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

17 (Additional Counsel on Following Page)

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COORDINATION PROCEEDING SPECIAL
TITLE [RULE 3.550]

SEPHORA WAGE AND HOUR CASES

Included actions:

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

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

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

Judicial Council Coordination Proceeding
No.: 4911

CLASS ACTION

**DECLARATION OF MATTHEW F.
ARCHBOLD IN SUPPORT OF MOTION
FOR APPROVAL OF ATTORNEY FEES
AND LITIGATION COSTS**

DATE: April 6, 2022

TIME: 2:00 p.m.

DEPT: 613

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9 and the Certified Class/Subclasses

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Attorneys for Plaintiff JESSICA DURAN and the Certified Subclasses

1 I, Matthew F. Archbold, hereby declares as follows:

2 1. I have personal knowledge of the facts contained in this declaration.

3 2. I am a Partner at the law firm of DEASON & ARCHBOLD and am
4 counsel of record for Named Plaintiffs Lacey Hernandez and Brenda Morales and
5 as Class Counsel for the Class along with co-counsel of record.

6 3. I make this declaration in support of the Plaintiffs' Motion for
7 Approval of Attorney Fees and Litigation Costs in connection to the pending Class
8 Action Settlement.

9 4. This Declaration is filed to support representations and facts
10 submitted to the Court as to: the reasonableness of the work performed by Class
11 Counsel, the attorney fees incurred in the prosecution of this matter as well as the
12 litigation costs incurred by Deason & Archbold as Class Counsel; and other related
13 matters.

14 5. the proposed Settlement comes at the end of several years of
15 enthusiastic litigation. During the litigation, the Parties have contested: (1) the
16 scope of Named Plaintiffs' claims asserted in the consolidated Complaint; (2)
17 whether the class and subclasses should be certified; (3) underlying liability for a
18 host of claims/subclasses; and extensive and complex damages issues and
19 calculations.

20 6. In December, 2000 I was licensed to practice by the California State
21 Bar. In 2005, I, along with my business partner David Deason, formed the law firm
22 of Deason & Archbold.

23 7. Deason & Archbold has focused its practice on employment matters,
24 including but not limited to wage and hour issues.

25 8. In addition to this Court approving Deason & Archbold as Class
26 Counsel in this case, I have litigated numerous wage and hour class and collective
27 action while at Deason & Archbold. Excluding the instant action, the name and
28 case number of several such matters are as follows: Nordstrom Commission

1 Cases, Orange County Superior Court - Judicial Council Coordination Proceeding
2 No. 4419 (unpaid commission wages class action with approximately 65,000 class
3 members); Esparza v. Two Jinn, Inc., et al., USDC Case No. SACV09-00099
4 AG(RNBx) (unpaid overtime class action disputing application of the Retail Sales
5 Commission exemption under the FLSA); Maraventano/Balasanyan v. Nordstrom,
6 Inc., Case No. 10cv2671 JM (WMc) (unpaid commission wages class action with
7 approximately 45,000 class members); Balsamo v. Orange Courier, Inc., OCSC
8 Case No. 30-2010-00406066-CU-OE-CXC (unpaid minimum wage and meal
9 period class action); Flowers, et al. v. HSBC Auto Finance, Inc., et al., Case No.
10 07CV 2146 MMA (“off the books” overtime class action with Rule 23 state law
11 and FLSA claims); Rico v. Chick’s Sporting Goods, Case No. BC 297826 (retail
12 overtime exemption class action); Santa Ana v. Eurostar, Inc., Case No.
13 BC310739; Jue v. Crawford & Company, Case No. CV03-7014 RGK (FMOx)
14 (Surveillance investigator overtime class action); Bernal v. International
15 Reupholstery Corporation of America, Case No. EDCV 04-01272VAP (SGLx)
16 (national FLSA overtime class action); Anchondo v. Faticon Incorporated, Case
17 No. SACV04-1453 (500+ putative class member national overtime class action
18 under the FLSA); Wonsch v. Faticon Incorporated, Case No. 06CC00053 (Non-
19 reimbursed employment related expenses and overtime class action; Anchondo vs.
20 Hospital Inventories Specialists, Inc., Case No. BC375250 (450+ class member
21 overtime class action).

22 9. The partners of Deason & Archbold have also fully litigated numerous
23 FLSA collective actions with hundreds of Opt-In Plaintiffs against major
24 employers such as the Los Angeles Police Department, the City of Los Angeles,
25 national workers compensation investigation firms and bail bonds companies, and
26 the County of San Bernardino.

27 10. Defendant has produced, and I have reviewed, literally thousands of
28 pages of documents on issues of class certification, liability and damages,

1 including, but not limited to, Sephora's policies and procedures; memos; training
2 manuals; personnel files; timesheets and payroll records; financial data; and SEC
3 filings. The parties have prepared and filed multiple briefs, and appeared on
4 several motions and status conferences.

5 11. The parties have engaged in countless settlement discussions, before,
6 during and after mediation, and an exhaustive evaluation of the merits of the case
7 and the various settlement offers and counteroffers throughout the litigation.
8 Additionally, the Parties have conducted their own internal investigations and
9 witness interviews.

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

14 13. It has been my practice during this litigation to maintain
15 contemporaneous time recording for the amount of time spent (at a minimum of
16 one-tenth of an hour) on each task, with explanatory statements regarding the
17 actual task involved. My usual practice is to record only those tasks that would
18 customarily be billed to a commercial client paying an hourly fee. As of the date
19 this Declaration was drafted, and over the course of litigating of this matter, I have
20 billed a total of 82.6 hours on this case. At \$650.00 per hour, the total attorney fees
21 billed by Deason and Archbold on this case thus far are **\$53,690.00**. A true and
22 correct copy of our redacted time records are attached hereto as Exhibit A.

23 14. As a typical procedure, Deason & Archbold maintains a
24 contemporaneous cost record for each case. As of the date of this declaration,
25 Deason & Archbold had also incurred **\$12,808.08** in direct costs for the
26 prosecution of this action, including but not limited to \$8,242.75 in expert survey
27 fees, \$3,115.33 in expert damages calculation fees, \$626.25 in mediation fees, and
28 \$1,450.00 in filing fees.

EXHIBIT “A”

EXHIBIT "A"

DEASON and ARCHBOLD
Time and Billing Sheet

Date	Atty.	Description	Hours	Rate	Billable Amount
7/8/2016	MFA	Review documents produced by Plaintiffs supporting claims.	2.30	\$650.00	\$1,495.00
7/8/2016	MFA	Rvw. Email from M. Norton re [REDACTED]	0.20	\$650.00	\$130.00
7/12/2016	MFA	Telecon w/ M. Norton re documents, [REDACTED] es.	0.80	\$650.00	\$520.00
7/14/2016	MFA	Rvw/respond to email thread with Norton re [REDACTED]	0.30	\$650.00	\$195.00
7/18/2016	MFA	Rvw/respond to email thread with Norton re [REDACTED]	0.10	\$650.00	\$65.00
7/22/2016	MFA	Rvw/respond to email thread with Norton re [REDACTED]	0.40	\$650.00	\$260.00
7/24/2016	MFA	Rvw/respond to email thread with Norton/Deason re [REDACTED]	0.20	\$650.00	\$130.00
7/28/2016	MFA	Further review of Sephora employment documents, handbooks, policies.	0.80	\$650.00	\$520.00
7/28/2016	MFA	Rvw/respond to email thread with Norton re Sephora employee docs.	0.40	\$650.00	\$260.00
7/29/2016	MFA	Rvw. Plaintiff statement summary.	0.30	\$650.00	\$195.00
8/2/2016	MFA	Rvw/revise/edit Plaintiffs' PAGA letter to LWDA.	0.70	\$650.00	\$455.00
8/4/2016	MFA	Rvw. Plaintiff expanded statement summary.	0.60	\$650.00	\$390.00
8/17/2016	MFA	Begin Draft Complaint for Damages.	1.10	\$650.00	\$715.00
8/17/2016	MFA	Research developments in [REDACTED]	2.90	\$650.00	\$1,885.00
8/17/2016	MFA	Telecon with Norton regarding Complaint.	0.20	\$650.00	\$130.00
8/19/2016	MFA	Rvw. Client summary report re [REDACTED]	0.30	\$650.00	\$195.00
8/19/2016	MFA	Rvw/respond to email thread re Plaintiff Morales [REDACTED]	0.30	\$650.00	\$195.00
8/25/2016	MFA	Continue Draft Complaint for Damages.	1.10	\$650.00	\$715.00
9/9/2016	MFA	Finalize 1st draft of Complaint for Damages.	1.60	\$650.00	\$1,040.00
9/13/2016	MFA	Revise and Edit 1st draft of Complaint for Damages.	0.70	\$650.00	\$455.00
9/13/2016	MFA	Rvw/respond to email thread with Norton re 1st draft of Complaint.	0.30	\$650.00	\$195.00
11/18/2016	MFA	Rvw. Correspondence from A Heifetz.	0.10	\$650.00	\$65.00
11/28/2016	MFA	Rvw research on [REDACTED]	0.40	\$650.00	\$260.00
1/19/2017	MFA	Prepare email to co-counsel, Setareh re Status Conference.	0.10	\$650.00	\$65.00
1/25/2017	MFA	Revise FINAL draft of Complaint for Damages for state Court filing.	0.30	\$650.00	\$195.00
1/25/2017	MFA	Prepare Notice of Related Case.	0.20	\$650.00	\$130.00
1/27/2017	MFA	Rvw/respond to email thread w/ M. Norton re: state court complaint.	0.20	\$650.00	\$130.00
2/8/2017	MFA	Review Court's Order re CMC.	0.10	\$650.00	\$65.00
2/10/2017	MFA	Review Court new filing documents.	0.20	\$650.00	\$130.00
2/15/2017	MFA	Review report on CMC.	0.10	\$650.00	\$65.00
2/16/2017	MFA	Review correspondence from A. Stahtapolous.	0.10	\$650.00	\$65.00
3/3/2017	MFA	Review report on hearing to coordinate.	0.20	\$650.00	\$130.00
4/28/2017	MFA	Rvw and respond to email from Heifetz re: CMC.	0.10	\$650.00	\$65.00
5/1/2017	MFA	Rvw and respond to email thread re: CMC.	0.10	\$650.00	\$65.00
5/4/2017	MFA	Rvw and respond to email thread with Heifetz re: CMC continuance.	0.10	\$650.00	\$65.00
5/18/2017	MFA	Tele. With counsel fro Duran re: [REDACTED]	0.40	\$650.00	\$260.00

DEASON and ARCHBOLD
Time and Billing Sheet

5/22/2017	MFA	Rvw email from Heifetz re: CMC Statement.	0.10	\$650.00	\$65.00
5/31/2017	MFA	Tele w/ counsel for Duran re: [REDACTED]	0.30	\$650.00	\$195.00
6/1/2017	MFA	Revise/edit FAC.	0.30	\$650.00	\$195.00
6/2/2017	MFA	Rvw Sephora responses to Form Rogs from Setareh.	0.30	\$650.00	\$195.00
6/2/2017	MFA	Rvw Sephora responses to Employment Form Rogs from Setareh.	0.40	\$650.00	\$260.00
6/2/2017	MFA	Rvw Sephora responses to RFP from Setareh.	0.30	\$650.00	\$195.00
6/2/2017	MFA	Rvw Sephora responses to Spec Rogs, set 1 from Setareh.	0.70	\$650.00	\$455.00
6/2/2017	MFA	Rvw Sephora responses to Spec Rogs, set 2 from Setareh.	0.60	\$650.00	\$390.00
6/2/2017	MFA	Rvw Sephora supp responses to Employment Form Rogs from Setareh.	0.20	\$650.00	\$130.00
6/2/2017	MFA	Rvw Sephora supp responses to RFP from Setareh.	0.30	\$650.00	\$195.00
6/2/2017	MFA	Rvw Sephora supp responses to Spec Rogs, set 2 from Setareh.	0.30	\$650.00	\$195.00
6/2/2017	MFA	Rvw. Setareh written discovery to Defendant.	0.90	\$650.00	\$585.00
6/5/2017	MFA	Rvw depo Notices to Plaintiffs Hernandez and Morales.	0.30	\$650.00	\$195.00
6/6/2017	MFA	Review and respond to email with Plaintiff Hernandez re depo.	0.10	\$650.00	\$65.00
6/6/2017	MFA	Review RFP to Plaintiffs Hernandez and Morales from Def.	0.50	\$650.00	\$325.00
6/12/2017	MFA	Meet with Plaintiff Hernandez re upcoming depo.	2.20	\$650.00	\$1,430.00
6/30/2017	MFA	Review/revise/edit Bel-Aire West Stip and Notice.	0.40	\$650.00	\$260.00
7/19/2017	MFA	Review depo transcript for Hernandez.	1.10	\$650.00	\$715.00
7/19/2017	MFA	Review depo transcript for Morales.	0.70	\$650.00	\$455.00
8/16/2017	MFA	Review Def. Proposed Protective Order.	0.30	\$650.00	\$195.00
8/30/2017	MFA	Review Martinez Depo. Transcript.	1.10	\$650.00	\$715.00
9/8/2017	MFA	Review Provencio Depo. Transcript.	0.90	\$650.00	\$585.00
10/18/2017	MFA	Review email hread re: CMC.	0.20	\$650.00	\$130.00
1/12/2018	MFA	Review summary of [REDACTED]	0.20	\$650.00	\$130.00
1/19/2018	MFA	Review draft of CMC statement	0.20	\$650.00	\$130.00
1/23/2018	MFA	Review final version of CMC Statement.	0.10	\$650.00	\$65.00
1/25/2018	MFA	Review correspondence from co-counsel re; improper depo. Notice service.	0.10	\$650.00	\$65.00
2/8/2018	MFA	Review email from Stathopoulos re: PMK depositions.	0.10	\$650.00	\$65.00
2/20/2018	MFA	Rvw email thread between counsel re: PMK depositions.	0.20	\$650.00	\$130.00
2/23/2018	MFA	Rvw. Def. Opposition to Burnthorne-Martinez Motion to Compel RFP.	0.40	\$650.00	\$260.00
2/28/2018	MFA	Rvw document production from Defendant.	1.20	\$650.00	\$780.00
3/8/2018	MFA	Rvw email thread re deposition scheduling.	0.20	\$650.00	\$130.00
3/9/2018	MFA	Rvw email thread re: PMK depositions.	0.20	\$650.00	\$130.00
3/9/2018	MFA	Rvw. Def. responses to Supp Responses to Burnthorne ROGS, set 2.	0.30	\$650.00	\$195.00
3/9/2018	MFA	Rvw. Def. responses to Supp Responses to Burnthorne RFP, set 1.	0.20	\$650.00	\$130.00
3/12/2018	MFA	Rvw. Def Objections to Duran Amended Depo. Notice. (30 pgs)	0.40	\$650.00	\$260.00
3/29/2018	MFA	Rvw corres from Stathopoulos re: payroll sample production.	0.10	\$650.00	\$65.00

DEASON and ARCHBOLD
Time and Billing Sheet

4/8/2018	MFA	Prepare declaration section re class counsel qualifications for cert motion.	0.20	\$650.00	\$130.00
4/10/2018	MFA	Review cert motion filing.	0.60	\$650.00	\$390.00
4/13/2018	MFA	Review email thread re: [REDACTED]	0.20	\$650.00	\$130.00
4/19/2018	MFA	Review email thread re: [REDACTED]	0.20	\$650.00	\$130.00
4/20/2018	MFA	Review Def Motion to File Under Seal.	0.30	\$650.00	\$195.00
5/1/2018	MFA	Research, review and analyze Dynamex case.	0.60	\$650.00	\$390.00
5/29/2018	MFA	Review Def's opposition to Motion for Class Certification.	1.70	\$650.00	\$1,105.00
5/29/2018	MFA	Review Def's Appendices of Evidence re: Opp to Class Cert.	0.90	\$650.00	\$585.00
6/15/2018	MFA	Review research on prior case as [REDACTED]	0.40	\$650.00	\$260.00
7/10/2018	MFA	Review Tentative ruling on Motion for Class Certification.	0.30	\$650.00	\$195.00
7/26/2018	MFA	Review and analyze Troester v. Starbuck's	0.80	\$650.00	\$520.00
10/12/2018	MFA	Review and analyze Order Granting in Part Certification (46 pgs)	1.40	\$650.00	\$910.00
11/1/2018	MFA	Review draft proposed order for class certification.	0.30	\$650.00	\$195.00
11/15/2018	MFA	Review draft CMC statement.	0.20	\$650.00	\$130.00
11/16/2018	MFA	Rvw email thread re drafting of postcard to class members.	0.20	\$650.00	\$130.00
12/14/2018	MFA	Rvw and confer re: Def. proposed changes to Class Notice.	0.40	\$650.00	\$260.00
12/18/2018	MFA	Rvw Def proposal re Bunton Opt-outs.	0.10	\$650.00	\$65.00
1/3/2019	MFA	Confer with co-counsel re: [REDACTED]	0.30	\$650.00	\$195.00
2/18/2019	MFA	Review mailing draft of Notice to Class.	0.20	\$650.00	\$130.00
3/8/2019	MFA	Review proposed CMO.	0.10	\$650.00	\$65.00
3/8/2019	MFA	Review Def Petition for Coordination of Potential Add-On Case.	0.30	\$650.00	\$195.00
4/12/2019	MFA	Review weekly report from Class Admin.	0.10	\$650.00	\$65.00
4/19/2019	MFA	Review weekly report from Class Admin.	0.10	\$650.00	\$65.00
4/30/2019	MFA	Review weekly report from Class Admin.	0.10	\$650.00	\$65.00
5/10/2019	MFA	Review weekly report from Class Admin.	0.10	\$650.00	\$65.00
5/31/2019	MFA	Review weekly report from Class Admin.	0.10	\$650.00	\$65.00
6/3/2019	MFA	Review proposed CMO.	0.20	\$650.00	\$130.00
9/17/2019	MFA	Review PAGA Supplement to trial plan.	0.20	\$650.00	\$130.00
9/23/2019	MFA	Revise and edit class member discovery survey.	0.60	\$650.00	\$390.00
1/23/2020	MFA	Review and Analyze Chavez v. Converse, Security check case.	0.20	\$650.00	\$130.00
2/16/2020	MFA	Review and Analyze Friekin v. Apple, Security check case.	0.70	\$650.00	\$455.00
2/28/2020	MFA	Review, analyze & research Def. Disclosure of Expert Wwitness.	0.50	\$650.00	\$325.00
6/5/2020	MFA	Review, analyze & research Def. Disclosure of Supp. Expert Wwitness.	0.20	\$650.00	\$130.00
6/25/2020	MFA	Analysis and discussion of [REDACTED]	0.40	\$650.00	\$260.00
8/6/2020	MFA	Review and respond to email thread re: potential mediators.	0.10	\$650.00	\$65.00
8/7/2020	MFA	Review and analyze Def. Motion for Summary Judgment/Adjudication.	2.40	\$650.00	\$1,560.00
8/8/2020	MFA	Review and analyze Def. Motion for Decertification.	1.70	\$650.00	\$1,105.00

DEASON and ARCHBOLD
Time and Billing Sheet

8/12/2020	MFA	Review Plaintiffs' Coordinated Motion for Summary Adjudication.	0.90	\$650.00	\$585.00
8/13/2010	MFA	Review/respond to email thread w/ counsel re: [REDACTED]	0.30	\$650.00	\$195.00
8/18/2020	MFA	Rvw. Email thread with Judge Wiss re: mediation and motion scheduling.	0.20	\$650.00	\$130.00
8/28/2020	MFA	Rvw. Correspondence from mediator re: interplay with co-counsel/offer structure.	0.10	\$650.00	\$65.00
9/21/2020	MFA	Rvw/execute and return mediation roster/confidentiality.	0.20	\$650.00	\$130.00
11/10/2020	MFA	Prepare for mediation - review damages calcs, pending motions (as needed).	2.60	\$650.00	\$1,690.00
11/11/2020	MFA	Appearance at Zoom mediation.	10.30	\$650.00	\$6,695.00
11/18/2020	MFA	Rvw/respond to email thread re: post-mediation discussions/strategies.	0.30	\$650.00	\$195.00
12/11/2020	MFA	Rvw/respond to email thread re: further post-mediation discussions/strategies.	0.20	\$650.00	\$130.00
12/18/2020	MFA	Rvw/respond to email thread re: further post-mediation discussions/strategies.	0.30	\$650.00	\$195.00
1/4/2021	MFA	Rvw/respond to email thread re: further post-mediation discussions/strategies.	0.20	\$650.00	\$130.00
2/18/2021	MFA	Rvw email from co-counsel re: [REDACTED]	0.10	\$650.00	\$65.00
3/29/2021	MFA	Rvw/respond to email thread re: further post-mediation discussions/strategies.	0.30	\$650.00	\$195.00
4/21/2021	MFA	Rvw/respond to email thread re: further post-mediation discussions/strategies.	0.40	\$650.00	\$260.00
4/22/2021	MFA	Rvw email from co-counsel re: status of settlement/sephora counter.	0.10	\$650.00	\$65.00
5/5/2021	MFA	Rvw/respond to email thread re: further post-mediation discussions/strategies.	0.30	\$650.00	\$195.00
5/7/2021	MFA	Rvw/respond to email thread re: [REDACTED]	0.20	\$650.00	\$130.00
6/25/2021	MFA	Revise and edit 1st draft of long form settlement agreement.	2.10	\$650.00	\$1,365.00
7/14/2021	MFA	Prepare draft of Notice of Settlement to Class Members.	2.90	\$650.00	\$1,885.00
7/15/2021	MFA	Review draft motion for Prelim Approval.	1.40	\$650.00	\$910.00
7/16/2021	MFA	Review draft of proposed Order Granting Prelim Approval.	0.80	\$650.00	\$520.00
7/20/2021	MFA	Prepare Declaration ISO of Motion for Prelim Approval.	0.90	\$650.00	\$585.00
7/21/2020	MFA	Rvw/respond to email thread re: cy pres recipient.	0.20	\$650.00	\$130.00
7/21/2020	MFA	Research interplay and applicable waivers in Class Actions and FLSA waivers.	1.20	\$650.00	\$780.00
7/21/2021	MFA	Review and revise 2nd draft of Motion for Prelim App.	0.70	\$650.00	\$455.00
8/26/2021	MFA	Review/annotate detailed tentative ruling on Motion for Prelim App..	1.10	\$650.00	\$715.00
9/3/2021	MFA	Prep corres to co-counsel re: DEASON & ARCHBOLD litigation costs.	0.10	\$650.00	\$65.00
9/23/2021	MFA	Review and advise re: draft supplemental agreement, notice, and briefing.	0.40	\$650.00	\$260.00
12/9/2021	MFA	Compose/respond to email thread re: possible hearing date on supp MPA.	0.10	\$650.00	\$65.00
12/16/2021	MFA	Rvw Court Order Granting Motion for Prelim App.	0.40	\$650.00	\$260.00
1/10/2022	MFA	Rvw. Email from settlement admin re: admin.	0.10	\$650.00	\$65.00
1/13/2022	MFA	Rvw email thread btwn settlement admin and A. Stathopoulos.	0.20	\$650.00	\$130.00
1/19/2022	MFA	Rvw email thread re: "final" versions of Notice and calculations.	0.20	\$650.00	\$130.00
2/5/2022	MFA	Prepare Declaration for use in Motion for Fees and Costs.	0.60	\$650.00	\$390.00
2/11/2022	MFA	Review Weekly report from Settlement Admin.	0.10	\$650.00	\$65.00
	MFA			\$650.00	\$0.00
	MFA			\$650.00	\$0.00

DEASON and ARCHBOLD
Time and Billing Sheet

	MFA			\$650.00	\$0.00
	MFA			\$650.00	\$0.00
	MFA			\$650.00	\$0.00
			82.60		\$53,690.00