04/28/2021	Analyze latest report with suggested strategy	0.3	650.00	195.00	204,555.00
04/28/2021	Teleconference with co-counsel regarding final demand	0.3	650.00	195.00	204,750.00
04/28/2021	Review current drafts of oppositions	0.8	650.00	520.00	205,270.00
05/05/2021	Draft email regarding [REDACTED]	0.3	650.00	195.00	205,465.00
05/06/2021	Review stipulation vacating dates	0.2	650.00	130.00	205,595.00
05/06/2021	Review MOU draft	1.1	650.00	715.00	206,310.00
05/21/2021	Draft report to clients on [REDACTED]	0.2	650.00	130.00	206,440.00
05/27/2021	Review final draft of MOU	0.6	650.00	390.00	206,830.00
05/27/2021	Draft email to clients re [REDACTED]	0.4	650.00	260.00	207,090.00
05/27/2021	Teleconference with clients regarding [REDACTED]	0.3	650.00	195.00	207,285.00
05/28/2021	Draft amended co-counsel agreement	0.7	650.00	455.00	207,740.00
05/29/2021	Assemble MOU signatures for clients and forward	0.3	650.00	195.00	207,935.00
06/18/2021	Edit co-counsel agreement	0.4	650.00	260.00	208,195.00
06/21/2021	Draft email to clients regarding [REDACTED]	0.3	650.00	195.00	208,390.00
06/22/2021	Review settlement agreement with co-counsel edits and analysis	1.7	650.00	1,105.00	209,495.00
06/24/2021	Finalize co-counsel agreement and forward to co-counsel	0.2	650.00	130.00	209,625.00
06/24/2021	Review email regarding issue of class size, revocation etc	0.4	650.00	260.00	209,885.00
06/24/2021	Review settlement agreement with notes regarding distribution of PAGA penalties to state and plaintiffs	0.8	650.00	520.00	210,405.00
06/24/2021	Draft email to co-counsel regarding issues with distribution of PAGA penalties	0.3	650.00	195.00	210,600.00

Date

2/14/2022

Bill To

Sephora U.S.A., Inc.--
Hernandez v. Sephora USA, Inc.
(S.F.S.C. Case No. CGC-17-557031)

Date	Description	Qty	Rate	Amount	Balance
06/28/2021	Draft email to clients [REDACTED]	0.3	650.00	195.00	210,795.00
06/28/2021	Review co-counsel strategy on incorporation of PAGA penalties issue	0.2	650.00	130.00	210,925.00
06/28/2021	Review M.Archbold questions regarding settlement agreement and forward to co-counsel	0.3	650.00	195.00	211,120.00
06/30/2021	Draft email on signatures [REDACTED]	0.1	650.00	65.00	211,185.00
07/01/2021	Assemble Morales, Hernandez, Norton and Archbold signatures to co-counsel agreement	0.2	650.00	130.00	211,315.00
07/14/2021	Draft report to co-counsel regarding MA drafting notice	0.1	650.00	65.00	211,380.00
07/15/2021	Review rough draft of preliminary approval motion	0.7	650.00	455.00	211,835.00
07/15/2021	Review of email thread regarding administrators	0.4	650.00	260.00	212,095.00
07/16/2021	Review co-counsel email on steps remaining for filing of preapproval motion	0.4	650.00	260.00	212,355.00
07/20/2021	Draft declaration regarding settlement	0.9	650.00	585.00	212,940.00
07/21/2021	Draft reply regarding cy pres	0.3	650.00	195.00	213,135.00
07/21/2021	Draft final declaration and sign	0.3	650.00	195.00	213,330.00
07/22/2021	Review settlement agreement with Defendant signature	0.5	650.00	325.00	213,655.00
07/22/2021	Draft email to clients [REDACTED]	0.2	650.00	130.00	213,785.00
07/22/2021	Draft reply to use of release of FLSA limited to California	0.4	650.00	260.00	214,045.00
07/22/2021	Draft edits to settlement agreement following teleconference with co-counsel	0.3	650.00	195.00	214,240.00
07/23/2021	Review approval motion noting edit in Kullar analysis	0.4	650.00	260.00	214,500.00
07/23/2021	Draft email to clients [REDACTED]	0.4	650.00	260.00	214,760.00
07/23/2021	Review emails from clients [REDACTED]	0.5	650.00	325.00	215,085.00
07/28/2021	Review email from L Hernandez re [REDACTED]	0.2	650.00	130.00	215,215.00
08/02/2021	Draft notice of settlement to DLSE	0.4	650.00	260.00	215,475.00
08/02/2021	Assemble Notice of Settlement with Settlement Agreement for DLSE	0.2	650.00	130.00	215,605.00
08/11/2021	Review of department clerk email regarding new hearing date	0.1	650.00	65.00	215,670.00

Matthew Norton & Associates, A
Professional Corporation

12839 S. Wakial Loop
Phoenix, Az 85044

Statement

Date

2/14/2022

Bill To

Sephora U.S.A., Inc.--
Hernandez v. Sephora USA, Inc.
(S.F.S.C. Case No. CGC-17-557031)

Date	Description	Qty	Rate	Amount	Balance
08/26/2021	Review Tentative Ruling re Motion for Preapproval	1.1	650.00	715.00	216,385.00
08/26/2021	Draft calendar addition for supplemental briefing	0.2	650.00	130.00	216,515.00
08/26/2021	Draft email to co-counsel with costs	0.2	650.00	130.00	216,645.00
09/14/2021	Review email from co-counsel regarding DLSE confirmation of settlement	0.1	650.00	65.00	216,710.00
09/14/2021	Review exhaustive Kellar analysis element of supplemental declaration	0.4	650.00	260.00	216,970.00
09/15/2021	Draft email with Notice to DLSE re settlement and DLSE acknowledgment	0.3	650.00	195.00	217,165.00
09/16/2021	Review status report on supplemental briefing	0.3	650.00	195.00	217,360.00
09/23/2021	Review email to expert re calculations for supplemental briefing	0.2	650.00	130.00	217,490.00
09/27/2021	Review femail regarding further calculations from expert with reference to TR	0.3	650.00	195.00	217,685.00
10/04/2021	Review email string re Amended Complaint with FLSA	0.3	650.00	195.00	217,880.00
10/08/2021	Review email request re extension of time for supplemental briefing	0.2	650.00	130.00	218,010.00
10/12/2021	Review department clerk email with extension	0.1	650.00	65.00	218,075.00
10/21/2021	Review email string re further extension on supplemental briefing with department clerk's new date	0.2	650.00	130.00	218,205.00
11/03/2021	Review order in conjunction with amendedd settlement agreeemnt	0.6	650.00	390.00	218,595.00
11/03/2021	Draft email to clients regarding amended settlement agreement	0.3	650.00	195.00	218,790.00
11/04/2021	Review email re further extension for supplemental briefing	0.3	650.00	195.00	218,985.00
11/09/2021	Draft email to clients [REDACTED]	0.4	650.00	260.00	219,245.00
11/11/2021	Sign stipulation re Amended Complaint and Answer	0.3	650.00	195.00	219,440.00
11/12/2021	Assemble signatures for amended Settlement Agreement and forward to co-counsel	0.4	650.00	260.00	219,700.00
11/15/2021	Review draft suuplemental briefing	0.6	650.00	390.00	220,090.00
11/16/2021	Revuew supplemental briefing	0.9	650.00	585.00	220,675.00
12/14/2021	Draft email to clients regarding [REDACTED]	0.2	650.00	130.00	220,805.00

Matthew Norton & Associates, A
Professional Corporation

12839 S. Wakial Loop
Phoenix, Az 85044

Statement

Date

2/14/2022

Bill To

Sephora U.S.A., Inc.--
Hernandez v. Sephora USA, Inc.
(S.F.S.C. Case No. CGC-17-557031)

Date	Description	Qty	Rate	Amount	Balance
12/16/2021	Review order on motion for preliminary approval	0.7	650.00	455.00	221,260.00
12/23/2021	Reveiw EmployeeStats invoice	0.3	650.00	195.00	221,455.00
12/23/2021	Issue check for Employee Stats	0.1	650.00	65.00	221,520.00
01/06/2022	Draft Outline of Morales Declaration	0.9	650.00	585.00	222,105.00
01/06/2022	Draft outline of Hernandez declaration	0.8	650.00	520.00	222,625.00
01/06/2022	Draft declaration section dealing Morales involvement with estimate of hours involved	1.4	650.00	910.00	223,535.00
01/17/2022	Review OP comments on CPT filings	0.6	650.00	390.00	223,925.00
01/17/2022	Review CPT response	0.1	650.00	65.00	223,990.00
01/18/2022	Review approval order, CPT proposals and issues by OP	0.8	650.00	520.00	224,510.00
01/18/2022	Draft Hernandez declaration section dealing with involvement and hours	1.7	650.00	1,105.00	225,615.00
01/19/2022	Review drafts in co-counsel's email	0.7	650.00	455.00	226,070.00
01/19/2022	Edit notices --	0.3	650.00	195.00	226,265.00
01/19/2022	Review emails [REDACTED]	0.1	650.00	65.00	226,330.00
01/27/2022	Edit declarations and forward to clients	0.9	650.00	585.00	226,915.00
01/31/2022	Assemble client declarations	0.5	650.00	325.00	227,240.00
01/31/2022	Draft outline of my declaration	1.1	650.00	715.00	227,955.00
02/02/2022	Assemble costs for state case	0.3	650.00	195.00	228,150.00
02/02/2022	Draft declaration for attorneys fees and service award	0.9	650.00	585.00	228,735.00
02/02/2022	Assemble invoice	0.9	650.00	585.00	229,320.00
02/04/2022	Redact invoice for inclusion in declaration	1.4	650.00	910.00	230,230.00
02/14/2022	Amount Due				230,230.00

EXHIBIT 2

Matthew Norton & Associates, A
Professional Corporation

12839 S. Wakial Loop
Phoenix, AZ

Federal Tax Identification No. [REDACTED]

Statement

Date

2/4/2022

Bill To

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

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