

Alejandro P. Gutierrez, SBN 107688  
**THE HATHAWAY LAW FIRM, LLP**  
200 Hathaway Building  
5450 Telegraph Road, Suite 200  
Post Office Box 3577  
Ventura, CA 93006-3577  
Telephone: (805) 644-7111  
Facsimile: (805) 644-8296  
E-mail: [agutierrez@hathawaylawfirm.com](mailto:agutierrez@hathawaylawfirm.com)

Daniel J. Palay, SBN 159348  
Brian D. Hefelfinger, SBN 253054  
**PALAY HEFELFINGER, APC**  
1484 E. Main Street  
Suite 105-B  
Ventura, CA 93001  
Telephone: (805) 628-8220  
Facsimile: (805) 765-8600  
E-mail: [djp@calemploymentcounsel.com](mailto:djp@calemploymentcounsel.com)

Attorneys for Plaintiff JESSICA DURAN and the Putative Class

**SUPERIOR COURT OF THE STATE OF CALIFORNIA**

**FOR THE COUNTY OF SAN FRANCISCO (UNLIMITED)**

COORDINATED PROCEEDINGS SPECIAL	)	Judicial Counsel Coordinated Proceeding
TITLE [RULE 3.550]	)	No. 4911
	)	
SEPHORA WAGE AND HOUR CASES	)	<u>CLASS ACTION</u>
	)	
Included actions:	)	<b>DECLARATION OF ALEJANDRO P.</b>
	)	<b>GUTIERREZ IN SUPPORT OF MOTION</b>
	)	<b>FOR ATTORNEY FEES AND COSTS</b>
<i>Burnthorne-Martinez v. SEPHORA USA, Inc.</i>	)	
(San Francisco OGC-16-55-894)	)	
	)	
<i>Provencio v. SEPHORA USA, Inc.</i> (Santa	)	
Clara 16CV294112)	)	
	)	
<i>Hernandez et al. v. SEPHORA USA, Inc.</i> (San	)	
Francisco OGC-17-557031)	)	
	)	
<i>Duran v. SEPHORA USA, Inc.</i> (San Francisco	)	
CGC-17-561452)	)	

---

1 I, ALEJANDRO P. GUTIERREZ, declare and state as follows:

2 1. I am an attorney at law qualified to practice before the courts in the state of California. I  
3 am a partner with The Hathaway Law Firm, LLP, attorneys of record for Plaintiff Jessica Duran and the  
4 Settlement Class in the above-entitled action. My firm changed its name in January 2022 to the name  
5 on the caption above. I am the attorney at our firm responsible for the litigation of this class action. I  
6 have personal knowledge of the facts stated in this declaration and if called upon, I would testify  
7 competently thereto.

8 2. I make this declaration in support of Plaintiffs' Motion for Fees and Costs.

9 3. On December 16, 2021, the Court granted preliminary approval of the Settlement.

10 4. When assessing my firm's entitlement to an award of fees, and the amount, it should first  
11 be noted that Plaintiff Jessica Duran hired me and my co-counsel on a contingency basis, and we agreed  
12 to advance all costs and receive no fee unless a recovery was accomplished. While litigating this case,  
13 we had to forego other work and faced financial risk in this action.

14 5. I am an experienced lawyer with substantial complex litigation experience. I have  
15 extensive experience in successful prosecution of numerous class actions. I have recovered more than  
16 one hundred fifty million dollars on behalf of thousands of individuals in California and have  
17 successfully handled numerous significant wage-and-hour class and representative actions. I have  
18 committed significant firm resources to the prosecution of this action. As noted, we were retained based  
19 upon a contingency fee arrangement, wherein we agreed to advance all costs and receive no fee, unless  
20 and until a recovery was accomplished.

21 6. Furthermore, Defendant was represented by Orrick, Herrington & Sutcliffe LLP, an  
22 international law firm with 25 offices worldwide and a significant wage and hour defense practice in  
23 California.

24 7. In terms of my qualifications and background, I graduated from the University of  
25  
26  
27  
28

1 California at Davis Law School and was admitted to the California Bar in 1983. I have extensive  
2 experience in civil litigation and an over 35-year history of aggressive, successful prosecution of labor  
3 law cases. For instance, in a wage and hour class action, in binding arbitration, I succeeded in  
4 procuring an award of \$51.2 million for the class. This recovery represented close to 100% of the  
5 compensatory damages suffered by class members, an exceptional and rare result. In fact, my efforts  
6 resulted in what I believe to be the largest per-person award in California history. Further, I have  
7 successfully resolved several class and PAGA representative actions before trial in favor of the class,  
8 including *Avitia v. Big Lots Stores*, Los Angeles County Superior Court Case No. BC436317; *McNeal*  
9 *v. Pacific Satellite*, Los Angeles County Superior Court Case No. BC382775; *Beltran v. Restaurant*  
10 *Miramar*, Ventura Co. Superior Court Case No. 56-2009-00362572-CU-BC-VTA; *Dockstader v.*  
11 *Employee Leasing, Inc.*, Ventura Co. Superior Court Case No. 56-2010-00371075-CU-OE-VTA;  
12 *Britto v. Zep*, Alameda County Superior Court Case No. VG-10553718; *Rizk v. DirectSat*, Los Angeles  
13 County Superior Court Case No. BC363435; *Bankwitz v. Ecolab*, USDC Case No. 2:17-cv-02924-  
14 EMC; *Miner v. Ecolab*, USDC Case No. 2:17-cv-02313-FMO-JC. I have also defended class action  
15 cases with favorable results, including successfully stemming a certification of class in a potentially  
16 multi-million dollar action in Santa Barbara. (*Villasenor v. Jimenez Nursery*, Santa Barbara Superior  
17 Court Case No. 1131798).

18 8. In addition, I was lead or co-counsel in the following wage and hour class actions: *Ross*  
19 *v. Ecolab*, Northern District of California case number 13-cv-5097-PJH; *Rose v. Sodexo*, U.S. District  
20 Court No. CV08-05687-RGK (AGRx); *Cooper v. Ecolab*, Los Angeles County Superior Court Case  
21 No. BC486875; *Roe v. Ecolab*, Ventura Co. Superior Court Case No. CIV 233936; *Dietz v. Ecolab*,  
22 Ventura Co. Superior Court Case No. CIV 241827; *Campos v. Ecolab*, Northern District of California  
23 case number 4:16-cv-04829-PJH; *Martino v. Ecolab*, Northern District of California case number  
24 5:14-cv-04358-PSG; *Ladore v. Ecolab*, Central District of California case number 2:11-cv-09386, all  
25 of which resolved in favor of the plaintiffs. I have been lead counsel or co-counsel in class actions that  
26 have resulted in damage recoveries of over \$130 million. I have also been one of the rare attorneys to  
27 take a class action to completion, litigating an overtime action against Ecolab on behalf of its pest  
28 control service specialists through an arbitration that Ecolab even challenged on appeal. I prevailed

1 on that appeal as well, which upheld an arbitration award of over \$50 million. (*Roe v. Ecolab, Inc.*  
2 (Cal. Ct. App., Aug. 19, 2009, No. B210262) 2009 WL 2517569.)

3 9. I have also handled numerous matters involving Labor Commissioner cases,  
4 approximately half of which were on behalf of the employee. Further, I have been counsel on over  
5 300 wage and hour arbitrations.

6 10. Further, I have been designated as a top-rated Super Lawyer for years 2019 to 2021.

7 11. In this matter, my hourly rate (for lodestar purposes; our client retained us under a written  
8 contingent fee arrangement) is \$850 per hour. This rate is reasonable for several reasons. First, based on  
9 my experience and familiarity with the employment law marketplace in California, \$850 per hour is a  
10 reasonable hourly billing rate for any attorney of my experience and credentials. I have also reviewed the  
11 most current, updated version of the *Laffey* Matrix concerning attorney billing rates, and the Matrix  
12 suggests that an attorney with 20-plus years of experience should be billing at the rate of at least \$919 per  
13 hour.

14 12. In addition, under previous fee awards and rate determinations I have received, I was  
15 approved at the rate of \$850 per hour in 2020 and 2021. I can provide exemplar awards and rulings  
16 containing these recent rate approvals, upon request. Finally, attorneys of comparable experience in similar  
17 cases in California have been awarded the same rate as my requested rate herein, of \$850 per hour. *See* ,  
18 *e.g., Polee v. Cent. Contra Costa Transit Auth.*, No. 18-CV-05405-SI, 2021 WL 308608, at \*4 (N.D. Cal.  
19 Jan. 29, 2021) (approving rate of \$850 per hour in employment case for attorney with 30+years of practice).  
20 Accordingly, my rate at \$850 an hour is consistent with my most recent rate determinations, the legal  
21 marketplace, and the case law.

22 13. I also utilized one of my firm's associates, Mr. Seth Shapiro, where appropriate for tasks  
23 that could be delegated in this matter. Mr. Shapiro is a fourteen-year attorney and a partner with my  
24 firm. Mr. Shapiro's practice includes civil litigation and employment law work. Based on Mr. Shapiro's  
25 experience and credentials, my firm has billed him at \$450. Coleen De Leon is a civil litigation paralegal  
26 in my firm, with 25-plus years of experience and high-level-attorney legal research and writing skills.  
27 In this matter, Ms. De Leon's lodestar rate is \$250 per hour, which is consistent with her most recent  
28 rate determinations from 2020 and 2021.

1           14. Plaintiff Jessica Duran retained my firm and the firm of Palay Hefelfinger APC to  
2 represent her in her case against Sephora.

3           15. My firm maintains records of the hours we spend working on our cases. I made a  
4 general examination of all of the billings regarding this litigation on account of legal services furnished.  
5 These records were made in the regular course of the Hathaway law firm's business. The billers from  
6 my firm are Coleen De Leon, a paralegal with 25-plus years of experience and high-level-attorney  
7 legal research and writing skills, attorney Seth Shapiro, and myself.

8           16. In providing this declaration, I have attempted to review all of the work the legal  
9 professionals in my firm each performed in this case including all emails, pleadings, drafts,  
10 spreadsheets, correspondence, my own billing entries, physical and electronic files in the matter, and  
11 the billing records of my co-counsel. I eliminated duplicate entries or any I felt were inefficient or  
12 would not otherwise be paid by an hourly-paying client.

13           17. Excluded from the summary of fees, however, is time that will be spent related to the  
14 final approval hearing as well as administrative tasks that will continue to occur in the months  
15 following final approval. For example, it is common in class action settlements that the class counsel  
16 firms must continue to field calls and questions from settlement class members for many months  
17 following approval, relating to things such as disbursement, address changes, where to seek tax advice,  
18 and the effect of the release.

19           18. I reviewed the hours recorded by my firm and made edits and/or deletions where  
20 appropriate (*i.e.*, if duplicative attorney time on the same task was found) in the exercise of billing  
21 discretion, in order to ensure that all of the time from my firm was reasonably and necessarily incurred  
22 in this matter.

23           19. The most recent court-approved rates for Ms. De Leon, and myself, are \$250 and \$850  
24 per hour, respectively. These are the rates at which we bill clients for class action work performed in  
25 California major metropolitan areas, such as in Los Angeles, San Diego, or the Bay Area(s). My most  
26 recent wage/hour class action settlement approval, and the rate determination therein, was granted in  
27 June of this year, and approved of these hourly rates. (*See, e.g., Bankwitz v. Ecolab Inc.*, N.D. Cal.  
28 Case No. 3:17-cv-02924-EMC (final appr. Granted June 24, 2021).

1           20. More than seven years ago, the Northern District of California court found my  
2 reasonable hourly rate to be \$700 per hour. *See Aguilar v. Zep Inc.*, No. 13-CV-00563-WHO, 2014  
3 WL 4063144, at \*4 (N.D. Cal., Aug. 15, 2014). The *Aguilar* matter was another wage-and-hour case  
4 brought under California law. The Court awarded fees in connection with a contested motion for fees.  
5 In the intervening seven years since the *Aguilar* fee award, my rate has increased by \$150.

6           21. I delegated work whenever possible in this matter to Ms. De Leon at my firm, who has  
7 a lower billing rate. The billing records reflect this fact.

8           22. In my employment practice, I represent employees the majority of the time in litigation  
9 matters. I almost always represent employees on a contingent-fee basis, and we typically advance  
10 litigation costs, since our individual clients cannot typically afford to fund litigation. Sometimes I am  
11 able to recover money for my clients, but sometimes I am not.

12           23. When that happens, I and my firm suffer a loss. For example, I co-counseled an  
13 employment case a number of years ago. I believed the case was strong, but the case did not resolve,  
14 and we ended up trying the case before a jury in Ventura County. The jury found for the employer.  
15 Our firms had advanced thousands in costs and incurred hundreds of hours in attorney time through  
16 the trial. Because we represented the client on a contingent-fee basis, we received zero fees and our  
17 client could not afford to pay our costs. This is the risk of representing a plaintiff on a contingent-fee  
18 basis.

19           24. The benefit of representing an employee on a contingent-fee basis is that it permits  
20 clients to obtain qualified attorneys without having to pay hourly fees. In turn, this provides critical  
21 access to the courts for people who otherwise would be unable to find competent counsel to represent  
22 them. It also vindicates important public policy aims that the wage and hour statutes are intended to  
23 protect, where the economic situation of meritorious plaintiffs might otherwise not permit.

24           25. My personal involvement in this case, including my evaluation of both the law and the  
25 evidence, leads to the conclusion that we have achieved a significant victory for the Class.

26           26. I have reviewed the expense file and receipts for litigation costs in this matter. Over  
27 the approximately three years of litigation, my firm advanced \$41,687.91 in costs in the matter. These  
28 include service of process costs, CourtCall fees, court filing fees, deposition costs, mediation fees, and

1 expert witness fees. Attached hereto as Exhibit A is a true and correct copy of the costs that were  
2 incurred by my firm in this matter.

3 27. My firm and I took on financial risk by advancing and paying these costs, totaling  
4 \$41,687.91, while the action has been pending. There was never any guarantee of recovery of these  
5 costs. Accordingly, I respectfully request that the Court reimburse these litigation costs from the  
6 common fund obtained under the Settlement.

7 28. As demonstrated by the fee schedule attached hereto, my firm expended 557.45 hours  
8 in this matter, for a total of \$275,669.50 in billings.

9 I declare under penalty of perjury and under the laws of State of California that the foregoing  
10 is true and correct. Executed this 16<sup>th</sup> day of February, 2022, at Ventura, California.

11  
12  
13 

14  
15 \_\_\_\_\_  
ALEJANDRO P. GUTIERREZ

**SCHEDULE OF FEES**

Date	Atty	Time	Fees	Task description
03/02/17	APG	1.5	1,275.00	Conference with client re facts and representative duties, documents, etc.
03/08/17	APG	1.5	1,275.00	Conference with client re facts and prepare authorization for records
03/10/17	APG	.25	212.50	Review PAGA letter and claims; confer with client re same
03/10/17	CDL	1.0	250.00	Telephone conference with Court re case initiation; file revised civil case sheet; email to court re same; letter to court re initiating documents
03/13/17	CDL	.8	200.00	Legal research re attorney fees under section 218.5 and 1194 for meal and rest breaks' commission employees paid for rest period
03/14/17	CDL	.2	50.00	Review judge's standing orders, new case service instructions
03/20/17	CDL	.5	125.00	Instructions to attorney service re service of summons and complaint and follow up
03/29/17	CDL	.8	200.00	E-file declaration of service; prepare demand for jury trial; e-mails to/from counsel
03/30/17	CDL	.8	200.00	E-file demand for jury; prepare consent to magistrate; review Sephora declaration of magistrate; e-file consent
03/31/17	CDL	.8	200.00	Draft first amended complaint; e-file same; instructions re court copy
03/31/17	APG	.25	212.00	Attention to FAC
03/31/17	CDL	.3	75.00	Review order re assigning case and review standing orders
04/15/17	CDL	.5	125.00	Prepare certificate of service re case management order; e-file same; review order
05/15/17	CDL	.3	75.00	Revisions to amended complaint
06/05/17	CDL	.2	50.00	File Joint Report
07/10/17	CDL	.6	150.00	Draft Stipulate and Order re filing Third Amended Complaint; review TAC
07/11/17	CDL	1.0	250.00	Begin legal research for and draft motion for leave to amend
07/12/17	CDL	4.8	1,200.00	Draft motion for leave to file third amended complaint; draft Gutierrez declaration in support; draft proposed order; make revisions; e-file; e-mail to court re instructions re chambers copy
07/24/17	CDL	2.2	550.00	Review Sephora opposition to motion for leave to amend TAC and declarations; confer with APG re



				response; review e-mail exchanges; begin drafting reply
07/25/17	CDL	3.8	950.00	Legal research re minimal diversity and class member domicile, futility prejudice and bad faith; continue drafting reply in support of motion for leave; e-mails to/from counsel re conferences with opposing counsel; review hearing transcript
7/26/17	CDL	4.8	1,200.00	Draft reply in support of motion for leave to amend; review e-mail chains re same
7/27/17	CDL	3.6	900.00	Revisions to reply; draft Gutierrez declaration; further legal research re futility and prejudice; emails to/from counsel
7/31/17	CDL	2.8	700.00	Additional revisions to reply; continue drafting declaration; e-file; instructions re chambers copy
08/14/17	CDL	.3	75.00	Review court order granting leave to file amended complaint and requiring further briefing on issue of supplemental jurisdiction
08/21/17	CDL	.3	75.00	Review Sephora supplemental brief and declaration; e-mail to APG re same
08/22/17	CDL	1.7	425.00	Legal research re jurisdiction
08/24/17	CDL	.5	125.00	Finalize and file Third Amended Complaint
08/31/17	CDL	.8	200.00	Draft Gutierrez declaration in support of Supp Brief re jurisdiction; e-file with supp brief; instructions re chambers copy
09/08/17	CDL	.4	100.00	Read and review Sephora's brief regarding supplemental jurisdiction and request for judicial notice; legal research re same
10/01/17	APG	1.0	850.00	Review Sephora responses to discovery; confer with client re same
10/05/17	CDL	.2	50.00	Review protective order
10/09/17	CDL	.4	100.00	Research Sephora state cases
10/24/17	CDL	.3	75.00	Review Sephora objections to deposition notice; joint stipulation
10/25/17	CDL	.4	100.00	Review and revise amended notice of PMK depo
10/26/17	CDL	1.8	450.00	Review and categorize Sephora production of documents
11/07/17	CDL	.3	75.00	Review Class Notice Sephora Wage and Hour Cases; docket review
11/08/17	CDL	.2	50.00	Review Sephora objection PMK Notice
11/28/17	CDL	1.9	475.00	Begin legal research for drafting dismissal of federal case
11/29/17	CDL	.8	200.00	Draft Stipulation and Proposed Order re Voluntary Dismissal
11/30/17	CDL	.6	150.00	Revise Stipulation and Order; e-file same; instructions re chambers copy
01/02/18	CDL	.3	75.00	Review Sephora discovery requests and begin drafting responses

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

01/10/18	APG	1.5	1,275.00	Confer with client re discovery from Sephora and responses
01/12/18	CDL	.6	150.00	Review client's responses to request for production of documents
01/16/18	APG	.5	425.00	Attention to disclosure of opt out info to Sephora counsel
01/17/18	CDL	.2	50.00	Review case management statement and order granting complex designation
01/17/18	APG	.25	212.00	Attention to objections to depo notice
01/17/18	APG	.25	212.00	Revisions to objections to Duran deposition notice
01/18/18	APG	1.25	1,062.00	Follow up with PAGA claims and further revisions to discovery responses
01/22/18	CDL	.3	75.00	Review client's responses to RFP
01/23/18	APG	.5	425.00	Attention to JCMC and edits
01/24/18	APG	.5	425.00	Confer with co-counsel re joint CMC statement
01/25/18	APG	8.25	7,212.00	Attendance at J. Duran deposition in San Francisco
01/25/18	APG	.5	425.00	Confer with co-counsel re deposition notice
01/29/18	CDL	.3	75.00	Review CMC Order
01/29/18	APG	1.75	1,487.00	Research re topics and issue of bonus calculations into OT and wage statements requirements; review document production re same
02/05/18	APG	1.0	50.00	Attention to PMK notice topics
02/05/18	CDL	.3	75.00	Review Order No. 5, completion of discovery
02/06/18	CDL	.3	75.00	Review Sephora discovery requests
02/06/18	CDL	.4	100.00	Review discovery requests to other plaintiffs
02/07/18	CDL	.4	100.00	Review Sephora's responses to RFPs
02/07/18	CDL	.8	200.00	Revise PMK depo notice; add topics
02/08/18	CDL	.5	125.00	Add more topics to depo notice
02/08/18	CDL	.3	75.00	Review Sephora objections to PMK depo notice
02/08/18	CDL	.8	200.00	Compare our proposed topics in depo notice with the ones proposed by other plaintiffs' counsel
02/13/18	CDL	.2	50.00	Review Martinez motion to compel further responses to RFP
02/13/18	CDL	.3	75.00	Review e-mails re: discovery related issues
02/14/18	CDL	.4	100.00	Revisions to depo notice
02/14/18	APG	.5	425.00	Revise and add topics for PMK deposition; review responses to discovery and bonus plans re same
02/15/18	APG	.5	425.00	Attention to PMK deposition preparation; follow up with logistics
02/23/18	CDL	.4	100.00	Review Sephora opposition to motion to compel RFP; response to separate statement
03/01/18	CDL	.8	200.00	Further review Sephora productions of documents
03/01/18	APG	6.5	5,525.00	Review Sephora documents re preparation for PMK deposition; review Sephora discovery responses; research re wage statements and DLSE re bonuses in OT rate; preparation of PMK outline re bonus plans, etc.

1	03/08/18	CDL	1.2	300.00	E-mails to/from counsel re deposition notice of Sephora PMK; revisions to same; e-mail opposing counsel; instructions re video conferencing; e-mail from plaintiff counsel re date and location deposition
2					
3	03/08/18	CDL	.3	75.00	Review order re motion to compel further responses from Sephora; discuss same with APG
4	03/09/18	CDL	.8	200.00	E-mail opposing counsel re depo notice; further instructions re video conferencing; emails to/from opposing counsel re same
5					
6	03/09/18	APG	1.0	850.00	Review e-mails re topics; confer with co-counsel re same; review prior transcripts
7	03/09/18	CDL	1.2	300.00	Prepare exhibits for deposition of Sephora PMK; e-mail from opposing counsel re notice; topics, etc.
8	03/12/18	APG	1.0	850.00	Review e-mail from opposing counsel re link; review outline and exhibits re same
9	03/12/18	CDL	.4	100.00	E-mails to/from counsel re PMK deposition, exhibits, court reporter
10	03/13/18	CDL	.7	175.00	Review exhibits produced during deposition; review Sephora's further responses to special interrogatories and request for production
11					
12	03/13/18	APG	9.5	8,075.00	Attendance at PMK deposition in San Francisco
13	03/14/18	APG	.75	637.50	Confer with J. Duran re discovery responses and status of case
14	03/14/18	CDL	.3	75.00	Review e-mails to/from opposing counsel re discovery extension
15	03/15/18	CDL	2.1	600.00	Draft Duran's responses to special interrogatories and request for production of documents; review Duran deposition and Duran written answers
16					
17	03/16/18	CDL	1.8	450.00	Read and review rough draft of transcript of Charles Diaz, Sephora PMK, mark pertinent passages for certification motion
18	03/18/18	APG	.5	425.00	Review draft responses to discovery and edit same
19	03/19/18	APG	1.0	850.00	Attention to draft responses to RFP; review documents for production
20	03/19/18	CDL	1.5	375.00	Revise and finalize Duran's responses to special interrogatories and request for production of documents; e-mail to client re same and verification
21					
22	03/19/18	APG	2.0	1,700.00	Review documents re preparation of responses; confer with client re same; review Sephora production re same
23					
24	03/19/18	APG	1.0	850.00	Revisions to discovery responses; confer with client re same
25	03/19/18	CDL	.2	50.00	E-mail to client re verifications
26	03/20/18	CDL	.2	50.00	Review signed verifications and serve
27	03/26/18	CDL	1.6	400.00	Review depo transcript of Sephora PMK Perna; mark pertinent passages
28					

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

04/03/18	CDL	1.4	350.00	Review CMC order re deadlines; begin legal research for motion class certification
04/04/18	CDL	1.8	450.00	Continue review of Perna deposition transcript; mark pertinent passages for citation in motion for class certification
04/04/18	APG	1.0	850.00	Review Perna transcript and exhibits; follow up with certification analysis
04/04/18	CDL	2.2	500.00	Review two Diaz deposition transcripts; mark pertinent passages for citation in motion for class certification
04/04/18	APG	1.75	1,487.00	Review deposition transcripts and discovery responses
04/04/18	CDL	.3	75.00	Review protective order issues for filing certification motion
04/04/18	CDL	1.7	425.00	Draft Duran portion of motion for class certification
04/04/18	CDL	.5	125.00	Legal research re procedure for filing/lodging sealed records
04/05/18	CDL	4.5	1,125.00	Continue legal research for and draft Duran portion of class certification motion
04/05/18	CDL	.3	75.00	Review memo re lodging procedures
04/05/18	CDL	.6	150.00	Review coordinated case counsel's motion for class certification
04/05/18	APG	4.5	2,825.00	Review evidence and argument re class certification; review Diaz deposition transcript re same
04/06/18	CDL	4.5	1,125.00	Begin adding Duran argument to coordinated motion; citations to evidence; confer with APG re arguments and facts
04/06/18	APG	3.25	2,762.00	Follow up with certification arguments and evidence citation gathering; review bonus plans re same
04/06/18	APG	1.0	850.00	Review discovery responses and track bonus plan and payroll data
04/06/18	CDL	.3	75.00	Review Diaz errata in deposition transcript and refer back to transcript
04/08/18	CDL	2.3	575.00	Continue drafting Duran portion of argument in motion class certification; review APG comments re same; make revisions
04/09/18	CDL	5.3	1,325.00	Continue drafting and revising Duran portion of argument in motion; draft APG declaration and prepare exhibits to same; scan and mark deposition transcripts; review Playa declaration and make changes to argument
04/09/18	APG	2.75	2,337	Attention to certification motion and declarations of Duran and APG
04/09/18	CDL	.7	175.00	Prepare Jessica Duran declaration; e-mail same to client
04/09/18	CDL	.5	125.00	E-mails to/from coordinated case counsel re motion class certification

1	04/10/18	APG	.25	212.00	Review declarations of Duran and APG
2	04/10/18	CDL	1.8	450.00	Finalize Duran and APG declarations ISO motion for class certification and e-mail to attorney Allen for filing; e-mails to/from coordinated case counsel re finalizing and filing motion; send all exhibits to APG declaration in pdf format for inclusion
3					
4	04/10/18	APG	.5	425.00	Attention to declarations and motion for class certification
5	05/11/18	CDL	.7	175.00	Review Magadia v. Wall Mart re 226 issue and incentive comp OT, no rates or hours
6	05/24/18	CDL	.3	75.00	Review Sephora further production of documents
7	05/24/18	APG	1.5	1,275.00	Review opposition to motion for class certification; review authorities cited
8	05/29/18	CDL	1.4	350.00	Review Sephora's opposition, declarations, exhibits
9	05/29/18	APG	.5	425.00	Review motion to seal and supporting declaration
10	05/29/18	CDL	1.8	450.00	Begin legal research for drafting reply
11	05/30/18	CDL	.4	100.00	Legal research re calculating overtime pay; determining the regular rate of pay
12	05/30/18	CDL	.5	125.00	Read Marin v Costco Wholesale Corp for bonus/OT argument in reply and related cases
13	05/30/18	CDL	.5	125.00	Read Harris v. Best Buy Stores LP and related cases for argument in reply
14	05/30/18	CDL	.3	75.00	Read Raines v. Coastal Pacific Food case re PAGA penalties for 226 violations re argument in reply
15	05/30/18	CDL	.4	100.00	Review all cases related to Magadia for argument in reply
16	05/30/18	CDL	.3	75.00	Review Sephora's objections to evidence
17	05/31/18	APG	2.5	2,125.00	Attention to opposition to class certification; review authorities re same
18	05/31/18	CDL	4.3	1,075.00	Begin drafting reply ISO motion for class certification; legal research for same
19	05/31/18	CDL	.6	150.00	Read cases re employee deemed to suffer injury
20	06/01/18	CDL	.4	100.00	Review Sephora notice of errata; corrected exhibits opposition class certification
21	06/01/18	CDL	3.6	900.00	Continue drafting reply ISO motion class certification; legal research for same
22	06/01/18	CDL	.3	75.00	Review e-mails to/from co-counsel re filing reply on cert motion
23	06/04/18	CDL	3.5	875.00	Continue drafting reply ISO motion class certification; legal research for same
24	06/05/18	CDL	1.1	275.00	Amendments to reply ISO cert motion
25	06/07/18	CDL	.6	150.00	E-mail from/to Palay re reply and cases; read cases
26	06/07/18	CDL	1.4	350.00	Finalize reply ISO class certification
27	06/08/18	APG	1.5	1,275.00	Attention to draft reply ISO motion for class certification
28	06/14/18	CDL	.2	50.00	Review objection to Depo of Robert Crandall

1	06/18/18	CDL	.4	100.00	Review e-mails to/from counsel re coordination of filing reply
2	07/10/18	APG	6.0	5,100.00	Attendance at hearing in San Francisco on motion for class certification; confer with co-counsel re same
3	07/11/18	CDL	.2	50.00	Review notice of hearing re motion to seal
4	07/11/18	APG	1.0	850.00	Attention to motion for class certification trial plan issues
5	07/12/18	CDL	.3	75.00	Review trial plan ISO motion for class certification
6	07/12/18	CDL	.5	125.00	Review Duran's further briefing re motion class certification
7	07/12/18	CDL	.2	50.00	Review court order re Plaintiffs' motion class certification
8	07/16/18	CDL	.3	75.00	Review Alonzo v. Maximus re bonus OT calculation
9	08/16/18	APG	.25	212.00	Attention to Stip and Order re scheduling
10	09/05/18	CDL	.3	75.00	Review APG Decl ISO Motion Class Cert; memo Ps and As, Stip
11	09/10/18	CDL	4.3	1,075.00	Summarize deposition testimony of Stella Dagliyan
12	09/10/18	CDL	1.2	300.00	Legal research re MSJ issues in view of employee testimony
13	09/11/18	CDL	4.7	1,175.00	Summarize deposition of Monique Jackson; summarize deposition of Jessica Duran; continue legal research re MSJ issues
14	09/12/18	CDL	3.2	800.00	Continue summarizing Duran deposition for MSJ issues
15	09/13/18	CDL	4.2	1,000.00	Finalize depo summaries
16	09/26/18	APG	5.0	4,250.00	Attendance at continued hearing on Motion for Class Cert
17	09/28/18	CDL	2.5	625.00	Begin drafting issues for MSJ
18	10/01/18	CDL	.2	50.00	Review Order granting parties leave to refile class certification briefing
19	10/08/18	CDL	.3	75.00	Review Notice of filing, evidence (redacted)
20	10/09/18	CDL	1.5	375.00	Continue legal research and fact summary for preparation of MSJ
21	10/12/18	CDL	.3	75.00	Review docket order granting motion for class certification
22	10/16/18	CDL	3.2	800.00	Further legal research and fact analysis re MSJ after class cert order
23	10/30/18	CDL	1.2	300.00	Research re calculation of overtime pay and bonus
24	11/01/18	CDL	.2	50.00	Review payroll checks and pay cards for Jessica Duran
25	11/01/18	CDL	2.5	2,125.00	Attention to trial plan; review authorities re claims; confer with co-counsel re same
26	11/02/18	CDL	1.8	450.00	Legal research re summary disposition of PAGA and UCL
27	11/06/18	CDL	.3	75.00	Review trial plan
28	11/06/18	APG	1.75	1,487.00	Further revisions to trial plan for J. Duran

1	11/07/18	CDL	.2	50.00	Review Joint Case Management Conference Statement
2	11/07/18	CDL	3.9	975.00	Review Ontiveros case re bonus overtime; draft MSA
3	11/08/18	CDL	3.8	950.00	Review additional cases re dispositive issues on Duran claims; continue drafting MSA
4	11/08/18	CDL	1.8	450.00	Additional legal research re dispositive issues on Duran claims
5	11/12/18	CDL	3.2	800.00	Review deposition transcripts and discovery; draft separate statement ISO MSA
6	11/13/18	CDL	.3	75.00	Review Case Management Conference order
7	11/13/18	CDL	4.3	1,075.00	Further draft Separate Statement, MSA, legal research for same
8	11/14/18	CDL	4.8	1,200.00	Further legal research re dispositive issues for MSA; continue drafting MSA, separate statement; continue review of deposition testimony and discovery
9	11/14/18	APG	4.0	3,400.00	Attention to trial plan and revisions to same; confer with co-counsel re same
10	11/15/18	CDL	4.6	1,150.00	Further legal research for and draft MSA and separate statement
11	11/16/18	CDL	3.5	875.00	Continue legal research for and draft MSA and separate statement
12	11/21/18	APG	5.75	4,887.50	Attendance at CMC; review trial plan issues in preparation for CMC
13	11/26/18	CDL	4.6	1,150.00	Legal research re PAGA civil penalties and summary adjudication; review Azpetiai v. Tesoro Refining re same; review Coronel v. Century Intermodal re same; review Culley v. Lincare; continue drafting MSA and separate statement
14	11/27/18	CDL	5.1	1,275.00	Continue legal research for and draft MSA and separate statement
15	11/28/18	CDL	3.9	975.00	Continue legal research for and draft MSA and separate statement
16	11/29/18	CDL	3.8	950.00	Legal research re MSA procedural requirements moving party; continue drafting MSA, separate statement; draft proposed order; review Class Notice
17	11/30/18	CDL	2.3	575.00	Legal research re disposition of UCL claim; disposition of 203 penalties; continue drafting MSA, separate statement
18	12/03/18	CDL	3.4	850.00	Continue drafting separate statement, MSJ, proposed order
19	12/04/18	CDL	1.8	450.00	Legal research re section 17200 claims can be summarily adjudicated on a motion brought under 437 and representative suits and summary adjudication; review In re Firearm cases
20	12/07/18	APG	.75	637.00	Attention to CMCO No. 7 and include revisions
21	12/11/18	APG	3.75	3,187.00	Attention to draft MSA and separate statement

1	12/12/18	APG	2.0	1,700.00	Review Alvarado and authorities; review PMK transcripts
2	12/13/18	CDL	.2	50.00	Review Petition to Coordinate
3	01/02/19	APG	.5	425.00	Confer with co-counsel re form of proposed order and Class Notice
4	01/03/19	CDL	.5	125.00	Review Alvarado case re MSJ
5	01/03/19	CDL	.4	100.00	Review APG edits to MSJ; make revisions
6	01/03/19	CDL	.2	50.00	Review Notice of Reassignment
7	01/07/19	CDL	2.5	625.00	Begin drafting RFP bonus class; special rogs, bonus class
8	01/07/19	APG	1.75	1,487.00	Draft topics and RFP for PMK deposition; confer with co-counsel re same
9	01/07/19	CDL	.2	50.00	Review opposition to petition to coordinate
10	01/08/19	CDL	3.8	950.00	Continue drafting special rogs and RFP for each sub-class
11	01/09/19	APG	.5	425.00	Revisions to discovery
12	01/09/19	CDL	1.5	375.00	Continue drafting sub-class discovery
13	01/09/19	CDL	.8	200.00	Review APG edits to special interrogatories; make revisions
14	01/09/19	APG	1.0	850.00	E-mail to client re status and discovery plan going forward; revisions and edits to discovery re sub-class issues
15	01/09/19	CDL	.4	100.00	Review APG edits to RFP and make revisions
16	01/10/19	CDL	.2	50.00	Review stip and proposed order re CMC
17	01/10/19	CDL	.5	125.00	Further analysis of Alvarado v. Dart case
18	01/10/19	APG	.25	212.00	Confer with client re discovery issues
19	01/10/19	CDL	1.8	450.00	Review Palay and APG edits to sub-class discovery (special rogs, RFA and RFP); make revisions
20	01/14/19	CDL	.3	75.00	Review order consolidating Duran case with other Sephora matters
21	01/14/19	APG	1.5	1,275.00	Review section 170.6 and Rules of Court 3.501, and related authorities; confer with co-counsel re same
22	01/15/19	APG	.5	425.00	Review authorities re 170.6; review draft 170.6 and email co-counsel
23	01/18/19	APG	.5	425.00	Review J. Jackson bio info; confer with co-counsel re same
24	01/21/19	APG	.25	212.00	Edits to Joint Stipulation Approving Proposed Order re Class Certification
25	01/24/19	APG	.25	212.00	Attention to Joint Stipulation Approving Order; confer with co-counsel re same
26	01/28/19	APG	.75	637.00	Follow up with Notice, proposed order and opt-out postcard; confer with co-counsel re same
27	01/30/19	APG	.5	425.00	E-mail to client re order re certification; confer with client re same and future steps
28	02/05/19	CDL	.2	50.00	Review Order granting MCC



1	02/12/19	APG	1.0	850.00	Attention to Duran insert into CMC re certified claims; e-mail co-counsel re same; revisions re trial plan
2	02/13/19	APG	.5	425.00	Attention to CMC statement and e-mail co-counsel re same; review and incorporate Palay edits
3	02/14/19	APG	.5	425.00	Review proposed stipulation and exhibit, trial plan; e-mail client re discovery verifications and review of responses to discovery
4	02/21/19	CDL	.8	200.00	Draft notice of PMK deposition OT and wage statement classes
5	02/22/19	APG	.25	212.00	Revisions to CMC Order; e-mail attorney Livingston re same
6	03/04/19	APG	.1	85.00	Attention to CMC Order
7	04/02/19	CDL	.2	50.00	Review order granting petition for coordination of add-on case
8	05/01/19	CDL	.2	50.00	Review CPT status report
9	05/10/19	CDL	.2	50.00	Review CPT Group link class list
10	05/21/19	APG	1.5	1,275.00	Attention to payroll records re bonus class period from May 15, 2014 to present
11	05/24/19	CDL	.2	50.00	Review CPT weekly report
12	05/31/19	APG	6.0	5,100.00	Attendance at CMC in San Francisco
13	06/03/19	APG	.1	85.00	Attention to CMC Order
14	06/05/19	APG	1.5	1,275.00	Revisions to Plaintiffs' proposed discovery plan re bonus subclass; draft proposed stipulations of fact re MSA
15	06/07/19	CDL	.2	50.00	Review CPT Group weekly report
16	09/17/19	APG	.5	425.00	Attention to PAGA supplement to trial plan
17	09/19/19	APG	.25	212.00	Review further CMCO revisions from opposing counsel and confer
18	09/19/19	APG	.5	425.00	Revisions to CMCO and convey to K. Allen
19	09/25/19	APG	1.0	850.00	Attendance at CMC in San Francisco
20	10/02/19	APG	.1	85.00	Attention to Stip and Order re scheduling
21	10/17/19	APG	1.5	1,275.00	Attention to correspondence to opposing counsel re PAGA compliance and LWDA letter; confer with co-counsel re same
22	10/18/19	APG	.5	425.00	Further edits to communication to opposing counsel re PAGA and LWDA letter
23	11/04/19	CDL	.2	50.00	Review CPT Group correspondence re late opt outs
24	11/05/19	APG	.25	212.00	Confer with K. Allen re PAGA issues and communication to opposing counsel
25	11/07/19	APG	.5	425.00	Attention to Joint CMC statement; confer with co-counsel
26	11/08/19	CDL	.3	75.00	Review Sephora's responses to Request for Production
27	12/27/19	APG	.5	425.00	Draft supplemental RFP and special interrogatories
28	01/29/20	APG	.75	637.00	Review discovery and confer with client re same

1	01/30/20	APG	.5	425.00	Review e-mail from opposing counsel re class member depositions; confer with co-counsel re covering same
2	01/06/20	SPS	2.7	1,080.00	Attend deposition of Wendy Sausser
3	01/06/20	APG	.5	425.00	Follow up with K. Allen re Sephora payroll production issues
4	01/07/20	APG	.25	212.00	E-mails to and from counsel re deposition of A. Valdez
5	01/07/20	APG	.5	425.00	Review notes from Sausser and Kerns depositions
6	01/08/20	APG	.25	212.00	E-mail to client re further discovery
7	01/14/20	APG	.75	637.00	Attention to discovery; confer with client re same
8	01/17/20	APG	.5	425.00	Attention to Joint CMC statement draft
9	01/21/20	APG	1.5	1,275.00	Follow up with discovery responses; review Sephora production; e-mail c-counsel re damage discovery from Sephora counsel; review e-mail from B. Hefelfinger re damages and responses to discovery
10	01/21/20	APG	.5	425.00	Review LWDA letter and allegations re discovery response prep
11	01/21/20	CDL	.5	425.00	Review of Sephora produced further documents
12	01/21/20	APG	.5	425.00	E-mails from co-counsel re deposition coverage; confer with counsel re same
13	01/22/20	APG	.5	425.00	Conference with W. Sausser re deposition scheduling
14	01/22/20	APG	.25	212.00	Conference with S. Rosman re deposition issues
15	01/22/20	APG	.5	425.00	Review data re non-respondent class members
16	01/22/20	APG	.5	425.00	E-mail client re document production; confer with client re production of documents; review e-mail from co-counsel re same
17	01/23/20	APG	2.0	1,700.00	Confer with S. Shapiro re deposition coverage; review class document production
18	01/23/20	APG	1.75	1,487.00	Review RFP, special interrogatories re bonus subclass, special interrogatories and RFPs; confer with client re same; review prior responses for consistency
19	01/23/20	APG	1.5	1,275.00	E-mail to co-counsel re deposition coverage for N. Alcaraz and D. Ali; confer with witnesses re same; confer with counsel re same
20	01/23/20	SPS	.3	120.00	Confer re depositions
21	01/24/20	APG	1.25	1,062.00	Attendance at CMC; confer with co-counsel re meet and confer re deposition scheduling
22	01/24/20	APG	.5	425.00	Memo to co-counsel re CMC; review notes re Alcaraz and Ali depositions; confer with S. Shapiro re same
23	01/27/20	SPS	3.0	1,200.00	Attend depositions of Alvarez and Ali; notes and e-mails re same
24	01/28/20	APG	1.0	850.00	Attention to Joint Stipulation approving proposed order; confer with co-counsel re same; final review of

1					order; notice and opt-out postcard; e-mail counsel re Hansen deposition attendance
2	01/29/20	APG	.25	212.00	Confer with Hansen re deposition; e-mail opposing counsel re same
3	01/29/20	APG	.25	212.00	Review deposition exhibits
4	02/03/20	CDL	.2	50.00	Review Orrick meet and confer letter
5	02/03/20	CDL	.3	75.00	Review Notice to Consumer, business record subpoena for Duran
6	02/03/20	CDL	.5	125.00	Begin drafting responses to wage statement discovery
7	02/04/20	CDL	1.5	375.00	Review all written discovery and production of documents for drafting responses to wage statement class discovery
8	02/04/20	CDL	1.5	375.00	Continue drafting responses to wage class discovery
9	02/05/20	CDL	1.5	375.00	Continue reviewing production of documents for drafting discovery responses; continue drafting responses
10	02/10/20	CDL	.4	100.00	Revise responses to special rogs with APG edits; revisions to responses to RFP
11	02/11/20	CDL	.2	50.00	Include DJP's edits in responses to rogs
12	02/11/20	APG	1.0	850.00	Confer with client re discovery and related issues on document production; review production; review e-mails re discovery from other plaintiffs and verification status
13					
14	02/11/20	CDL	.6	150.00	Edit and reformat supplemental responses to rogs and RFPs
15	02/13/20	CDL	.3	75.00	Review Sephora responses to written discovery
16	02/15/20	APG	1.5	1,275.00	Preparation of outline for PMK deposition re payroll documents
17	02/25/20	APG	1.0	850.00	Review meet and confer re discovery; review responses re Duran
18	02/28/20	APG	1.0	850.00	Review and edit draft meet and confer letter to Sephora counsel; review topics in PMK deposition notice re same; confer with K. Allen re same
19					
20	02/28/20	APG	.5	425.00	Attention to EmployStats engagement agreement
21	03/04/20	CDL	1.8	450.00	Go through production of documents to respond to Sephora meet and confer letter regarding identifying docs by bates numbers, go through check registers
22					
23	03/04/20	APG	1.	85.00	Attention to CMC order
24	04/01/20	CDL	.3	75.00	Review Sephora production paycards
25	05/21/20	CDL	.2	50.00	Review stip and order continuing motion and deadlines
26	06/01/20	CDL	.2	50.00	Review Plaintiffs; designation of expert witness
27	06/05/20	CDL	.2	50.00	Review rebuttal expert designation
28	06/15/20	APG	1.0	850.00	Attention to CMC; review opposing counsel's e-mail re same; confer with co-counsel re CMC statement
	06/26/20	APG	.50	425.00	Attention to EmployStats Service Agreement provisions; follow up

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

06/26/20	APG	.75	637.00	Revisions to list of PAGA claims in each action/notice
07/08/20	CDL	.2	50.00	Review exhibits to depo of Dr. Dwight Steward
07/15/20	SPS	4.1	1,640.00	Research and work on MSJ
07/16/20	SPS	1.0	400.00	Research and work on MSJ
07/17/20	SPS	.9	360.00	Work on MSJ
07/20/20	APG	2.75	2,337.00	Work on stipulation of facts and authentication of documents; review referenced documents for completeness; confer with M. Norton re productions
07/21/20	SPS	.9	360.00	Work on MSJ
07/20/20	SPS	.3	120.00	Work on MSJ
07/22/20	APG	2.0	1,700.00	Follow up with Stipulation of Facts and confer with counsel re same and productions; review Sephora responses referencing documents re bonus subclass issues
07/23/20	CDL	.8	200.00	Search through all productions for documents cited in stipulation of facts.
07/23/20	CDL	.8	200.00	Review redline stipulation of facts, try to match documents
07/23/20	APG	1.5	1,275.00	Attention to stipulations of fact; review of productions to match up document authentication
07/23/20	SPS	.2	80.00	Work on MSJ
07/24/20	APG	1.75	1,487.00	Follow up with revisions to stipulation of facts; follow up with documents being authenticated, confirming all documents utilized by expert included; confer with co-counsel re same
07/24/20	CDL	1.7	425.00	Continue document search for stip of facts
07/24/20	CDL	.2	50.00	Review Petersen survey stip re disclosure
07/30/20	CDL	3.7	925.00	Gather exhibits for PMK deposition; match to stip docs; create Dropbox link
07/31/20	CDL	.2	50.00	E-mail to court reporter with exhibits for PMK depo
08/02/20	CDL	1.2	300.00	Legal research re failure to exhaust
08/04/20	SPS	1.3	520.00	Work on separate statement and MSJ
08/05/20	SPS	6.1	2,440.00	Work on Motion for Summary Judgment, Separate Statement, compendium of exhibits
08/06/20	CDL	1.1	275.00	Review sections of MSA and edit same
08/06/20	APG	2.75	2,337.00	Attention to MSA and separate statement; follow up with M. Norton re payroll production
08/06/20	SPS	1.60	640.00	Work on Motion for Summary Judgment, Separate Statement, compendium of exhibits
08/07/20	CDL	1.2	300.00	Further revisions to MSA; legal research for same
08/07/20	APG	10.0	8,500.00	Attention to MSJ; confer with M. Norton re documents; review data and production re same
08/07/20	SPS	8.6	3,440.00	Work on Motion for Summary Judgment, Separate Statement, compendium of exhibits
08/10/20	APG	9.0	7,650.00	Attention to draft MSJ, separate statement and exhibits; confer with S. Shapiro re same

1	08/10/20	CDL	.5	125.00	Review Sephora 9 volumes of exhibits
	08/10/20	APG	2.75	2,337.00	Follow up review of MSJ and evidence
2	08/10/20	APG	2.50	2,125.00	Confer with associate re exhibits and payroll data; review data and stipulation of facts
3	08/10/20	SPS	.2	80.00	Redact MPA
4	08/11/20	APG	2.0	1,700.00	Review Sephora motions and exhibits
5	08/12/20	CDL	2.7	675.00	Review Sephora hybrid MIL/Motion to Strike PAGA claims; begin drafting opposition
6	08/12/20	CDL	1.1	275.00	Prepare analysis of issues covered by Sephora decert motion, MSJ/MSA
7	08/13/20	CDL	4.5	1,125.00	Continue legal research for opp to Sephora MIL/Motion to Strike; begin drafting opp to separate statement
8	08/25/20	CDL	.3	75.00	Review Sephora Motion Summary Adjudication, motions to seal
9	09/23/20	APG	.25	212.00	Attention to Rotman confidentiality agreement
10	09/25/20	CDL	.2	50.00	Review correspondence from CPT Group re wage and hour administration
11	10/29/20	SPS	3.0	1,200.00	Work on mediation brief; e-mails re same
12	10/30/20	SPS	1.7	680.00	Work on mediation brief; e-mails re same
13	11/02/20	APG	2.0	1,700.00	Review and provide edits to K. Allen revised draft mediation brief
14	11/02/20	SPS	1.5	600.00	Work on mediation brief; e-mails re same
15	11/03/20	SPS	.6	240.00	Review and revise mediation brief; e-mail re same
16	11/03/20	APG	2.00	1,700.00	Attention to mediation brief
17	11/04/20	SPS	.6	240.00	Review mediation brief edits; e-mail re discrepancy in damage computation
18	12/02/20	CDL	1.5	375.00	Read and review transcript of experts Petersen and Steward
19	12/19/20	APG	.25	212.00	Confer with co-counsel re production from Sephora and meet and confer re reponses/production
20	12/20/20	APG	2.0	1,700.00	Review Sephora production re missing time periods of documents
21	12/27/20	APG	.25	212.00	Review e-mail from K. Allen re meet and confer on production issues
22	01/03/21	APG	.5	425.00	E-mails to and from co-counsel re deposition scheduling and calling deponents
23	01/04/21	APG	1.5	1,275.00	Review authorities in support of Sephora MSJ re bonus; review Magaida and related cases
24	01/04/21	APG	.5	425.00	E-mails to co-counsel re Rotman recommendations on bracketing and respond
25	01/04/21	CDL	4.8	1,200.00	Begin legal research for an draft argument in opposition to MSJ re bonus and wage statement; review ours and Sephora's separate statements
26	01/04/21	CDL	.2	50.00	Review e-mails re settlement discussions
27	01/05/21	APG	4.0	3,400.00	Review authorities and research re opposition; review decert motion authorities
28					

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

01/05/21	APG	1.0	850.00	Review Rotman further recommendations; confer with client and co-counsel re same
01/05/21	CDL	5.2	1,300.00	Continue legal research for and drafting sections of opp; draft evidentiary objections; review all docs produced by Sephora and by client
01/06/21	CDL	5.3	1,325.00	Continue drafting opp to MSJ; legal research for same; revise evidentiary objections
01/07/21	APG	4.0	3,400.00	Attention to opposition to Sephora MSJ; re-review authorities and evidence cited; confer with paralegal re same
01/07/21	APG	.25	212.00	Review Joint Stipulation re deadlines and leave re motion to seal
01/07/21	CDL	4.6	1,150.00	Continue drafting opp to MSJ; review e-mail re stip to continue
01/07/21	CDL	.2	50.00	E-mail to opposing counsel re separate statement
01/08/21	CDL	.2	50.00	Review e-mails re continue MSJ hearing, briefing
01/08/21	CDL	2.5	625.00	Further review of evidence for opposition and evidentiary objections; revisions thereto
01/11/21	CDL	4.5	1,125.00	Research re Sephora claim paid employees non-discretionary bonuses using standard calculations; federal versus state standards; continuing drafting opp and evidentiary objections
01/11/21	APG	3.0	2,550.00	Review payroll evidence and bonus plans re calculations; review evidentiary objections and further research
01/11/21	CDL	.3	75.00	Review court's order granting class certification
01/11/21	CDL	.2	50.00	Review signed stip and order re continuing hearing, briefing
01/12/21	CDL	3.8	950.00	Research Alvarado v. Dart and progeny and court/appellate briefs referring to same; research secondary sources discussing same
01/13/21	APG	.25	212.00	Review e-mails re stipulation re deadlines
01/14/21	CDL	.2	50.00	Review court order re new deadlines
01/14/21	CDL	.5	125.00	Finalize first draft of opp to MSJ
01/15/21	APG	.5	425.00	Attention to opposition to MSJ; review evidence and authorities re same
02/08/21	APG	.25	212.00	Confer with co-counsel re settlement status; e-mail counsel re same
03/11/21	CDL	.7	175.00	Revisions to opp to MSJ
04/21/21	CDL	.3	75.00	Review fees and costs to date
04/23/21	CDL	2.5	625.00	Begin drafting our part of opposition to MSJ
04/27/21	CDL	4.8	1,200.00	Continue drafting our portion of opp to Sephora MSJ; legal research for same; revise opp; review motion to decertify issues
04/28/21	APG	3.5	2,975.00	Further revisions and evidence analysis re opposition to MSJ; review decertification issues
04/29/21	APG	2.0	1,700.00	Further revisions and review of evidence citations

1	04/29/21	APG	.75	637.00	Final review of final opposition and citations
	04/29/21	CDL	2.5	625.00	Finalize our portion of opp to Sephora MSJ
2	05/06/32	CDL	.2	50.00	Review joint stipulation vacate trial date
	05/26/31	APG	.5	425.00	Attention to MOU provisions
3	06/24/21	APG	.5	425.00	Attention to co-counsel agreement provisions
	07/16/21	APG	1.0	850.00	Attention to Motion for Prelim Approval
4	07/18/21	APG	.25	212.00	Attention to MPA
	07/19/21	CDL	.3	75.00	Review APG dec motion preliminary approval class PAGA settlement
5					
6	07/20/21	APG	.5	425.00	Review updated proposal from Phoenix Solutions and CPT
7	07/23/21	APG	.5	425.00	Review revised Settlement Agreement
	08/02/21	CDL	.2	50.00	Review supplemental Allen Decl. ISO MPA
8	08/02/21	CDL	.2	50.00	Review fully executed Settlement Agreement to be filed with LWDA
9					
10	08/26/21	APG	.5	425.00	Attention to revised final settlement agreement for signing and Stipulation and Order to Continue Motion and Hearing Deadlines and Trial
11					
12	09/16/21	APG	.75	637.00	Revisions to Settlement Agreement and Joint Supp Brief in Support of MPa
	11/04/21	APG	.5	425.00	Attention to revised Settlement Agreement
13	11/09/21	APG	.75	637.00	Review final of first amended settlement agreement; confer with counsel re same
14					
15	11/11/21	APG	.5	425.00	Attention to Allen Second Supplemental Declaration and joint supplemental brief
16	12/16/21	CDL	.2	50.00	Review order granting preliminary approval class action settlement
17	02/02/22	CDL	2.8	700.00	Review fees and costs; begin drafting APG declaration ISO motion for fees and costs
18	02/03/22	CDL	4.2	1,050.00	Continue drafting APG declaration ISO motion fees and costs; prepare chart of fees and costs
19	<b>Totals</b>		<b>557.45</b>	<b>\$275,669.50</b>	

# Exhibit A



Trans	Date	F "Gp"	Actual	"Dol Transaction description
09/22/17	VI		1554.65	OneLegal - San Francisco County Superior Court - File Complaint - Cla
10/06/17	VI		27.95	OneLegal - Delivery of proof of Service to Judge
10/11/17	VI		9.95	OneLegal - Efiling Charge - San Francisco County Superior Court - Pro
10/17/17	VI		86	CourtCall #8661280
11/06/17	VI		46.3	Pacer Service Center - Research 7/01/17 - 9/30/17
11/07/17	PP		58.75	FexEx #770694511544
12/01/17	PP		31.62	FedEx #770873121118 (11-30-17)
12/04/17	CK		47.4	File & ServeXpress #201711691693401 //53518//
12/20/17	CK		1743.7	Just Write Court Reporters #171113AW //53861//
01/17/18	VI		86	CourtCall #8839876
02/22/18	CK		1131.25	Miller & Company Reporters #19245 //54009//
03/12/18	PP		82.2	FedEx #780001516863
03/12/18	PP		57.78	FedEx #780012802005
03/12/18	PP		57.78	FedEx #780012802406
03/21/18	CK		1890	Just Write Court Reporters #180313CN
03/30/18	CK		1134.55	Atkinosn-Baker, Inc. #AC02A84 AC //54096//
04/25/18	CK		896.15	Atkinson-Baker, Inc. #AC02A85 //54135//
05/23/18	CK		432.95	Barkley Court Reporters #520188 //54502//
05/23/18	CK		515.2	Barkley Court Reporters #520324 //54502//
11/12/18	VI		116	CourtCall #9433420
11/19/18	VI		86	CourtCall #9442149
12/05/18	CK		22	File & ServeXpress - San Francisco County Superior Court - Filing and
02/12/19	VI		94	CourtCall #9605100
02/19/19	VI		4	Pacer Service Center - Research 10/01/18 -12/31/18
05/29/19	VI		94	CourtCall #9825171
06/07/19	VI		94	CourtCall #9846378
07/12/19	CK		297.5	Aptus Court Reporting #1059353 //56030//
09/24/19	VI		94	CourtCall #10076010
11/13/19	VI		124	CourtCall #10179292
01/14/20	CK		75.6	One Hour Delivery Service #315455 //56222//
01/27/20	CK		835.87	Aptus Court Reporting #1067580 //56265//
01/27/20	VI		94	CourtCall #10321414
02/14/20	PP		43.22	FedEx #777778817221
02/20/20	CK		1472.18	Aptus Court Reporting #1068866//56347//
03/06/20	CK		3500	Steward Research Group Inc DBA Employstats Wire transfer to Chasi
04/01/20	CK		5193.76	Steward Research Group Inc DBA Employstats Wire transfer to Chase
06/18/20	VI		94	CourtCall #10648486
07/06/20	CK		7405.35	EmployStats #3306 //Wire Transfer//
07/30/20	CK		605.94	EmployStats #3314 //Wire Transfer//
07/31/20	CK		380.78	Barkley Court Reporters, Inc. #544172
09/10/20	CK		3168.32	CPT Group #14688 //60385//
09/15/20	CK		3313	David A. Rotman #20765 //60403//
10/15/20	CK		631.42	U.S. Legal Support, Inc. #110389705 //60501//
11/11/20	CK		947.08	US Legal Support #110389705 //60598//
11/16/20	CK		1533.46	Employstats wire transfer //9401596890//

03/18/21	VI	20 San Francisco Superior Court - Statutory Fee
05/05/21	CK	40 File & ServeXpress #663434730 //65153//
11/24/21	CK	1418.25 Employstat #3663 - Wire Transfer
		41687.91