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7 Attorneys for Plaintiff
 ALYSSA BURNTHORNE-MARTINEZ,
 8 Class Representatives, and the Settlement Class

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SUPERIOR COURT OF THE STATE OF CALIFORNIA
 FOR THE COUNTY OF SAN FRANCISCO
 COMPLEX CIVIL LITIGATION

Coordinated Proceedings Special Title [Rule
 3.550]
 SEPHORA WAGE AND HOUR CASES
 Included actions:
Burnthorne-Martinez v. SEPHORA USA, Inc.
 (San Francisco OGC-16-55-894)
Provencio v. SEPHORA USA, Inc.
 (Santa Clara 16CV294112)
Hernandez et al. v. SEPHORA USA, Inc.
 (San Francisco OGC-17-557031)
Duran v. Sephora USA, Inc.
 (San Francisco CGC-17-561452)

Judicial Counsel Coordinated Proceeding
 No. 4911
 Assigned to Coordinated Trial Judge, the
 Honorable Andrew Y.S. Cheng, Department 613
**DECLARATION OF SHAUN SETAREH IN
 SUPPORT OF PLAINTIFFS' MOTIONS
 FOR FINAL APPROVAL OF CLASS
 SETTLEMENT AND FOR ATTORNEYS'
 FEES, REIMBURSEMENT OF COSTS, AND
 ENHANCEMENT AWARDS**
 Date: April 6, 2022
 Time: 2:00 p.m.
 Place: Department 613

Complaint Filed: March 10, 2016

1 **DECLARATION OF SHAUN SETAREH**

2 I, Shaun Setareh, declare as follows:

3 1. I am an attorney in good standing duly admitted to the State Bar of California, the
4 principal attorney at Setareh Law Group, counsel of record for Plaintiff ALYSSA BURNTHORNE-
5 MARTINEZ (“Burnthorne-Martinez”) in this coordinated proceeding with Plaintiffs ROSE
6 PROVENCIO, JESSICA DURAN, LACEY HERNANDEZ, and BRENDA MORALES (collectively
7 with Ms. Burnthorne-Martinez, “Plaintiffs”) against Defendant SEPHORA USA, INC. (“Sephora” or
8 “Defendant”) (Plaintiffs and Defendant, collectively, the “Parties”). This declaration is made in support
9 of Plaintiffs’ Motions for Final Approval of Class Settlement and for Attorneys’ Fees, Reimbursement of
10 Costs, and Enhancement Awards.

11 2. Except for those matters stated on information and belief, which I am informed and
12 believe are true and correct, I have personal knowledge of all matters set forth herein. If called as a
13 witness, I could and would competently testify thereto.

14 **Adequacy of Plaintiff Burnthorne-Martinez and Her Counsel**

15 3. I am aware of no conflicts of interest between Plaintiffs and absent Class Members.
16 Furthermore, throughout this litigation, Ms. Burnthorne-Martinez and the other Plaintiffs have pursued
17 the interests of the Class above their own interests.

18 4. I received my undergraduate degree from UCLA in 1996 and my law degree from Loyola
19 Law School in 1999. Since being admitted to the State Bar of California in 1999, I have actively
20 practiced civil litigation for the entirety of that time period.

21 5. Setareh Law Group and I, as its principal attorney, are well-experienced class action
22 attorneys. I, along with the senior attorney assigned to this case, Thomas Segal, have considerable
23 experience in class action litigation. I, and the attorneys at Setareh Law Group, have been involved as
24 lead class counsel, co-lead class counsel, and other levels of involvement in over 100 wage-and-hour,
25 consumer, and antitrust class action cases. Because of this, Setareh Law Group has more than 140
26 Westlaw citable opinions, including the following noteworthy appellate decisions:

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1 ***State Appellate Decisions***

2 a. *Troester v. Starbucks Corporation, et al.*, 5 Cal.5th 829 (2018) (reversed
3 summary judgment in favor of Defendants, issuing a landmark published decision that clarified
4 and rejected the application of the widely adopted federal *de minimis* doctrine to California’s
5 wage-and-hour laws). In this victory for Plaintiff in the Supreme Court of California, I was
6 appointed as Lead Counsel and received the California Lawyer of the Year or “CLAY” award
7 for my work on the case.

8 Setareh Law Group has prevailed in its six most recent Ninth Circuit appeals. Four of the six cases
9 resulted in reversals of the trial court decision, with the remaining two cases (*Harris* and *Parsittie*)
10 affirming a decision favorable to the Plaintiff. These six cases are listed below:

11 ***Ninth Circuit Decisions***

12 b. *Troester v. Starbucks Corp.*, 738 Fed. Appx. 562 (9th Cir. 2018) (Ninth Circuit
13 opinion following the California Supreme Court answering the Ninth Circuit’s certified
14 question).

15 c. *Gilberg v. California Check Cashing Stores, LLC*, 913 F.3d 1169 (9th Cir. 2019)
16 (vacated district court’s summary judgment in favor of Defendants and remanded for further
17 proceedings, holding that Defendants’ Fair Credit Reporting Act disclosure form lacked
18 sufficient clarity in a published opinion).

19 d. *Rodriguez v. U.S. Healthworks*, 813 Fed.Appx. 315 (9th Cir. 2020) (reversed
20 district court’s summary judgement in favor of Defendants with instructions to remand the action
21 to state court).

22 e. *Harris v. KM Industrial, Inc.*, 980 F.3d 694 (9th Cir. November 13, 2020)
23 (affirmed the district court’s granting of Plaintiff’s motion to remand, holding in a published
24 opinion that Defendants had failed to establish by a preponderance of the evidence that the
25 amount in controversy exceeded \$5 million as required under the Class Action Fairness Act for
26 removal).

27 f. *Parsittie v. Schneider Logistics, Inc. et al.*, Case No. 20-55470 (9th Cir. June 9,
28 2021) (reversed the district court’s dismissal of Plaintiff’s meal and rest break claims, holding

1 that Plaintiff's security check allegations were sufficient to state a claim for break-time violations
2 and remanding for further proceedings).

3 g. *Ahlstrom v. DHI Mortg. Co., Ltd., L.P.*, 21 F.4th 631 (9th Cir. December 29,
4 2021) (reversed the district court's ruling compelling claims to arbitration, holding that parties
5 cannot delegate issues of formation of an arbitration agreement to the arbitrator for
6 determination).

7 **Class Counsel Appointments.** The following is a sampling of class actions in which the Setareh
8 Law Group and I have been appointed as class counsel:

9 *Federal Cases*

10 h. *Cerdenia v. USA Truck, Inc.*, U.S. District Court, Central District of California,
11 Case No. 10-CV-1489-JVS (granted final approval in an action on behalf of truck drivers for
12 meal and rest period violations, off-the-clock pre- and post-shift work, and unauthorized wage
13 deductions).

14 i. *Fronza v. Staffmark*, U.S. District Court, Northern District of California, Case
15 No. 15-CV-02315-MEJ (granted final approval in a case involving alleged uncompensated
16 security checks for warehouse workers).

17 j. *Garcia v. Am. Gen. Fin. Mgmt. Corp.*, U.S. District Court, Central District of
18 California, Case No. 09-CV-1916 (granted final approval in a case filed on behalf of account
19 managers in case involving, among other things, alleged overtime miscalculations and meal and
20 rest period violations).

21 k. *Jones v. Shred-It USA, Inc.*, U.S. District Court, Central District of California,
22 Case No. 11-CV-00526 (granted final approval in a case brought on behalf of customer service
23 representatives and balers for alleged off-the-clock work and meal and rest period violations).

24 l. *O'Neill v. Genesis Logistics, Inc.*, U.S. District Court, Northern District of
25 California, Case No. 08-CV-4707 (granted final approval in a case involving claims for failure to
26 provide meal periods to employees who worked as drivers delivering goods to 7-11 stores
27 throughout California and failure to pay final wages in a timely manner to terminated
28 employees).

1 m. *Padilla v. UPS*, U.S. District Court, Central District of California, Case No. 08-
2 CV-1590 (granted final approval in a case involving claims for failure to provide meal periods to
3 part time employees engaged in sort operations and failure to pay final wages in a timely manner
4 to terminated employees).

5 n. *Pitre v. Wal-Mart Stores, Inc.*, U.S. District Court, Central District of California,
6 Case No. 17-cv-01281-DOC (granting class certification against Wal-Mart for a class of almost
7 5,000,000 in a Fair Credit Reporting Act action).

8 o. *Utne v. Home Depot U.S.A., Inc.*, U.S. District Court, Northern District of
9 California, Case No. 16-cv-01854-RS (granting class certification against Home Depot in
10 connection with uncompensated off-the-clock work occurring at the start of all employee shifts
11 and at the end of closing shifts).

12 p. *Vang v. Burlington Coat Factory Warehouse Corp.*, U.S. District Court, Central
13 District of California Case No. 09-CV-8061 (granted final approval in a case involving, among
14 other things, vacation pay forfeitures, failures to provide meal and rest periods, and failures to
15 pay overtime wages based on employee misclassification).

16 q. *Wilson v. TE Connectivity*, Northern District of California Case No. 3:14-cv-
17 04872-EDL (granted class certification through contested motion in case on behalf of
18 manufacturing facility employees subject to auto-deduction of meal breaks).

19 *State Cases*

20 r. *Alvarez v. Gary Grace Enterprises, LP*, Marin Superior Court, Case No. CIV
21 1002553 (granted final approval in a case on behalf of hair salon employees for overtime
22 miscalculation and related claims).

23 s. *Butler v. Lexxiom, Inc.*, San Bernardino Superior Court, Case No. CIVRS
24 1001579 (granted final approval in an action on behalf of debt resolution center employees
25 alleging, among other things, meal and rest period violations and overtime calculation errors).

26 t. *Calderon v. GreatCall, Inc.*, San Diego Superior Court, Case No. 37-2010-
27 00093743-CU-OE-CTL (granted final approval in a case on behalf of customer service
28 employees for, among other things, alleged meal and rest period violations and overtime

1 calculation errors).

2 u. *Douglas v. California Credit Union*, Los Angeles Superior Court, Case No.
3 BC445050 (granted final approval in a case on behalf of customer service representatives
4 alleging overtime miscalculation claims).

5 v. *Green v. Staples Contract and Commercial, Inc.*, Los Angeles Superior Court,
6 Case No. BC389789 (granted final approval in a case involving claims for unprovided meal and
7 rest periods, inaccurate wage statements, waiting time penalties, and unfair business practices on
8 behalf of truck drivers delivering Staples office supplies in California).

9 w. *Green v. Universal Music Group*, Los Angeles Superior Court, Case No.
10 BC374253 (granted final approval in a case involving misclassification claims of current or
11 former IT Support employees, including engineers, server analysts, desktop support, and
12 technical leads).

13 x. *Sandoval v. Rite Aid Corp.*, Los Angeles County Superior Court, Case No.
14 BC431249 (granted class certification through contested motion in case on behalf of former
15 pharmacy employees based on late final wage payments in violation of Labor Code §§ 201–203;
16 subsequently granted final approval of class action settlement).

17 y. *Spokes v. Lush Cosmetics, LLC*, Los Angeles Superior Court, Case No.
18 BC391397 (granted final approval in a case alleging failures to provide meal and rest periods and
19 failure to timely pay all final wages to California sales associates and key holders).

20 z. *Valencia v. SCIS Air Security Corp.*, Los Angeles Superior Court, Case No.
21 BC421485 (granted class certification through contested motion in case on behalf of former
22 security workers based on late final wage payments in violation of Labor Code §§ 201–203;
23 subsequently granted preliminary approval of proposed class action settlement).

24 6. As the above shows, the Setareh Law Group and I have substantial experience in wage-
25 and-hour class action litigation, including actions alleging failure to provide meal and/or rest periods,
26 failure to pay wages, failure to provide accurate wage statements, failure to provide timely final wage
27 payments, and other related claims. We are knowledgeable about the applicable law and have worked
28 diligently to investigate and identify the potential claims in this action. I will continue to commit my

1 firm's resources to further the interests of the Class. Setareh Law Group and I have no known conflicts
2 of interest with Plaintiffs or with absent Class Members.

3 **Reasonableness and Fairness of Fees and Costs to Be Sought by Class Counsel**

4 7. Setareh Law Group's request for reimbursement of litigation costs of \$127,636.48 is fair
5 and reasonable. This is less than the costs allowed under the Settlement Agreement of \$300,000.
6 (Settlement, ¶ 8.2.) Attached hereto as **Exhibit 1** is a spreadsheet setting forth the costs of \$127,636.48
7 already incurred by Setareh Law Group in this litigation, including, among other things, filing fees, travel
8 costs, mediation fees, and postage charges.

9 8. Class Counsel request attorneys' fees of \$4,250,000 (one-third (1/3) of the Gross
10 Settlement Amount), which is the maximum provided under the Settlement Agreement. (Settlement, ¶
11 8.2.) Class Counsel seek only this amount in fees. In view of Class Counsel's efforts and risks in
12 pursuing this case, and the expenses incurred in vigorously litigating these claims, this amount is well
13 within the range of reasonableness and thus warrants final approval. Indeed, as class counsel in similar
14 wage and hour class actions, Setareh Law Group has been routinely awarded fees amounting to
15 approximately one-third of the settlement fund. These cases include, but are not limited to: *O'Brien v.*
16 *Optima Network Services, Inc.*, San Bernardino County Superior Court, Case No. CIVRS1107056 (one-
17 third of fund); *Noyd v. The Cristcat Group, et al.*, Los Angeles County Superior Court, Case No.
18 BC439558 (one-third of fund); *Perez v. Southwest Dealer Services, Inc.*, Los Angeles County Superior
19 Court, Case No. BC439253 (one-third of fund); *Alvarez v. Gary Grace Enterprises, LP*, Marin County
20 Superior Court, Case No. CIV1002553 (one-third of fund); *Calderon v. Greatcall, Inc.*, San Diego
21 Superior Court, Case No. 37-2010-00093743-CU-OE-CTL (one-third of fund); *Butler v. Lexxiom, Inc.*,
22 San Bernardino County Superior Court, Case No. CIVRS1001579 (one-third of fund); *Huynh v.*
23 *Carefusion Resources, LLC, et al*, San Diego County Superior Court, Case No. 37-2009-00103277-CU-
24 OE-CTL (one-third of fund); *Stucker v. L'Oreal USA S/D, Inc.*, Los Angeles County Superior Court,
25 Case No. BC456080 (one-third of fund); *Sandoval v. Thrifty Payless, Inc.*, Los Angeles County Superior
26 Court, Case No. BC431249 (one-third of fund); *Tucker v. Maly's West, Inc.*, Los Angeles County
27 Superior Court, Case No. BC483920 (one-third of fund); *Tiwari v. Merrill's Packaging*, San Mateo
28 Superior Court, Case No. 519070 (one-third of fund); *Montgomery v. Del Monte Corp., et al*, Kings

1 County Case No. 13C0204 (one-third of fund).

2 9. In addition, Class Counsel have an agreement to apportion all recovered attorneys' fees as
3 follows: 38.25% of the total attorneys' fees to counsel for Ms. Burnthorne-Martinez, 38.25% to counsel
4 for Rose Provencio, 10% to counsel for Jessica Duran, and 13.5% to counsel for Lacey Hernandez and
5 Brenda Morales. This fee arrangement was documented in writing and disclosed to each of the Plaintiffs
6 who signed acknowledgments pursuant to Cal. Rules of Professional Conduct, Rule 1.5.1. Under this
7 arrangement, Setareh Law Group would receive \$1,625,625 in attorneys' fees (38.25% of the total fees)
8 if the entire \$4,250,000 in fees requested by Class Counsel is approved by the Court.

9 10. I have reviewed the work performed on the case and the billing entered by the attorneys
10 working on this case at my firm. The table below includes a summary of all the hours worked. My
11 firm's lodestar is currently \$612,223.75 resulting in a multiplier of approximately 2.66 with respect to
12 the 38.25% apportionment to Ms. Burnthorne-Martinez's counsel of the total fees sought per Class
13 Counsels' fee split agreement. This is below the multiplier range of 1 to 4 commonly found to be
14 appropriate in complex class action cases. *See, e.g., Vizcaino v. Microsoft Corp.* (9th Cir. 2002) 290
15 F.3d 1043, 1051 n.6.

16 11. Looking at the work of attorneys for Ms. Burnthorne-Martinez in this matter (*and*
17 *excluding paralegals*), the lodestar for all firm attorneys involved in this matter is estimated to be as
18 follows:¹

Attorney	Bar Year	Hourly Rate	Hours Billed	Total Billed
Shaun Setareh	1999	\$925.00	80.5	\$74,462.50
H. Scott Leviant	1999	\$925.00	15.6	\$14,430.00
Thomas Segal	2002	\$900.00	310.25	\$279,225.00
William M Pao	2002	\$900.00	75.95	\$68,355.00
Jose Patino	2010	\$725.00	78.05	\$56,586.25
Candice Pillion	2011	\$700.00	8.5	\$5,950.00
Farrah Grant	2013	\$650.00	125.3	\$81,445.00
Stacey Shim	2015	\$550.00	9.6	\$5,280.00

25
26 ¹ H. Scott Leviant, Candice Pillion, Stacey Shim, Ashley Batiste, Alexandra McIntosh, Lilit Ter-
27 Astvatsatryan, and Rochelle Rotea are no longer with Setareh Law Group. The amounts included in the
28 lodestar for these individuals is an estimate based on a thorough review of the file and the time entries for
these individuals.

Ashley Batiste	2017	\$475.00	11.4	\$5,415.00
Alex McIntosh	2018	\$425.00	1.25	\$531.25
Lilit Ter-Astvatsatryan	2018	\$425.00	22.55	\$9,583.75
Rochelle Rotea	2019	\$400.00	27.4	\$10,960.00
Total			766.35	\$612,223.75
Fees Sought (38.25%)				\$1,625,625.00
Multiplier				2.66

12. Setareh Law Group and I have routinely been awarded fees constituting a multiplier of the lodestar within this range in similar complex class actions including, but not limited to: *Valadez v. Stater Bros. Markets*, San Bernardino Superior Court, Case No. CIVDS1701283 (3.07 multiplier); *Emetoh v. FedEx Freight, Inc.*, Northern District of California, Case No. 17-cv-7272-YGR (2.79 multiplier); *Johnson v. Greenpeace, Inc.*, Los Angeles Superior Court, Case No. BC700130 (2.46 multiplier); *Rosales v. Loomis Armored US, LLC*, Santa Clara Superior Court, Case No. 18CV326826 (2.38 multiplier); *Arroyo v. J.R. Simplot Company*, Santa Clara Superior Court, Case No. 18CV335800 (2.37 multiplier).

13. Ms. Burnthorne-Martinez’s counsel will incur approximately 5 additional hours in preparing for the final approval hearing, appearing at the final approval hearing, communicating with class members, and communicating with the Settlement Administrator.

14. The hours billed represent time spent on tasks that were essential to litigation and settlement. The standard hourly rates for Ms. Burnthorne-Martinez’s counsel—ranging from \$400 to \$925—are reasonable. These rates are in line with those charged by experienced class action lawyers who practice on a national scale and within the range of those approved by other courts in similar circumstances. *See, e.g., Spano v. Boeing Co.*, No. 06-CV-743-NJR-DGW, 2016 WL 3791123, at *3 (S.D. Ill. Mar. 31, 2016) (approving hourly rates of \$460 to \$998 for attorneys, \$309 for paralegals, and \$190 for legal assistants). The 2021-2022 Adjusted Laffey Matrix states that an attorney with 20 years of experience can reasonably charge \$919 per hour. <http://www.laffeymatrix.com/see.html>.² However, that rate is derived from the Washington, D.C. area and requires a costs of living correction for Los

² Last viewed February 11, 2022.

1 Angeles. Using federal statistics for average attorney salaries, attorney pay is 3.14% lower in Los
 2 Angeles, compared to Washington, D.C., indicating a 3.14% downward adjustment to the Laffey Matrix
 3 is appropriate. [https://www.bls.gov/oes/current/oes231011.htm#\(9\)](https://www.bls.gov/oes/current/oes231011.htm#(9)).³ However, using federal employee
 4 pay tables, federal employee wages are 1.58% higher in Los Angeles, compared to Washington, D.C.,
 5 indicating a 1.58% upward adjustment to the Laffey Matrix is appropriate. [https://www.opm.gov/policy-](https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/2022/general-schedule/)
 6 [data-oversight/pay-leave/salaries-wages/2022/general-schedule/](https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/2022/general-schedule/).⁴ Thus, something in the range of a
 7 1.58% locality increase to a 3.14% locality reduction appears appropriate here. Applying an adjustment
 8 factor of -1.56%, the locality corrected Adjusted Laffey Matrix hourly rate for attorneys with 20 years of
 9 experience is \$904.66.⁵

10 15. I have been a licensed, practicing attorney in California for 23 years. I estimate I worked
 11 at least 80.5 hours on this matter and likely devoted more time than that. The tasks performed by me
 12 include: initial investigation of the case and evaluation of claims; participation in interviews of Ms.
 13 Burnthorne-Martinez; monitoring the work of other attorneys at Setareh Law Group handling the case;
 14 review of the final drafts of all initial case filing documents; overall case strategy; involvement in
 15 drafting and editing motions and oppositions, including the Motion for Class Certification and its reply
 16 brief; defense of Ms. Burnthorne-Martinez at her deposition; preparation for and taking the deposition of
 17 _____

18 ³ Last viewed February 11, 2022.

19 ⁴ Last viewed February 11, 2022.

20 ⁵ The full 2021-2022 Adjusted Laffey Matrix provides for the following hourly rates for
 21 paralegals/law clerks and attorneys falling into various ranges of years of experience:

Year	Adj. Factor	Paralegal Clerk	1-3	4-7	8-10	11-19	20
6/01/21- 5/31/22	1.0000	\$208	\$381	\$468	\$676	\$764	\$919

24 Applying the -1.56% locality adjustment to those rates, the Los Angeles rates for the Adjusted Laffey
 25 Matrix are as follows:

Year	Adj. Factor	Paralegal Clerk	1-3	4-7	8-10	11-19	20
6/01/21- 5/31/22	0.9844	\$204.75	\$375.06	\$460.70	\$665.45	\$752.08	\$904.66

1 Defendant's Person Most Knowledgeable, Charles Diaz; preparation for and attendance at mediation;
2 attended deposition of defense expert Robert Crandall; and defense of putative class member Callie
3 Habenicht at her deposition.

4 16. H. Scott Leviant is a former senior attorney at Setareh Law Group and a graduate of the
5 University of Southern California Law Center. He has been a licensed, practicing attorney in California
6 for 23 years, practicing almost exclusively class actions and complex litigation. He has argued before the
7 California Court of Appeal and drafted many class certification motions, summary judgment
8 oppositions, and appellate briefs, including contributions to appellant's briefs leading to *Troester v.*
9 *Starbucks Corporation* (2018) 5 Cal.5th 829 and *Gilberg v. California Check Cashing Stores, LLC* (9th
10 Cir. 2019) 913 F.3d 1169. Mr. Leviant worked an estimated 15.6 hours on this matter. The tasks
11 performed by Mr. Leviant include: drafted and filed the reply brief in support of Motion for Class
12 Certification.

13 17. Thomas Segal is the senior attorney assigned to this case and a 2002 graduate of the
14 University of California–Hastings College of the Law. He has been a licensed, practicing attorney in
15 California for 20 years, practicing almost exclusively class actions and complex litigation. He has argued
16 before the California Court of Appeal and drafted many appellate briefs, class certification motions, and
17 summary judgment oppositions. He has been part of the trial team including cross-examining witnesses
18 and arguing evidentiary issues in two class action trials, including *Kirk v. First American Title Company*,
19 Los Angeles Superior Court Case No. BC372797 which resulted in a multimillion-dollar judgment in
20 favor of the putative class. Mr. Segal worked an estimated 310.25 hours on this matter. The tasks
21 performed by Mr. Segal include: primary responsibility for day-to-day handling of case for Setareh Law
22 Group; review of all pleadings and filings in case; supervision of the work of junior attorneys pertaining
23 to the case; supervision of call campaign to get declarations from class members to support Motion for
24 Class Certification; revised and edited Motion for Class Certification; defended depositions of putative
25 class members; travelled to and attended court appearances; prepared for and took the deposition of
26 defense expert Robert Crandall; drafted portions of Plaintiffs' motion for summary adjudication related
27 to Labor Code section 203 and 226 penalties for security check claims; revised and edited mediation
28 brief; fully drafted oppositions to Defendant's three simultaneously filed motions: (1) for summary

1 judgment, (2) for decertification of the certified classes, and (3) to strike the PAGA claims [the
2 oppositions were originally due September 30, 2020, then continued to January 15, 2021, then to
3 February 26, 2021, then to March 26, 2021, then to April 30, 202, and finally to May 14, 2021 before the
4 Parties reached a settlement in principle on May 7, 2021]; reviewed and edited the Settlement
5 Agreement; and reviewed and edited the supplemental preliminary approval brief.

6 18. William M. Pao is a senior attorney at Setareh Law Group and a 2001 graduate of Loyola
7 Law School. He has been a licensed, practicing attorney in California for 20 years, practicing almost
8 exclusively employment law, with the last 6 years in wage and hour class actions and complex litigation.
9 He has drafted many class certification motions, summary judgment oppositions, and appellate briefs,
10 including appellant’s briefs leading to *Rodriguez v. U.S. Healthworks*, 813 Fed.Appx. 315 (9th Cir.
11 2020) and *Harris v. KM Industrial, Inc.*, 980 F.3d 694 (9th Cir. November 13, 2020). Mr. Pao worked
12 an estimated 75.95 hours on this matter. The tasks performed by Mr. Pao include: prepared for and
13 defended putative class members at various depositions taken by Defendant; drafted and appeared for
14 hearing on Motion to Compel Further Responses; discussed depositions and written discovery with other
15 attorneys at Setareh Law Group; met and conferred with defense counsel on motions to compel;
16 communicated with Ms. Burnthorne-Martinez regarding settlement matters; and drafted and reviewed
17 discovery responses and class member declarations; and drafted amended complaints.

18 19. Jose Maria D. Patino, Jr. is a senior attorney at Setareh Law Group and a 2009 graduate
19 of Rutgers University School of Law–Newark. He has been a licensed, practicing attorney in California
20 for 12 years, practicing almost exclusively wage and hour class actions and complex litigation. While at
21 Setareh Law Group, his practice has also included Fair Credit Reporting Act (“FCRA”) class actions,
22 and he has been appointed class counsel in a number of class actions and successfully taken dozens of
23 wage and hour and FCRA class action settlements through preliminary and final approval. Mr. Patino
24 worked an estimated 78.05 hours on this matter. The tasks performed by Mr. Patino include: reviewed
25 and researched tentative ruling regarding Motion for Preliminary Approval; drafted, revised, and filed
26 the supplemental brief and declaration in support of the motion for preliminary approval in response to
27 the tentative ruling; met and conferred with Plaintiffs’ counsel and defense counsel regarding the
28 supplemental papers, class notice, and the amended settlement agreement; finalized amended settlement

1 agreement and circulated for execution; and drafted and revised declaration in support of the motions for
2 final approval and for fees, costs, and enhancement awards and discussed the same with co-counsel.

3 20. Candice Pillion is a former associate attorney at Setareh Law Group and a 2011 graduate
4 of Loyola Law School. Ms. Pillion worked an estimated 8.5 hours on this matter. The tasks performed
5 by Ms. Pillion include: communicated with Ms. Burnthorne-Martinez and other attorneys at the firm
6 regarding discovery responses; drafted discovery responses; and reviewed discovery meet and confer
7 letters and communicated with defense counsel thereupon.

8 21. Farrah Grant is the junior attorney assigned to this case and a graduate of University of
9 California–Los Angeles School of Law. She has been a licensed, practicing attorney in California for 9
10 years, primarily practicing plaintiff’s side employment litigation and almost exclusively wage and hour
11 class actions and complex litigation over the last 6 years, and she has been named class counsel in a
12 number of class action settlements and has taken several settlements through preliminary and/or final
13 approval. Ms. Grant worked an estimated 125.3 hours on this matter. The tasks performed by Ms. Grant
14 include: reviewed minute orders; drafted declarations; reviewed the answer to the complaint; drafted
15 amended complaint; communicated with Ms. Burnthorne-Martinez regarding the status of the case and
16 prepared her for her deposition; prepared for and defended putative class member depositions; prepared
17 for and attended Case Management Conferences; communicated with other attorneys at Setareh Law
18 Group regarding various matters; communicated with defense counsel regarding various matters
19 including discovery meet and confer and damage calculations; analyzed various documents including
20 discovery responses and the class list; attended mediation; and drafted and revised various documents,
21 including meet and confer letters and Memorandum of Understanding.

22 22. Min Ha “Stacey” Shim is a former associate attorney at Setareh Law Group and a
23 graduate of Loyola Law School. She has been a licensed, practicing attorney in California for 7 years,
24 primarily practicing almost exclusively employment litigation, including wage and hour class actions
25 and complex litigation. Ms. Shim worked an estimated 9.6 hours on this matter. The tasks performed by
26 Ms. Shim include: communicated with Ms. Burnthorne-Martinez in preparation to draft the initial case
27 memorandum, the complaint, and the PAGA letter; drafted those documents; and drafted the Application
28 to Designate Case as Complex.

1 23. Ashley Batiste is a former associate attorney at Setareh Law Group and graduated from
2 the University of Alabama School of Law in 2016. She has been a licensed, practicing attorney in
3 California for 5 years, primarily practicing almost exclusively wage and hour class actions and complex
4 litigation. Ms. Batiste worked an estimated 11.4 hours on this matter. The tasks performed by Ms.
5 Batiste include: drafted discovery requests, including deposition notices; communicated with other
6 attorneys at Setareh Law Group regarding various matters including discovery requests and responses;
7 drafted and revised declaration; reviewed and analyzed discovery responses and documents produced;
8 communicated with Court personnel; and updated the case memorandum.

9 24. Alexandra McIntosh is a former associate attorney at Setareh Law Group and graduated
10 from the University of California, Irvine School of Law in 2017. She has been a licensed, practicing
11 attorney in California for 4 years, primarily practicing almost exclusively wage and hour class actions
12 and complex litigation. Ms. McIntosh worked an estimated 1.25 hours on this matter. The tasks
13 performed by Ms. McIntosh include: defended deposition of putative class member.

14 25. Lilit Ter-Astvatsatryan is a former associate attorney at Setareh Law Group and
15 graduated from the University of California–Hastings College of the Law in 2017. She has been a
16 licensed, practicing attorney in California for 4 years, primarily practicing almost exclusively wage and
17 hour class actions and complex litigation. Ms. Ter-Astvatsatryan worked an estimated 22.55 hours on
18 this matter. The tasks performed by Ms. Ter-Astvatsatryan include: drafted responses to discovery
19 requests; communicated with other attorneys at Setareh Law Group regarding various matters including
20 depositions and expert witnesses; and reviewed the document production in preparation for the
21 deposition of Defendant’s Person Most Knowledgeable.

22 26. Rochelle Rotea is a former associate attorney at Setareh Law Group and graduated from
23 the University of California, Irvine School of Law in 2019. She has been a licensed, practicing attorney
24 in California for nearly 3 years, primarily practicing almost exclusively employment law, including wage
25 and hour class actions and complex litigation. Ms. Rotea worked an estimated 27.4 hours on this matter.
26 The tasks performed by Ms. Rotea include: communicated with other attorneys at Setareh Law Group
27 regarding discovery; drafted and revised discovery responses; and met and conferred with defense
28 counsel regarding discovery.

1 27. Setareh Law Group prosecuted this matter on a contingent basis meaning that if the case
2 were unsuccessful the firm would have received no compensation or reimbursement of costs. As
3 discussed above, litigation of this action through settlement took a considerable amount of time and
4 effort that could have been spent on other fee-generating work.

5 28. It is only fair that every class member who benefits from the settlement pay his or her *pro*
6 *rata* share of attorney’s fees, and Plaintiffs’ request for fees here means that Class Counsel seek an
7 amount of fees less than the amount Class Counsel would likely receive if they represented each class
8 member individually. Typical contingent fee contracts of plaintiffs’ counsel provide for attorney’s fees
9 of about 40% of any recovery obtained for a client.

10 **Reasonableness of Class Representative Enhancement Award**

11 29. The Plaintiffs contributed significantly to the prosecution and ultimate success of this
12 litigation, including but not limited to spending time speaking with their counsel, gathering documents,
13 assisting counsel in preparing for the mediation, and reviewing settlement documents. The Plaintiffs,
14 including Ms. Burnthorne-Martinez, faced the possibility of worsened career prospects from having sued
15 an employer in a wage-and-hour class action and a potential cost award against them if the litigation
16 were lost. This long-lived coordinated proceeding was fraught with existential risks for Plaintiffs at
17 every juncture: e.g., at every deposition taken from each of the Plaintiffs and putative class member
18 declarants, at the motion for class certification, and at the motions for summary judgment, for
19 decertification, and to strike PAGA claims that were concurrently pending when the Parties reached the
20 Settlement. Based on my extensive experience as plaintiffs’ counsel in similar wage-and-hour class
21 actions, the proposed incentive award of \$20,000 to each of the Plaintiffs, or \$100,000 total, is
22 reasonable.

23
24 I declare under the penalty of perjury of the laws of the State of California that the foregoing is
25 true and correct to the best of my knowledge. Executed 02/17/2022 in Beverly Hills, California.

26
27
28 

Shaun Setareh

EXHIBIT 1

Law Office of Shaun Setareh, APC
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Date	Name	Memo	Account	Amount
01/03/2022	File and Serve Express	Inv.# 202112695799301, case # CJC-16-004911	Sephora USA	78.60
12/06/2021	EmployStats	Inv. # 3880, paid in full	Sephora USA	5,424.81
12/01/2021	File and Serve Express	Inv.# 202111695799301, case # CJC-16-004911	Sephora USA	148.40
08/11/2021	Court Call	ID# 11312182, case #CJC-16-004911	Sephora USA	94.00
08/02/2021	File and Serve Express	Inv.# 202107695799301, case # CJC-26-004911	Sephora USA	148.60
04/30/2021	Thomson Reuters-West		Sephora USA	19.84
02/28/2021	Thomson Reuters-West		Sephora USA	55.00
02/18/2021	EmployStats	Inv. # 3382	Sephora USA	1,955.14
01/31/2021	Thomson Reuters-West		Sephora USA	8.35
12/31/2020	Thomson Reuters-West		Sephora USA	54.98
12/30/2020	CPT Group Inc	Inv.# 15560	Sephora USA	4,990.83
11/30/2020	Thomson Reuters-West		Sephora USA	133.14
11/30/2020	FedEx	Inv.# 7-181-53649, 11/13/20	Sephora USA	34.68
11/12/2020	Court Call	ID# 10956183, case #004911	Sephora USA	94.00
10/31/2020	Thomson Reuters-West		Sephora USA	2.52
10/01/2020	File and Serve Express	Inv.# 202009695799301, case # CJC-16-004911	Sephora USA	500.00
09/30/2020	PACER	Inv. # 2957234-Q32020	Sephora USA	7.60
09/28/2020	David A. Rotman	File # 20765, 11/11/20	Sephora USA	4,223.00
09/01/2020	File and Serve Express	Inv.# 202008695799301, case # CGC-16-550894	Sephora USA	488.80
09/01/2020	File and Serve Express	Inv.# 202008695799301, case # CJC-16-004911	Sephora USA	176.00
08/19/2020	Peter With r.p.s. LLC	Inv. # 3780489	Sephora USA	50.00
08/10/2020	EmployStats	Inv. # 3316	Sephora USA	772.57
07/31/2020	Thomson Reuters-West		Sephora USA	23.54
07/15/2020	EmployStats	Inv. # 3308	Sephora USA	9,441.81
07/15/2020	Allman & Petersen Economics, LLC	Inv. # 7840	Sephora USA	1,928.44
07/01/2020	Aptus Court Reporting	Inv.# 1067655, case # JCCPC 4911	Sephora USA	1,876.71
06/24/2020	EmployStats	Inv. # 3297	Sephora USA	8,211.56
06/16/2020	Court Call	ID# 10640613, case #CJC16004911	Sephora USA	94.00
06/09/2020	Allman & Petersen Economics, LLC	Inv. # 7769	Sephora USA	15,778.00
05/31/2020	Thomson Reuters-West		Sephora USA	37.25
05/20/2020	Barkley Court Reporters	Inv.# 540809	Sephora USA	397.90
05/20/2020	Shelburne Sherr Court Reporters, Inc	Inv. # 143988	Sephora USA	408.75
05/20/2020	Shelburne Sherr Court Reporters, Inc	Inv. # 144216	Sephora USA	947.50
04/15/2020	Court Call	ID# 10528161, case #CJC16004911	Sephora USA	54.00
03/31/2020	Thomson Reuters-West		Sephora USA	17.58
03/24/2020	Davis Research LLC	Inv. # 19-0126B (total inv. \$30305.00, only 42.5% needs to be paid)	Sephora USA	12,879.62
02/29/2020	Thomson Reuters-West		Sephora USA	4.46
12/31/2019	FedEx	Inv.# 6-875-03884, 12/20/19	Sephora USA	8.40
12/09/2019	Davis Research LLC		Sephora USA	15,151.25
11/13/2019	Court Call	ID# 10177902, case # JCCP4911	Sephora USA	124.00
09/27/2019	Kevin R. Allen		Sephora USA	3,612.50
09/26/2019	Court Call	ID# 10067031, case # JCCP4911	Sephora USA	94.00
06/30/2019	PACER		Sephora USA	2.20
06/10/2019	Court Call	ID# 9849800, case # RCJC-16-004911	Sephora USA	94.00
05/24/2019	Court Call	ID# 9818479, case # CJC-16-004911	Sephora USA	94.00
02/15/2019	Court Call	ID# 9612350, case # CJC-16-004911	Sephora USA	94.00
12/14/2018	Thomas A Segal	11/12/18	Sephora USA	31.43
11/30/2018	Thomson Reuters-West	Inv.# 839183501, 11/1/18-11/30/18	Sephora USA	5.17
11/22/2018	Bob Hope		Sephora USA	32.00
11/22/2018	Lulu's Prune yard		Sephora USA	25.11
11/22/2018	San Jose Airport		Sephora USA	24.26
11/21/2018	Burbank Airport Food		Sephora USA	19.10
11/15/2018	Court Call	ID# 9441676, case # JCCP4911	Sephora USA	86.00
11/09/2018	Court Call	ID# 9430679, case # JCCP4911	Sephora USA	116.00
09/30/2018	PACER		Sephora USA	1.60
09/27/2018	Ritz Carlton Hotel		Sephora USA	626.63
09/26/2018	Proper SF Hotel San Francisco		Sephora USA	9.92
09/26/2018	Uber Technologie		Sephora USA	1.00
09/26/2018	Uber Technologie		Sephora USA	40.25
09/26/2018	Ozumo		Sephora USA	5.76
09/25/2018	Barkley Court Reporters	Inv.# 520436, Case # CJC-16-004911, paid in full	Sephora USA	216.12
09/25/2018	Southwest Air	Conff# SD6BZ4, Shaun Setareh, 9/26/18	Sephora USA	-224.98
09/19/2018	Southwest Air	Conff# SD6BZ4, Shaun Setareh, 9/26/18	Sephora USA	449.96
09/14/2018	File and Serve Express	Inv.# 201808695799301, case # CJC-16004911	Sephora USA	37.30

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Date	Name	Memo	Account	Amount
08/10/2018	Thomas A Segal	7/9/2018	Sephora USA	46.63
08/10/2018	Thomas A Segal	7/10/2018	Sephora USA	69.38
08/10/2018	Aptus Court Reporting	Inv.# 1046430, case # JCCPC 4911	Sephora USA	250.00
08/10/2018	File and Serve Express	Inv.# 201807695799301, case # CJC-16-550894	Sephora USA	35.10
08/10/2018	File and Serve Express	Inv.# 201806695799301, case # CJC-16-004911	Sephora USA	37.10
07/31/2018	Thomson Reuters-West	Inv.# 838631984, 7/1/18-7/31/18	Sephora USA	121.00
07/20/2018	Atkinson Baker, Inc.	Inv.# AC062B9AA, Case# JCCP4911, paid 50%	Sephora USA	702.88
07/20/2018	Atkinson Baker, Inc.	Inv.# AC02A84AA, Case# JCCP4911, paid 50%	Sephora USA	430.38
07/16/2018	Aptus Court Reporting	Inv.# 1044018, case # JCCPC 4911	Sephora USA	579.21
07/16/2018	Aptus Court Reporting	Inv.# 1044737, case # JCCPC 4911	Sephora USA	597.29
07/09/2018	File and Serve Express	Inv.# 201806695799301, case # CJC-16-004911	Sephora USA	32.00
07/02/2018	Southwest Air	Conff# RTJ8L5, Segal Thomas, 7/9-10/18	Sephora USA	271.96
07/02/2018	Hotels.Com	Thomas Segal, 7/9/18	Sephora USA	449.57
06/30/2018	PACER	2nd Qtr., Inv.# 2957234-Q22018	Sephora USA	10.80
06/30/2018	Thomson Reuters-West	Inv.# 838480567, 6/1/18-6/30/18	Sephora USA	52.01
06/30/2018	PACER	2nd Qtr., Inv.# 2957234-Q22018	Sephora USA FCRA	26.00
06/20/2018	One Legal LLC	Sales Order # 12073491, Case# CJC-16-004911	Sephora USA	70.00
06/18/2018	Amazon	Litigation Services for Sephora case	Sephora USA	178.16
06/15/2018	One Legal LLC	Sales Order # 12058220, Case# CJC-16-004911	Sephora USA	30.00
06/15/2018	One Legal LLC	Sales Order # 12058278, Case# CJC-16-004911	Sephora USA	30.00
06/08/2018	Atkinson Baker, Inc.	Inv.# AC02A84AA, Case# JCCP4911, paid 50%	Sephora USA	990.06
06/08/2018	Atkinson Baker, Inc.	Inv.# AC02A85AA, Case# JCCP4911, paid 50%	Sephora USA	701.68
06/08/2018	Barkley Court Reporters	Inv.# 520187, Case # CJC-16-004911, paid 50%	Sephora USA	207.98
06/08/2018	Barkley Court Reporters	Inv.# 520326, Case # CJC-16-004911, paid 50%	Sephora USA	257.60
06/08/2018	Barkley Court Reporters	Inv.# 520436, Case # CJC-16-004911, paid 50%	Sephora USA	216.13
06/08/2018	Barkley Court Reporters	Inv.# 520502, Case # CJC-16-004911, paid 50%	Sephora USA	277.23
06/08/2018	Barkley Court Reporters	Inv.# 520535, Case # CJC-16-004911, paid 50%	Sephora USA	270.13
06/01/2018	William M. Pao	5/22/18-5/23/2018	Sephora USA	113.88
05/31/2018	Thomson Reuters-West	Inv.# 838306357, 5/1/18-5/31/18	Sephora USA	4.18
05/18/2018	William M. Pao	5/14/18	Sephora USA	19.71
05/18/2018	William M. Pao	5/15/18	Sephora USA	38.71
05/18/2018	Southwest Air	Conff# RE864W, Pao William, 5/21-22/18	Sephora USA	315.96
05/18/2018	Hotels.Com	Conff# RE864W, Pao William, 5/21/18	Sephora USA	313.73
05/14/2018	One Legal LLC	Sales Order # 11971420, Case# 4:16-CV-02843	Sephora USA FCRA	50.00
05/04/2018	File and Serve Express	Inv.# 201804695799301, case # CJC-16-004911	Sephora USA	289.00
04/30/2018	Thomson Reuters-West	Inv.# 838145969, 4/1/18-4/30/18	Sephora USA	1.21
04/30/2018	Thomson Reuters-West	Inv.# 838145969, 4/1/18-4/30/18	Sephora USA FCRA	1.01
04/25/2018	One Legal LLC	Sales Order # 11913076, Case#CJC-16-004911	Sephora USA	335.00
04/25/2018	Uber Technologie		Sephora USA FCRA	28.65
04/24/2018	Fountain Cafe Oakland		Sephora USA FCRA	8.09
04/24/2018	Uber Technologie		Sephora USA FCRA	3.00
04/24/2018	Uber Technologie		Sephora USA FCRA	27.57
04/24/2018	Uber Technologie		Sephora USA FCRA	22.85
04/24/2018	Uber Technologie		Sephora USA FCRA	20.39
04/23/2018	Southwest Air	Conff# QFB4ML, Setareh Chaim, 4/24/2018	Sephora USA FCRA	60.00
04/20/2018	Southwest Air	Conff# Q2MTLL, Wilson Dale, 4/24/2018	Sephora USA FCRA	275.96
04/20/2018	Southwest Air	Conff# QFB4ML, Setareh Chaim, 4/24/2018	Sephora USA FCRA	271.96
04/18/2018	One Legal LLC	Sales Order # 11884806, Case#JCCP4911	Sephora USA	335.00
04/03/2018	File and Serve Express	Inv.# 201803695799301, case # CJC-16-004911	Sephora USA	34.80
04/03/2018	File and Serve Express	Inv.# 201803695799301, case # CJC-16-004911	Sephora USA	9.00
03/31/2018	PACER	1st Qtr., Inv.# 2957234-Q12018	Sephora USA	0.40
03/31/2018	PACER	1st Qtr., Inv.# 2957234-Q12018	Sephora USA FCRA	18.80
03/31/2018	Thomson Reuters-West	Inv.# 837975611, 3/1/18-3/31/18	Sephora USA FCRA	7.23
03/15/2018	One Legal LLC	Sales Order # 11812616, Case# 4:16-cv-02843	Sephora USA FCRA	50.00
03/14/2018	CPT Group Inc	Inv.# 13868	Sephora USA	2,491.66
03/14/2018	One Legal LLC	Sales Order # 11808139, Case# 4:16-cv-02843	Sephora USA FCRA	50.00
03/13/2018	Uber Technologie		Sephora USA	10.28
03/13/2018	Uber Technologie		Sephora USA	38.37
03/13/2018	Uber Technologie		Sephora USA	24.53
03/13/2018	Uber Technologie		Sephora USA	4.90
03/12/2018	Southwest Air	Conff# PP7ZQU, Shaun Setareh, 3/13/2018	Sephora USA	394.96
03/09/2018		Postage	Sephora USA FCRA	15.20
03/09/2018		Copies	Sephora USA FCRA	75.00
03/01/2018	Court Call	ID# 8931013, case # JCCP4911	Sephora USA	86.00
03/01/2018	File and Serve Express	Inv.# 201802695799301, case # CGC-17-550894	Sephora USA	110.00

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Date	Name	Memo	Account	Amount
02/27/2018	One Legal LLC	Sales Order # 11765335, Case# 4911	Sephora USA	30.00
01/23/2018	Court Call	ID# 8853950, case # JCCP4911	Sephora USA	86.00
01/12/2018	Thomas A Segal	12/19/17	Sephora USA FCRA	85.45
01/09/2018	One Legal LLC	Sales Order # 11640677, Case# 4:16-CV-02843	Sephora USA FCRA	47.90
12/31/2017	Thomson Reuters-West	Inv.# 837466722, 12/1/17-12/31/17	Sephora USA	3.42
12/31/2017	PACER	4th Qtr., Inv.# 2957234-Q42017	Sephora USA	4.40
12/31/2017	Thomson Reuters-West	Inv.# 837466722, 12/1/17-12/31/17	Sephora USA FCRA	2.31
12/31/2017	PACER	4th Qtr., Inv.# 2957234-Q42017	Sephora USA FCRA	8.10
12/11/2017	Southwest Air	Conf# OB79QN, Segal Thomas, 12/19/17	Sephora USA FCRA	267.96
11/13/2017	One Legal LLC	Sales Order # 11512697, Case# 4:16-CV-02843	Sephora USA FCRA	47.90
10/19/2017	Court Call	ID# 8667278, case # JCCP4911	Sephora USA	86.00
10/05/2017	File and Serve Express	Inv.# 201709695799301, case # CJC-16-004911	Sephora USA	76.70
10/04/2017	Court Call	ID# 8635891, case # CJC16004911	Sephora USA	116.00
09/01/2017	Court Call	ID# 8572980, case # CGC-16-550894 NOW CJC-16-004911	Sephora USA	116.00
06/30/2017	PACER	2nd Qtr., Inv.# 2957234-Q22017	Sephora USA FCRA	8.50
06/07/2017	File and Serve Express	Inv.# 201705695799301, case # CJC-16-004911	Sephora USA	22.00
05/31/2017	Thomson Reuters-West	Inv.# 836228868, 5/1/17-5/31/17	Sephora USA FCRA	0.70
05/26/2017	Court Call	ID# 8372277, case# 550894	Sephora USA	86.00
05/22/2017	Bar Bacco SF		Sephora USA FCRA	42.46
05/19/2017	Thomas A Segal	5/18/17	Sephora USA FCRA	72.20
05/19/2017	LAX Airport Lot		Sephora USA FCRA	60.00
05/19/2017	Uber Technologie		Sephora USA FCRA	42.51
05/18/2017	Shaun Setareh	Alyssa Martinez reimbursed for travel,Mediation on 5/18/17	Sephora USA FCRA	200.00
05/18/2017	Firewood Cafe		Sephora USA FCRA	14.77
05/18/2017	Intercontinental		Sephora USA FCRA	666.22
05/18/2017	Intercontinental		Sephora USA FCRA	626.50
05/18/2017	Cafe Venue		Sephora USA FCRA	34.67
05/18/2017	Uber Technologie		Sephora USA FCRA	9.22
05/17/2017	MG-252 Cal LLC		Sephora USA FCRA	40.98
05/17/2017	Jamber		Sephora USA FCRA	33.21
05/17/2017	Uber Technologie		Sephora USA FCRA	13.89
05/17/2017	Uber Technologie		Sephora USA FCRA	22.06
05/15/2017	Southwest Air	5/17-18/2017, Thomas Segal, conf# V3K05J	Sephora USA FCRA	394.95
05/15/2017	Southwest Air	5/17-18/2017, Shaun Setareh, conf# V3K05J	Sephora USA FCRA	394.95
05/03/2017	Michael E. Dickstein	Case name: Alyssa Martinez v Sephowa (WT), 5/18/17	Sephora USA FCRA	7,000.00
03/31/2017	PACER	1st Qtr., Inv.# 2957234-Q12017	Sephora USA	20.60
03/31/2017	PACER	1st Qtr., Inv.# 2957234-Q12017	Sephora USA FCRA	44.40
03/31/2017	Thomson Reuters-West	Inv.# 835878194, 3/1/17-3/31/17	Sephora USA FCRA	127.00
03/16/2017	One Legal LLC	Sales Order # 10930603, Case# 4:16-02843-YGR	Sephora USA FCRA	48.65
03/14/2017	Diane Skillman	refund, inv.# Inv.# 5737	Sephora USA FCRA	-30.25
03/10/2017	Thomas A Segal	2/10/17	Sephora USA FCRA	81.00
03/09/2017	One Legal LLC	Sales Order # 10914109, Case# 4:16-02843 YGR	Sephora USA FCRA	46.90
03/06/2017	Miller & Company Reporters	Inv.# 84163***	Sephora USA	733.60
03/03/2017	FedEx	Inv.# 5-725-37920, 3/3/17	Sephora USA FCRA	24.98
02/28/2017	Alyssa Martinez	mileage and parking reimbursement	Sephora USA	174.45
02/28/2017	Diane Skillman	Inv.# 5737	Sephora USA FCRA	151.25
02/28/2017	FedEx	Inv.# 5-704-00234, 2/10/17	Sephora USA FCRA	24.92
02/28/2017	Thomson Reuters-West	Inv.# 835709515, 2/1/17-2/28/17	Sephora USA FCRA	135.00
02/27/2017	Specialty's Cafe		Sephora USA	20.52
02/27/2017	Uber Technologie		Sephora USA	38.40
02/27/2017	Uber Technologie		Sephora USA	21.41
02/27/2017	Uber Technologie		Sephora USA	22.79
02/24/2017	U.S Legal Support	Inv.# 110015710	Sephora USA FCRA	2,055.17
02/24/2017	One Legal LLC	Sales Order # 10880093, Case# 16-CV-02843-YGR	Sephora USA FCRA	46.90
02/23/2017	Southwest Air	2/22/17, Setareh Shaun, conf # 57QHUP	Sephora USA	441.88
02/22/2017	Southwest Air	Conf.# 59JF7S, Segal Thomas	Sephora USA FCRA	8.94
02/20/2017	Miller & Company Reporters	Inv.# 84115***	Sephora USA FCRA	289.40
02/17/2017	Court Call	ID# 8161176, case# 550894	Sephora USA	86.00
02/10/2017	Court Call	ID# 8145144, case# 550894	Sephora USA	86.00
02/10/2017	Southwest Air	Conf.# 59JF7S, Segal Thomas	Sephora USA FCRA	90.00
02/09/2017	One Legal LLC	Sales Order # 10854140, Case# 4:16-02843	Sephora USA FCRA	97.85
02/09/2017	Southwest Air	Conf.# 55C62N, Segal Thomas	Sephora USA FCRA	441.88
02/07/2017	Uber Technologie		Sephora USA	41.93
02/07/2017	Uber Technologie		Sephora USA	6.12
02/07/2017	LAX Airport Lot		Sephora USA	30.00
02/07/2017	Subway		Sephora USA	10.11

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Date	Name	Memo	Account	Amount
02/07/2017	Alyssa Martinez	mileage reimbursement	Sephora USA FCRA	144.45
02/07/2017	Alyssa Martinez	parking reimbursement	Sephora USA FCRA	31.50
02/07/2017	LAX Airport Lot		Sephora USA FCRA	30.00
02/06/2017	Uber Technologie		Sephora USA FCRA	37.28
02/06/2017	Uber Technologie		Sephora USA FCRA	3.75
02/06/2017	Ryokos Restaurant		Sephora USA FCRA	44.00
02/05/2017	OMNI HOTELS	Sahun Setareh 2/6/17	Sephora USA	13.14
02/05/2017	OMNI HOTELS	Sahun Setareh 2/6/17	Sephora USA FCRA	13.15
02/03/2017	OMNI HOTELS	Sahun Setareh 2/6/17	Sephora USA	238.13
02/03/2017	Southwest Air	Sahun Setareh 2/6/17	Sephora USA	220.94
02/03/2017	OMNI HOTELS	Sahun Setareh 2/6/17	Sephora USA FCRA	238.13
02/03/2017	Southwest Air	Sahun Setareh 2/6/17	Sephora USA FCRA	220.94
01/31/2017	FedEx	Inv.# 5-688-62696, 1/27/17	Sephora USA FCRA	25.69
12/31/2016	PACER	4th Qtr., Inv.# 2957234-Q42016	Sephora USA	3.80
12/31/2016	PACER	4th Qtr., Inv.# 2957234-Q42016	Sephora USA FCRA	0.30
12/05/2016		Postage	Sephora USA	45.44
12/05/2016		Photocopies and Prints	Sephora USA	78.00
12/02/2016	One Legal LLC	Sales Order # 10710667, Case# 4:16-02843	Sephora USA FCRA	26.95
11/09/2016	Court Call	case# CGC16-550894	Sephora USA	86.00
11/09/2016	One Legal LLC	Sales Order # 10661814, Case# 4:16-02843 YGR	Sephora USA FCRA	46.90
10/31/2016	Thomson Reuters-West	Inv.# 834997714, 10/1/16-10/31/16	Sephora USA	1.58
10/31/2016	Thomson Reuters-West	Inv.# 834997714, 10/1/16-10/31/16	Sephora USA FCRA	4.56
10/27/2016	One Legal LLC	Sales Order # 10636398, Case# 3:16-CV-02843-YJR	Sephora USA FCRA	46.90
10/04/2016	Thomas A Segal	reimbursement for taxi, parking, food	Sephora USA	106.38
09/30/2016	PACER	Account # 2957234, Inv.# 3rd QTR	Sephora USA	2.00
09/29/2016	Southwest Air	Thomas Segal, 10/3/16	Sephora USA FCRA	447.96
09/27/2016	Park Central Hotel	Thomas Segal	Sephora USA	245.15
09/23/2016	Southwest Air	Thomas Segal	Sephora USA	447.96
08/11/2016	File and Serve Express	Inv.# 201607695799301	Sephora USA	15.00
08/11/2016	File and Serve Express	Inv.# 201605695799301	Sephora USA FCRA	82.00
08/11/2016	File and Serve Express	Inv.# 201605695799301	Sephora USA FCRA	10.00
08/05/2016	PACER	Account # 2957234, inv.# 2957234-Q22016	Sephora USA	1.10
05/31/2016	Rapid Legal, Inc.	Inv.# 1156265	Sephora USA	24.50
05/31/2016	Rapid Legal, Inc.	Inv.# 1191170-02	Sephora USA FCRA	70.00
05/25/2016	One Legal LLC		Sephora USA	81.51
05/05/2016	File and Serve Express	Inv. No. 20160395799301	Sephora USA	1,495.70
05/04/2016	Rapid Legal, Inc.	Inv 1191170-01 Advance	Sephora USA FCRA	1,450.00
04/30/2016	Rapid Legal, Inc.	Inv.# 1191170-01 (the difference)	Sephora USA FCRA	112.78
04/22/2016	One Legal LLC		Sephora USA	24.95
Total				<u>127,636.48</u>