

**BLUMENTHAL NORDREHAUG BHOWMIK
DE BLOUW LLP**

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Attorneys for Plaintiff
NATHAN KLIPFEL

**SUPERIOR COURT FOR THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES**

CHARLES SAN NICOLAS, an individual, NATHAN KLIPFEL, an individual, on behalf of themselves, in their representative capacity on behalf of the State of California, and on behalf of all persons similarly situated,

Plaintiffs,

vs.

WEST COVINA CORPORATE FITNESS, INC., et al,

Defendants.

CASE NO.: BC616304 [consolidated with CASE NO. BC665577; related to CASE NOS. 20STCV07368 and 20STCV27502)

DECLARATION OF KYLE NORDREHAUG IN SUPPORT OF MOTION FOR FINAL APPROVAL OF CLASS ACTION AND PAGA SETTLEMENT

Date: September 6, 2022
Time: 10:30 a.m.
Dept: 1
Judge: Hon. Stuart M. Rice

1 I, Kyle Nordrehaug, do hereby declare as follows:

2 1. I am a partner of the law firm of Blumenthal Nordrehaug Bhowmik De Blouw
3 LLP (“BNBD”), counsel of record for Plaintiff Charles San Nicolas. As such, I am fully
4 familiar with the facts, pleadings and history of this matter. The following facts are within my
5 own personal knowledge, and if called as a witness, I could testify competently to the matters
6 stated herein.

7 2. This declaration is being submitted in support of Plaintiffs’ Motion for Final
8 Approval of Class Settlement. The settlement reached with Defendants Gym Management
9 Services, Inc., Gold’s Gym SoCal aka Gold’s Gym SoCal Group, Angel Banos, William Banos,
10 West Covina Corporate Fitness, Inc., Muscle Head, Inc., Muscle Bound, Inc., LA Corporate
11 Fitness, Inc., Thousand Oaks Corporate Fitness, Inc., Simi Valley Corporate Fitness, Inc.,
12 Culver City Corporate Fitness, Inc., Fullerton Corporate Fitness, Inc., Valencia Corporate
13 Fitness, Inc., Santa Anita Corporate Fitness, Inc., Montclair Corporate Fitness, Inc., Santa
14 Barbara Corporate Fitness, Inc., Anaheim Corporate Fitness, Inc., Glendale Corporate Fitness,
15 Inc., Santa Ana Corporate Fitness, Inc., and Gym Management Services, Inc. (collectively,
16 “Defendants”) is set forth in the amended Stipulation of Class Action Settlement and Release of
17 Claims (“Agreement”) submitted with this motion.

18 3. Over the course of the litigation, my firm has worked actively on this matter. The
19 firm credentials are reflected in the BNBD Resume, a true and correct copy of which is attached
20 hereto as Exhibit 1. Some of the major cases our firm has undertaken are also set forth therein.
21 The attorneys at BNBD have had extensive class litigation experience, most of it area of
22 employment class actions, unfair business practices and other complex litigation. The attorneys
23 at my firm have extensive experience in cases involving labor code violations and overtime
24 claims. BNBD has successfully litigated similar overtime cases against other employers on
25 behalf of employees, including cases against Securitas, Walt Disney Resorts, El Pollo Loco,
26 Panda Express, Universal Protection, Mattress Firm, Total Renal, Apple, Coventry Health Care,
27 Liberty Mutual, Qualxserv, Union Bank, Marriott, Kaiser, Walgreens, Wells Fargo Bank, and
28 California State Automobile Association. My firm has been approved as class counsel by state

1 and federal courts in California in contested class certification motions, including the Central
2 District of California. It is this level of experience which enabled the firm to undertake the
3 instant matter and to successfully combat the resources of the defendants and their capable and
4 experienced counsel. On account of the concerted and dedicated effort this case demanded in
5 order to properly handle and prosecute, BNBD was precluded from taking other cases, and in
6 fact, had to turn away other potential fee generating cases.

7 4. Plaintiff Charles San Nicolas was non-exempt employee employed as a personal
8 trainer at the Gold's Gym location in West Covina, California (West Covina Corporate Fitness,
9 Inc.) from July of 2014 through November of 2015. On April 8, 2016, the *San Nicolas Action*,
10 entitled *San Nicolas v. West Covina Corporate Fitness, Inc.*, LASC Case No. BC616304), was
11 filed as a class action on behalf of San Nicolas against Defendant West Covina Corporate
12 Fitness, Inc. ("West Covina Fitness"), which operates as a "Gold's Gym." On June 3, 2016, San
13 Nicolas added a PAGA claim. In the PAGA claim, Plaintiff San Nicolas asserted violations of
14 Labor Code §§ 201, 202, 203, 204, 226(a), 226.7, 510, 512, 1194, 1198, 2802 and the Applicable
15 Wage Order.

16 5. On October 21, 2016, Defendants filed a Motion to Compel Arbitration and Dismiss
17 Class Claims. The litigation was stayed pending a Supreme Court Ruling in *Morris v. Ernst & Young*,
18 LLP, 834 F.3d 975 (9th Cir. 2016). During the stay, San Nicolas filed a Second Amended Complaint,
19 adding two additional individuals (Peter Contreras and David Price) as plaintiffs.

20 6. On June 22, 2018, Plaintiff David Price filed a Demand for Arbitration with the
21 American Arbitration Association entitled *Price v. West Covina Corporate Fitness, Inc.*, AAA Case
22 No. 01-18-0002-4496. On June 22, 2018, Plaintiff Peter Contreras filed a Demand for Arbitration
23 with the American Arbitration Association entitled *Contreras v. West Covina Corporate Fitness, Inc.*,
24 AAA Case No. 01-18-0002-4494. This left one plaintiff (San Nicolas) asserting only a PAGA claim
25 in the San Nicolas Action against Defendant West Covina Fitness.

26 7. On July 6, 2018, the San Nicolas parties stipulated to lift the 17-month-old stay after
27 the Supreme Court decided the *Morris* case, and the Court dismissed the class action claims and the
28 individual claims of all Plaintiffs.

1 8. On January 15, 2019, Plaintiff San Nicolas mediated with West Covina Fitness in the
2 *San Nicolas* action before Hon. William C. Pate (Ret.), which led to a settlement agreement whereby
3 Nicolas would settle the PAGA claim for \$775,000.

4 9. On August 5, 2019, the LWDA notified Plaintiffs and Defendants that it was extending
5 the time to investigate. Although the LWDA investigation is now closed, during the period it was
6 open, and at the LWDA's suggestion, all of the parties discussed a global resolution. Defendants
7 increased their global settlement offer from an aggregate of \$775,000 to \$1,150,000. Plaintiff Charles
8 San Nicolas and Proposed Intervenor Plaintiff Nathan Klipfel agreed to the \$1,150,000 increased
9 settlement. Class counsel have also agreed to the allocation of settlement proceeds and attorney's fees
10 and costs.

11 10. During the pendency of the Action, my firm engaged in extensive litigation and
12 investigation as to the claims alleged. This work included legal research and the analysis of relevant
13 data for purpose of evaluating the merits and the value of the class claims.

14 11. In this case, the Settlement reached in the total non-reversionary amount of \$1,000,000
15 as the Settlement Fund is the product of substantial effort by the Parties and counsel should be
16 approved as fair, reasonable and adequate. The Settlement was the result of arms-length negotiations
17 during mediation and extensive follow up thereafter between experienced counsel. The Settlement
18 was only reached after extensive factual and legal investigation and research, careful evaluation of the
19 respective parties' strengths and weaknesses, and diligent negotiation efforts. The Settlement amount
20 is a negotiated compromise which took into account risks related to liability, damages, and all the
21 defenses asserted by Defendants. The risk that class certification would not be granted was an
22 extremely important consideration, as the denial of class certification would mean that the class would
23 receive nothing. The fear of retaliation and blacklisting makes it unlikely that absent class
24 certification, individuals would come forward to assert their rights individually. I also believe in the
25 fairness of the settlement that is based on factoring in the uncertainty and risks to Plaintiffs involved in
26 not prevailing on one or more of the causes of action or theories alleged, the possibility of non-
27 certification and potential for appeals. Based on the foregoing data and our own independent
28 investigation and evaluation, I am of the opinion that the settlement with the Defendants for the

1 consideration and on the terms set forth in the Stipulation is fair, reasonable, and adequate and is in the
2 best interest of the class in light of all known facts and circumstances, including the risk of significant
3 delay, the defenses asserted by Defendants, and numerous potential appellate issues.

4 12. There is a substantial difference between the risk assumed by attorneys being
5 paid by the hour and attorneys working on a contingent fee basis. The attorney being paid by
6 the hour can go to the bank with his fee. The attorney working on a contingent basis can only
7 log hours while working without pay towards a result that will hopefully entitle him to a market
8 place contingent fee taking into account the risk and other factors of the undertaking.
9 Otherwise, the contingent fee attorney receives nothing. In this case, the representation by my
10 firm and the nature of the fee was wholly contingent. BNBD subjected themselves to this
11 contingent fee market risk in this all or nothing contingent fee case wherein the necessity and
12 financial burden of private enforcement makes the requested award appropriate. This case was
13 litigated on a contingent basis over a year, with all of the risk factors inherent in such an
14 uncertain undertaking. At the time this case was brought, the result was far from certain.
15 Defendants' practices at issue here had been in place for years. Defendants' numerous defenses
16 to the merits of the case and to class certification created difficulties with proof and complex
17 legal issues for Class Counsel to overcome. Indeed, I am aware of other similar cases where the
18 court dismissed the class allegations or denied class certification. Under such contingent
19 circumstances, courts have held that a risk multiplier must be applied to the fee award

20 13. From December 9, 2015 to August 2, 2022, my firm has worked more than 323 hours
21 prosecuting these class claims with the attorneys' hourly fee rates for attorneys ranging from \$475 to
22 \$795, which resulted in lodestar for BNBD relating to the class claims for this period in the amount of
23 \$198,943.75. In addition, there will be additional work performed to complete the settlement process.
24 Attached hereto as Exhibit #2 is a true and correct copy of the BNBD billing statement for this matter
25 which sets forth the specific tasks, time and attorney for the work performed on this matter.

26 14. The rates charged by my firm are in line with the prevailing rates of attorneys in
27 the local legal community for similar work and, if this were a commercial matter, these are the
28 charges that would be made and presented to the client. These hourly rates have been approved

1 by Court’s throughout California, including the Courts in the Superior Court of California. In
2 fact, on August 1, 2018, District Judge Andre Birotte Jr. explicitly found that BNBD’s “rates
3 generally appear reasonable and ‘in line with those prevailing in the [relevant] community’—
4 the Central District of California”. Finally, the reasonableness of BNBD’s hourly rates is
5 further confirmed by comparing such rates with the rates of comparable counsel practicing
6 complex and class litigation as detailed in the National Law Journal Billing Survey. See e.g.
7 *Zest IP Holdings, LLC v. Implant Direct MFG., LLC*, 2014 U.S. Dist. LEXIS 167563 (S.D. Cal.
8 2014) (finding that “Mayer Brown's \$775 average billing rate for partners” and “Mayer Brown's
9 \$543 average associate billing rate” are reasonable rates when compared within 21 other firms
10 practicing in the Southern District of California.) This survey is useful to show that BNBD’s
11 rates are in line with the comparable rates of the defense counsel that opposes these types of
12 class claims, such as Mayer Brown noted above who is defense counsel in cases currently being
13 prosecuted by BNBD. In another example, Sheppard Mullin Richter & Hampton, who is
14 opposing counsel in many cases prosecuted by BNBD, charges rates as high as \$875 for
15 partners and \$535 for associates. Similarly, Paul Hastings, another opposing counsel in these
16 types of cases, charges between \$900 and \$750 for partners and \$755 and \$335 for associates.
17 Thus, the rates charged by BNBD for comparable work are less than these examples, and are
18 therefore undoubtedly reasonable.

19 15. The reasonableness of the requested award is also established by reference to
20 similar awards in other wage and hour cases. The following are examples of similar recent fee
21 awards. On June 14, 2017, in *Smith v. Space Exploration* (Los Angeles Superior Court Case
22 No. BC554258), Judge Elihu Berle awarded a 1/3 fee award in a wage and hour class
23 settlement. On December 4, 2018, in *Panda Express Wage and Hour Cases* (Los Angeles
24 Superior Court, Case No. JCCP 4919) Judge Carolyn Kuhl awarded a one-third fee award in a
25 wage and hour class settlement. On February 1, 2019, in *Solarcity Wage and Hour Cases* (San
26 Mateo Superior Court, Case No. JCCP 4945) Judge Marie Weiner awarded a one-third fee
27 award in a wage and hour class settlement. On July 30, 2019, in *Erickson v. John Muir Health*,
28 (Contra Costa Superior Court Case No. MSC18-00307) Judge Edward Weil awarded a one-

1 third fee award in a wage and hour class settlement. On December 18, 2019, in *Velasco v.*
2 *Lemonade Restaurant Group*, (Los Angeles Superior Court Case No. BC672235) Judge
3 William Highberger awarded a one-third fee award in a wage and hour class settlement. On
4 January 31, 2020, in *El Pollo Loco Wage and Hour Cases* (Orange County Superior Court Case
5 No. JCCP 4957), Judge William Claster awarded a one-third award in a wage and hour class
6 settlement. On February 11, 2020, in *Singh v. Total Renal Care* (San Francisco Superior Court
7 Case No. CGC-16-550847) Judge Ethan Schulman awarded a one-third award in a wage and
8 hour class settlement. On October 23, 2020, in *Ontiveros v. Baker Concrete*, (Santa Clara
9 Superior Court Case No. 18CV328679) Judge Brian Walsh awarded a one-third fee award in a
10 wage and hour class settlement. On December 3, 2020, in *Blackshear v. California Fine Wine &*
11 *Spirits* (Sacramento Superior Court Case No. 34-2018-00245842) Judge Christopher Krueger
12 awarded a one-third fee award in a wage and hour class settlement. On April 15, 2021, in
13 *Walker v. Brink's Global Services USA* (Los Angeles County Superior Court Case No.
14 BC564369) Judge Amy Hogue awarded a one-third award in a wage and hour class settlement.
15 On June 2, 2021, in *Pacia v. CIM Group, L.P.* (Los Angeles Superior Court Case No.
16 BC709666), Judge Amy D. Hogue awarded a one-third fee award in a wage and hour class
17 settlement. On September 13, 2021, in *Smith v. California Protection and Investigation*
18 *Services* (Los Angeles Superior Court Case No. 19STCV14719), Judge Daniel Buckley
19 awarded a one-third fee award in a wage and hour class settlement. On November 8, 2021, in
20 *Securitas Wage and Hour Cases* (Los Angeles Superior Court Case No. JCCP4837) Judge
21 David Cunningham awarded a one-third fee award in a wage and hour class settlement. On
22 November 17, 2021, in *Leon v. Sierra Aluminum Company* (San Bernardino Superior Court
23 Case No. CIVDS2010856) Judge David Cohn awarded a one-third fee award in a wage and
24 hour class settlement. On March 17, 2022, in *See's Candies Wage and Hour Cases* (Los
25 Angeles Superior Court Case No. JCCP5004) Judge Maren Nelson awarded a one-third fee
26 award in a wage and hour class action settlement. On April 12, 2022, in *O'Donnell v. Okta, Inc.*,
27 (San Francisco Superior Court Case No. CGC-20-587665) Judge Richard Ulmer awarded a one-
28 third fee award in a wage and hour class action settlement. On May 23, 2022, in *Ettedgui v. WB*

1 *Studio Enterprises Inc.*, (United States District Court, Central District of California Case No.
2 2:20-cv-08053-MCS-JDE) Judge Mark C. Scarsi awarded a one-third fee award in a wage and
3 hour class action settlement. On June 30, 2022, in *Armstrong, et al. v. Prometric LLC* (Los
4 Angeles Sueprior Court Case No. 20STCV29967), Judge Maren E. Nelson awarded a one-third
5 fee award in a wage and hour class action. On July 13, 2022, in *Crum v. S&D Carwash*
6 *Management LLC*, (Sacramento Superior Court Case No. 2019-00251338), Judge Christopher
7 E. Krueger awarded a one-third fee award in a wage and hour class action settlement.

8 16. To date, BNBD has incurred litigation expenses of \$17,077.30. These litigation
9 expenses include the expenses incurred for filing fees, expert expenses, mediation expenses,
10 attorney service charges (Knox, One Legal and Online Legal Courier), Caseanywhere charges,
11 legal research charges, CourtCall and LA Courtconnect charges and delivery charges, all of
12 which are costs normally billed to and paid by the client. These costs were reasonably incurred
13 by BNBD in the prosecution of this matter and are set forth in the BNBD billing records
14 attached hereto as Exhibit #2.

15
16 I declare under penalty of perjury under the laws of the State of California and the
17 United States that the foregoing is true and correct. Executed this 5th day of August, 2022, at
18 La Jolla, California.

19
20 /s/ Kyle Nordrehaug
21 Kyle R. Nordrehaug
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EXHIBIT #1

Blumenthal Nordrehaug Bhowmik De Blouw LLP

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FIRM RESUME

Areas of Practice: Employee, Consumer and Securities Class Actions, Wage and Hour Class Actions, Civil Litigation, Business Litigation.

ATTORNEY BIOGRAPHIES

Norman B. Blumenthal

Partner, Blumenthal Nordrehaug Bhowmik De Blouw LLP (2018 to present)

Practice Areas: Consumer and Securities Class Action, Civil Litigation, Wage and Hour Class Actions, Transactional Law

Admitted: 1973, Illinois; 1976, California

Biography: Law Clerk to Justice Thomas J. Moran, Illinois Supreme Court, 1973-1975, while on Illinois Court of Appeals. Instructor, Oil and Gas Law: California Western School of Law, 1981; University of San Diego School of Law, 1983. Sole Practitioner 1976-1987. Partner, Blumenthal & Ostroff, 1988-1995. Partner, Blumenthal, Ostroff & Markham, 1995-2001. Partner, Blumenthal & Markham, 2001-2007. Partner, Blumenthal & Nordrehaug, 2007. Partner, Blumenthal, Nordrehaug & Bhowmik, 2008-2018. Partner, Blumenthal Nordrehaug Bhowmik De Blouw LLP, 2018 - present.

Member: San Diego County, Illinois State and American Bar Associations; State Bar of California.

Educated: University of Wisconsin (B.A., 1970); Loyola University of Chicago (J.D., 1973);

Summer Intern (1971) with Harvard Voluntary Defenders

Kyle R. Nordrehaug

Partner, Blumenthal Nordrehaug Bhowmik De Blouw LLP (2018 to present)

Practice Areas: Consumer and Securities Class Actions, Wage and Hour Class Actions, Civil Litigation

Admitted: 1999, California

Biography: Associate, Blumenthal, Ostroff & Markham, 1999-2001. Associate, Blumenthal & Markham, 2001-2007. Partner, Blumenthal & Nordrehaug, 2007. Partner, Blumenthal, Nordrehaug & Bhowmik, 2008-2017

Member: State Bar of California, Ninth Circuit Court of Appeals, Third Circuit Court of Appeals

Educated: University of California at Berkeley (B.A., 1994); University of San Diego School of Law (J.D. 1999)

Awards: Top Labor & Employment Attorney 2016; Top Appellate Reversal - Daily Journal 2015; Super Lawyer 2015-2018

Aparajit Bhowmik

Partner, Blumenthal Nordrehaug Bhowmik De Blouw LLP (2018 to present)

Practice Areas: Civil Litigation; Consumer Class Actions, Wage and Hour Class Actions

Admitted: 2006, California

Educated: University of California at San Diego (B.A., 2002); University of San Diego School of Law (J.D. 2006)

Biography: Partner, Blumenthal, Nordrehaug & Bhowmik, 2008-2017

Awards: Rising Star 2015

Nicholas J. De Blouw

Partner, Blumenthal Nordrehaug Bhowmik De Blouw LLP (2018 to present)
Practice Areas: Civil Litigation; Consumer Class Actions, Wage and Hour Class Actions
Admitted: 2011, California
Educated: Wayne State University (B.A. 2008); California Western School of Law (J.D. 2011)

Piya Mukherjee

Associate Attorney
Practice Areas: Civil Litigation; Consumer Class Actions, Wage and Hour Class Actions
Admitted: 2010, California
Educated: University of California, San Diego (B.S. 2006); University of Southern California, Gould School of Law (J.D. 2010)

Victoria Rivapalacio

Associate Attorney
Practice Areas: Civil Litigation; Consumer Class Actions, Wage and Hour Class Actions
Admitted: 2011, California
Educated: University of California at San Diego (B.A., 2003); George Washington University Law School (J.D. 2010)

Ricardo Ehmman

Associate Attorney
Practice Areas: Civil Litigation; Wage and Hour Class Actions
Admitted: 2018, California; 2004, Nevada
Educated: University of California, San Diego (B.A. 1998); Loyola Law School (J.D. 2001)

Jeffrey S. Herman

Associate Attorney
Practice Areas: Civil Litigation; Wage and Hour Class Actions
Admitted: 2011, California; 2016 Arizona
Educated: University of Michigan (B.A. 2008); California Western School of Law (J.D. 2011)

Charlotte James

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Practice Areas: Civil Litigation; Wage and Hour Class Actions
Admitted: 2016, California
Educated: San Diego State University; California Western School of Law

Christine Levu

Associate Attorney
Practice Areas: Civil Litigation; Wage and Hour Class Actions
Admitted: 2012, California
Educated: University of California, Irvine; California Western School of Law

Andrew Ronan

Associate Attorney
Practice Areas: Civil Litigation; Wage and Hour Class Actions
Admitted: 2016, California
Educated: Arizona State University; University of San Diego School of Law

Scott Blumenthal

Associate Attorney

Practice Areas: Civil Litigation; Wage and Hour Class Actions

Admitted: 2020, New Mexico

Educated: University of Southern California; California Western School of Law

REPORTED CASES

Sakkab v. Luxottica Retail N. Am., Inc., 803 F.3d 425 (9th Cir. 2015) (The panel reversed the district court's order granting Luxottica Retail North America, Inc.'s motion to compel arbitration of claims and dismissing plaintiff's first amended complaint, in a putative class action raising class employment-related claims and a non-class representative claim for civil penalties under the Private Attorney General Act.);

Securitas Security Services USA, Inc. v. Superior Court, 234 Cal. App. 4th 1109 (Cal. Feb. 27, 2015) (Court of Appeal concluded the trial court correctly ruled that *Iskanian* rendered the PAGA waiver within the parties' dispute resolution agreement unenforceable. However, the Court of Appeal then ruled the trial court erred by failing to invalidate the non-severable class action waiver from the agreement and remanded the entire complaint, including class action and PAGA claims, be litigated in the Superior Court);

Sussex v. United States Dist. Court for the Dist. of Nev., 781 F.3d 1065 (9th Cir. 2015) (The panel determined that the district court clearly erred in holding that its decision to intervene mid-arbitration was justified under *Aerojet-General*. Specifically, the panel held that the district court erred in predicting that an award issued by the arbitrator would likely be vacated because of his "evident partiality" under 9 U.S.C. § 10(a)(2).);

Provost v. YourMechanic, Inc., 2020 Cal. App. Lexis 955 (Oct. 15, 2020) (Court of Appeals affirmed denial of arbitration of PAGA claim, and held in a case of first impression, that there was no additional standing rules for PAGA claim brought by independent contractor);

In re Tobacco Cases II, 41 Cal. 4th 1257 (2007); Washington Mutual Bank v. Superior Court, 24 Cal. 4th 906 (2001); Rocker v. KPMG LLP, 148 P.3d 703; 122 Nev. 1185 (2006); PCO, Inc. v. Christensen, Miller, Fink, Jacobs, Glaser, Weil & Shapiro, LLP, 150 Cal. App. 4th 384 (2007); Hall v. County of Los Angeles, 148 Cal. App. 4th 318 (2007); Coshov v. City of Escondido, 132 Cal. App. 4th 687 (2005); Daniels v. Philip Morris, 18 F.Supp 2d 1110 (S.D. Cal.1998); Gibson v. World Savings & Loan Asso., 103 Cal. App. 4th 1291 (2003); Jordan v. Department of Motor Vehicles, 75 Cal. App. 4th 445 (1999); Jordan v. Department of Motor Vehicles, 100 Cal.App. 4th 431 (2002); Norwest Mortgage, Inc. v. Superior Court, 72 Cal.App.4th 214 (1999); Hildago v. Diversified Transp. Sya, 1998 U.S. App. LEXIS 3207 (9th Cir. 1998); Kensington Capital Mgal. v. Oakley, Inc., 1999 U.S. Dist LEXIS 385; Fed.Sec.L.Rep. (CCH) P90, 411 (1999 C.D. Cal.); Lister v. Oakley, Inc., 1999 U.S. Dist. LEXIS 384; Fed. Sec. L. Rep. (CCH) P90,409 (C.D. Cal. 1999); Olszewski v. Scripps Health, 30 Cal. 4th 798 (2003); Steroid Hormone Product Cases, 181 Cal. App. 4th 145 (2010); Owen v. Macy's, Inc., 175 Cal. App. 4th 462 (2009); Taiheiyo Cement Corp. v. Superior Court, 117 Cal. App. 4th 380 (2004); Taiheiyo Cement Corp. v. Superior Court, 105 Cal.App. 4th 398 (2003); McMeans v. Scripps Health, Inc., 100 Cal. App. 4th 507 (2002); Ramos v. Countrywide Home Loans, 82 Cal.App. 4th 615 (2000); Tevssier v. City of San Diego, 81 Cal.App. 4th 685 (2000); Washington Mutual Bank v. Superior Court, 70 Cal. App. 4th 299 (1999); Silvas v. E*Trade Mortg. Corp., 514 F.3d 1001 (9th Cir. 2008); Silvas v. E*Trade Mortg. Corp., 421 F. Supp. 2d 1315 (S.D. Cal. 2006); McPhail v. First Command Fin. Planning, Inc., 2009 U.S. Dist. LEXIS 26544 (S.D. Cal. 2009); McPhail v. First Command Fin. Planning, Inc., 251 F.R.D. 514 (S.D. Cal. 2008); McPhail v. First Command Fin. Planning, Inc., 247 F.R.D. 598 (S.D. Cal. 2007); Barcia v. Contain-A-Way, Inc., 2009 U.S. Dist. LEXIS 17118 (S.D. Cal. 2009); Barcia v. Contain-A-Way, Inc., 2008 U.S. Dist. LEXIS 27365 (S.D. Cal. 2008); Wise v. Cubic Def. Applications, Inc., 2009 U.S. Dist. LEXIS 11225 (S.D. Cal. 2009); Gabisan v. Pelican Prods., 2009 U.S. Dist. LEXIS 1391

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Navajo Express, Inc. – San Bernardino County Superior Court, Case No. CIVDS1613846; Lara v. Commercial Protective Service, Inc. – Los Angeles County Superior Court, Case No. BC648921; Picos v. Culinart of California, Inc. – San Diego County Superior Court, Case No. JCCP 4892; Samaniego v. A&I Transport, Inc. – Santa Cruz County Superior Court, Case No. 16CV01894; Bailey v. Romanoff Floor Covering, Inc. – U.S. District Court, Eastern District of California, Case No. 17-CV-00685-TLN-CMK; Aguirre v. Bitech, Inc. – Sacramento County Superior Court, Case No. 34-2016-002022; Phillips v. DI Overnite LLC – San Diego County Superior Court, Case No. 37-2016-00016800-CU-OE-CTL; Jacob v. Pride Transport, Inc. – Santa Cruz County Superior Court, Case No. 16CV1337; Bennett v. Heartland Express, Inc. of Iowa – San Diego County Superior Court, Case No. 37-2016-00015056-CU-OE-CTL; Stapf v. Mercer Health & Benefits Administration LLC – Los Angeles County Superior Court, Case No. BC643007; Armstrong v. Ruan Transport Corporation – San Bernardino County Superior Court, Case No. CIVDS1605897; Geiger v. Floyd’s 99-California LLC – Orange County Superior Court, Case No. 30-2016-00874943-CU-OE-CXC; Mondrian v. Trius Trucking, Inc. – Fresno County Superior Court, Case No. 16CECG01501; Johnson v. Fedex Office and Print Services, Inc. – Alameda County Superior Court, Case No. RG17856291; Rios v. Pacific Western Bank - San Diego County Superior Court, Case No. 37-2016-00038083; Sanders v. Old Dominion Freight Lines, Inc. – San Diego County Superior Court, Case No. 37-2016-00030725-CU-OE-CTL; Taylor v. Gardner Trucking, Inc. – San Bernardino County Superior Court, Case No. CIVDS1614280; Couture v. Wal-Mart Associates, Inc. – U.S. District Court, Eastern District of California, case No. 16-CV-02202-VC; Bertuol v. AHMC Anaheim Regional Medical Center LP – Orange County Superior Court, Case No. 30-2017-00899024-CO-OE-CXC; Espinoza v. Prime Communications of California, LLC – San Mateo County Superior Court, Case No. 16CIV01563; Archuletta v. Tidy Services, Inc. – Orange County Superior court, Case No. 30-2016-008611892-CU-OE-CXC; Puccini v. Earthbound Farm, LLC – Santa Clara County Superior Court, Case No. 17CV308643; Vikram v. First Student Management, LLC – U.S. District Court, Northern District of California, Case No. 17-CV-04656-KAW; Blair v. Ashley Distribution Services, LTD. – U.S. District Court, Central District of California, Case No. 17-CV-01427-JAK-SP; Richardson v. Service Staffing, LLC – Orange County Superior Court, Case No. 30-2017-00899039-CU-OE-CXC; Coffin v. Certified Freight Logistics, Inc. – San Diego County Superior Court, Case No. 37-2016-00036523-CU-OE-CTL; Encarnacion v. S.A.S. Services Group, Inc. – San Diego County Superior Court, Case No. 37-2017-00026726-CU-OE-CTL; Vasquez v. Golden State Overnight Delivery Service, Inc. – Alameda County Superior Court, Case No. RG17862924; Karr v. Tristar Managed Care, Inc. – Contra Costa Superior Court, case No. MSC17-00650; Gouveia v. Central Cal Transportation – San Joaquin County Superior Court, Case No. STK-CV-UOE-2017-0001765; Miranda v. Genex Services, LLC – U.S. District Court, Northern District of California, Case No. 17-CV-01438-JD; Spears v. Health Net of California, Inc. – Sacramento County Superior Court, Case No. 34-2017-00210560; Martinez v. Geil Enterprises, Inc. – Fresno County Superior Court, Case No. 17CECG01879; McComack v. Marriott Ownership Resorts, Inc. – U.S. District Court, Southern District of California, Case No. 17CV1663 BEN WVG; Velasco v. Lemonade Restaurant Group, LLC – Los Angeles County Superior Court, Case No. BC672235; Smith v. Personnel Services, Inc. – U.S. District Court, Northern District of California, Case NO. 17-CV-03594-SK; Gabriel v. Kuni SDA, LLC – San Diego County Superior Court, Case No. 37-2017-000251191-CU-OE-CTL; Miller v. Mattress Firm, Inc. – Santa Clara County Superior Court, Case No. 17CV313148; Provost v. Yourmechanic, Inc. – San Diego County Superior Court, Case No. 37-2017-00024056-CU-OE-CTL; Zirpolo v. UAG Stevens Creek II, Inc. – Santa Clara County Superior Court, Case No. 17CV313457; Salazar v. Aids Healthcare Foundation – San Diego County Superior Court, Case No. 37-2017-00033482-CU-OE-CTL; Knipe v. Amazon.com, Inc. – San Diego County Superior Court, Case No. 37-2017-00029426-CU-OE-CTL; Erwin v. Caremeridian, LLC – Fresno County Superior Court, Case No. 17CECG03048; Davis v. Cox Communications California, LLC – U.S. District Court, Southern District of California, Case No. 16-CV-00989-BAS-BLM; Lara v. RMI International, Inc. – Los Angeles County Superior Court, Case No. BC597695; Harper v. C.R. England, Inc. – U.S. District Court, Utah Central

Division, Case No. 16-CV-00906-DB; Mrazik v. C.H. Robinson Company – U.S. District Court, Central District of California, Case No. 12-CV-02067-CAS-PLA; Horn v. Rise Medical Staffing, LLC – U.S. District Court, Eastern District of California, Case No. 2:17-cv-01967-MCE-KJN; Pasallo v. GSG Protective Services CA Inc. – San Diego Superior Court, Case No. 37-2018-00037611-CU-OE-CTL; Smith v. Pacific Personnel Services, Inc. – U.S. District Court, Northern District of California, Case No. 17-cv-03594-SK; Terrado v. Accredited Debt Relief, LLC – San Diego Superior Court, Case No. 37-2018-00014181-CU-OE-CTL; Escobedo v. Pacific Western Bank – Los Angeles Superior Court, Case No. BC682686; Wade v. Automobile Club of Southern California – Orange County Superior Court, Case No. 30-2017-00960268-CU-OE-CXC; Montano v. American Automobile Association of Northern California – Contra Costa County Superior Court, Case No. CIVMSC18-01539; Perez v. Summit Interconnect, Inc. – Orange County Superior Court, Case No. 30-2018-00995403-CU-OE-CXC; Wolleson v. Gosch Imports, Inc. – Riverside County Superior Court, Case No. RIC170356; Banuelos v. Ortho Mattress, Inc. – Orange County Superior Court, Case No. 30-2020-01161304-CU-OE-CXC; Castellanos v. Miller Automotive Group, Inc. – Los Angeles County Superior Court, Case No. BC699211; Tressler v. Spoonful Management, LLC – Los Angeles County Superior Court, Case No. BC71940; Delph v. Employee Retention Services, LLC – San Diego County Superior Court, Case No. 37-2018-00007885; Romero v. May Trucking Company – U.S. District Court, Central District of California, Case No. 5:17-cv-02166-JGB-SHK; Miranda v. Genex Services, LLC – San Bernardino County Superior Court, Case No. CIVDS1700779; Moore v. Zirx Transportation Services, Inc. – Los Angeles County Superior Court, Case No. CGC-18-566655; Sottile v. Motion Recruitment Partners – Santa Clara County Superior Court, Case No. 18CV321677; Shahbazian v. Fast Auto Loans, Inc. – U.S. District Court, Central District of California, Case No. 2:18-cv-03076-ODW-KS; Salazar v. Johnson & Johnson Consumer Inc. – Los Angeles County Superior Court, Case No. BC702468; Conti v. L’Oreal USA S/D, Inc. – U.S. District Court, Eastern District of California, Fresno, Case No. 1:19-CV-00769-LJO-SKO; Mercado v. Security Industry Specialists, Inc. – Santa Clara County Superior Court, Case No. 17CV320059; Vikili v. Dignity Health – San Francisco County Superior Court, Case No. CGC-18-569456; Bagby v. Swissport SA, LLC – Los Angeles County Superior Court, Case No. BC691058; Henry v. Motion Entertainment Group, LLC – San Francisco County Superior Court, Case No. CGC18565643; Dandoy v. West Coast Convenience, LLC – Alameda County Superior Court, Case No. HG20051121; Lanuza v. AccentCare, Inc. – San Francisco County Superior Court, Case No. CGC-18-565521; Thomas v. Easy Driving School, LLC – San Diego County Superior Court, Case No. 37-2018-00047639-CU-OE-CTL; Erickson v. Erickson – Contra Costa County Superior Court, Case No. MSC18-00307; Martin v. Menzies Aviation (USA) Inc. – San Francisco County Superior Court, Case No. CGC-18-566072; Mortimer v. Healthsouth Bakersfield Rehabilitation Hospital, LLC – Kern County Superior Court, Case No. BCV-18-102761; Alcaraz v. Red Lion Hotels Corporation – San Francisco County Superior Court, Case No. CGC-18-570310; Calhoun v. Total Transportation and Distribution, Inc. – San Diego County Superior Court, Case No. 37-2018-00058681-CU-OE-CTL; Rataul v. Overton Security Services, Inc. – Alameda County Superior Court, Case No. RG18891882; Beltran v. Compass Bank – San Diego County Superior Court, Case No. 37-2019-00024475-CU-OE-CTL; Kirshner v. Touchstone Golf, LLC – San Diego County Superior Court, Case No. 37-2018-00028865-CU-OE-CTL; Pizarro v. The Home Depot, Inc. – U.S. District Court for the Northern District of Georgia-Atlanta Division; Hatanaka v. Restore Rehabilitation, LLC – San Diego County Superior Court, Case No. 37-2018-00034780-CU-OE-CTL; Faria v. Carriage Funeral Holdings, Inc. – Contra Costa County Superior Court, Case No. MSC18-00606; Ontiveros v. Baker Concrete Construction, Inc. – Santa Clara County Superior Court, Case No. 18CV328679; Morales v. Redlands Automotive Services, Inc. – San Bernardino County Superior Court, Case No. CIVDS1807525; Ramirez v. Carefusion Resources, LLC – U.S. District Court, Southern District of California; Amster v. Starbucks Corporation – San Bernardino Superior Court, Case No. CIVDS1922016; Kutzman v. Derrel’s Mini Storage, Inc. – U.S. District, Eastern District of California, Case No. 1:18-cv-00755-AWI-JLT; Marks v. Universal Propulsion Company, Inc. – Solano County Superior Court, Case No. FCS051608; Martinez v. Geil Enterprises,

Inc. – Fresno County Superior Court, Case No. 17CECG01480; Teniente v. Cirrus Asset Management, Inc. – Los Angeles County Superior Court, Case No. 20STCV16302; Blackshear v. California Fine Wine & Spirits LLC – Sacramento County Superior Court, Case No. 34-2018-00245842; Warnick v. Golden Gate America West LLC – Los Angeles County Superior Court, Case No. BC714176; Bennett v. Dnata Aviation USA, Inc. – San Francisco County Superior Court, Case No. CGC-18-566911; George v. PF Stockton Fitness LLC – Sacramento County Superior Court, Case No. 34-2019-00261113-CU-OE-GDS; Oshana v. Farmers and Merchants Bank of Central California – Stanislaus County Superior Court, Case No. CV-19-003427; Vasquez v. Packaging Corporation of America, – U.S. District Court, California Central District, Case No. 2:19-cv-01935-PSG-PLA; Palomino v. Zara USA Inc. – Orange County Superior Court, Case No. 30-2018-00992682-CU-OE-CXC; Simmons v. Joe & The Juice LA, LLC – San Francisco County Superior Court; Pacia v. CIM Group, L.P. – Los Angeles County Superior Court, Case No. BC709666; Flores v. Plastic Express – Los Angeles County Superior Court, Case No. BC71971; Madera v. William Warren Properties, Inc. – Orange County Superior Court, Case No. 30-2019-01055704-CU-OE-CXC; Hernandez v. Quality Custom Distribution – Orange County Superior Court, Case No. 30-2018-01010611-CU-OE-CXC; Arango v. Schlumberger Technology Corporation – Orange County Superior Court, Case No. 30-2019-01056839-CU-OE-CXC; Dandoy v. West Coast Convenience, LLC – Alameda County Superior Court, Case No. HG20051121; Ramirez v. J E H Enterprises, Inc. – San Francisco County Superior Court, Case No. CGC-19-574691; Sullen v. First Service Residential California, LLC – San Francisco County Superior Court, Case No. CGC-19-575131; Valentino v. East Bay Tire Co. – Solano County Superior Court, Case No. FCS053067; Murphy v. Rockler Retail Group, Inc. – Sacramento Superior Court, Case No. 34-2019-00251220; Shahbazian v. Onewest Bank – Los Angeles County Superior Court, Case No. 19STCV23722; Bruemmer v. Tempur Retail Stores LLC – Marin County Superior Court, Case No. CIV1803646; Antonios v. Interface Rehab, Inc. – Orange County Superior, Case No. 30-2019-01067547-CU-OE-CXC; Tavallodi v. DC Auto, Inc. – San Bernardino, Case No. CIVDS1833598; Miranda v. The Lloyd Pest Control Co. – San Diego County Superior Court, Case No. 37-2018-00052510-CU-OE-CTL; Soenardi v. Magnussen Imports, Inc. – Santa Clara County Superior Court, Case No. 18CV340003; Thai v. Team Industrial Services, Inc. – Los Angeles County Superior Court, Case No. 19STCV21953; Castillo v. A.J. Kirkwood & Associates, Inc. – Los Angeles County Superior Court, Case No. 19STCV04435; Moss v. Jabil Inc. – Alameda County Superior Court, Case No. HG20050536; Billosillo, Jr. v. Crown Energy Services, Inc. – San Diego County Superior Court, Case No. 37-2018-00058254-CU-OE-CTL; Tarkington v. Freetime, Inc. – San Diego County Superior Court, Case No. 37-2019-00011473-CU-OE-CTL; McIntyre v. J.J.R. Enterprises, Inc. – Sacramento County Superior Court, Case No. 34-2019-00251220; Bucur v. Pharmaca Integrative Pharmacy, Inc. – San Diego County Superior Court, Case No. 37-2019-00009409-CU-OE-CTL; Batin v. McGee Air Services, Inc. – Santa Clara County Superior Court, Case No. 19CV347733; Terry v. McGee Air Services, Inc. – King County Superior Court of Washington, Case No. 19-2-3321-5 KNT; Weiss v. Niznik Behavioral Health Resources, Inc. – San Diego County Superior Court, Case No. 37-2019-00039441-CU-OE-CTL; Cavada v. Inter-Continental Hotels Group, Inc. – U.S. District Court, Southern District of California, Case No. 3:19-cv-01675-GPC-AHG; Lesevic v. Spectraforce Technologies, Inc. – U.S. District Court, Northern District of California, Case No. 5:19-cv-03126-LHK; Mutchler v. Circle K Stores, Inc. – San Diego County Superior Court, Case No. 37-2020-00016331-CU-OE-CTL; Azima v. CSI Medical Group, – Santa Clara County Superior Court, Case No. 19CV345450; Porras v. Baypointe Enterprises, LLC – Los Angeles County Superior Court, Case No. 19STCV31015; Mitchell v. Mack Trucking, Inc. – San Bernardino County Superior Court, Case No. CIVDS1928334; Watts v. T.R.L. Systems, Incorporated – Orange County Superior Court, Case No. 30-2019-01102457-CU-OE-CXC; Price v. DMSD Restaurants Inc. – San Diego County Superior Court, Case No. 37-2019-00024062-CU-OE-CTL; Jacobs v. Nortek Security & Control LLC – San Diego County Superior Court, Case No. 37-2019-0019735-CU-OE-CTL; Gonzalez v. Hub International Midwest – San Bernardino County Superior Court, Case No. CIVDS1900463; Cisneros v. Bluepearl California, Inc. – San Mateo Superior Court, Case No. 19-

CIV-05707; Garcia v. Gallagher Basset Services – San Bernardino Superior Court, Case No. CIVDS2004140; Callow v. Adventist Health System/West – Placer County Superior Court, Case No. SCV0043607; Dominguez v. Kimco Facility Services, LLC – Los Angeles County Superior Court, Case No. 19STCV37592; Searles v. Robert Heath Trucking, Inc. – Los Angeles County Superior Court, Case No. 19STCY30808; Rangel v. Pioneer Hi-Bred international, Inc. – Yolo County Superior Court, Case No. CV-19-1797; Ivon v. Sinclair Television of California, Humboldt County Superior Court, Case No. DR190699; Williams v. Henkels & McCoy, Inc. – San Bernardino County Superior Court, Case No. CIVDS2003888; Cano v. Larry Green Chrysler Jeep Dodge, Inc. – Riverside County Superior Court, Case No. BLC1900184; Lopez v. Cepheid – Santa Clara County Superior Court, Case No. 19CV358827; Hernandez v. Quick Dispense, Inc. – Los Angeles County Superior Court, Case No. 19STCV29405; Lopez v. Lacoste USA, Inc. – San Bernardino County Superior Court, Case No. CIVDS1914626; Duhe v. Hospital Couriers Nevada, LLC – Contra Costa County Superior Court, Case No. MSC19-01377; Law v. Sequoia Equities, Incorporated – Contra Costa Superior Court, Case No. C19-01925; Dvorak v. Rockwell Collins, Inc. – San Diego County Superior Court, Case No. 37-2019-00064397-CU-OE-CTL; Noguera v. Metal Container Corporation – Riverside County Superior Court, Case No. RIC2003235; Leon v. Miller Event Management, Inc. – San Luis Obispo Superior Court, Case No. 19CV-0435; Leon v. Miller Event Management, Inc. – San Luis Obispo County Superior Court, Case No. 19CV-0435, Camacho-Bias v. Serve U Brands Inc. – Butte County Superior Court, Case No. 20CV00603; La Pietra v. Entertainment Partners Services, LLC – Los Angeles County Superior Court, Case No. 19STCV39529; Celis v. Theatre Box - San Diego, LLC – San Diego County Superior Court, Case No. ____; Ignacio v. Laboratory Corporation of America – U.S. District Court, California Central District, Case No. 2:19-cv-06079-AB-RAO; Kovnas v. Cahill Contractors LLC – Alameda County Superior Court, Case No. RG19037852; Hersh v. Mrs. Gooch's Natural Food – Los Angeles County Superior Court, Case No. 19STCV10444; Miller v. The Permanente Medical Group – Alameda County Superior Court, Case No. RG19045904; Vasquez v. Autoalert, LLC – Orange County Superior Court, Case No. 30-2019-01114549-CU-OE-CXC; Cavanaugh v. Morton Golf, LLC – Sacramento County Superior Court, Case No. 34-2019-00270176; Coley v. Monroe Operations, LLC – Alameda County Superior Court, Case No. RG20063188; Ramirez v. Sierra Aluminum Company – U.S. District Court, California Central District Court, Case No. 5:20-cv-00417-JGB-KK; Marrero v. Stat Med, P.C. – Alameda County Superior Court, Case No. HG19043214; Enriquez v. Solari Enterprises, Inc. – Los Angeles County Superior Court, Case No. 20STCV11129; Craig v. Hometown Heart – San Francisco County Superior Court, Case No. CGC-20-582454; Lopez v. Hy0Lang Electric California, Inc. – San Diego County Superior Court, Case No. 37-2020-00012543-CU-OE-CTL; Heuklom v. Clara Medical Group, P.C. – San Francisco County Superior Court, Case No. CGC-20-585918; Dominguez v. Lifesafer of Northern California – Monterey County Superior Court, Case No. 20CV002586; Kiseleva v. Totalmed Staffing Inc. – U.S. District Court, California Northern District, Case No. 5:19-cv-06480; Vires v. Sweetgreen, Inc. – Santa Clara County Superior Court, Case No. 20CV365918; Kim v. Wireless Vision, LLC – San Bernardino County Superior Court, Case No. CIVDS2000074; Senoren v. Air Canada Corporation – Los Angeles County Superior Court, Case No. 20STCV13942; Clark v. Quest Diagnostics Incorporated – San Bernardino County Superior Court, Case No. CIVDS2018707; Green v. Shipt, Inc. – Los Angeles County Superior Court, Case No. 20STCV01001; Respass v. The Scion Group LLC – Sacramento County Superior County, Case No. 34-2020-00285265; Jackson v. Decathlon USA LLC – Alameda County Superior Court, Case No. RG2003024; Avacena v. FTG Aerospace Inc. – Los Angeles County Superior Court, Case No. 20STCV28767; Perez v. Butler America, LLC – Los Angeles County Superior Court, Case No. 20STCV20218; Christensen v. Carter's Retail, Inc. – Orange County Superior Court, Case No. 30-2020-01138792-CU-OE-CXC; Astudillo v. Torrance Health Association, Inc. – Los Angeles County Superior Court, Case No. 20STCV18424; Hansen v. Holiday AI Management Sub LLC – Contra Costa County Superior Court, Case No. CIVMSC20-00779; Almahdi v. Vitamin Shoppe Industries Inc – Santa Clara County Superior Court, Case No. 20CV365150; Krisinda v. Loyal Source Government Services LLC – U.S. District Court, California

Southern District, Case No. 3:20-cv-879-LAB-NLS; Ettedgui v. WB Studio Enterprises Inc – U.S. District Court, California Central District, Case No. 2:20-CV-08053-MCS (MAAx); Fernandez v. Nuvision Federal Credit Union – Orange County Superior Court, Case No. 30-2020-01161691-CU-OE-CJC; Aviles v. UPS Supply Chain Solutions, Inc. – Riverside County Superior Court, Case No. RIC2000727; Alcocer v. DSV Solutions, LLC – San Bernardino Superior Court, Case No. CIVDS2010345; Wilson v. Wholesome Harvest Baking, LLC – U.S. District Court, California Northern District, Case No. 4:20-cv-05186-YGR; Gregory v. Verio Healthcare, Inc. – Los Angeles County Superior Court, Case No. 20STCV37254; Rose v. Impact Group, LLC – Orange County Superior Court, Case No. 30-2020-01141107-CU-OE-CXC; Monasterio v. Citibank, N.A. – San Mateo County Superior Court, Case No. 20-CIV-03650; Martinez-Lopez v. Medamerica, Inc. – San Diego County Superior Court, Case No. 37-2020-00034393-CU-OE-CTL; Cox v. PRB Management, LLC – Solano County Superior Court, Case No. FCS055514; Nash v. K. Hovnanian Companies, LLC – Riverside County Superior Court, Case No. RIC2003319; Kyler v. Harbor Freight Tools USA, Inc. – San Diego County Superior Court, Case No. 37-2020-00015828-CU-OE-CTL; Roberts v. Solantic Corporation – Los Angeles County Superior Court, Case No. 20STCV41117; Price v. Mistras Group, Inc. – Los Angeles County Superior Court, Case No. 20STCV22485; Macias v. ABM Electrical & Lighting Solutions, Inc. – San Diego County Superior Court, Case No. 37-2020-00024997-CU-OE-CTL; Basu-Kesselman v. Garuda Labs, Inc. – San Francisco County Superior Court, Case No. CGC-20-585229; Armstrong v. Prometric LLC – Los Angeles County Superior Court, Case No. 20STCV29967; Ashlock v. Advantis Medical Staffing, LLC – San Diego County Superior Court, Case No. 37-2020-00022305-CU-OE-CTL; Wilson v. WXI Global Solutions, LLC – Los Angeles County Superior Court, Case No. 20STCV25007; Gandhale v. Select Rehabilitation, LLC – Monterey County Superior Court, Case No. 20CV002240; Starvoice v. G4S Secure Solutions (USA) Inc. – San Diego County Superior Court, Case No. 37-2020-00029421-CU-OE-CTL; Mbise v. Axlehire, Inc. – Alameda County Superior Court, Case No. RG20067350; Points v. C&J Services, Inc. – Kern County Superior Court, Case No. BCV-20-102483; Marshall v. PHI Air Medical, LLC – Lassen County Superior Court, Case No. 62973; Jauregui v. Cytotec Engineered Materials, Inc. – Orange County Superior Court, Case No. 30-2020-01164932-CU-OE-CXC

EXHIBIT #2

BLUMENTHAL NORDREHAUG
BHOWMIK DE BLOUW LLP
2255 CALLE CLARA
LA JOLLA, CA 92037
(858) 551-1223

AUGUST 2, 2022

CHARLES SAN NICHOLAS

RE: GOLD'S GYM SOUTHERN CALIFORNIA
FILE NUMBER: CA1196.001

ATTORNEY FEES

<u>DATE</u>	<u>ATTY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
12/09/15	NBB	REVIEW COMPLAINT, ANALYZE, FINAL.	2.50	795	1,987.50
12/09/15 17	ND	REVIEW & REVISE COMPLAINT. SEND TO CLIENT FOR APPROVAL - PHONE CALL WITH CLIENT.	0.50	495	247.50
12/15/15	ND	ANALYSIS OF CASE DAMAGES, DRAFT CLIENT NOTES MEMO, CALL WITH CLIENT.	1.30	495	643.50
02/08/16	ND	CALL WITH CLIENT TO DISCUSS COMPLAINT ISSUES, STATUS.	0.30	495	148.50
04/04/16 17	KN	REVIEW & REVISE COMPLAINT; DRAFT SUMMONS AND COVER SHEET.	1.20	750	900.00
04/06/16 25	KN	PREPARE COMPLAINT FOR FILING; FILE COMPLAINT.	1.00	750	750.00
04/20/16 15	KN	REVIEW FILED DOCS; MEMO TO STAFF.	0.75	750	562.50
04/22/16 10	ND	DRAFT PAGA NOTICE.	0.80	495	396.00
05/12/16 25	KN	PREPARE COMPLAINT FOR SERVICE.	0.50	750	375.00
05/18/16 15	ND	REVIEW FILE - CALL CLIENT BACK TO DISCUSS STATUS, PAGA AMENDMENT.	0.40	495	198.00
05/26/16	CRJ	DRAFT FAC.	0.70	175	122.50

<u>DATE</u>	<u>ATTY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
06/08/16	PM	SERVE FAC.	0.30	475	142.50
06/14/16 12	PM	TELEPHONE CONFERENCE WITH DEF RE FAC AND ARB; REVIEW ARB AGREEMENT.	0.50	475	237.50
06/14/16 12	VR	TELEPHONE CONFERENCE WITH DEF RE DISCOVERY ADN FAC, STATUS OF CASE; FOLLOW UP.	0.80	495	396.00
07/07/16	ND	CALL WITH CLIENT RE OTHER CLASS MEMBERS WARRANTY TO JOIN.	0.40	495	198.00
07/07/16 10	VR	DRAFT STATUS CONF STATEMENT, REVIEW CASE FILE AND STATUS; DOCKET.	0.60	495	297.00
07/08/16 11	VR	EXECUTE DOCUMENTS, FILE AND SERVE REQUEST TO CONT STATUS CONF.	0.80	495	396.00
07/08/16 15	VR	REVIEW CORR FROMD EF; ARB AGREEMENT.	1.20	495	594.00
07/11/16 15	VR	REVIEW CASE FILE, STATUS OF CMC.	0.40	495	198.00
07/12/16	ND	CALL WITH PUTATIVE CLASS MEMBER RE CASE STATUS, CLAIMS, REPRESENTATION.	0.40	495	198.00
07/15/16 08	VR	COURT APPEARANCE CMC AND PREP AND FOLLOW UP.	0.60	495	297.00
07/29/16	ND	CALLS WITH PUTATIVE CLASS MEMBERS RE STATUS, CLAIMS ETC.	0.50	495	247.50
09/07/16	ND	CALL WITH CLIENT RE STATUS, REVIEW FILE.	0.40	495	198.00
09/15/16 10	VR	DRAFT JOINT STATUS CONFERENCE STATEMENT; FOLLOW UP.	1.50	495	742.50
09/16/16 17	VR	REVIEW & REVISE JOINT STATUS CONFERENCE STATEMENT; EXECUTE AND FILE AND SERVE.	2.00	495	990.00
09/16/16 04	VR	CONFERENCE WITH ATTORNEY RE ARB AGREEMENT AND STRATEGY.	0.30	495	148.50

<u>DATE</u>	<u>ATTY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
09/20/16	ND	CALL WITH PLAINTIFF RE STATUS, REVIEW CMC STATEMENTS.	0.60	495	297.00
09/23/16 08	VR	COURT APPEARANCE -INITIAL STATUS CONF; PREP; FOLLOW UP.	2.00	495	990.00
09/28/16 15	VR	REVIEW COURT ORDER AND FOLLOW UP RE SERVICE LIST AND TPA; FILE AND SERVE SERVICE LIST.	0.70	495	346.50
10/21/16 15	KN	REVIEW MOTION TO COMPEL ARB.	0.50	750	375.00
12/19/16	ND	CALL WITH PLANTIFF RE STATUS- REVIEW MOTION TO COMPEL ARBITRATION.	0.50	495	247.50
01/10/17 15	KN	REVIEW MOTION AND CASE STATUS.	0.50	750	375.00
01/17/17 10	KN	DRAFT OPPOSITION; LEGAL RESEARCH.	5.00	750	3,750.00
01/19/17 17	KN	REVIEW & REVISE OPPOSITION FOR FINAL; FILE AND SERVE.	1.50	750	1,125.00
01/26/17 17	KN	REVIEW & REVISE STIPULATION AND ORDER.	0.40	750	300.00
03/09/17 15	ND	REVIEW AND ANALYZE EMPLOYMENT DOC, FILES OF CONTRERAS.	2.50	495	1,237.50
06/09/17 06	VR	CORRESPONDENCE TO DEFENSE RE CMC; RESEARCH RE DOCKET AND STATUS.	0.60	495	297.00
06/12/17 04	VR	CONFERENCE WITH ATTORNEY KN RE STATUS OF CASE AND APPEAL; FOLLOW UP.	0.50	495	247.50
06/12/17 17	VR	REVIEW & REVISE JOINT STATUS CONFERENCE STATEMENT; FOLLOW UP.	1.00	495	495.00
06/15/17 11	VR	EXECUTE DOCUMENTS +FILE +SERVE CMC STATEMENT.	0.50	495	247.50
06/27/17 15	ND	REVIEW AND RESPOND TO CLIENT EMAIL; REVIEW STIP TO STAY; CALL	0.40	495	198.00

<u>DATE</u>	<u>ATTY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
		TO DISCUSS.			
09/06/17 15	ND	REVIEW AND RESPOND TO CLIENTS EMAIL; CALL TO DISCUSS	0.40	495	198.00
10/16/17 10	VR	DRAFT CMC STATEMENT	1.00	495	495.00
10/17/17 10	VR	DRAFT, FILE AND SERVE JOINT STATEMENT	1.00	495	495.00
12/21/17 04	VR	CONFERENCE WITH ATTORNEY KN RE STATUS AND STRATEGY	0.60	495	297.00
12/22/17 14	PM	LEGAL RESEARCH RE MOTION TO AMEND AND DRAFT MOTION TO AMEND	3.50	475	1,662.50
01/02/18 11	VR	EXECUTE DOCUMENTS; FILE AND SERVE JOINT STATEMENT	0.50	495	247.50
01/02/18 10	PM	DRAFT, REVIEW AND REVISE MOTION TO AMEND	1.00	475	475.00
01/08/18 17	PM	REVIEW & REVISE MOTION TO AMEND; REVIEW CASE DOCS AND CMO AND ANALYZE	0.50	475	237.50
01/09/18 10	PM	DRAFT JOINT STATEMENT RE AMENDED COMPLAINT; REVIEW AND REVISE STIP TO FILE SAC; REVIEW AND REVISE SAC	2.00	475	950.00
01/10/18 04	VR	CONFERENCE WITH ATTORNEY PM RE STATUS OF CASE AND STRATEGY	0.50	495	247.50
01/12/18 10	PM	DRAFT POSTING ON CASE ANYWHERE; REVIEW STATEMENT RE AMENDED COMPLAINT; REVIEW DOCKET	1.00	475	475.00
01/30/18 17	PM	REVIEW & REVISE SAC, FILE AND SERVE	0.60	475	285.00
03/19/18 10	VR	DRAFT AND CIRCULATE; REVIEW, FINALIZE, FILE AND SERVE CMC STATEMENT	1.00	495	495.00
05/30/18 10	ND	DRAFT THIRD AMENDED COMPLAINT; PAGA ONLY- REVIEW DOCS; INNER	2.80	495	1,386.00

<u>DATE</u>	<u>ATTY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
		OFFICE EMAILS			
06/01/18	RE	REVIEW FILE AND DRAFT STIP TO AMEND TAC; DRAFT DEC RE CRC 3.770CC AND REDLINE TAC; EMAIL TO DEF COUNSEL	2.00	475	950.00
06/04/18 10	VR	DRAFT STATUS CONF STATEMENT AND FOLLOW UP WITH DEF	1.70	495	841.50
06/06/18 10	VR	DRAFT JOINT STATEMENT RE MORRIS AND FOLLOW UP WITH DEF	1.50	495	742.50
06/06/18 11	VR	EXECUTE DOCUMENTS, FILE AND SERVE J STATEMENT	0.50	495	247.50
06/11/18 08	VR	COURT APPEARANCE, CMC RESEARCH, PREP AND FOLLOW UP	2.50	495	1,237.50
06/18/18	RE	REVIEW ARB AGREEMENT RE ARB DEMAND AND ANALYZE	0.40	475	190.00
06/18/18	RE	REVIEW FILE AND REVIEW CMC SUMMARY; UPDATE CHART RE STATUS OF STIP TO AMEND	0.50	475	237.50
06/19/18 04	VR	CONFERENCE WITH ATTORNEY RE RE STATUS OF CASE AND DISMISSAL	0.50	495	247.50
06/21/18	RE	FINISH ARB DEMANDS FOR CONTRERAS AND FILE	2.50	475	1,187.50
06/21/18	RE	FINAL ARB DEMANDS AND REVIEW AND SERVE VIA U.S. MAIL AND EMAIL TO AAA	1.30	475	617.50
06/21/18	RE	DRAFT STIPULATED ORDER OF DISMISSAL RE PAGA ONLY ACTION	1.00	475	475.00
06/21/18	RE	DRAFT DECL OF V.R RE DISMISSAL OF CLASS ALLEGATIONS RE CRC3.770	1.00	475	475.00
06/29/18 15	VR	REVIEW STATUS OF CASE; COURT'S ORDERS AND FOLLOW UP	1.00	495	495.00
07/03/18	RE	PAY FILING FEE RE CONTRERAS ARB	0.40	475	190.00
07/03/18	RE	PAY FILING FEE RE ARB	0.40	475	190.00

<u>DATE</u>	<u>ATTY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
07/03/18	RE	REVIEW AAA CORR RE FILING FEE PAYMENT STATUS AND DEADLINE	0.30	475	142.50
07/03/18 10	VR	DRAFT JOINT STATEMENT, REVIEW CASE STATUS AND HISTORY	1.00	495	495.00
07/03/18	JH	REVIEW CORRESPONDENCE FROM AAA RE INITIAL FILING FEE; CORRESPONDENCE WITH OPPOSING COUNSEL RE SAME	0.40	550	220.00
07/05/18	RE	REVIEW FILE RE STATUS OF STIP FOR LEAVE TO AMEND AND UPDATE CHART	0.40	475	190.00
07/06/18 15	VR	REVIEW STATUS OF FILING AND FOLLOW UP	0.50	495	247.50
07/09/18	RE	FINAL REQUEST FOR DISMISSAL AND DECL IN SUPPORT AND FILE	0.70	475	332.50
07/11/18 15	VR	REVIEW COURTS ORDERS AND STATUS OF CASE	0.50	495	247.50
07/17/18	JH	REVIEW CORRESPONDENCE FROM AAA RE FILING FEES AND INITIAL CMC	0.40	550	220.00
07/27/18	JH	CORRESPONDENCE WITH OPPOSING COUNSEL AND AAA RE ARBITRATION	0.40	550	220.00
08/01/18	RE	REVIEW AAA CORR RE CONTRERAS AND PRICE	0.40	475	190.00
08/01/18	RE	DRAFT COMPLETE CHECKLIST FOR CONFLICTS	0.60	475	285.00
08/01/18	JH	REVIEW STRIKE LISTS FOR CONTRERAS AND PRICE ARBS; RESEARCH ARBITRATORS; DISCUSS WITH ND	1.00	550	550.00
08/01/18	JH	REVIEW STRIKE LISTS FOR CONTRERAS AND PRICE ARBS; RESEARCH ARBITRATORS; DISCUSS WITH ND	1.00	550	550.00
08/17/18	JH	REVIEW AND RESPOND TO CORRESPONDENCE FROM AAA RE	0.30	550	165.00

<u>DATE</u>	<u>ATTY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
		ARBITRATOR SELECTION			
08/20/18	JH	REVIEW ARBITRATOR'S DISCLOSURES AND NOTICE OF COMPENSATION ARRANGEMENTS IN CONTRERAS	0.40	550	220.00
08/20/18	JH	REVIEW SUPPLEMENTAL STRIKE LIST; RESEARCH POTENTIAL ARBITRATORS; DISCUSS WITH ND	1.50	550	825.00
08/21/18	JH	REVIEW STATUS OF CONTRERAS ARBITRATION	0.40	550	220.00
09/05/18	JH	REVIEW CORRESPONDENCE FROM AAA RE INITIAL CMC; SET CALENDAR	0.30	550	165.00
09/14/18	JH	REVIEW RETAINER DOCUMENTS FOR HON. KATZ; REVIEW DISCLOSURES	0.50	550	275.00
09/24/18	JH	PREPARE AND APPEAR FOR INITIAL ARBITRATION CMC; ADVISE TEAM	1.30	550	715.00
09/25/18	RE	REVIEW AAA CORR RE TRIAL DATE	0.20	475	95.00
09/25/18	JH	REVIEW SCHEDULING ORDER COMPARED TO NOTES FROM CMC	0.40	550	220.00
09/25/18	JH	REVIEW SCHEDULING ORDER COMPARED TO NOTES FROM CMC	0.40	550	220.00
10/03/18 15	PM	REVIEW AND ANALYZE DOCKET AND ORDERS; DRAFT INTERNAL EMAIL RE THE SAME	0.70	475	332.50
10/09/18	JH	REVIEW FILE AND STATUS OF MATTER TO DETERMINE UPCOMING DEADLINES	0.40	550	220.00
10/10/18	JH	DRAFT DISCOVERY REQUESTS TO RESPONDENT IN CONTRERAS MATTER	1.40	550	770.00
10/12/18 04	VR	CONFERENCE WITH ATTORNEY RE RE STATUS CASE AND SERVICE; FOLLOW UP	0.50	495	247.50
10/15/18 15	VR	REVIEW COURT'S ORDERS AND DOCKET FILINGS; FOLLOW UP WITH RE	0.50	495	247.50

<u>DATE</u>	<u>ATTY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
10/15/18	JH	PREPARE FOR AND ATTEND INITIAL ARBITRATION CMC; ADVISE TEAM	2.00	550	1,100.00
10/17/18	JH	FINALIZE AND SERVE CLAIMANT CONTRERAS'S FIRST SET OF DISCOVERY TO RESPONDENT	0.60	550	330.00
10/17/18	JH	CALL WITH CLAIMANT CONTRERAS RE INITIAL EXCHANGE OF DOCUMENTS	0.40	550	220.00
10/18/18	JH	FOLLOW UP CALL WITH CLIENT RE DOCUMENTS FOR INITIAL EXCHANGE	0.40	550	220.00
10/23/18	JH	TELEPHONE CALL WITH DEFENSE COUNSEL RE INITIAL COVINA DISCLOSURES AND SETTLEMENT DEMAND	0.40	550	220.00
10/25/18	JH	DRAFT DISCOVERY REQUESTS FOR CLAIMANT PRICE	2.00	550	1,100.00
10/26/18	JH	REVISE AND SERVE DISCOVERY REQUESTS FOR CLAIMANT PRICE	0.40	550	220.00
10/29/18 06	VR	CORRESPONDENCE TO DEF RE M&C AND CMC; FOLLOW UP	0.60	495	297.00
10/30/18 12	VR	TELEPHONE CONFERENCE WITH DEF RE CMC AND MEDIATION; DRAFT CMC STATEMENT AND FILE AND SERVE	2.00	495	990.00
11/07/18 08	VR	COURT APPEARANCE, CMC PREP AND FOLLOW UP	1.50	495	742.50
11/07/18	RE	REVIEW FILE AND EMAIL TO AJ RE PROCEDURAL HISTORY	0.40	475	190.00
11/07/18	JH	MULTIPLE CORRESPONDENCE WITH NEW DEFENSE COUNSEL RE UPCOMING DEADLINES	0.70	550	385.00
11/08/18	AJB	EXCHANGE EMAILS WITH DEFENSE RE: MEDIATION AND DEADLINES; REVIEW DEADLINES AND CALENDAR; REVIEW FILE AND ANALYZE CLAIM	1.50	725	1,087.50
11/08/18	AJB	CALL WITH DEFENSE RE SCOPE OF MEDIATION; ANALYZE DATA NEEDS;	1.50	725	1,087.50

<u>DATE</u>	<u>ATTY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
		REVIEW AND RESPOND TO DEF'S REQUEST FOR A STAY			
11/13/18 15	AJB	REVIEW FILE AND ANALYZE CLAIMS; RESEARCH POTENTIAL MEDIATORS AND ADVISE DEF OF AVAILABILITY	2.00	725	1,450.00
12/13/18	NBB	REVIEW DOCS; ANALYZE AND REVIEW LAW RE SETTLEMENT ISSUES	2.00	795	1,590.00
12/18/18 15	AJB	REVIEW FILE AND ANALYZE MEDIATION NEEDS	1.50	725	1,087.50
01/02/19	AJB	CALL DEF RE MEDIATION DATA. DRAFT MEDIATION BRIEF.	1.50	725	1,087.50
01/05/19 10	AJB	DRAFT MEDIATION BRIEF. REVIEW AND ANALYZE DOCS AND PROCEDURAL HISTORY OF CASE.	8.00	725	5,800.00
01/08/19	ND	REVIEW AND ANALYZE DATA PROVIDED BY DEF AND REVIEW AND ANALYZE DOCS FOR MEDIATION	4.00	495	1,980.00
01/08/19	JH	CORRESPONDENCE WITH ARBITRATORS RE UPCOMING MEDIATION	0.40	550	220.00
01/10/19	NBB	REVIEW SETTLEMENT ISSUES AND ANALYZE LAW +DOCS; ADVISE AJ	2.75	795	2,186.25
01/10/19 10	AJB	DRAFT AND FILE MEDIATION BRIEF.	2.00	725	1,450.00
01/10/19	RE	REVIEW & ADVISE AJ RE MEDIATION BRIEF DRAFT	2.50	475	1,187.50
01/11/19	NBB	REVIEW MEDIATION BRIEF AND ANALYZE SETTLEMENT ISSUES; ADVISE AJ	2.75	795	2,186.25
01/11/19 15	VR	REVIEW COURT'S ORDERS AND DOCKET; MEDIATION STATUS	0.70	495	346.50
01/18/19 15	KN	REVIEW MOU AND RESPOND TO AJ.	0.75	750	562.50
01/18/19 17	KN	REVIEW & REVISE MOU DRAFT; REVIEW CORRESPONDENCE.	0.80	750	600.00

<u>DATE</u>	<u>ATTY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
01/18/19 15	ND	REVIEW AND ANALYZE MOU; DISCUSS WITH CO-COUNSEL AND SEND 2 REPS FOR SIGNATURES	1.20	495	594.00
01/18/19 06	VR	CORRESPONDENCE TO DEF RE NOTICE TO COURT AND UPCOMING CMC; RESEARCH CASE	1.00	495	495.00
01/18/19	RE	REVIEW MOU AND ANALYZE	0.50	475	237.50
01/21/19	ND	FOLLOW UP CALLS TO UNSIGNED PLAINTIFFS RE MOU AND REVIEW DOCS	1.00	495	495.00
01/21/19 06	VR	CORRESPONDENCE TO DEF RE NOTICE OF SETTLEMENT	0.50	495	247.50
01/21/19	JH	REVIEW MOU	0.30	550	165.00
01/22/19 15	VR	REVIEW AND EXECUTE JOINT STATEMENT RE SETTLEMENT AND CORRESPONDENCE TO DEF	0.60	495	297.00
01/23/19 12	KN	TELEPHONE CONFERENCE WITH DEF; REVIEW PLEADINGS AND STATUS; MEMO TO COUNSEL.	1.00	750	750.00
01/23/19	RE	PREPARE DOE AMENDMENT USING LOCAL FORM FOR 15 DOES	2.75	475	1,306.25
01/23/19 17	VR	REVIEW & REVISE JOINT STATEMENT RE MEDIATION AND CMC	0.50	495	247.50
01/24/19	RE	DRAFT STIP FOR LEAVE TO AMEND TAC; EMAIL TO DEFENSE COUNSEL	0.70	475	332.50
01/25/19	RE	P/C BRANDON M RE STIP TO AMEND; PROPOSED ORDER; EMAIL TO KN RE SAME	0.40	475	190.00
01/25/19	RE	FILE STIP FOR LEAVE TO AMEND TAC	0.60	475	285.00
01/28/19	RE	PREP FOR HEARING; ATTEND HEARING & DRAFT SUMMARY FOR FILE	1.50	475	712.50
01/29/19	RE	VARIOUS W DEFENSE COUNSEL RE STATUS OF TAC ORDER	0.70	475	332.50

<u>DATE</u>	<u>ATTY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
01/30/19	NBB	REVIEW MOU AND ANALYZE; OUTLINE SETTLEMENT AGREEMENT	3.00	795	2,385.00
01/30/19	RE	CALL WITH DEPT. 1 CLERK RE STATUS OF TAC ORDER; EMAIL TO D/C	1.50	475	712.50
01/30/19 15	PM	REVIEW AND ANALYZE MOU; DRAFT SETTLEMENT AGREEMENT	3.50	475	1,662.50
02/01/19	RE	CHECK STATUS OF STIP RE TAC; EMAIL TO D/C	0.30	475	142.50
02/01/19	RE	PLACE ORDER TO OBTAIN CONFORMED COPY OF SIGNED ORDER RE TAC	0.40	475	190.00
02/04/19	RE	REVIEW ORDER RE TAC; EMAIL TO D/C; FINAL TAC, FILE AND SERVE	1.30	475	617.50
02/04/19 15	VR	REVIEW TAC AND SERVICE PROCEDURE	0.50	495	247.50
02/05/19	RE	DRAFT TAC WITH DOE DEFENDANTS & DRAFT RELATED ERRATA	1.00	475	475.00
02/05/19	RE	REVISE ERRATA RE TAC PER KN	0.80	475	380.00
02/05/19	RE	UPLOAD ALL COMPLAINT CONTAINING PAGA CLAIMS TO LWDA WEBSITE	0.60	475	285.00
02/05/19	RE	CONFERENCE WITH ND; DRAFT 2ND ERRATA RE TAC, FILE AND SERVE	0.70	475	332.50
02/05/19 15	KN	REVIEW EX PARTE PAPERS; TEL CONF WITH DEF; DISCUSS WITH NBB	1.50	750	1,125.00
02/05/19 14	KN	LEGAL RESEARCH RE EX PARTE.	0.75	750	562.50
02/05/19 10	KN	DRAFT OPP TO EX PARTE; REVIEW EX PARTE.	1.75	750	1,312.50
02/05/19	AJB	ANALYZE AMENDMENT ISSUES	1.00	725	725.00
02/05/19 10	ND	DRAFT AMENDED PAGA NOTICE NAMING ADDITIONAL DOE DEFENDANTS	2.20	495	1,089.00

<u>DATE</u>	<u>ATTY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
02/06/19	RE	REVIEW AND ANALYZE EX PARTE OPPO	1.00	475	475.00
02/06/19 15	KN	REVIEW DEF OPP TO EX PARTE.	0.70	750	525.00
02/06/19 15	AJB	REVIEW DEF'S OPP TO EX PARTE AND REVIEW EX PARTE BY INTERVENOR	1.00	725	725.00
02/07/19 17	KN	REVIEW & REVISE DRAFT AGREEMENT; EMAIL DEFENDANT.	3.00	750	2,250.00
02/13/19 12	KN	TELEPHONE CONFERENCE WITH BRANDON; REVIEW KIPFEL RESPONSE.	0.60	750	450.00
02/13/19 10	KN	DRAFT RESPONSE TO NOTICE OF RELATED CASE.	1.50	750	1,125.00
02/22/19 15	KN	REVIEW DEF REVISIONS TO AGREEMENT.	1.50	750	1,125.00
02/28/19	NBB	REVIEW PAGA APPROVAL LAW ANALYZE AND DRAFT MOTION PAPERS	2.75	795	2,186.25
03/04/19 15	KN	REVIEW REVISIONS; REVISE AGREEMENT.	1.75	750	1,312.50
03/06/19 15	VR	REVIEW SERVICE STATUS, COURT FILINGS AND DOCKET	0.50	495	247.50
03/08/19 12	KN	TELEPHONE CONFERENCE WITH DEF; CONF WITH CLERK; ANALYZE ISSUE.	0.90	750	675.00
03/11/19 15	KN	REVIEW STATUS AND EMAIL DEF.	0.30	750	225.00
03/13/19 06	KN	CORRESPONDENCE TO DEF.	0.25	750	187.50
03/13/19 10	KN	DRAFT MOTION FOR PAGA APPROVAL.	3.50	750	2,625.00
03/13/19 15	ND	REVIEW AND ANALYZE SETTLEMENT AGREEMENT; SEND TO 3 PLAINTIFFS FOR SIGNING AND CALL TO DISCUSS	1.30	495	643.50
03/14/19 15	KN	REVIEW DRAFT AGREEMENT; REVISE AND FINAL; EMAIL DEF.	1.00	750	750.00

<u>DATE</u>	<u>ATTY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
03/14/19 10	KN	DRAFT DECL ISO MOTION.	1.50	750	1,125.00
03/14/19 15	KN	REVIEW DEF COMMENTS ON MOTION AND PROPOSED ORDER; REVISE MOTIONS.	2.00	750	1,500.00
03/15/19 14	KN	LEGAL RESEARCH AND WORK ON MOTION; REVISE DECLARATION; FINAL MOTION.	3.50	750	2,625.00
03/15/19 17	KN	REVIEW & REVISE DECLARATION; SERVE MOTION ON LWDA	1.30	750	975.00
03/15/19 17	KN	REVIEW & REVISE STIPULATION	0.40	750	300.00
03/26/19 10	KN	DRAFT OPP; LEGAL RESEARCH.	4.00	750	3,000.00
03/27/19 10	KN	DRAFT OPPOSITION.	5.00	750	3,750.00
03/28/19 17	KN	REVIEW & REVISE OPPOSITION; DRAFT DECL; FILE AND SERVE.	3.75	750	2,812.50
03/28/19	NBB	REVIEW OPP TO INTERVENTION, ANALYZE, REVISE, ADVISE KN.	2.75	795	2,186.25
03/29/19 15	KN	REVIEW EMAILS AND RESPOND; PREPARE FOR EX PARTE.	0.80	750	600.00
04/02/19 08	KN	COURT APPEARANCE -EX PARTE.	1.00	750	750.00
04/02/19 10	KN	DRAFT AMENDED NOTICE; FILE AND SERVE	1.00	750	750.00
04/05/19 15	KN	REVIEW OPP TO MOTION.	1.00	750	750.00
04/09/19 10	KN	DRAFT OPP; LEGAL RESEARCH RE OPP.	7.50	750	5,625.00
04/10/19 10	KN	DRAFT REPLY TO OPP	6.00	750	4,500.00
04/11/19 17	KN	REVIEW & REVISE REPLY; DRAFT DECL; FILE AND SERVE.	3.10	750	2,325.00

<u>DATE</u>	<u>ATTY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
04/18/19 10	KN	DRAFT NOTICE; FILE AND SERVE.	0.50	750	375.00
05/07/19 15	ND	REVIEW AND RESPOND TO CLIENTS RE LWDA STAY OF CASE	0.70	495	346.50
05/08/19	CJ	EVALUATE EFFICACY OF EX PARTE FOR BELIARE ISSUE	0.25	475	118.75
06/05/19 15	KN	REVIEW DLSE EMAIL AND RESPOND; DISCUSS WITH NBB.	0.50	750	375.00
06/06/19 14	KN	LEGAL RESEARCH ON 558 AT SUPREME CT.	0.40	750	300.00
06/11/19 10	KN	DRAFT RESPONSE TO DLSE.	3.50	750	2,625.00
06/11/19	NBB	REVIEW LETTER TO LWDA, ANALYZE LAW, REVISE LETTER, ADVISE KN.	2.75	795	2,186.25
06/12/19 17	KN	REVIEW & REVISE RESPONSE TO DLSE.	2.10	750	1,575.00
08/16/19 14	KN	LEGAL RESEARCH ON PAGA AND LWDA	1.20	750	900.00
09/17/19 15	KN	REVIEW STATUS; EMAIL STAFF	0.30	750	225.00
09/17/19 06	KN	CORRESPONDENCE TO DEF; REVIEW JOINT REPORT; RESPOND TO KLIPFEL ATTY	0.60	750	450.00
09/17/19 15	PM	REVIEW CASE STATUS; DRAFT JOINT STATUS CONF STATEMENT; REVIEW AND REVISE JOINT CONF STATEMENT; REVIEW COURT ORDERS AND ANALYZE.	1.50	475	712.50
09/18/19	PM	FINALIZE AND FILE JOINT STATUS REPORT AND SERVE; REVIEW CASE DOCUMENTS AND ANALYZE.	0.50	475	237.50
10/11/19 15	KN	REVIEWEMAIL AND PROPOSAL; DISCUSS WITH NBB	0.40	750	300.00
10/15/19 15	KN	REVIEW EMALS AND ANALYZE; RESPOND TO DEF	0.60	750	450.00

<u>DATE</u>	<u>ATTY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
10/16/19 15	KN	REVIEW EMAIL AND RESPOND	0.30	750	225.00
10/17/19 12	KN	TELEPHONE CONFERENCE WITH DEF AND WITH LWDA; DRAFT MEMO RE CALLS	0.80	750	600.00
10/24/19 16	KN	REVISE AGREEMENT WITH NEW TERMS AND DETAILS	1.50	750	1,125.00
11/01/19 10	PM	DRAFT JOINT STATUS CONFERENCE STATEMENT; REVIEW CASE STATUS.	0.50	475	237.50
11/07/19 17	PM	REVIEW & REVISE JOINT STATUS CONFERENCE STATEMENT AND FINALIZE; FILE AND SERVE; REVIEW CASE STATUS AND DOCKET.	1.00	475	475.00
11/07/19 15	KN	REVIEW DRAFT JOINT REPORTS; RESPOND	0.50	750	375.00
11/13/19 15	VR	REVIEW COURT'S ORDERS AND DOCKET; STATUS OF CMC AND UPCOMING HEARINGS; ADVISE PM	0.50	495	247.50
12/02/19	NBB	REVIEW AND REVISE SETTLEMENT AGREEMENT, ANALYZE LAW AND DOCS, ADVISE KN.	2.50	795	1,987.50
01/06/20	NBB	REVIEW AGREEMENT WITH CO-COUNSEL, ANALYZE, DRAFT REVISIONS, ADVISE PM.	2.75	795	2,186.25
01/13/20 17	PM	REVIEW & REVISE SETTLEMENT AGREEMENT; REVIEW CORRESPONDENCES AND CASE FILE.	2.50	475	1,187.50
01/14/20	PM	REVIEW AND REVISE SETTLEMENT AGREEMENT	1.00	475	475.00
01/15/20 17	PM	REVIEW & REVISE SETTLEMENT AGREEMENT.	1.00	475	475.00
01/15/20 15	KN	REVIEW DRAFT AGREEMENT	0.50	750	375.00
01/17/20 10	VR	DRAFT CMC STATEMENT; REVIEW CASE HISTORY AND BACKGROUND; ADVISE KN; CORRESPONDENCE TO	1.50	495	742.50

<u>DATE</u>	<u>ATTY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
		COUNSEL			
01/17/20 17	KN	REVIEW & REVISE REVISED AGREEMENT DRAFT; EMAIL COUNSEL	1.50	750	1,125.00
01/21/20 15	KN	REVIEW AGREEMENT DRAFT AND RESPOND TO VICK	0.30	750	225.00
01/23/20 17	VR	REVIEW & REVISE CMC STATEMENT; FILE AND SERVE; ADVISE KN	1.00	495	495.00
01/23/20	HD	REVIEW COURT CASE DOCKET TO VERIFY STATUS CONFERENCE IS STILL ON CALENDAR FOR JANUARY 27, 2020, CONTACT COURT CALL AND RESERVE TELEPHONIC APPEARANCE. OBTAIN CONFIRMATION AND FORWARD TO ATTORNEY RIVAPALACIO.	0.20	250	50.00
01/23/20 17	KN	REVIEW & REVISE REVISED AGREEMENT; EMAIL TO VICK	0.75	750	562.50
01/24/20 15	VR	REVIEW STATUS OF CASE; STATUS OF CMC STATEMENT FILING; NEXT STEPS FOR SETTLEMENT; PREPARE FOR HEARING MONDAY; CHECK TENTATIVE	1.50	495	742.50
01/27/20 15	VR	REVIEW COURT'S ORDERS AND DOCKET; FOLLOW UP	0.50	495	247.50
01/27/20 17	KN	REVIEW & REVISE DRAFT MOTION FOR PAGA APPROVAL; DISCUSS WITH NBB	1.75	750	1,312.50
01/28/20 17	KN	REVIEW & REVISE MOTION DRAFT; EMAIL TO DEF	0.50	750	375.00
01/28/20 17	KN	REVIEW & REVISE MOTION DRAFT; EMAIL TO DEF	0.50	750	375.00
02/21/20 15	KN	REVIEW DEF REVISIONS TO MOTION	1.00	750	750.00
03/03/20 15	KN	REVIEW DEF REVISIONS TO THE AGREEMENT	0.50	750	375.00
03/11/20	KN	RESPOND TO EMAILS RE:	0.30	750	225.00

<u>DATE</u>	<u>ATTY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
		SETTLEMENT			
04/16/20 15	KN	REVIEW EMAILS REGARDING SETTLEMENT; DISCUSS WITH NBB; REVIEW STATUS OF SETTLEMENT AGREEMENT; OUTLINE REVISIONS	1.50	750	1,125.00
04/17/20 16	KN	REVISE AGREEMENT PER DISCUSSION WITH NBB AND VICK; EMAIL CO-COUNSEL	1.40	750	1,050.00
05/20/20 15	VR	REVIEW CORRESPONDENCE FROM COURT; FOLLOW UP	0.30	495	148.50
06/09/20 12	KN	TELEPHONE CONFERENCE WITH DEF RE SETTLEMENT ISSUES; REVIEW DOCS FROM VICK; MEMO TO PARTNERS	1.00	750	750.00
06/15/20	ND	REVIEW AND ANALYZE STATUS OF LITIGATION AND DOCKET. UPDATE THREE CLIENTS.	1.00	575	575.00
06/16/20 17	VR	REVIEW & REVISE JOINT CMC STATEMENT; CORRESPONDENCE TO DEF	0.50	495	247.50
06/17/20 11	VR	EXECUTE DOCUMENTS AND FILE AND SERVE CMC STATEMENT	0.40	495	198.00
08/17/20 15	PM	REVIEW STATUS OF ACTION AND SETTLEMENT RE JOINT STATUS CONFERENCE STATEMENT.	0.50	475	237.50
08/18/20 10	PM	DRAFT JOINT CASE MANAGEMENT CONFERENCE STATEMENT.	0.60	475	285.00
08/20/20	PM	FINALIZE AND FILE JOINT STATUS CONFERENCE STATEMENT.	1.00	475	475.00
09/15/20	ND	EMAILS AND CALL TO PLAINTIFF SAN NICOLAS REGARDING STATUS OF SETTLEMENT AND SIGNATURE FROM DEFENDANT. EXPLAIN RESULTS OF LWDA INVESTIGATION. REVIEW AND ANALYZE SETTLEMENT AGREEMENT.	0.90	575	517.50
10/12/20 04	KN	CONFERENCE WITH ATTORNEY RE SETTLEMENT; MEMO TO STAFF	0.50	750	375.00

<u>DATE</u>	<u>ATTY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
10/26/20	CJ	EVALUATE STATUS OF CLAIMS, AND SETTLEMENT DISCUSSIONS, CONFER WITH KN RE SAME, DRAFT JOINT REPORT SEND TO CO COUNSEL, COORDINATE STRAGEY RE SAME	1.50	475	712.50
10/28/20 01	KN	ANALYSIS OF ISSUE; MEMO TO STAFF	0.75	750	562.50
11/03/20	CJ	EVALUATE 5 YEAR ISSUE AND STARTEGY RE SAME AT STATUS CONFERNCE	0.50	475	237.50
11/04/20	CJ	PREPARE FOR STATUS CONFERENCE	1.00	475	475.00
11/04/20	CJ	APPEAR AT STATUS CONFERENCE	1.00	475	475.00
11/04/20	CJ	RESEARCH SOL ISSUE INCLUDING CCP 583.340	1.00	475	475.00
12/11/20	CJ	CONFER WITH KN RE STATUS OF CASE AND RELATED COUNSEL'S INVOLVEMENT, EVALUATE STATUS OF CASE AND INTERVENOR - REDLINE JOINT REPORT, RETURN FOR FILING	1.50	475	712.50
12/30/20	ND	CONFERENCE WITH PLAINTIFF PRICE REGARDING POTENTIAL OF SETTLEMENT PAYOUT AND NEW SETTLEMENT AMOUNT. REVIEW AND ANALYZE EMAILS REGARDING THE SAME.	0.50	575	287.50
03/08/21	CJ	RESEARCH RELATED CASE ISSUE ADN WHETHER BRIEFING IS REQUIRED RE DEFEDANTN'S RELATIONSHIPS WITH EACH OTHER	0.50	475	237.50
03/26/21 15	VR	REVIEW COURT'S ORDERS AND DOCKET; REVIEW STATUS OF CASE AND UPCOMING CMC; REVIEW CMC STATEMENT; ADVISE KH AND PM	1.00	495	495.00
04/05/21	CJ	PREPARE FOR STATUS CONFERENCE BY EVALUATING STATEMENT TO COURT AND RESEARCHING RELATED CASE STATUSES, AND APPEAR AT STATUS CONFERENCE	1.50	475	712.50

<u>DATE</u>	<u>ATTY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
05/11/21	PM	REVIEW DOCKET AND STATUS OF ACTION; CONFER WITH CJ RE UPCOMING CMC AND CMC STATEMENT.	1.00	550	550.00
05/11/21	CJ	RESEARCH STATUS OF RELATED CASES FOR PURPOSES OF DRAFT CMC ST.	1.00	475	475.00
05/11/21	CJ	BEGIN DRAFTING CMC ST.	1.00	475	475.00
05/12/21 15	KN	REVIEW EMAILS AND JOINT REPORT; RESPOND	0.50	750	375.00
05/17/21	CJ	PREPARE FOR AND ATTEND STATUS CONFERENCE	1.00	475	475.00
05/24/21	CJ	RESEARCH DEADLINE RE STATUS REPORT AND STATUS OF RELATED CASES, COORESPOND WITH CO COUNSEL RE SAME	0.50	475	237.50
06/01/21	CJ	EVALUATE STATUS OF FILING THE STATUS CONFERENCE REPORT	0.50	475	237.50
06/01/21	CJ	EVALUATE POSITIONS IN STATUS REPORT DRAFTED BY CO COUNSEL	0.50	475	237.50
07/13/21	RE	REVIEW FILE; PHONE CONFERENCE WITH CHARLES SAN NICOLAS RE DECLARATION IN SUPPORT OF PRELIMINARY APPROVAL	0.75	475	356.25
07/13/21	RE	REVIEW FILE; REVIEW SETTLEMENT AGREEMENT, MOU AND RECENT PLEADINGS IN PREPARATION TO DRAFT DECLARATION OF CHARLES SAN NICOLAS IN SUPPORT OF PRELIMINARY APPROVAL/SERVICE AWARD REQUEST	0.75	475	356.25
07/13/21	RE	BEGIN DRAFTING DECLARATION OF CHARLES SAN NICOLAS RE PRELIMINARY APPROVAL/SERVICE AWARD	1.25	475	593.75
07/14/21	RE	REVIEW FILE; FINISH DRAFTING DECLARATION OF CHARLES SAN NICOLAS RE PRELIMINARY APPROVAL	2.00	475	950.00

<u>DATE</u>	<u>ATTY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
		MOTION			
07/14/21	RE	EMAIL TO CHARLES SAN NICOLAS; ATTACH DRAFT OF DECLARATION IN SUPPORT OF PRELIMINARY APPROVAL/SERVICE AWARD REQUEST; DISPATCH VIA EMAIL AND ECHOSIGN	0.30	475	142.50
07/14/21	RE	SAVE SIGNED DECLARATION OF CHARLES SAN NICOLAS; CONFIRM RECEIPT WITH CLIENT; ADVISE KN OF RECEIPT OF DECLARATION	0.30	475	142.50
07/14/21 10	KN	DRAFT DECL ISO PRELIM APPROVAL	1.50	750	1,125.00
07/16/21 17	KN	REVIEW & REVISE MOTION FOR PRELIM APPROVAL AND DECL ISO MOTION; REVIEW PROPOSED ORDER	1.50	750	1,125.00
08/02/21	CJ	RESEARCH STATUS OF MOTION FOR PRELIMINARY APPROVAL, ADVISE KN, DETERMINE WHETHER STATUS CONFERENCE STATEMENT IS NEEDED	0.50	475	237.50
08/06/21	CJ	EVALUATE TENTATIVE RULING, ADVISE KN, EMAIL S. VICK RE ADDL INFO TEH COURT REQUIRES IS SUBMITTED	0.75	475	356.25
09/30/21 15	KN	REVIEW EMAILS AND RESPONSE; DISCUSS WITH NBB	0.50	750	375.00
11/08/21	CJ	ANALYZE STATUS OF MOTION FOR PRELIMINARY APPROVAL, ADVISE KN AND RELATED COUNSEL SCOTT VICK RE SAME	0.50	475	237.50
03/02/22	CJ	RESEARCH J REPORT ISSUE, ADVISE KN, EMAIL S VICK RE J CMC ST.	0.50	475	237.50
03/10/22	CJ	EVALUATE JOINT REPORT IN PREPARATION FOR STATUS CONFERENCE, EVALUATE ORDER FORM COURT STATUS CONFERENCE CONTINUED	0.50	475	237.50
03/21/22	RE	CONFER W KN AND CO-COUNSEL RE	1.25	475	593.75

<u>DATE</u>	<u>ATTY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
		CLIENT DECLARATIONS IN SUPPORT OF PRELIMINARY APPROVAL; REVIEW FILE; REVIEW SETTLEMENT AGREEMENT AND PRIOR ORDERS			
03/21/22	RE	PHONE CONFERENCE WITH CO-COUNSEL SCOTT VICK RE CLIENT DECLARATIONS IN SUPPORT OF PRELIMINARY APPROVAL/ENHANCEMENT AWARDS	0.40	475	190.00
03/21/22	RE	DRAFT REVISED DECLARATION OF CHARLES SAN NICHOLAS IN SUPPORT OF PRELIMINARY APPROVAL/ENHANCEMENT AWARD REQUEST	1.50	475	712.50
03/21/22	RE	PHONE CONFERENCE WITH PETER CONTRERAS RE DECLARATION IN SUPPORT OF PRELIMINARY APPROVAL/ENHANCEMENT AWARD REQUEST	0.40	475	190.00
03/21/22	RE	DRAFT DECLARATION OF PETER CONTRERAS IN SUPPORT OF PRELIMINARY APPROVAL / ENHANCEMENT AWARD REQUEST	2.25	475	1,068.75
03/21/22	RE	DRAFT DECLARATION OF DAVID PRICE IN SUPPORT OF PRELIMINARY APPROVAL / ENHANCEMENT AWARD REQUEST	1.75	475	831.25
04/04/22	CJ	RESEARCH STATUS OF MOTION FOR PRELIMINARY APPROVAL, EVALUATE JOINT CMC ST. REQUIREMENTS	0.50	475	237.50
04/07/22	PM	REVIEW PRELIMINARY APPROVAL MOTION.	0.50	550	275.00

TOTAL BILLED HOURS

A.J.BHOWMIK	20.00 hr @ 725.00	\$ 14,500.00
CHARLOTTE JAMES	16.50 hr @ 475.00	\$ 7,837.50
CHRYSTAL JOHNSON	0.70 hr @ 175.00	\$ 122.50
HEATHER DROSI	0.20 hr @ 250.00	\$ 50.00
JEFF HERMAN	18.10 hr @ 550.00	\$ 9,955.00
KYLE NORDREHAUG	104.70 hr @ 750.00	\$ 78,525.00
NORMAN BLUMENTHAL	26.50 hr @ 795.00	\$ 21,067.50

NICK DEBLOUW	22.60 hr @ 495.00	\$ 11,187.00
NICK DEBLOUW	2.40 hr @ 575.00	\$ 1,380.00
PIYA MUKHERJEE	23.70 hr @ 475.00	\$ 11,257.50
PIYA MUKHERJEE	1.50 hr @ 550.00	\$ 825.00
RICO EHMANN	42.65 hr @ 475.00	\$ 20,258.75
VICTORIA RIVAPALACIO	44.40 hr @ 495.00	\$ 21,978.00

TOTAL PROFESSIONAL SERVICES

323.95

\$198,943.75

COSTS ADVANCED

04/11/16	COMPLEX FILING FEE.	1,435.00
04/30/16	MESSENGER - KNOX	74.75
05/31/16	MESSENGER - KNOX	104.25
06/03/16	ONLINE LEGAL COURIER.	34.95
06/30/16	MESSENGER - KNOX	104.25
07/08/16	ONLINE LEGAL COURIER.	42.86
07/11/16	COURTCALL - STASTUS CONF.	86.00
09/19/16	ONLINE LEGAL COURIER.	22.35
09/19/16	COURTCALL.	86.00
12/11/16	CASE ANYWHERE FEES.	100.20
01/31/17	LEXIS NEXIS	267.00
01/31/17	MESSENGER - KNOX	95.87
03/16/17	CASE ANYWHERE FEE.	125.00
06/15/17	COURTCALL	86.00
06/16/17	ONLINE LEGAL COURIER.	19.95
06/16/17	ONLINE LEGAL COURIER FEE.	19.95
10/17/17	ONLINE LEGAL COURIER FEE.	19.95
10/20/17	COURTCALL	86.00
01/01/18	LEXIS NEXIS	84.00
01/02/18	ONLINE LEGAL COURIER.	19.95

<u>DATE</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
01/24/18	ONLINE LEGAL COURIER.	59.05
01/31/18	ONLINE LEGAL COURIER.	35.55
03/06/18	ONLINE LEGAL COURIER FEE.	19.95
03/14/18	CASE ANYWHERE FEE.	150.00
03/21/18	COURT CALL	86.00
06/07/18	ONLINE LEGAL COURIER FEE.	29.90
06/10/18	CASE ANYWHERE FEE.	130.00
07/02/18	AAA FILING FEE - PRICE.	300.00
07/02/18	AAA FILING FEE - CONTRERAS.	300.00
07/06/18	COURTCALL.	86.00
07/12/18	ONE LEGAL FILING FEE.	77.00
09/18/18	CASE ANYWHERE FEE.	64.00
11/01/18	COURTCALL.	86.00
12/06/18	CASE ANYWHERE FEE.	76.00
12/12/18	JAMS MEDIATION FEES.	4,700.00
01/25/19	COURTCALL.	124.00
01/30/19	ONE LEGAL FILING FEE.	130.41
01/31/19	MESSENGER - KNOX	106.75
02/01/19	LEXIS NEXIS	24.00
02/06/19	ONE LEGAL FILING FEE.	75.00
02/06/19	ONE LEGAL FILING FEE.	108.50
02/07/19	EXPERT WITNESS AND CONSULTANTS -DM&A.	3,312.50
02/08/19	ONE LEGAL FILING FEE	90.50
02/08/19	ONE LEGAL FILING FEE	151.00
02/08/19	ONE LEGAL FILING FEE	152.25

<u>DATE</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
02/19/19	JAMS REFUND.	-1,250.00
03/01/19	LEXIS NEXIS	884.00
03/04/19	MESSENGER - KNOX	213.50
03/08/19	CASE ANYWHERE FEE.	155.00
03/13/19	MOTION FILING FEE.	60.00
03/22/19	FEDERAL EXPRESS	26.05
03/29/19	COURTCALL.	94.00
03/31/19	MESSENGER - KNOX	86.75
03/31/19	MESSENGER - KNOX	106.75
04/05/19	EXPERT WITNESS AND CONSULTANTS -DM&A.	62.50
04/05/19	FEDERAL EXPRESS	24.83
04/19/19	FEDERAL EXPRESS	21.88
04/30/19	MESSENGER - KNOX	172.75
04/30/19	MESSENGER - KNOX	106.75
04/30/19	MESSENGER - KNOX	66.75
04/30/19	MESSENGER - KNOX	106.75
04/30/19	MESSENGER - KNOX	66.75
04/30/19	LEXIS NEXIS	621.00
06/14/19	CASE ANYWHERE FEE.	170.00
09/18/19	ONLINE LEGAL COURIER FEE.	29.90
09/20/19	COURTCALL.	94.00
09/24/19	COURTCALL REFUND.	-94.00
10/01/19	LEXIS NEXIS	60.00
11/08/19	COURTCALL.	94.00
11/15/19	COURTCALL REFUND.	-94.00

<u>DATE</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
12/04/19	CASE ANYWHERE FEE.	130.00
01/15/20	COURTCALL.	94.00
03/31/20	CASE ANYWHERE	120.00
06/03/20	CASE ANYWHERE FEES.	120.00
06/27/20	FILING VIA ONELEGAL	101.25
08/31/20	MESSENGER - KNOX	217.50
09/08/20	CASE ANYWHERE FEE.	135.00
11/09/20	LA COURT CONNECT FEE - COURT APPEARANCE	15.00
12/03/20	CASE ANYWHERE FEES.	120.00
03/04/21	CASE ANYWHERE	120.00
04/10/21	LA COURT CONNECT APPEARANCE FEE	15.00
05/22/21	LACOURTCONNECT - COURT APPEARANCE FEE	15.00
06/04/21	CASE ANYWHERE	120.00
09/03/21	CASE ANYWHERE	120.00
12/07/21	CASE ANYWHERE	120.00
03/05/22	CASE ANYWHERE	120.00
06/07/22	CASE ANYWHERE	<u>120.00</u>
	TOTAL COSTS ADVANCED	<u>\$ 17,077.30</u>
TOTAL CURRENT CHARGES		<u>\$216,021.05</u>