

MARLIN & SALTZMAN
Stanley D. Saltzman (SBN 90058)
Adam M. Tamburelli (SBN 301902)
29800 Agoura Road, Suite 210
Agoura Hills, California 91301
Telephone: (818) 991-8080
Facsimile: (818) 991-8081
ssaltzman@marlinsaltzman.com

Paul T. Cullen (SBN 193575)
THE CULLEN LAW FIRM, APC
19360 Rinaldi Street, Box 647
Porter Ranch, CA 91326
818-360-2529/ fax 866-794-5741
paul@cullenlegal.com

Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA -- WESTERN DIVISION

GERARDO ORTEGA and MICHAEL
D. PATTON, individually and on
behalf of themselves, all others
similarly situated, and the general
public,

Plaintiffs,

vs.

J. B. HUNT TRANSPORT, INC., an
Arkansas corporation; and DOES 1 to
10, inclusive,

Defendants.

CASE NO. 2:07-CV-08336-RGK-SH

CLASS ACTION (FRCP 23)

**DECLARATION OF CLASS
COUNSEL, PAUL T. CULLEN, IN
SUPPORT OF PLAINTIFFS'
MOTION FOR ATTORNEYS'
FEES, COSTS AND INCENTIVE
AWARDS**

**DECLARATION OF PAUL T. CULLEN ISO PLAINTIFFS' MOTION FOR ATTORNEYS' FEES,
COSTS AND INCENTIVE AWARDS**

1 I, Paul T. Cullen, declare as follows:

2 1. I am an attorney at law duly licensed to practice law before all of the courts
3 of the States of California, Oregon and Washington as well as several of the district
4 courts within the Ninth Circuit. I am the owner and principal of the Cullen Law
5 Firm, APC and class counsel for Plaintiff settlement class herein. Except for such
6 matters as are stated on information and belief, I have personal knowledge of all
7 the matters set forth herein, and if called upon, I could and would competently
8 testify to the same.
9
10

11 2. All of the factual representations made in the Memorandum of Points and
12 Authorities in support of **PLAINTIFFS MOTION FOR APPROVAL OF**
13 **ATTORNEYS' FEES, COSTS, AND INCENTIVE AWARDS** are true to the
14 best of my knowledge, and I am providing this declaration in support thereof.
15

16 3. So as not to unnecessarily duplicate the information set forth in the
17 declarations of my co-counsel, namely Stanley D. Saltzman, I concur with the
18 description of the litigation history and facts set forth therein.
19

20 4. Moreover, because this Court already certified me as class counsel, and
21 because I have been designated class counsel in approximately 25 other cases,
22 many of which were certified in contested certification battles, I will not recount
23 here my qualifications as class counsel for purposes of this motion for final
24 approval.
25

26 5. **Fees Request:** As a class action employment litigator with 20 years of
27 experience, I currently charge \$750 per hour for my fees.
28

**DECLARATION OF PAUL T. CULLEN ISO PLAINTIFFS' MOTION FOR ATTORNEYS' FEES,
COSTS AND INCENTIVE AWARDS**

1 6. My office has obtained settlements in wage and hour class actions that
2 (including this settlement) exceed \$65 million.

3
4 7. While I am a sole practitioner, when appropriate, as here, I work on larger
5 class cases in conjunction with employee associates, contracted attorneys, and
6 trusted co-counsel like Marlin & Saltzman.

7 8. At the outset of this litigation, I was retained by plaintiffs Gerardo Ortega,
8 Michael Patton and Alfredo Salvatierra on a contingent fee basis.

9
10 9. After this case was removed to federal court and the magnitude of the task at
11 hand became apparent, I enlisted the assistance of my current co-counsel, Marlin &
12 Saltzman, as well as the now disbanded firm of Schwartz, Daniels & Bradley.

13 10. Together, we have worked collaboratively over 11 years, collectively
14 spending thousands of hours to achieve the proposed class settlement that is now
15 before this Court for final approval.

16
17 11. I have always been the lead contact for both Mr. Ortega and Mr. Patton.

18 12. Along with my co-counsel, I agreed to advance costs and receive no fees
19 unless we obtained a successful resolution of the case.

20
21 13. As noted above, I have been appointed to represent class members as class
22 counsel in over two dozen cases, and I have always accepted that appointment
23 knowing the appointment obligates me to act in the best interests of the class, to
24 litigate as appropriate all the cases, and to see them through to the best possible
25 resolution, whether that be settlement or trial.

26
27 14. From the moment I began the case, I began to prepare it for trial and to
28 position it for settlement if possible.

1 15. After commencing litigation, I did some informal research to learn a little bit
2 about the track record of litigation by my opposing counsel and the defendant. It
3 became apparent, not only from reputation, but from the proceedings herein, that
4 Defendant and its counsel would vigorously prosecute their defense of this case.
5

6 16. I knew that the defendant, against whose counsel I had previously litigated,
7 would put up a staunch defense. They did. As such, I knew that the financial risks I
8 undertook in continuing to prosecute the case were significant, and that I may have
9 to wait many years before receiving any compensation for the time I invested in
10 the case.
11

12 17. Even so, I did not expect it would take 11 years and would require me to
13 seek and obtain admission to the bar of the United States Supreme Court (in the
14 eventuality that Defendant's petition for writ of certiorari were to have been
15 accepted) before an acceptable settlement would ultimately be obtained.
16

17 18. Even at the outset of this case in 2007, I knew that, given the vigorous nature
18 of the defense, I would have to (and I certainly did have to) forego other profitable
19 cases, so I could focus my attention on this matter so that it could be brought to a
20 successful conclusion.
21

22 19. My late associate, Craig Pynes, my former "of counsel," Barbara DuVan-
23 Clarke, and I contemporaneously recorded the hours we worked on this case. A
24 true and correct copy of our billing records is attached hereto as **Exhibit A**.
25

26 20. Craig Pynes was a 1990 graduate of Loyola Law school, and he came to
27 work for my firm and that of Marlin & Saltzman with over 21 years of litigation
28 experience. During the time he worked on this case for my office, he was

1 concurrently employed by my office and Marlin & Saltzman, and his billing rate,
2 based on his extensive experience in complex litigation was \$695 per hour.

3
4 21. Barbara DuVanClarke has worked with my office as of counsel, and she also
5 worked on this matter. Based on her 10 years of experience in employment law
6 and trial advocacy, her billing rate is \$625 per hour.

7
8 22. Based on my 20 years of experience in wage and hour class action litigation,
9 both my requested rate of \$750 per hour, and Mr. Pynes' rate of \$695 per hour and
10 Ms. Duvan-Clarke's rate of \$625 per hour, are reasonable hourly rates charged in
11 Los Angeles for this type of litigation for attorneys with similar experience in wage
12 and hour class action matters.

13
14 23. An accurate description of the attorneys' fees to date for my firm, excluding
15 over 30 hours I have spent preparing this fee application and many more hours that
16 over the course of 11 years I no doubt omitted to include, includes **1,704 hours**
17 **resulting in a lodestar of \$1,269,425.00 for the Cullen Law Firm**, with the
18 following breakdowns:

- 19
20 a. 1,594.8 hours for me at \$750 per hour for a subtotal of **\$1,196,100.00**;
21
22 b. 72.5 hours for Craig Pynes at \$695 per hour for a subtotal of
23 **\$50,387.50**; and
24
25 c. 36.7 hours for Barbara Duvan-Clarke at \$625 per hour for a subtotal
26 of **\$22,937.50**.

27
28 24. **The blended rate** for our office, given that the bulk of the work on this case
was done by me, is **\$744.97 per hour for the 1,704 attorney hours expended**.

1 25. The details of the tasks that Mr. Pynes, Ms. Duvan-Clarke and I performed
2 are described in **Exhibit A**.

3
4 26. The expenses my firm incurred are detailed in **Exhibit B** hereto, which is a
5 spreadsheet we maintain in Excel, that compiles all the invoices and expenses we
6 have paid that are directly related to the prosecution of this matter. The vast
7 majority of these expenses are comprised of expert witness fees, deposition
8 transcripts and necessary travel and document production expenses.

9
10 27. As of this date, **The Cullen Law Firm has fronted \$52,100.65 in expenses**
11 for the plaintiff class for which we seek reimbursement by way of this motion.

12 28. We have only sought reimbursement of expenses directly related to this
13 litigation, expenses that were necessary and reasonable.

14
15 29. **Class Representative Enhancements for Mr. Ortega and Mr. Patton:**

16 Having worked with Mr. Ortega and Mr. Patton now for over 11 years on this case,
17 I can attest, based upon my personal and observations, that they have been fully
18 involved in and committed to the successful prosecution of this matter.

19
20 30. I defended them both in depositions, worked with them for several days
21 responding to written discovery, and I have had countless case-related
22 teleconferences and email exchanges with them over the years.

23
24 31. In light of their perseverance for 11 years to see this matter through to a
25 successful completion, the \$15,000 request is rather modest, and I believe it is
26 absolutely warranted under the circumstances.

1 I declare under penalty of perjury of the laws of the United States of
2 America that the foregoing is true and correct and that this declaration was
3 executed in the city of Los Angeles, California on December 28, 2018.
4


5
6 By  _____
7 Paul T. Cullen, Declarant
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

EXHIBIT A

**To the Declaration of Paul T. Cullen In Support of Plaintiffs'
Motion for Attorneys' Fees, Costs, and Incentive Awards**

The Cullen Law Firm, APC - Client Summary

#15214

Date Start: 12/1/2006 | Date End: 12/28/2018 | Clients: Ortega, Gerardo v. JB Hunt | Projects: complaint,Complaint | Users: Paul Cullen | Account Managers: All

Date	Project	Description	Rate/ Unit Price	Labor Time/ Quantity	Billable Time/ Cost Price	Bill Amt/ Sell Price
Ortega, Gerardo v. JB Hunt						
Paul Cullen						
02/24/2007	complaint	Telephonic conference with referring counsel.	750.00 hr	0.30	0.30	225.00
03/04/2007	complaint	Receipt and review correspondence from referring counsel. Respond to same.	750.00 hr	0.30	0.30	225.00
03/05/2007	complaint	Commence research regarding potential causes of action and similar cases.	750.00 hr	3.70	3.70	2,775.00
03/07/2007	complaint	Conduct follow-up research to ascertain the viability of causes of action.	750.00 hr	3.00	3.00	2,250.00
03/07/2007	complaint	Telephonically interview potential clients.	750.00 hr	2.10	2.10	1,575.00
03/13/2007	complaint	Prepare initial draft of class action complaint.	750.00 hr	5.80	5.80	4,350.00
03/14/2007	complaint	Follow up conversations with clients	750.00 hr	1.20	1.20	900.00
03/30/2007	complaint	Draft correspondence to referring counsel.	750.00 hr	0.30	0.30	225.00
04/06/2007	complaint	Telephonic conference with referring counsel.	750.00 hr	0.40	0.40	300.00
04/09/2007	complaint	Telephonic conference with client Patton.	750.00 hr	0.50	0.50	375.00
04/09/2007	complaint	Telephonic conference with client Salvatierra.	750.00 hr	0.20	0.20	150.00
05/31/2007	complaint	Receipt and review correspondence from Referring counsel and response to same.	750.00 hr	0.20	0.20	150.00
06/01/2007	complaint	Receipt and review correspondence from Referring counsel and response to same.	750.00 hr	0.20	0.20	150.00
06/27/2007	complaint	Conference with referring counsel.	750.00 hr	0.30	0.30	225.00
07/05/2007	complaint	Draft consent forms for 29 U.S.C. §216 and draft correspondence to referring counsel.	750.00 hr	0.50	0.50	375.00
07/17/2007	complaint	Telephone conference with client Patton.	750.00 hr	0.50	0.50	375.00
07/17/2007	complaint	Receipt and review of correspondence from referring counsel and response to same.	750.00 hr	0.20	0.20	150.00
07/31/2007	complaint	Receipt and review of correspondence from referring counsel and response to same.	750.00 hr	0.20	0.20	150.00
08/09/2007	complaint	Receipt and review of correspondence from referring counsel and response to same.	750.00 hr	0.20	0.20	150.00
08/17/2007	complaint	Receipt and review of correspondence from referring counsel and response to same.	750.00 hr	0.30	0.30	225.00
09/20/2007	complaint	Receipt and review of correspondence from referring counsel and response to same.	750.00 hr	0.20	0.20	150.00
10/03/2007	complaint	Receipt and review of correspondence from referring counsel and response to same.	750.00 hr	0.10	0.10	75.00
10/03/2007	complaint	Receipt and review of correspondence from referring counsel and response to same.	750.00 hr	0.30	0.30	225.00
11/06/2007	complaint	Continued research of law relating to proposed claims. Continue revising and drafting of the complaint.	750.00 hr	5.30	5.30	3,975.00

11/14/2007	complaint	Multiple telephone conferences with clients, Salvalillo, Unger, and Patton.	750.00 hr	1.90	1.90	1,425.00
11/15/2007	complaint	Draft memorandum to file and continue revisions to draft complaint.	750.00 hr	1.20	1.20	900.00
11/16/2007	complaint	Finalize drafting, execute, and send out complaint for filing.	750.00 hr	2.30	2.30	1,725.00
11/19/2007	complaint	Draft correspondence to referring counsel.	750.00 hr	0.20	0.20	150.00
11/22/2007	complaint	Review conformed documents from filing of complaint and research assigned Judge.	750.00 hr	1.20	1.20	900.00
11/26/2007	complaint	Receipt, review, and response to multiple items of correspondence from referring counsel.	750.00 hr	0.50	0.50	375.00
11/27/2007	complaint	Receipt, review, and response to multiple items of correspondence from Patricia Berry.	750.00 hr	0.30	0.30	225.00
01/02/2008	complaint	Receipt and preliminary review of a notice of removal, notice of interested parties, notice of related cases, declaration of Mark Whitehead and declaration of Kevin Lilly along with other case initiation documents.	750.00 hr	2.10	2.10	1,575.00
01/03/2008	complaint	Research viability of potential motion to remand and advisability of same.	750.00 hr	2.20	2.20	1,650.00
01/03/2008	complaint	Conference with Mark Bradley.	750.00 hr	0.40	0.40	300.00
01/04/2008	complaint	Receipt and review of minute order from Judge Cooper setting scheduling conference for March 10, 2008.	750.00 hr	0.30	0.30	225.00
01/31/2008	complaint	Prepare for, engage in early meeting of counsel. Prepare memo to file regarding same.	750.00 hr	1.70	1.70	1,275.00
02/05/2008	complaint	Conference with opposing counsel Lidman regarding stipulation to extend certification filing deadline.	750.00 hr	0.40	0.40	300.00
02/15/2008	complaint	Draft correspondence to opposing counsel Lidman. Make phone call to opposing counsel, and leave message.	750.00 hr	0.50	0.50	375.00
02/15/2008	complaint	Receipt and review of correspondence from opposing counsel Lidman.	750.00 hr	0.20	0.20	150.00
02/19/2008	complaint	Engage in continued early meeting of counsel and draft notes to file regarding same. Commence drafting of joint report.	750.00 hr	3.10	3.10	2,325.00
02/19/2008	complaint	Engage in continued early meeting of counsel and draft notes to file regarding same.	750.00 hr	2.00	2.00	1,500.00
02/22/2008	complaint	Draft a certificate of interested parties and notice of related cases. Prepare same for filing and file.	750.00 hr	1.50	1.50	1,125.00
02/25/2008	complaint	Effectuate transmission of courtesy copies of statement of interested parties and statement of related cases.	750.00 hr	0.30	0.30	225.00
02/26/2008	complaint	Receive and respond to multiple items of correspondence from Scott Lidman regarding joint drafting of stipulation to continue motion for certification deadline. Continue drafting same.	750.00 hr	1.20	1.20	900.00
02/27/2008	complaint	Finalize stipulation to continue deadline for filing motion for class certification. Draft correspondence to opposing counsel regarding same.	750.00 hr	0.70	0.70	525.00
02/29/2008	complaint	Receipt and review of correspondence from opposing counsel Lidman, including draft of joint report of early meeting of counsel. Draft and transmit plaintiffs revisions regarding same same.	750.00 hr	1.30	1.30	975.00
03/01/2008	complaint	Receipt and review of notice of statistical adjustment.	750.00 hr	0.30	0.30	225.00
03/03/2008	complaint	Receipt and review of order on stipulation regarding deadline for filing class certification motion. Calendar deadlines and conduct intraoffice meeting regarding same with Patricia Berry.	750.00 hr	0.40	0.40	300.00
03/03/2008	complaint	Receipt and review of correspondence from opposing counsel Lidman, further revisions to draft Joint Report. Conduct teleconference with Scott Lidman regarding same.	750.00 hr	0.80	0.80	600.00
03/03/2008	complaint	Prepare proposed ADR questionnaire, and revise and send it and signed rule 26 report to opposing counsel.	750.00 hr	1.20	1.20	900.00

Date	Event	Description	Hours	Rate	Amount
03/04/2008	complaint	Prepare addendum to the 30 report for request for production. Receipt, review and response to multiple items of correspondence with opposing counsel regarding same.	750.00 hr	1.00	750.00
03/05/2008	complaint	File addendum to rule 26 report.	750.00 hr	0.40	300.00
03/07/2008	complaint	Conference with proposed co-counsel, Schwartz, Daniels & Bradley.	750.00 hr	1.50	1,125.00
03/07/2008	complaint	Review file and preparation for scheduling conference.	750.00 hr	1.50	1,125.00
03/10/2008	complaint	Travel to/from, attend and prepare notes to file regarding scheduling conference	750.00 hr	4.50	3,375.00
03/11/2008	complaint	Receive, download, internally file and review Court's order for jury trial and referral to ADR pilot program. Conduct intraoffice conference regarding same and ensure that all deadlines are properly calendared and plan litigation timeline.	750.00 hr	3.60	2,700.00
03/12/2008	complaint	Receipt and review correspondence from cocounsel William Daniels, and conduct teleconference in response to same.	750.00 hr	0.50	375.00
03/25/2008	complaint	Receipt and review correspondence from Kevin Lilly.	750.00 hr	0.20	150.00
03/25/2008	complaint	Teleconference with opposing counsel Scott Lidman, and follow-up correspondence confirming same.	750.00 hr	0.50	375.00
03/28/2008	complaint	Receipt and initial review of requests for production of documents to each of the 3 plaintiffs, including 94 categories as well as 25 special interrogatories for each plaintiff. Calendar deadlines, and communicate with cocounsel and clients.	750.00 hr	2.90	2,175.00
03/31/2008	complaint	Interoffice conference with members of proposed cocounsel team.	750.00 hr	1.30	975.00
03/31/2008	complaint	Continued review of request for production of documents and special interrogatories. Review file and documents previously provided by clients to organize same for preliminary draft of responses.	750.00 hr	3.00	2,250.00
04/03/2008	complaint	Prepare and file notice of association of counsel.	750.00 hr	1.80	1,350.00
04/07/2008	complaint	Teleconference with opposing counsel and follow-up correspondence confirming continuance of deadline to exchange rule 26 disclosures.	750.00 hr	0.40	300.00
04/08/2008	complaint	Conduct further review of Defendants' discovery. Communicate with clients, and Commence drafting preliminary model responses.	750.00 hr	6.80	5,100.00
04/08/2008	complaint	Aggregate, organize and review for redaction \clients' documents for production (approximately 450 pages).	750.00 hr	4.70	3,525.00
04/15/2008	complaint	Review written Discovery from opposing counsel and commence drafting responses to same, following multiple teleconferences with clients.	750.00 hr	6.30	4,725.00
04/16/2008	complaint	Receipt and review of additional documents from clients in response to request for production of documents. Review all documents to date and flag for potential redaction issues.	750.00 hr	1.50	1,125.00
04/17/2008	complaint	Continued drafting of responses to written Discovery from defendant.	750.00 hr	4.70	3,525.00
04/21/2008	complaint	Draft correspondence to opposing counsel regarding discovery requests and requested extension for same.	750.00 hr	0.30	225.00
04/21/2008	complaint	Continued drafting of responses to written Discovery from defendant.	750.00 hr	1.10	825.00
04/22/2008	complaint	Review of Defendant's initial disclosures, and communicate with opposing counsel regarding scheduling of depositions of individuals identified therein.	750.00 hr	2.50	1,875.00
04/22/2008	complaint	Draft 30B6 deposition notice.	750.00 hr	1.50	1,125.00
04/23/2008	complaint	Draft deposition notices for Aaron regular Lotto and Sherry Moncrief. Finalize 30B6 deposition notice and confer with cocounsel.	750.00 hr	2.00	1,500.00
04/23/2008	complaint	Intra-office Conference re: Case management with Patricia Berry.	750.00 hr	1.10	825.00

Date	Complaint	Description	Hours	Rate	Amount	Total
04/23/2008	complaint	Receipt and review correspondence from Scott Linn and Patricia Berry regarding deposition scheduling and deadline for filing class certification motion. Follow-up regarding same.	750.00 hr	0.50		375.00
04/30/2008	complaint	Commence drafting request for production of documents.	750.00 hr	4.50	4.50	3,375.00
05/01/2008	complaint	Continued drafting request for production of documents.	750.00 hr	3.10	3.10	2,325.00
05/02/2008	complaint	Finalize and serve request for production of documents (27 pages/96 categories).	750.00 hr	3.10	3.10	2,325.00
05/02/2008	complaint	Intraoffice conference regarding needed extension on class certification filing deadline.	750.00 hr	1.00	1.00	750.00
05/05/2008	complaint	Draft proposed stipulation to continue certification filing deadline and trial. Transmit same to opposing counsel for review.	750.00 hr	2.70	2.70	2,025.00
05/05/2008	complaint	Teleconference with opposing counsel Lidman regarding proposed stipulation and order to continue certification motion and need for same. Further discussion regarding scheduling issues. Draft memorandum to file.	750.00 hr	1.60	1.60	1,200.00
05/07/2008	complaint	Receipt review and response to multiple items of correspondence regarding proposed stipulation and order to continue the deadline for certification filing and trial. Undertake multiple revisions per meet and confer with opposing counsel regarding same.	750.00 hr	2.50	2.50	1,875.00
05/08/2008	complaint	Request native electronic copy of written discovery from defendant.	750.00 hr	0.20	0.20	150.00
05/08/2008	complaint	Receipt and review of native electronic copies of written discovery to plaintiffs. Distribute same internally.	750.00 hr	0.40	0.40	300.00
05/08/2008	complaint	Conduct in depth research regarding motor Carrier exemption and analyze same with respect to claims in complaint.	750.00 hr	4.10	4.10	3,075.00
05/09/2008	complaint	Finalize, execute and file stipulation and proposed order.	750.00 hr	1.00	1.00	750.00
05/12/2008	complaint	Continued drafting of discovery responses for plaintiffs. Multiple telephone conferences with clients and intraoffice conferences regarding same.	750.00 hr	7.60	7.60	5,700.00
05/13/2008	complaint	Receive, download, internally file and review of court's order on stipulation to continue hearing for motion for class certification filing deadlines and trial, including court changes to proposed order. Draft memo to file and calendar all dates. Follow-up interoffice conference.	750.00 hr	2.30	2.30	1,725.00
05/13/2008	complaint	Receive, download, internally file and review Notice of pendency of other action filed by defendant. Conduct follow-up research regarding same.	750.00 hr	1.10	1.10	825.00
05/13/2008	complaint	Conduct further research regarding preliminary and post-liminary activities and compensability of same under California law and federal law.	750.00 hr	3.00	3.00	2,250.00
05/14/2008	complaint	Intraoffice conference and review of near final discovery responses with target response service date of May 16, 2008.	750.00 hr	2.90	2.90	2,175.00
05/15/2008	complaint	Draft final revisions to plaintiff's discovery responses and communicate with clients	750.00 hr	4.10	4.10	3,075.00
05/16/2008	complaint	Finalize, execute, execute, and serve plaintiffs' written discovery responses	750.00 hr	2.60	2.60	1,950.00
05/16/2008	complaint	Conference with clients. Contact final review of discovery responses with them.	750.00 hr	3.80	3.80	2,850.00
05/16/2008	complaint	Review, organize, and prepare for production additional documents. Draft correspondence to opposing counsel regarding same.	750.00 hr	1.60	1.60	1,200.00
05/30/2008	complaint	Receipt and review correspondence from Lidman. Respond to same and adjust calendar entries regarding deadlines for discovery responses.	750.00 hr	0.50	0.50	375.00

Date	Complaint	Description	Hours	Rate	Amount	Total
06/02/2008	complaint	Communicate with cocounsel and opposing counsel regarding deposition scheduling. Receive, review and respond to multiple items of correspondence regarding same and conduct multiple teleconferences regarding same.	750.00 hr	1.90		1,425.00
06/03/2008	complaint	Receipt and review correspondence from Lidman and follow-up regarding same	750.00 hr	0.50	0.50	375.00
06/03/2008	complaint	Review case of competing plaintiff filed by James Hawkins and impact of concurrent litigation on case.	750.00 hr	0.80	0.80	600.00
06/06/2008	complaint	Receipt and preliminary review of correspondence from opposing counsel including personnel files of all plaintiffs. draft memo to file regarding same.	750.00 hr	4.00	4.00	3,000.00
06/09/2008	complaint	Receipt and review correspondence from Lidman regarding meet and confer regarding plaintiff's responses to discovery. Plan response to same.	750.00 hr	1.50	1.50	1,125.00
06/09/2008	complaint	Communicate with opposing counsel regarding need to relocate deposition for plaintiff Ortega.	750.00 hr	0.40	0.40	300.00
06/09/2008	complaint	Prepare a response to opposing counsel regarding request to stipulate to amended answer. Circulate same among cocounsel.	750.00 hr	1.10	1.10	825.00
06/11/2008	complaint	Receipt and review amended deposition notice for Gerardo Ortega.	750.00 hr	0.40	0.40	300.00
06/12/2008	complaint	Conference with client Salvatierra to prepare him for deposition.	750.00 hr	3.50	3.50	2,625.00
06/12/2008	complaint	Conference with client Patton to prepare him for deposition.	750.00 hr	4.90	4.90	3,675.00
06/13/2008	complaint	Receipt and review of supplemental document production by defendant	750.00 hr	2.50	2.50	1,875.00
06/13/2008	complaint	Conference with client to prepare him for deposition.	750.00 hr	4.20	4.20	3,150.00
06/15/2008	complaint	Follow-up Conference with client Patton to prepare him for deposition.	750.00 hr	2.00	2.00	1,500.00
06/15/2008	complaint	Follow-up with client to prepare him for deposition.	750.00 hr	1.90	1.90	1,425.00
06/15/2008	complaint	Follow-up conference with client Salvatierra to prepare him for deposition.	750.00 hr	1.50	1.50	1,125.00
06/16/2008	complaint	Travel to/from and attend/defend deposition of plaintiff Ortega. Follow-up conference with Bill Daniels regarding same.	750.00 hr	9.80	9.80	7,350.00
06/17/2008	complaint	Travel to/from and attend/defend deposition of plaintiff Patton. Follow-up conference with Bill Daniels regarding same.	750.00 hr	10.40	10.40	7,800.00
06/18/2008	complaint	Travel to/from planned deposition of plaintiff Salvatierra. Plaintiff fails to show. Discuss potential resolution of same with opposing counsel.	750.00 hr	3.90	3.90	2,925.00
06/19/2008	complaint	Continue drafting PMK deposition notice for 6 categories pursuant to F.R.C.P. 30B6.	750.00 hr	3.80	3.80	2,850.00
06/20/2008	complaint	Follow-up regarding failure of client to show at deposition.	750.00 hr	0.80	0.80	600.00
06/20/2008	complaint	Conference with cocounsel regarding PMK deposition notice and finalize and serve same.	750.00 hr	1.90	1.90	1,425.00
06/23/2008	complaint	Communications with opposing counsel and internally among cocounsel regarding deposition scheduling for PMK depositions.	750.00 hr	0.60	0.60	450.00
06/25/2008	complaint	Finalize PMK deposition notices as well as deposition notices for Aaron Regalado and Sherry Moncrief. Coordinate with Bill Daniels regarding same and effectuate service of deposition notices.	750.00 hr	2.40	2.40	1,800.00
06/27/2008	complaint	Receipt, review, and consider various responses to multiple subpoenas issued by defendant regarding Plaintiffs' employment records.	750.00 hr	1.30	1.30	975.00
06/27/2008	complaint	Teleconferences with clients.	750.00 hr	1.00	1.00	750.00
06/30/2008	complaint	Draft correspondence to plaintiff Patton.	750.00 hr	1.30	1.30	975.00
07/01/2008	complaint	Intraoffice communications with cocounsel regarding litigation strategy.	750.00 hr	1.50	1.50	1,125.00

07/07/2008	complaint	Prepare draft stipulation to withdraw plaintiff's proposed class representative and proposed order thereon. Circulate for review, and attend to filing of same.	750.00 hr	2.50	2.50	1,875.00
07/08/2008	complaint	Attend to continued deposition of plaintiff Patton and scheduling of same.	750.00 hr	1.10	1.10	825.00
07/08/2008	complaint	Conference with client Patton to prepare for continued deposition.	750.00 hr	2.80	2.80	2,100.00
07/09/2008	complaint	Draft correspondence to client Salvatierra.	750.00 hr	2.80	2.80	2,100.00
07/21/2008	complaint	Receipt and review of objections to PMK deposition notices, including potential implications of same. circulate objections among cocounsel.	750.00 hr	1.10	1.10	825.00
07/22/2008	complaint	Conduct research regarding newest case law applicable to plaintiffs' claims in preparation for PMK depositions.	750.00 hr	2.50	2.50	1,875.00
07/22/2008	complaint	Attend filing of stipulation to withdraw plaintiff Salvatierra.	750.00 hr	0.90	0.90	675.00
07/23/2008	complaint	Conduct research and meeting regarding implications of Brinker v. Superior Court, decided 7/22/08.	750.00 hr	1.90	1.90	1,425.00
07/23/2008	complaint	Preparation for depositions of Sherry Moncrief and Aaron Regalado to assist cocounsel Daniels.	750.00 hr	4.20	4.20	3,150.00
07/23/2008	complaint	Draft lengthy correspondence to opposing counsel Keith Jacoby meeting and conferring regarding discovery responses.	750.00 hr	2.80	2.80	2,100.00
07/23/2008	complaint	Meeting with William Daniels and Christina Humphrey including preparation for same.	750.00 hr	3.10	3.10	2,325.00
07/24/2008	complaint	Receipt and review of amended PMK deposition notice.	750.00 hr	0.50	0.50	375.00
07/24/2008	complaint	Travel to/from and attend deposition of Sherry Moncrief along with follow-up meeting with cocounsel after conclusion of same.	750.00 hr	9.20	9.20	6,900.00
07/24/2008	complaint	Receipt and review correspondence from Kevin Lilly.	750.00 hr	0.20	0.20	150.00
07/25/2008	complaint	Receive, download, internally file and review Order on stipulation to withdraw a proposed class representative.	750.00 hr	0.50	0.50	375.00
07/25/2008	complaint	Travel to/from and attend deposition of Aaron Regalado along with follow-up meeting with cocounsel after conclusion of same.	750.00 hr	9.00	9.00	6,750.00
07/28/2008	complaint	Monitor and review multiple items of communication and documents sent among cocounsel and from opposing counsel.	750.00 hr	1.60	1.60	1,200.00
07/29/2008	complaint	Review file and draft follow-up correspondence to opposing counsel regarding protective order, PMK depositions, status of class list, document production and discovery deadlines.	750.00 hr	2.60	2.60	1,950.00
07/29/2008	complaint	Review documents recently produced by defendant in response to RFP's.	750.00 hr	1.50	1.50	1,125.00
07/29/2008	complaint	Research Judge Cooper's rules and any additional, applicable procedures regarding potential motion to compel further responses from defendant.	750.00 hr	0.60	0.60	450.00
07/30/2008	complaint	Review additional documents produced by defendant in response to RFP's.	750.00 hr	1.80	1.80	1,350.00
07/31/2008	complaint	Review internal correspondence/memoranda from Susan Joseph along with documents referenced in same.	750.00 hr	2.40	2.40	1,800.00
07/31/2008	complaint	Receipt and review correspondence from Opposing counsel Jacoby regarding multiple issues related to case administration and PMK depositions. Confer among cocounsel regarding same and formulate plan for response.	750.00 hr	1.30	1.30	975.00
08/04/2008	complaint	Monitor PMK deposition notice communications among counsel and review final drafts of deposition notices and provide commentary regarding same.	750.00 hr	1.90	1.90	1,425.00
08/06/2008	complaint	Review draft stipulation to compel interrogatory responses	750.00 hr	2.50	2.50	1,875.00
08/08/2008	complaint	Monitor and participate in communications regarding scheduling of meet and confer regarding discovery.	750.00 hr	1.10	1.10	825.00
08/08/2008	complaint	Review and provide comments regarding draft protective order regarding class list.	750.00 hr	1.40	1.40	1,050.00

Date	Event Type	Description	Hours	Rate	Amount
08/11/2008	complaint	Draft and file notice of entry regarding additional affidavits counsel in caption.	750.00 hr	0.80	600.00
08/11/2008	complaint	Meet and confer teleconference with opposing counsel and internal follow-up regarding same.	750.00 hr	2.70	2,025.00
08/11/2008	complaint	Review Def.'s objections to August 14 and August 15 PMK deposition notices.	750.00 hr	0.80	600.00
08/13/2008	complaint	Review file for deadlines, including discovery cut off.	750.00 hr	1.10	825.00
08/14/2008	complaint	Receipt and review correspondence from Regarding discovery cut off stipulation and proposed amended pretrial schedule. Respond to same.	750.00 hr	0.60	450.00
08/14/2008	complaint	Receipt and review of additional documents produced by defendant.	750.00 hr	0.60	450.00
08/14/2008	complaint	Receive, download, internally file and review Stipulation and protective order filed by defendant.	750.00 hr	0.60	450.00
08/14/2008	complaint	Receive, download, internally file and review Stipulation to continue discovery cut off.	750.00 hr	0.50	375.00
08/15/2008	complaint	Intraoffice conferences regarding PMK deposition scheduling and follow-up regarding multiple items related thereto.	750.00 hr	1.50	1,125.00
08/15/2008	complaint	Receipt and review of Wesley Griffin declaration and correspondence from Scott Lidman.	750.00 hr	0.80	600.00
08/18/2008	complaint	Commence preparation for deposition of Leonard Garcia.	750.00 hr	3.80	2,850.00
08/18/2008	complaint	Receive, download, internally file and review order continuing discovery cut off. Attend to calendaring same.	750.00 hr	0.40	300.00
08/20/2008	complaint	Continued preparation for deposition of Leonard Garcia.	750.00 hr	6.40	4,800.00
08/21/2008	complaint	Review of additional documents produced by J.B. Hunt, including pay component information.	750.00 hr	0.80	600.00
08/21/2008	complaint	Draft correspondence to clients.	750.00 hr	1.10	825.00
08/21/2008	complaint	Receipt and review of client deposition transcripts for full-day depositions of both Ortega and Patton.	750.00 hr	6.20	4,650.00
08/21/2008	complaint	Continued preparation for deposition of Leonard Garcia.	750.00 hr	7.10	5,325.00
08/22/2008	complaint	Travel to/from and conduct deposition of Leonard Garcia along with follow-up meeting with cocounsel after conclusion of same.	750.00 hr	9.60	7,200.00
08/26/2008	complaint	Conference with Christina Humphrey regarding further deposition scheduling and content. Communications with opposing counsel regarding same.	750.00 hr	2.50	1,875.00
08/27/2008	complaint	Further conference with Christina Humphrey regarding further deposition scheduling and content.	750.00 hr	1.80	1,350.00
08/28/2008	complaint	Communications with opposing counsel regarding future deposition scheduling.	750.00 hr	0.50	375.00
08/29/2008	complaint	Receive, download, internally file and review Protective order regarding list of defendant's drivers noting changes made by court.	750.00 hr	0.60	450.00
08/29/2008	complaint	Receipt and review of defendants correspondence along with hard copy of the class list. Intraoffice correspondence regarding same.	750.00 hr	1.50	1,125.00
09/02/2008	complaint	Research Federal rules regarding requirement to produce native format of spreadsheet containing class list and intraoffice conference regarding same.	750.00 hr	3.80	2,850.00
09/02/2008	complaint	Monitor correspondence regarding dispute related to defendants' failure to produce native format Excel spreadsheet with class list.	750.00 hr	0.30	225.00
09/04/2008	complaint	Receipt and review correspondence from Opposing Counsel With list of local drivers in native, usable Excel spreadsheet format. Follow-up regarding same.	750.00 hr	0.50	375.00

09/04/2008	complaint	2 documents filed in proposed Belaire West letter.	750.00 hr	2.10		1,575.00
09/05/2008	complaint	Conference call with counsel., Including preparation for same and subsequent memo to file.	750.00 hr	2.50	2.50	1,875.00
09/08/2008	complaint	Continued drafting of revisions to proposed Belaire West letter. circulate same internally for review and comment.	750.00 hr	1.30	1.30	975.00
09/08/2008	complaint	Receipt and review correspondence from Regarding stipulation and proposed order to continue certification in trial proceedings no less than 120 days.	750.00 hr	0.40	0.40	300.00
09/09/2008	complaint	Monitor and participate in continued revisions to proposed scheduling stipulation.	750.00 hr	0.80	0.80	600.00
09/15/2008	complaint	Receipt and review of additional documents produced by defendant.	750.00 hr	1.00	1.00	750.00
09/17/2008	complaint	Review draft first amended complaint and conduct meeting with Bill Daniels regarding same.	750.00 hr	3.60	3.60	2,700.00
09/18/2008	complaint	Receive, download, internally file and review declaration of Wesley Griffin regarding numerosity issues. Confer with cocounsel.	750.00 hr	1.20	1.20	900.00
09/19/2008	complaint	Review and revise draft questionnaire for precertification class member interviews.	750.00 hr	3.70	3.70	2,775.00
09/19/2008	complaint	Receive, download, internally file and review Order on stipulation to continue motion for class certification in trial.	750.00 hr	0.50	0.50	375.00
09/22/2008	complaint	Review additional revisions from Bill Daniels regarding precertification questionnaire. Confer with Bill Daniels regarding further revisions. Finalize and prepare for client outreach.	750.00 hr	2.80	2.80	2,100.00
09/23/2008	complaint	Confer with Steve O'Dell and Bill Daniels regarding draft first amended complaint. Review proposed changes and provide input regarding same.	750.00 hr	2.80	2.80	2,100.00
09/24/2008	complaint	Interview 7 class members and complete questionnaires re: same.	750.00 hr	5.80	5.80	4,350.00
09/25/2008	complaint	Interview 9 more class members. Complete questionnaires regarding same.	750.00 hr	6.10	6.10	4,575.00
09/26/2008	complaint	Interview 9 class members. Complete questionnaires regarding same.	750.00 hr	6.80	6.80	5,100.00
09/29/2008	complaint	Interview 3 more class members. Complete questionnaires and conduct intraoffice meeting with Patricia Berry regarding same.	750.00 hr	1.80	1.80	1,350.00
10/01/2008	complaint	Interview 8 class members. Complete questionnaires and conduct intraoffice meeting with Patricia Berry regarding same.	750.00 hr	6.90	6.90	5,175.00
10/02/2008	complaint	Interview 9 class members. Complete questionnaires re: same.	750.00 hr	4.60	4.60	3,450.00
10/03/2008	complaint	Complete additional 8 interviews of class members. Complete questionnaires re: same.	750.00 hr	5.30	5.30	3,975.00
10/06/2008	complaint	Monitor meet and confer efforts with Scott Lidman. Confer with Christina Humphrey.	750.00 hr	0.60	0.60	450.00
10/06/2008	complaint	Complete additional 4 interviews of class members. Complete questionnaires re: same. Review completed questionnaires and begin to compile notes and observations from results.	750.00 hr	6.90	6.90	5,175.00
10/10/2008	complaint	Complete 3 more class member interviews and questionnaires for same.	750.00 hr	2.10	2.10	1,575.00
10/14/2008	complaint	Initial review of defendants meet and confer correspondence regarding written discovery.	750.00 hr	0.60	0.60	450.00
10/14/2008	complaint	Interview class member and complete questionnaire.	750.00 hr	0.60	0.60	450.00
10/14/2008	complaint	Interview class member and complete questionnaire.	750.00 hr	0.50	0.50	375.00
10/15/2008	complaint	Receipt and review of 2nd set of request for production from defendant.	750.00 hr	0.50	0.50	375.00
10/15/2008	complaint	Interview class member and complete questionnaire.	750.00 hr	0.50	0.50	375.00

10/15/2008	complaint	Prepare initial response to and set of requests for production from defendant.	750.00 hr	2.90	2.90	2,175.00
10/16/2008	complaint	Complete interview with class member and questionnaire regarding same.	750.00 hr	0.60	0.60	450.00
10/16/2008	complaint	Complete 3 interviews with class members and questionnaires regarding same.	750.00 hr	2.90	2.90	2,175.00
10/22/2008	complaint	Confer with cocounsel and provided tutorial comments to propose first amended complaint and stipulation filing same.	750.00 hr	1.20	1.20	900.00
10/23/2008	complaint	Review final draft of response to request for production of documents and correspondence among counsel regarding same.	750.00 hr	0.50	0.50	375.00
10/28/2008	complaint	Review of defense counsel's correspondence regarding proposed first amended complaint and punitive damages allegations. Research cases cited in letter. Confer with cocounsel regarding proposed response to same.	750.00 hr	2.30	2.30	1,725.00
10/31/2008	complaint	Confer with cocounsel regarding first amended complaint and timeline for filing same.	750.00 hr	0.60	0.60	450.00
11/03/2008	complaint	Prepare preliminary draft of PAGA letter.	750.00 hr	2.90	2.90	2,175.00
11/04/2008	complaint	Receive, download, internally file and review stipulation for leave to file first amended complaint.	750.00 hr	0.50	0.50	375.00
11/05/2008	complaint	Finalize draft of PAGA letter.	750.00 hr	1.00	1.00	750.00
11/05/2008	complaint	Execute, file, and serve PAGA letter.	750.00 hr	0.90	0.90	675.00
11/06/2008	complaint	Research regarding cases filed by a potential intervenor. Communicate with opposing counsel regarding same.	750.00 hr	3.50	3.50	2,625.00
11/07/2008	complaint	Receive, download, internally file and review order on stipulation for leave to file first amended complaint.	750.00 hr	0.30	0.30	225.00
11/07/2008	complaint	Receive, download, internally file and review first amended complaint.	750.00 hr	0.30	0.30	225.00
11/12/2008	complaint	Receive, download, internally file and review response by court to notice to filer of deficiencies and electronically filed document.	750.00 hr	0.30	0.30	225.00
11/12/2008	complaint	Receive, download, internally file and review notice of deficiencies regarding filing of first amended complaint. Follow-up internally regarding same.	750.00 hr	0.50	0.50	375.00
11/17/2008	complaint	Receive, download, internally file and review notice of Motion and Motion for ruling regarding legal standards governing obligations to provide meal periods filed by defendant.	750.00 hr	4.80	4.80	3,600.00
11/17/2008	complaint	Receive, download, internally file and review first amended complaint manually filed by plaintiffs.	750.00 hr	0.40	0.40	300.00
11/18/2008	complaint	Commence research for opposition to Motion for ruling on legal standards governing obligation to provide meal periods.	750.00 hr	4.10	4.10	3,075.00
11/18/2008	complaint	Draft meet and confer correspondence to opposing counsel regarding Defendant's motion regarding preemption and standard regarding meal periods.	750.00 hr	3.50	3.50	2,625.00
11/18/2008	complaint	Confer with cocounsel to plan opposition to Motion for ruling on legal standard governing obligation to provide meal periods.	750.00 hr	2.10	2.10	1,575.00
11/19/2008	complaint	Commence drafting opposition to Motion for ruling on legal standards governing obligation to provide meal periods.	750.00 hr	7.90	7.90	5,925.00
11/20/2008	complaint	Continue further research and drafting to opposition to Motion for ruling on legal standards governing obligation to provide meal periods.	750.00 hr	8.10	8.10	6,075.00
11/21/2008	complaint	Continue opposition to Motion for ruling on legal standards governing obligation to provide meal periods. Circulate final draft documents for review and comment.	750.00 hr	5.50	5.50	4,125.00

Date	Case	Description	Hours	Rate	Amount
11/21/2008	complaint	Draft and prepare for filing request for judicial notice in opposition to Motion for class certification.	750.00 hr	2.90	2,175.00
11/21/2008	complaint	Travel to and attend court hearing on motion to stay copycat lawsuit of potential intervenor.	750.00 hr	4.50	3,375.00
11/24/2008	complaint	Conduct research and draft supplement to Opposition Brief regarding one-way intervention and Fireside Bank.	750.00 hr	5.30	3,975.00
11/24/2008	complaint	Receive, download, internally file and review opposition to Defendants' motion for ruling on legal standards governing obligation to provide meal periods.	750.00 hr	0.50	375.00
11/25/2008	complaint	Research and review recently issued certification orders in similar cases.	750.00 hr	3.60	2,700.00
11/25/2008	complaint	Finalize and file motion for hearing on judicial notice regarding memorandum in opposition to Motion for ruling on legal standards governing obligation to provide meal periods.	750.00 hr	4.10	3,075.00
11/25/2008	complaint	Draft and prepare for filing request for judicial notice.	750.00 hr	4.30	3,225.00
12/01/2008	complaint	Receive, download, internally file and review Reply brief in support of Defendant's motion for ruling on legal standards governing obligations to provide meal periods. Research case authority cited by defendant therein.	750.00 hr	3.50	2,625.00
12/01/2008	complaint	Receive, download, internally file and review of court order denying motion without prejudice regarding Defendant's motion for ruling on legal standard governing obligation to provide meal periods. Intraoffice conference regarding follow-up to same.	750.00 hr	0.50	375.00
12/04/2008	complaint	Receipt and review of meet and confer letter from defendant regarding plaintiff's discovery responses and communications with class members. Confer with cocounsel regarding same.	750.00 hr	2.10	1,575.00
12/05/2008	complaint	Receive, download, internally file and review defendant's answer to Plaintiffs' first amended complaint. Compare with prior answer for any changes in position.	750.00 hr	1.50	1,125.00
12/09/2008	complaint	Check status of PAGA letter.	750.00 hr	0.30	225.00
12/11/2008	complaint	Commence preparation of ex parte application to extend time to file a motion for class certification.	750.00 hr	6.80	5,100.00
12/11/2008	complaint	Review draft PMK deposition notice and provide editorial comments regarding same.	750.00 hr	0.60	450.00
12/11/2008	complaint	Draft correspondence to class members.	750.00 hr	3.60	2,700.00
12/12/2008	complaint	Continue preparation of ex parte application to extend time to file a motion for class certification.	750.00 hr	8.10	6,075.00
12/12/2008	complaint	Review Excel spreadsheet list of class drivers.	750.00 hr	0.70	525.00
12/15/2008	complaint	Continue preparation of ex parte application to extend time to file a motion for class certification.	750.00 hr	5.90	4,425.00
12/16/2008	complaint	Continue preparation of ex parte application to extend time to file a motion for class certification.	750.00 hr	7.50	5,625.00
12/17/2008	complaint	Preparation for 2nd session of deposition of Leonard Garcia.	750.00 hr	3.40	2,550.00
12/18/2008	complaint	Continued preparation for 2nd session of deposition of Leonard Garcia.	750.00 hr	5.10	3,825.00
12/19/2008	complaint	Receive, download, internally file and review filed ex parte application.	750.00 hr	0.30	225.00
12/19/2008	complaint	Review draft protective order. Provide editorial comments regarding same.	750.00 hr	1.50	1,125.00
12/19/2008	complaint	Continue preparation of ex parte application to extend time to file a motion for class certification. Attend filing of same.	750.00 hr	6.30	4,725.00
12/21/2008	complaint	Continued preparation for 2nd session of deposition of Leonard Garcia.	750.00 hr	2.90	2,175.00
12/22/2008	complaint	Travel to/from and conduct 2nd session of deposition of Leonard Garcia along with follow-up meeting with cocounsel after conclusion of same.	750.00 hr	8.50	6,375.00

12/23/2008	complaint	Receive, download, internally file and review court's application for protective order filed by defendant.	750.00 hr	0.30	0.30	225.00
12/23/2008	complaint	Receive, download, internally file and review of court's order on protective order for confidential information regarding defendant's customers.	750.00 hr	0.30	0.30	225.00
12/23/2008	complaint	Receive, download, internally file and review of court's order on ex parte application to continue deadline for filing class certification. Update calendaring as a result of same and review timeline for further litigation.	750.00 hr	1.30	1.30	975.00
12/23/2008	complaint	Receive, download, internally file and review defendant's opposition to ex parte application for extension of time to file motion for class certification including declaration of Scott Lidman and exhibits thereto.	750.00 hr	3.30	3.30	2,475.00
12/29/2008	complaint	Review request for continuance of deposition schedule by 3 weeks. Formulate response to same. Confer with cocounsel	750.00 hr	2.30	2.30	1,725.00
01/02/2009	complaint	Preparation for depositions of Michael Graves, Robert Schoenberger, and Tony Vargas.	750.00 hr	7.50	7.50	5,625.00
01/05/2009	complaint	Receipt and review of rough draft of Garcia deposition transcript Garcia.	750.00 hr	3.60	3.60	2,700.00
01/05/2009	complaint	Continued preparation for depositions of Michael Graves, Robert Schoenberger, and Tony Vargas.	750.00 hr	4.40	4.40	3,300.00
01/05/2009	complaint	Teleconference with opposing counsel and review follow-up letter from opposing counsel regarding deposition scheduling and logistics.	750.00 hr	0.90	0.90	675.00
01/06/2009	complaint	Continued preparation for depositions of Michael Graves, Robert Schoenberger, and Tony Vargas.	750.00 hr	9.10	9.10	6,825.00
01/07/2009	complaint	Confer with Christina Humphrey and draft intra-office memorandum..	750.00 hr	2.30	2.30	1,725.00
01/07/2009	complaint	Travel to/from and conduct deposition of Tony Vargas along with follow-up meeting with cocounsel after conclusion of same.	750.00 hr	10.30	10.30	7,725.00
01/08/2009	complaint	Travel to/from and attend deposition of Robert Schonberger in Century City at office of opposing counsel along with follow-up meeting with cocounsel after conclusion of same.	750.00 hr	8.50	8.50	6,375.00
01/09/2009	complaint	Travel to/from and conduct deposition of Michael Graves along with follow-up meeting with cocounsel after conclusion of same.	750.00 hr	6.30	6.30	4,725.00
01/12/2009	complaint	Update notes regarding client interviews and review compilation of data from same.	750.00 hr	3.40	3.40	2,550.00
01/14/2009	complaint	Receive, download, internally file and review of notice of change of address by Bill Daniels. Update case contacts.	750.00 hr	0.40	0.40	300.00
01/16/2009	complaint	Review operative complaint to determine breath of claims and potential necessity for further amendment.	750.00 hr	2.30	2.30	1,725.00
01/20/2009	complaint	Receive, download, internally file and review Notice of withdrawal of attorneys, Schwartz, Daniels & Bradley.	750.00 hr	0.20	0.20	150.00
01/22/2009	complaint	Intraoffice conference to further develop plan regarding litigation timeline and relevant court-ordered deadlines.	750.00 hr	1.50	1.50	1,125.00
01/23/2009	complaint	Follow-up Intraoffice conference to further develop plan regarding litigation timeline and relevant court-ordered deadlines.	750.00 hr	0.40	0.40	300.00
01/29/2009	complaint	Commence drafting proposed stipulation regarding discovery and pretrial deadlines. Circulated internally for comment.	750.00 hr	2.00	2.00	1,500.00
01/30/2009	complaint	Conference with clients.	750.00 hr	0.80	0.80	600.00
01/30/2009	complaint	Finalize draft of proposed stipulation regarding discovery and pretrial deadlines and send to opposing counsel.	750.00 hr	0.90	0.90	675.00
02/02/2009	complaint	Confer with opposing counsel. Pursuant to same, revise joint stipulation to vacate discovery deadline and Motion filing deadline.	750.00 hr	1.80	1.80	1,350.00

02/04/2009	complaint	Review deposition transcripts of Graves, Cullen and Stoebinger.	750.00 hr		6.10		4,575.00
02/04/2009	complaint	Receipt and review of comments from opposing counsel and update proposed stipulation regarding discovery and pretrial deadlines. Circulate and discuss internally and send to opposing counsel.	750.00 hr		2.10	2.10	1,575.00
02/06/2009	complaint	Receive, download, internally file and review of joint stipulation to vacate discovery deadline and Motion filing deadline.	750.00 hr		0.30	0.30	225.00
02/09/2009	complaint	Receive, download, internally file and review Order on stipulation to vacate discovery cut off and Motion filing deadline.	750.00 hr		0.40	0.40	300.00
02/10/2009	complaint	Commence research for and draft of motion to certify case, class notice, including review of motor Carrier exceptions and review implications of liquidated damages cases.	750.00 hr		8.00	8.00	6,000.00
02/11/2009	complaint	Continue research for and draft of motion to certify case. Review defendant document production.	750.00 hr		7.10	7.10	5,325.00
02/12/2009	complaint	Continue research for and draft of motion to certify case. Review defendant document production and witness deposition transcripts.	750.00 hr		4.60	4.60	3,450.00
02/13/2009	complaint	Intraoffice conferences with cocounsel and communications with opposing counsel regarding briefing schedule for Motion for class certification.	750.00 hr		1.10	1.10	825.00
02/13/2009	complaint	Continue research for and draft of motion to certify case. Review plaintiff and defendant document production and witness deposition transcripts. Review questionnaires.	750.00 hr		6.60	6.60	4,950.00
02/17/2009	complaint	Follow up regarding class member interviews and resume research and deposition review for briefing class certification motion.	750.00 hr		3.80	3.80	2,850.00
02/18/2009	complaint	Continue document review for class certification briefing.	750.00 hr		3.00	3.00	2,250.00
02/18/2009	complaint	Continued communication with opposing counsel and internally regarding proposed briefing schedule. Review defense counsel's draft stipulation.	750.00 hr		1.20	1.20	900.00
02/18/2009	complaint	Receive, download, internally file and review notice of withdrawal of attorney Bill Daniels.	750.00 hr		0.30	0.30	225.00
02/20/2009	complaint	Receive, download, internally file and review stipulation regarding briefing schedule for certification of class.	750.00 hr		0.30	0.30	225.00
02/20/2009	complaint	Attend to executing the stipulation regarding proposed briefing schedule and communication with opposing counsel.	750.00 hr		1.30	1.30	975.00
02/25/2009	complaint	Research and drafting Re: motion for class certification. Review corrections to deposition transcripts from defense witnesses. Communicate with team regarding various responsibilities of class certification motion going forward.	750.00 hr		5.50	5.50	4,125.00
02/27/2009	complaint	Continued intraoffice communications regarding certification briefing issues and continued research and drafting	750.00 hr		3.40	3.40	2,550.00
03/02/2009	complaint	Receive, download, internally file and review order regarding briefing schedule and hearing on Motion for class certification.	750.00 hr		0.50	0.50	375.00
03/04/2009	complaint	Communicate with opposing counsel regarding proposed stipulation regarding deposition testimony from Aaron Regalado.	750.00 hr		0.30	0.30	225.00
03/05/2009	complaint	Draft and circulate proposed stipulation regarding deposition testimony from Aaron Regalado.	750.00 hr		1.20	1.20	900.00
03/06/2009	complaint	Draft correspondence to opposing counsel with proposed stipulation regarding deposition testimony from Aaron Regalado.	750.00 hr		0.50	0.50	375.00
03/09/2009	complaint	Continued communications with cocounsel and opposing counsel regarding proposed stipulation regarding deposition testimony from Aaron Regalado.	750.00 hr		1.30	1.30	975.00
03/10/2009	complaint	Receive and review executed stipulation regarding deposition testimony from Aaron Regalado.	750.00 hr		0.30	0.30	225.00

03/11/2009	complaint	Continue research for and drafting of documents related to Motion for class certification, including declarations of class representatives and meal breaks section.	750.00 hr	10.00	10.00	6,825.00
03/12/2009	complaint	Continue research for and drafting of documents related to Motion for class certification.	750.00 hr	10.00	10.00	7,500.00
03/15/2009	complaint	Review and revise current draft of certification motion, revise and communicate with cocounsel. Finalize and obtain executed declarations from named plaintiffs and conduct teleconferences with named plaintiffs.	750.00 hr	9.80	9.80	7,350.00
03/16/2009	complaint	Continued revisions and drafting to Motion for class certification and supporting declarations and documents.	750.00 hr	11.50	11.50	8,625.00
03/17/2009	complaint	Receive, download, internally file and review plaintiff's motion for class certification.	750.00 hr	0.50	0.50	375.00
03/19/2009	complaint	Review interview notes from absent class member interviews and intraoffice communications regarding same.	750.00 hr	1.40	1.40	1,050.00
03/30/2009	complaint	Review correspondence from opposing counsel threatening motion to deny certification on federal preemption grounds and commence research regarding same. Multiple communications with cocounsel.	750.00 hr	3.50	3.50	2,625.00
04/06/2009	complaint	Review correspondence from defendant to the absent class members. Review implications of same with cocounsel.	750.00 hr	1.40	1.40	1,050.00
04/06/2009	complaint	Receive, download, internally file and review Judge Nguyen's orders regarding stayed case.	750.00 hr	0.50	0.50	375.00
04/13/2009	complaint	Receive, download, internally file and preliminarily review opposition to plaintiff's motion for class certification.	750.00 hr	4.20	4.20	3,150.00
04/14/2009	complaint	Review defendant's 2nd amended initial disclosures. Confer with cocounsel and determine advisability of seeking deposition testimony to support reply to opposition to Motion for class certification.	750.00 hr	6.20	6.20	4,650.00
04/15/2009	complaint	Continued review of opposition to motion for class certification. Commence research of all cases cited therein.	750.00 hr	9.10	9.10	6,825.00
04/16/2009	complaint	Continued review of opposition to motion for class certification and related research.	750.00 hr	7.40	7.40	5,550.00
04/17/2009	complaint	Review defendant's operations manuals and confer with cocounsel regarding contents of same. Review deposition testimony from defendant witnesses to determine the propriety of evidentiary objections in reply brief.	750.00 hr	5.50	5.50	4,125.00
04/18/2009	complaint	Continued review of deposition testimony from defendant witnesses to determine the propriety of evidentiary objections in reply brief.	750.00 hr	6.00	6.00	4,500.00
04/22/2009	complaint	Legal research regarding cases in opposition brief and for reply brief. Further review of defendant documents produced subject to protective order and determine how to resolve potential need to file documents under seal.	750.00 hr	7.20	7.20	5,400.00
04/23/2009	complaint	Confer with cocounsel further regarding distribution of responsibilities for preparation of reply brief. Commence additional legal research regarding same and commence drafting portions of reply brief.	750.00 hr	6.50	6.50	4,875.00
04/24/2009	complaint	Finalize first draft of assigned portions of reply brief. Confer with cocounsel.	750.00 hr	5.50	5.50	4,125.00
04/27/2009	complaint	Receive, download, internally file and review Defendant's notice of lodging of case authorities in opposition to Motion for class certification.	750.00 hr	0.50	0.50	375.00
04/27/2009	complaint	Receive, download, internally file and review Defendant's notice of lodging of case authorities in opposition to Motion for class certification.	750.00 hr	0.50	0.50	375.00
05/01/2009	complaint	Review draft response to Defendant's notice of lodging of case authorities in opposition to Motion for class certification.	750.00 hr	0.50	0.50	375.00

05/18/2009	complaint	Receive, download, internally file and review Court granting motion for class certification and staying portion of action pending California Supreme Court ruling on meal and rest break issues in Brinker. Confer with co-counsel regarding next steps.	750.00 hr	3.50		2,625.00
05/18/2009	complaint	Intraoffice conferences with cocounsel regarding order granting motion for class certification.	750.00 hr	1.10	1.10	825.00
05/29/2009	complaint	Commence drafting a proposed class notice. Circulate among cocounsel.	750.00 hr	2.90	2.90	2,175.00
06/01/2009	complaint	Revise proposed class notice. Circulate among co-counsel.	750.00 hr	1.80	1.80	1,350.00
06/02/2009	complaint	Review and analyze all trial dates to determine logistics of pretrial planning.	750.00 hr	3.20	3.20	2,400.00
06/10/2009	complaint	Review of continued revisions to proposed class notice. Commence research for and preparation of preliminary draft joint statement to be submitted to court.	750.00 hr	3.20	3.20	2,400.00
06/15/2009	complaint	Receive, download, internally file and review Joint statement regarding effect of stay on meal and rest break claims and further proceedings.	750.00 hr	0.30	0.30	225.00
06/15/2009	complaint	Receipt and review of Defendants' portion of joint statement. Draft combined statement and prepare for review by all counsel. Effectuate filing of same.	750.00 hr	6.30	6.30	4,725.00
06/19/2009	complaint	Receipt and review of court's order staying case, and conduct multiple teleconferences with cocounsel regarding implications of same. Research potential avenues for seeking reconsideration.	750.00 hr	4.60	4.60	3,450.00
11/30/2009	complaint	Receive, download, internally file and review change of attorney information for defense counsel. Update case contact information.	750.00 hr	0.40	0.40	300.00
12/23/2009	complaint	Receive, download, internally file and review Court order transferring case to Judge Nguyen. Research new judge.	750.00 hr	1.40	1.40	1,050.00
04/06/2010	complaint	Receive, download, internally file and review minutes in chambers after transfer of case Judge Nguyen.	750.00 hr	0.30	0.30	225.00
12/03/2010	complaint	Communicate with opposing counsel regarding possibility of stipulation to lift stay.	750.00 hr	0.40	0.40	300.00
12/09/2010	complaint	Follow-up communications with opposing counsel regarding possibility of stipulation to lift stay.	750.00 hr	0.30	0.30	225.00
06/17/2011	complaint	Review file, and deposition transcript for plaintiffs.	750.00 hr	1.90	1.90	1,425.00
05/08/2012	complaint	Draft, file, download and internally file notice regarding decision of California Supreme Court in Brinker restaurant case.	750.00 hr	1.90	1.90	1,425.00
05/15/2012	complaint	Receive, download, internally file and review notice regarding transfer of case from Judge Nguyen to Judge Fitzgerald.	750.00 hr	0.50	0.50	375.00
05/15/2012	complaint	Receive, download, internally file and review minute order from Judge Fitzgerald.	750.00 hr	0.50	0.50	375.00
05/23/2012	complaint	Receive, review, and provide written response to a couple dozen items of correspondence among counsel regarding future proceedings and anticipated conference among counsel regarding same.	750.00 hr	1.50	1.50	1,125.00
07/09/2012	complaint	Further communications among counsel regarding planned conference call.	750.00 hr	0.50	0.50	375.00
08/10/2012	complaint	Draft, file, download and internally file a joint statement regarding lifting stay in scheduling of status conference.	750.00 hr	0.30	0.30	225.00
08/10/2012	complaint	Review and comment on proposed stipulation to lift stay.	750.00 hr	1.00	1.00	750.00
08/21/2012	complaint	Receive, download, internally file and review scheduling notice by Judge Fitzgerald setting status conference for 8/27/2012 11:30 AM. Attend to calendaring the same.	750.00 hr	0.40	0.40	300.00
08/24/2012	complaint	Draft, file, download and internally file a joint statement regarding status of case.	750.00 hr	0.30	0.30	225.00

08/27/2012	complaint	Travel to/from and participate in meeting regarding current status of work up to opposition to motion to decertify class. Continue research and review of discovery materials potentially related to same.	750.00 hr	4.30	4.30	3,225.00
08/27/2012	complaint	Receive, download, internally file and review minutes from status conference held by Judge Fitzgerald.	750.00 hr	0.30	0.30	225.00
09/27/2012	complaint	Interoffice communications regarding tasks and deadlines related to motion to decertify.	750.00 hr	3.40	3.40	2,550.00
09/28/2012	complaint	Receive, download, internally file and review motion for decertification and proof of service for same, including declarations and evidence in support thereof.	750.00 hr	6.10	6.10	4,575.00
10/01/2012	Complaint	Teleconference with C Humphrey.	750.00 hr	0.40	0.40	300.00
10/01/2012	complaint	Teleconference with C Humphrey.	750.00 hr	0.30	0.30	225.00
10/01/2012	complaint	Confer with Craig Pynes regarding necessary tasks to prepare for opposition to decertification motion. Commence research regarding all cases cited in moving brief and review entire motion. Create a preliminary outline of issues that must be addressed. Monitor dozens of emails throughout the day and respond as appropriate.	750.00 hr	9.80	9.80	7,350.00
10/01/2012	complaint	Review and respond to co-counsel e-mail.	750.00 hr	0.40	0.40	300.00
10/03/2012	complaint	Receipt and review of correspondence from Sandy Laranjo.	750.00 hr	0.10	0.10	75.00
10/03/2012	complaint	Monitor e-mails among counsel.	750.00 hr	0.30	0.30	225.00
10/03/2012	complaint	Receive, download, internally file and review stipulation to continue briefing deadlines and hearing date on Defendant's motion for decertification.	750.00 hr	0.50	0.50	375.00
10/03/2012	complaint	Receive, download, internally file and review stipulation to continue briefing deadlines and hearing date on Defendant's motion for decertification.	750.00 hr	0.50	0.50	375.00
10/16/2012	complaint	Research and review of discovery materials for potential inclusion in opposition to Motion to decertify. Conduct further case research regarding same..	750.00 hr	4.90	4.90	3,675.00
10/18/2012	complaint	Travel to/from and participate in meeting regarding current status of work up to opposition to motion to decertify class. Continue research and review of discovery materials potentially related to same.	750.00 hr	6.30	6.30	4,725.00
10/26/2012	complaint	Continued research and editing of opposition to motion to decertify.	750.00 hr	6.80	6.80	5,100.00
10/27/2012	complaint	Continued research and editing of opposition to motion to decertify, evidentiary objections, and request for judicial notice.	750.00 hr	5.80	5.80	4,350.00
10/28/2012	complaint	Continued editing of opposition to motion to decertify, evidentiary objections, and request for judicial notice. Multiple teleconferences and written communications with cocounsel regarding same.	750.00 hr	8.00	8.00	6,000.00
10/29/2012	complaint	Continued editing of opposition to motion to decertify, evidentiary objections, and request for judicial notice. Multiple teleconferences and written communications with cocounsel regarding same.	750.00 hr	6.80	6.80	5,100.00
10/29/2012	complaint	Receive, download, internally file and review opposition to Motion for decertification along with evidentiary objections to declarations of Leonard Garcia and others and request for judicial notice.	750.00 hr	1.10	1.10	825.00
11/01/2012	complaint	Review filed documents and organize to upload to server.	750.00 hr	0.70	0.70	525.00
11/28/2012	complaint	Download and initial review of reply brief on motion for decertification.	750.00 hr	0.40	0.40	300.00
11/29/2012	complaint	Continued, detailed review of reply on Motion for decertification and request for judicial notice ISO motion. Research all case citations.	750.00 hr	6.80	6.80	5,100.00
12/13/2012	complaint	Finalize research in anticipation of conference with litigation team members regarding motion to decertify and plans for oral argument.	750.00 hr	5.50	5.50	4,125.00
12/14/2012	complaint	Confer with litigation team members regarding motion to decertify and plans for oral argument.	750.00 hr	5.30	5.30	3,975.00

12/17/2012	complaint	Travel to/from and attend oral argument to modify order to decertify class. Confer with cocounsel thereafter.	750.00 hr	6.30		4,725.00
12/17/2012	complaint	Travel to/from and attend Defendant's motion for decertification. Thereafter, Receive, download, internally file and review minutes from hearing on Motion for decertification.	750.00 hr	5.50	5.50	4,125.00
12/18/2012	complaint	Receive, download, internally file and review minute order on denying Motion for decertification. Review file and case deadlines in light of same.	750.00 hr	2.10	2.10	1,575.00
01/03/2013	complaint	Conference with litigation team to prepare class notice for dissemination.	750.00 hr	2.20	2.20	1,650.00
01/30/2013	complaint	Confer with opposing counsel and cocounsel regarding court's request to schedule a teleconference.	750.00 hr	1.30	1.30	975.00
01/31/2013	complaint	Receive, download, internally file and review of court's scheduling notice. Calendar scheduled telephonic status conference and intraoffice meaning regarding same.	750.00 hr	0.50	0.50	375.00
02/04/2013	complaint	Receipt, review, and internal conference in response to defendant's announced intent to file a motion to stay proceedings. Address multiple other case administration obligations.	750.00 hr	2.30	2.30	1,725.00
02/05/2013	complaint	Research cases cited by defendant in defense counsel's letter announcing defendant's intent to file a motion to stay proceedings.	750.00 hr	3.40	3.40	2,550.00
02/08/2013	complaint	Receive, download, internally file and review of court's amended scheduling notice. Calendar scheduled telephonic status conference and intraoffice meaning regarding same.	750.00 hr	0.20	0.20	150.00
02/08/2013	complaint	Respond to court's clerk regarding scheduling of conference call with the court.	750.00 hr	0.30	0.30	225.00
02/11/2013	complaint	Receive, download, internally file and review of court's minutes regarding telephonic status conference .	750.00 hr	0.30	0.30	225.00
02/11/2013	complaint	Prepare for, participate in and prepare post meeting notes for telephonic status conference with the court.	750.00 hr	2.30	2.30	1,725.00
02/18/2013	complaint	Review defense counsel comments regarding class notice an opt out form. Communicate with cocounsel regarding same.	750.00 hr	0.30	0.30	225.00
02/25/2013	complaint	Review defense counsel's detailed correspondence regarding class notice an opt out form. Review proposed forms, and Communicate with cocounsel regarding same.	750.00 hr	0.80	0.80	600.00
02/25/2013	complaint	Receive, download, internally file and review Def.'s Mot. to stay case pending US Court of Appeals decision in Dilts v. Penske, etc.	750.00 hr	2.40	2.40	1,800.00
02/27/2013	complaint	Review Def.'s Mot. to stay and all cases cited in Defendant's motion to stay. Prepare outline of issues to be addressed.	750.00 hr	4.80	4.80	3,600.00
02/28/2013	complaint	Confer with cocounsel regarding research and results thereof.	750.00 hr	0.70	0.70	525.00
03/04/2013	complaint	Receive, download, internally file and review opposition to Def.'s Mot. to stay case pending US Court of Appeals decision in Dilts v. Penske, etc.	750.00 hr	0.50	0.50	375.00
04/11/2013	complaint	Telcon with class member .	750.00 hr	0.50	0.50	375.00
04/23/2013	complaint	Receive, download, internally file and review of court order denying motion to stay case.	750.00 hr	0.50	0.50	375.00
04/26/2013	complaint	Review communications among counsel regarding moving case forward and denial of stay, focusing on issuance of class notice.	750.00 hr	0.50	0.50	375.00
05/02/2013	complaint	Receive, download, internally file and review of court transferring case to Judge Ried O'Connell.	750.00 hr	0.50	0.50	375.00
05/14/2013	complaint	Coordinate with cocounsel and confer with Craig Pynes regarding task assignments for opposition to Motion for judgment on the pleadings.	750.00 hr	2.50	2.50	1,875.00

Date	Event	Description	Hours	Rate	Amount	Balance
05/20/2013	complaint	Receive, download, internally file and review of court order to meet and confer regarding stipulation for schedule up through trial. Commence follow-up regarding same.	7.50 hr	60	450.00	
05/22/2013	complaint	Review draft opposition to Motion for judgment on the pleadings.	750.00 hr	3.30	3.30	2,475.00
05/23/2013	complaint	Review revised draft opposition to Motion for judgment on the pleadings.	750.00 hr	2.30	2.30	1,725.00
05/24/2013	complaint	Receive, download, internally file and review of Defendant's motion for judgment on pleadings as to the 3rd cause of action for failure to provide meal and rest breaks.	750.00 hr	0.50	0.50	375.00
05/28/2013	complaint	Receive, download, internally file and review of court scheduling notice regarding motion for judgment on the pleadings.	750.00 hr	1.70	1.70	1,275.00
05/31/2013	complaint	Continued review of motion for judgment on pleadings and all attachments thereto. Research all cases cited therein and draft outline to address issues raised.	750.00 hr	4.00	4.00	3,000.00
06/04/2013	complaint	Continued research on cases cited in motion for judgment on the pleadings. Review discovery file.	750.00 hr	5.10	5.10	3,825.00
06/07/2013	complaint	Receive, download, internally file and review of joint statement regarding trial schedule and status of case.	750.00 hr	0.30	0.30	225.00
06/12/2013	complaint	Receive, download, internally file and review of court's scheduling notice regarding trial schedule.	750.00 hr	0.30	0.30	225.00
06/21/2013	complaint	Review revised draft opposition to Motion for judgment on the pleadings.	750.00 hr	3.00	3.00	2,250.00
06/24/2013	complaint	Receive, download, internally file and review of memorandum in opposition to Motion for judgment on the pleadings regarding 3rd cause of action for failure to provide meal and rest breaks along with request for judicial notice regarding motion.	750.00 hr	0.50	0.50	375.00
07/01/2013	complaint	Receive, download, internally file and review of Defendants' reply memorandum on motion for judgment on the pleadings regarding 3rd cause of action for failure to provide meal and rest breaks.	750.00 hr	3.60	3.60	2,700.00
07/01/2013	complaint	Confer with cocounsel re: Review of reply brief.	750.00 hr	0.50	0.50	375.00
07/03/2013	complaint	Receive, download, internally file and review of court's scheduling notice regarding motion for judgment on the pleadings. Update calendar regarding same.	750.00 hr	0.50	0.50	375.00
07/09/2013	complaint	Receive, download, internally file and review of court's notice regarding pilot project for sealed documents. Review of court website regarding same.	750.00 hr	0.50	0.50	375.00
07/11/2013	complaint	Receive, download, internally file and review of notice of appearance by Leslie Joyner and follow-up regarding same.	750.00 hr	0.30	0.30	225.00
07/15/2013	complaint	Receive, download, internally file and review of defendants's request for judicial notice regarding motion for judgment on the pleadings.	750.00 hr	0.60	0.60	450.00
07/18/2013	complaint	Receive, download, internally file and review of court's minute order from scheduling conference and hearing on Motion for judgment on the pleadings. Update calendar regarding newly issued dates.	750.00 hr	1.10	1.10	825.00
07/20/2013	complaint	Receive, download, internally file and review notice of reassignment of case.	750.00 hr	0.30	0.30	225.00
07/22/2013	complaint	Receive, download, internally file and review notice of decision in Schwann v. FedEx.	750.00 hr	0.50	0.50	375.00
07/22/2013	complaint	Review and provide comments regarding additional discovery to be propounded on defendant.	750.00 hr	2.10	2.10	1,575.00
07/23/2013	complaint	Receive, download, internally file and review Transcript resignation and ordering by defendant.	750.00 hr	0.30	0.30	225.00

07/24/2013	complaint	Receive, download, internally file and review notice of availability of transcript for judgment on the pleadings.	750.00 hr	0.20	0.20	150.00
07/25/2013	complaint	Telephone conference with Christina Humphrey	750.00 hr	0.50	0.50	375.00
07/26/2013	complaint	Obtain electronic copies of and review and analyze deposition transcripts of Garcia, Graves, Moncrief, Regalado, Schoenberger, and Vargas.	750.00 hr	5.40	5.40	4,050.00
07/26/2013	complaint	Interoffice correspondence.	750.00 hr	0.50	0.50	375.00
07/27/2013	complaint	Continued review and analysis of deposition transcripts of Garcia, Graves, Moncrief, Regalado, Schoenberger, and Vargas.	750.00 hr	4.10	4.10	3,075.00
07/29/2013	complaint	Complete review and analysis of deposition transcripts of Garcia, Graves, Moncrief, Regalado, Schoenberger, and Vargas.	750.00 hr	5.00	5.00	3,750.00
07/30/2013	complaint	Review court filings and upload to server.	750.00 hr	0.20	0.20	150.00
07/31/2013	complaint	Conduct research regarding possible experts for piece rate best practices. Confer with Paul D. Cullen, Esq.	750.00 hr	2.80	2.80	2,100.00
07/31/2013	complaint	Receive, download, internally file and review notice of availability of transcript for proceedings of July 18, 2013.	750.00 hr	0.20	0.20	150.00
08/02/2013	complaint	Receive and review hearing transcript.	750.00 hr	0.60	0.60	450.00
08/07/2013	complaint	Receive, download, internally file and review stipulation for approval of class notice language.	750.00 hr	0.30	0.30	225.00
08/07/2013	complaint	Monitor and respond to approximately 10 items of meet and confer communications primarily related to proposed order regarding class notice.	750.00 hr	0.90	0.90	675.00
08/09/2013	complaint	Receive, download, internally file and review of order by court approving stipulation for approval of class notice language.	750.00 hr	0.30	0.30	225.00
08/12/2013	complaint	Conduct further review and markup of deposition testimony and identify relevant portions for further briefing.	750.00 hr	3.10	3.10	2,325.00
08/14/2013	complaint	Review compilation of all piece rate cases and conduct further research to determine whether additional cases should be considered.	750.00 hr	5.60	5.60	4,200.00
08/15/2013	complaint	Continued review and conferences regarding piece rate cases and possible experts.	750.00 hr	6.20	6.20	4,650.00
08/19/2013	complaint	Receive, download, internally file and review of request to strike improper argument from defendant's request for judicial notice.	750.00 hr	0.30	0.30	225.00
08/19/2013	complaint	Receive, download, internally file and review of Defendants' request for judicial notice regarding motion for judgment on pleadings as to 3rd cause of action. Follow-up research regarding same.	750.00 hr	0.70	0.70	525.00
08/20/2013	complaint	Receive, download, internally file and review of Defendants' ex parte application to defer class notice. Conduct follow-up research and Confer with cocounsel regarding same.	750.00 hr	4.10	4.10	3,075.00
08/21/2013	complaint	Receive, download, internally file and review plaintiff's opposition to ex parte application.	750.00 hr	0.30	0.30	225.00
08/21/2013	complaint	Receive, download, internally file and review notice of appearance of new defense counsel Kimberlin.	750.00 hr	0.40	0.40	300.00
08/21/2013	complaint	Receive, download, internally file and review Order by court on defendant's ex parte application. Update calendar regarding same.	750.00 hr	0.40	0.40	300.00
08/21/2013	complaint	Confer with cocounsel regarding final draft of opposition to ex parte application.	750.00 hr	0.50	0.50	375.00
08/27/2013	complaint	Receive, download, internally file and review notice of appearance of new defense counsel Mashouf.	750.00 hr	0.20	0.20	150.00
09/05/2013	complaint	Receipt and review of correspondence from co-counsel.	750.00 hr	0.30	0.30	225.00
09/10/2013	complaint	Receipt and review of correspondence from co-counsel.	750.00 hr	0.30	0.30	225.00

09/23/2013	complaint	Review case files, correspondence and monitor efforts to attempt to resolve same.	750.00 hr	1.10	1.10	825.00
10/01/2013	complaint	Review multiple court filings, downloading some from CM ECF.	750.00 hr	1.10	1.10	825.00
10/01/2013	complaint	Review and categorize all e-mails from past four weeks.	750.00 hr	0.80	0.80	600.00
10/02/2013	complaint	Receive, download, internally file and review Court's order on Motion for judgment on the pleadings. Follow-up research and conference with cocounsel regarding same.	750.00 hr	2.30	2.30	1,725.00
10/02/2013	complaint	Review court order on MJOP.	750.00 hr	0.50	0.50	375.00
10/02/2013	complaint	Telcon w/C Humphrey.	750.00 hr	0.50	0.50	375.00
10/16/2013	complaint	Continued research efforts to find appropriate trucking case experts.	750.00 hr	2.00	2.00	1,500.00
10/18/2013	complaint	Receive, download, internally file and initial review defendant's motion for summary judgment as to remaining claims and request for judicial notice in support of same.	750.00 hr	3.50	3.50	2,625.00
10/23/2013	complaint	Receive, download, internally file and initial review defendant's notice of errata regarding motion for summary judgment as to remaining claims.	750.00 hr	1.20	1.20	900.00
10/24/2013	complaint	Review multiple notices of deposition. Review calendar regarding viability of attending/conducting same.	750.00 hr	1.30	1.30	975.00
10/25/2013	complaint	Review and respond to intraoffice communications and prepare for meet and confer regarding MSJ.	750.00 hr	1.00	1.00	750.00
11/02/2013	complaint	Review correspondence from opposing counsel regarding retirement of Mobius software and compare with data exemplar provided with correspondence. Follow-up with cocounsel.	750.00 hr	1.60	1.60	1,200.00
11/04/2013	complaint	Review correspondence from opposing counsel.	750.00 hr	0.20	0.20	150.00
11/07/2013	complaint	Review request to stipulate to withdraw claims pursuant to Labor Code §226. Research and review options regarding same.	750.00 hr	1.00	1.00	750.00
11/12/2013	complaint	Receive, download, internally file and review stipulation to continue hearing on motion for summary judgment.	750.00 hr	0.30	0.30	225.00
11/15/2013	complaint	Teleconference with client.	750.00 hr	0.80	0.80	600.00
11/15/2013	complaint	Receive, download, internally file and review of court's order on stipulation to continue hearing on motion for summary judgment. Intraoffice conference and update calendar regarding same.	750.00 hr	0.30	0.30	225.00
11/18/2013	complaint	Receive, download, internally file and initial review of declarations of Kris Ashmore, Frank Broadstreet, Aaron Regalado, Robert Topel and Benton Walker and application for order granting application to seal certain exhibits.	750.00 hr	3.10	3.10	2,325.00
11/21/2013	complaint	Receive, download, internally file and review of court order granting application for order to seal.	750.00 hr	0.40	0.40	300.00
11/21/2013	complaint	Receive, download, internally file and review of the civil jury trial order. Update calendar and review planned litigation timeline.	750.00 hr	2.50	2.50	1,875.00
12/09/2013	complaint	Monitor and/or respond to approximately 3 dozen emails regarding defendants MSJ. Review lengthy litigation memorandum. Begin detailed review of Defendants' declarations to assist in preparing opposition to MSJ. Begin to prepare for deposition of Kris Ashmore.	750.00 hr	9.90	9.90	7,425.00
12/10/2013	complaint	Continued preparation for deposition of Kris Ashmore. Prepare outline and review discovery to date.	750.00 hr	9.50	9.50	7,125.00
12/11/2013	complaint	Travel to/from an conduct deposition of Kris Ashmore.	750.00 hr	10.00	10.00	7,500.00
12/12/2013	complaint	Review rough transcript of Kris Ashmore and create memorandum regarding same. Review Hein and Feld transcripts.	750.00 hr	7.80	7.80	5,850.00

Date	Event	Description	Hours	Rate	Amount
12/13/2013	complaint	Conduct initial case and formal review and research on the merits in order for summary judgment	750.00 hr	3.00	3,225.00
12/13/2013	complaint	Review Robert Topel deposition transcript.	750.00 hr	3.00	2,250.00
12/17/2013	complaint	Monitor emails regarding errata in filings of 12/16/2013.	750.00 hr	0.30	225.00
12/17/2013	complaint	Receive, download, internally file and review of notices of manual filing, proof of service and application file under seal.	750.00 hr	1.20	900.00
12/18/2013	complaint	Review proposed stipulation to continue trial and related dates.	750.00 hr	0.30	225.00
12/18/2013	complaint	Review proposed stipulation to continue trial and related dates and application to seal.	750.00 hr	1.60	1,200.00
12/18/2013	complaint	Receive, download, internally file and review of amended notice a manual filing, proof of service, stipulation to continue trial and notice of lodging.	750.00 hr	0.80	600.00
12/19/2013	complaint	Receive, download, internally file and review minute order granting in part and denying in part application to seal and notice regarding amended notice of manual filing. Follow-up with cocounsel regarding same.	750.00 hr	1.10	825.00
12/19/2013	complaint	Proposed exhibits, draft motion for summary judgment and commenced drafting plaintiff declarations.	750.00 hr	3.90	2,925.00
12/19/2013	complaint	Correspondence with co-counsel.	750.00 hr	0.60	450.00
12/19/2013	complaint	Phone call with client Ortega.	750.00 hr	0.50	375.00
12/20/2013	complaint	Continue drafting plaintiff declarations and review of motion for summary judgment. Review Def.'s discovery responses and document production, including driver settlement summaries and activity sheets.	750.00 hr	5.60	4,200.00
12/21/2013	complaint	Continue drafting plaintiff declarations and review of motion for summary judgment. Teleconferences with clients.	750.00 hr	6.50	4,875.00
12/22/2013	complaint	Continued drafting plaintiff declarations and review and editing of motion for summary judgment and exhibits thereto. Teleconferences and correspondence with cocounsel and clients. Review and annotate exhibits. Crosschecking all factual assertions for accuracy.	750.00 hr	11.30	8,475.00
12/23/2013	complaint	Continue drafting plaintiff declarations and review and editing of motion for summary judgment. Teleconferences with cocounsel.	750.00 hr	3.90	2,925.00
12/23/2013	complaint	Receive, download, internally file and review order granting stipulation to continue trial and related dates. Update calendar regarding same and review litigation timetable to conform to new deadlines.	750.00 hr	0.80	600.00
12/24/2013	complaint	Finalize and file with court, download, and internally file Plaintiffs' motion for summary judgment (Docket 151, 152, 153)	750.00 hr	8.40	6,300.00
12/26/2013	complaint	Review, finalize, file, download, internally file redacted plaintiffs' opposition to Defendants' motion for summary judgment and declarations in support thereof. Arrange for courtesy copies to be sent to chambers.	750.00 hr	4.10	3,075.00
12/27/2013	complaint	Receive, download, internally file and review sealed documents (Docket Nos 158, 159 and 160).	750.00 hr	1.00	750.00
12/30/2013	complaint	Review errata sheet from Kris Ashmore deposition.	750.00 hr	0.60	450.00
01/07/2014	complaint	Receive, download, internally file and review scheduling notice by the Court. Intraoffice conference and update calendar in response to same.	750.00 hr	0.80	600.00
01/07/2014	complaint	Receive, download, internally file and review amended scheduling notice by the Court. Intraoffice conference and update calendar in response to same.	750.00 hr	0.40	300.00
01/09/2014	complaint	Receive, download, internally file and review Def.'s ex parte application to extend time to file opposition to Motion for summary judgment.	750.00 hr	1.50	1,125.00
01/10/2014	complaint	Receive, download, internally file and review notice of non-opposition to ex parte application.	750.00 hr	0.30	225.00

01/17/2014	complaint	Receive, download, internally file and review notice of decision on defendant's motion for summary judgment.	750.00 hr	0.30	0.30	225.00
03/26/2014	complaint	Draft correspondence to client Patton.	750.00 hr	0.20	0.20	150.00
03/26/2014	complaint	Further correspondence with client Patton and follow-up telephone conference.	750.00 hr	1.00	1.00	750.00
04/01/2014	complaint	Receive, download, internally file and review notice of decision in support of plaintiffs' opposition to defendant's Motion for summary judgment.	750.00 hr	0.30	0.30	225.00
04/02/2014	complaint	Receive, download, internally file and review notice of decision in support of Defendant's motion for summary judgment filed by defendant.	750.00 hr	0.60	0.60	450.00
04/04/2014	complaint	Receive, download, internally file and review notice of decision in support of plaintiff's opposition to Defendants' motion for summary judgment.	750.00 hr	0.50	0.50	375.00
04/15/2014	complaint	Receive, download, internally file and review notice of decision in support of Defendants' motion for summary judgment.	750.00 hr	0.80	0.80	600.00
06/04/2014	complaint	Receive, download, internally file and review order granting Defendants' motion for summary judgment. Follow-up conference with cocounsel and intraoffice conference regarding same.	750.00 hr	3.90	3.90	2,925.00
06/04/2014	complaint	Draft lengthy correspondence to clients.	750.00 hr	2.50	2.50	1,875.00
06/05/2014	complaint	Commence research on bases for appeal and confer with cocounsel.	750.00 hr	4.50	4.50	3,375.00
06/06/2014	complaint	Receive, download, internally file and review notice of lodging of proposed judgment.	750.00 hr	1.50	1.50	1,125.00
06/09/2014	complaint	Preparation for and conduct litigation team teleconference. Conduct research re implications of judgment for plaintiff's and ability to object to any aspect of same.	750.00 hr	3.80	3.80	2,850.00
06/10/2014	complaint	Review Def.'s proposed order and assist in preparing proposed objections to same.	750.00 hr	4.00	4.00	3,000.00
06/11/2014	complaint	Receive, download, internally file and review final version of filed objections to proposed judgment.	750.00 hr	1.00	1.00	750.00
06/12/2014	complaint	Research Erie doctrine and applicability of F.R.C.P. 54 v. one-way fee shifting statutes in California Labor Code to determine if court may impose costs on Plaintiffs.	750.00 hr	3.70	3.70	2,775.00
06/12/2014	complaint	Receive, download, internally file and review order regarding objections to proposed judgment and judgment.	750.00 hr	0.90	0.90	675.00
06/23/2014	complaint	Receive, download, internally file and review Def.'s application to tax costs against plaintiffs Ortega and Patton.	750.00 hr	0.90	0.90	675.00
06/23/2014	complaint	Receive, download, internally file and review notice of appeal to the Ninth Circuit.	750.00 hr	0.80	0.80	600.00
06/27/2014	complaint	Receive, download, internally file and review notice of appeal to the Ninth Circuit.	750.00 hr	0.30	0.30	225.00
06/30/2014	complaint	Receive, download, internally file and review notification by the Ninth Circuit of appellate docket number.	750.00 hr	0.80	0.80	600.00
07/03/2014	complaint	Receive, download, internally file and review opposition to application to tax costs against plaintiffs.	750.00 hr	1.30	1.30	975.00
07/08/2014	complaint	Receive, download, internally file and review reply to opposition to application to tax costs against plaintiffs.	750.00 hr	1.00	1.00	750.00
07/23/2014	complaint	Receive, download, internally file and review notice of unavailability of defense counsel.	750.00 hr	0.20	0.20	150.00
07/30/2014	complaint	Receive, download, internally file and review transcript order.	750.00 hr	0.20	0.20	150.00
08/22/2014	complaint	Receive, download, internally file and review bill of costs taxed in favor of defendants against plaintiffs.	750.00 hr	0.40	0.40	300.00

Date	Case Type	Description	Hours	Rate	Amount
09/05/2014	complaint	Receive, download, internally file and review Order regarding briefing schedule from Ninth Circuit. Calendar same and confer with cocounsel.	750.00 hr	0.30	225.00
12/03/2014	complaint	Receive, download, internally file and review appellant's opening brief.	750.00 hr	0.60	450.00
12/03/2014	complaint	Review appeals court order denying motion for remand without prejudice.	750.00 hr	0.40	300.00
01/20/2016	complaint	Premediation communications among litigation team.	750.00 hr	0.50	375.00
05/29/2016	complaint	Continued premediation communications among litigation team.	750.00 hr	0.50	375.00
05/30/2016	complaint	Review potentially related lawsuit.	750.00 hr	0.50	375.00
05/31/2016	complaint	Review Plaintiffs' mediation brief.	750.00 hr	2.30	1,725.00
06/03/2016	complaint	Travel to attend mediation with Mark Rudy in San Francisco.	750.00 hr	5.00	3,750.00
06/06/2016	complaint	Attend mediation with Mark Rudy in San Francisco and travel home.	750.00 hr	10.00	7,500.00
06/07/2016	complaint	Review correspondence from Stan Saltzman to Scott Lidman. Follow-up regarding same.	750.00 hr	0.30	225.00
06/30/2016	complaint	Receive, download, internally file and review notice of withdrawal of Leslie Joyner and Christina Humphrey.	750.00 hr	0.20	150.00
08/17/2016	complaint	Review opening brief.	750.00 hr	2.90	2,175.00
08/25/2016	complaint	Telephonic conference with client Ortega.	750.00 hr	0.50	375.00
08/31/2016	complaint	Receive, download, internally file and review answering brief.	750.00 hr	2.50	1,875.00
11/04/2016	complaint	Review appellee's answering brief.	750.00 hr	3.00	2,250.00
11/07/2016	complaint	Review American Trucking Association's brief seeking amicus curiae status.	750.00 hr	0.90	675.00
11/16/2016	complaint	Review Plaintiffs' Reply Brief.	750.00 hr	1.90	1,425.00
12/19/2016	complaint	Receive, download, internally file and review notice of related case filed by defendants.	750.00 hr	0.50	375.00
01/04/2017	complaint	Receive, download, internally file and review acknowledgment of hearing notice.	750.00 hr	0.30	225.00
01/27/2017	complaint	Travel to and attend hearing on appeal. Post hearing meeting with cocounsel.	750.00 hr	5.70	4,275.00
04/04/2017	complaint	Draft correspondence to client Patton.	750.00 hr	1.20	900.00
07/22/2017	complaint	Receipt and review correspondence from client Patton. Respond to same.	750.00 hr	0.30	225.00
07/26/2017	complaint	Receive, download, internally file and review notice of US Supreme Court denying review to BeavEx matter.	750.00 hr	0.30	225.00
07/31/2017	complaint	Receive, download, internally file and review memorandum from Ninth Circuit Court of Appeals vacating and remanding Court's decision on Motion for summary judgment.	750.00 hr	0.20	150.00
07/31/2017	complaint	Receive, download, internally file and review memorandum of decision reversing District Court and remanding for further proceedings. Teleconference with cocounsel and clients thereafter.	750.00 hr	3.50	2,625.00
08/22/2017	complaint	Receive, review, and respond to client correspondence from client Patton.	750.00 hr	0.30	225.00
09/13/2017	complaint	Receive, download, internally file and review Def.'s petition for en banc review. Confer with cocounsel regarding same.	750.00 hr	1.80	1,350.00
09/20/2017	complaint	Receive, download, internally file and review amicus brief. Confer with cocounsel.	750.00 hr	2.00	1,500.00
09/20/2017	complaint	Receive, download, internally file and review order regarding amicus brief. Confer with cocounsel.	750.00 hr	0.70	525.00
09/20/2017	complaint	Review American trucking Association brief.	750.00 hr	3.10	2,325.00

10/26/2017	complaint	Multiple items of correspondence with plaintiff Patton.	750.00 hr	0.70		525.00
11/07/2017	complaint	Receive, download, internally file and review order denying petition for rehearing en banc. Follow-up telephone conference with cocounsel.	750.00 hr	0.60	0.60	450.00
11/08/2017	complaint	Review Ninth Circuit order rejecting request for en banc review. Follow-up communications with cocounsel.	750.00 hr	1.00	1.00	750.00
11/15/2017	complaint	Receive, download, internally file and review mandate from court of appeal.	750.00 hr	0.30	0.30	225.00
11/16/2017	complaint	Receive, download, internally file and review notice of reassignment of case.	750.00 hr	0.40	0.40	300.00
11/16/2017	complaint	Confer with cocounsel regarding Case management.	750.00 hr	1.30	1.30	975.00
11/29/2017	complaint	Communications with mediator.	750.00 hr	0.20	0.20	150.00
12/16/2017	complaint	Receive, review, and respond to multiple items of client correspondence from client Patton.	750.00 hr	0.40	0.40	300.00
01/03/2018	complaint	Telephonic conference with client Ortega.	750.00 hr	0.30	0.30	225.00
01/16/2018	complaint	Receive, download, internally file and review notice of reassignment of magistrate judge.	750.00 hr	0.30	0.30	225.00
01/18/2018	complaint	Receive, download, internally file and review three court orders re: trial. Confer with co-counsel re: same.	750.00 hr	1.40	1.40	1,050.00
01/18/2018	complaint	Confer with cocounsel regarding trial date and monitor communications with opposing counsel regarding potential stipulation related to same.	750.00 hr	1.20	1.20	900.00
01/23/2018	complaint	Confer with cocounsel regarding stipulation to move trial date.	750.00 hr	0.30	0.30	225.00
01/29/2018	complaint	Confer with cocounsel and review communications from SCOTUS counsel.	750.00 hr	0.50	0.50	375.00
01/31/2018	complaint	Receive, download, internally file and review request for ADR procedure by defendants.	750.00 hr	0.20	0.20	150.00
02/01/2018	complaint	Receive, download, internally file and review of court order regarding mediation.	750.00 hr	0.20	0.20	150.00
02/06/2018	complaint	Receipt and review correspondence from From Dan Lerman and review Def.'s petition for writ of certiorari and accompanying appendix. Review communications between cocounsel and Scotus counsel.	750.00 hr	4.20	4.20	3,150.00
02/12/2018	complaint	Monitor communications with and respond to Scotus counsel. Plan conference call for 2/13/18. Review petition for writ of certiorari in advance of same.	750.00 hr	3.20	3.20	2,400.00
02/13/2018	complaint	Conference call with cocounsel and Scotus counsel. Preparation for same and notes to file thereafter.	750.00 hr	1.30	1.30	975.00
02/16/2018	complaint	Review and revise proposed stipulation to continue trial and associated dates. Communicate same to cocounsel.	750.00 hr	1.00	1.00	750.00
02/21/2018	complaint	Receive notification of need to update address with District Court. Attend to same.	750.00 hr	0.90	0.90	675.00
02/21/2018	complaint	Receive, download, internally file and review stipulation to stay case pending petition for writ of certiorari with the US Supreme Court.	750.00 hr	0.30	0.30	225.00
02/22/2018	complaint	Receive, download, internally file and review letter from David Leimbach to court.	750.00 hr	0.30	0.30	225.00
02/22/2018	complaint	Receive, download, internally file and review notice of errata regarding stipulation to stay case pending petition for writ of certiorari with the US Supreme Court.	750.00 hr	0.30	0.30	225.00
03/01/2018	complaint	Monitor and participate in communications among counsel regarding potential for mediation.	750.00 hr	0.50	0.50	375.00

03/01/2018	complaint	Receive documents internally, file and review. Confer with Scott on stay case pending petition for writ of certiorari with the US Supreme Court. Calendar new dates and confer with cocounsel.	750.00 hr	1.60	1.60	450.00
03/02/2018	complaint	Confer with Scotus counsel and cocounsel regarding petition for writ of certiorari. Locate original soft copy of pleadings, and confirm accuracy with PDF filed document.	750.00 hr	1.40	1.40	1,050.00
03/02/2018	complaint	Receive, download, internally file and review notice of appearance of counsel Bradley Schwan for J.B. Hunt.	750.00 hr	0.20	0.20	150.00
03/05/2018	complaint	Confer with cocounsel regarding possibility of mediation and scheduling of same.	750.00 hr	0.80	0.80	600.00
03/07/2018	complaint	Review Def.'s opposition to petition for extension for plaintiffs' opposition to petition for writ of certiorari.	750.00 hr	0.30	0.30	225.00
03/07/2018	complaint	Monitor communications with cocounsel. Confer with cocounsel regarding Plant mediation and confer with Scotus counsel.	750.00 hr	1.40	1.40	1,050.00
03/09/2018	complaint	Draft and file notice of change of attorney business contact information. Receive, download, internally file same.	750.00 hr	1.30	1.30	975.00
03/22/2018	complaint	Research "directly related" phrase as it relates to piece rate cases and Labor Code §226.2	750.00 hr	7.10	7.10	5,325.00
03/26/2018	complaint	Continued research and draft memo analyzing current piece rate cases.	750.00 hr	4.30	4.30	3,225.00
03/28/2018	complaint	Review and edit proposed class notice. Confer with cocounsel.	750.00 hr	1.40	1.40	1,050.00
03/28/2018	complaint	Revise memo analyzing current legal landscape for piece rate cases. Research and compile California and federal cases related to the issue.	750.00 hr	2.70	2.70	2,025.00
03/29/2018	complaint	Review correspondence regarding class certification and notice and mediation and internal communications regarding same.	750.00 hr	0.80	0.80	600.00
03/29/2018	complaint	Review research memo and confer with cocounsel regarding same.	750.00 hr	2.10	2.10	1,575.00
04/02/2018	complaint	Review mediation brief and damages matrix. Confer with cocounsel.	750.00 hr	3.90	3.90	2,925.00
04/02/2018	complaint	Fly to/fr. and attend mediation.	750.00 hr	15.50	15.50	11,625.00
04/03/2018	complaint	Telcon with client.	750.00 hr	0.20	0.20	150.00
04/04/2018	complaint	Telephonic conference with client.	750.00 hr	0.30	0.30	225.00
04/06/2018	complaint	Review and respond to correspondence related to class notice. Obtain sponsors for admission to the Bar of SCOTUS and file application for the same.	750.00 hr	3.50	3.50	2,625.00
04/11/2018	complaint	Review Adam Tamburelli's research memorandum. Review some of the cases cited therein.	750.00 hr	3.10	3.10	2,325.00
04/11/2018	complaint	Draft Plaintiff's responses to special interrogatory set number 2 (interrogatories 26 through 149).	750.00 hr	8.00	8.00	6,000.00
04/12/2018	complaint	Continued drafting of Plaintiff's responses to special interrogatory set number 2 (interrogatories 26 through 149) and commence drafting of plaintiff's approximately 90 requests for admission to defendant.	750.00 hr	9.00	9.00	6,750.00
04/12/2018	complaint	Intra-office Conference with Josh Orem.	750.00 hr	0.70	0.70	525.00
04/12/2018	complaint	Commence preparation of discovery.	750.00 hr	1.10	1.10	825.00
04/12/2018	complaint	Travel to/fr. meeting with S Saltzman and A Tamburelli - conduct conference call and pre-trial planning.	750.00 hr	4.00	4.00	3,000.00
04/13/2018	complaint	Continued drafting of plaintiff's approximately 90 requests for admission to defendant and commenced drafting special interrogatories to defendant, set 2. Begin drafting deposition notice for 30B6 designees.	750.00 hr	9.50	9.50	7,125.00
04/14/2018	complaint	Continued drafting of plaintiff's discovery requests and start deposition notice for 30B6 designees.	750.00 hr	2.10	2.10	1,575.00

04/16/2018	complaint	Finalize drafting of plaintiffs requests for discovery, including Special Interrogatories and deposition notice for 30B6 designees. Complete drafting request for production of documents, set 4.	750.00 hr	9.10	9.10	6,825.00
04/16/2018	complaint	Receipt and review correspondence from Co-Counsel. Respond to same.	750.00 hr	0.40	0.40	300.00
04/16/2018	complaint	Receive, download, internally file and review ex parte application.	750.00 hr	0.50	0.50	375.00
04/16/2018	complaint	Telephonic conference with S Saltzman.	750.00 hr	0.20	0.20	150.00
04/16/2018	complaint	Receipt and review correspondence from Opposing Counsel.	750.00 hr	0.20	0.20	150.00
04/16/2018	complaint	Telephonic conference with A Tamburelli, J Orem and Defense Counsel B Schwan.	750.00 hr	0.40	0.40	300.00
04/16/2018	complaint	Revise discovery, Requests for Admissions and Special Interrogatories.	750.00 hr	3.90	3.90	2,925.00
04/16/2018	complaint	Telephonic conference with A Tamburelli.	750.00 hr	0.20	0.20	150.00
04/16/2018	complaint	Review draft deposition notice.	750.00 hr	0.50	0.50	375.00
04/16/2018	complaint	Review draft responses to defendant's discovery.	750.00 hr	0.70	0.70	525.00
04/16/2018	complaint	Telephonic conferences with Josh Orem.	750.00 hr	1.00	1.00	750.00
04/17/2018	complaint	Circulate draft discovery among cocounsel for review. Review new declarations for the named plaintiffs to support a motion for summary judgment.	750.00 hr	6.10	6.10	4,575.00
04/17/2018	complaint	Receive, download, internally file and review notice of "non-opposition" on ex parte application.	750.00 hr	1.30	1.30	975.00
04/18/2018	complaint	Finalize and execute all discovery and effectuate service of same.	750.00 hr	5.00	5.00	3,750.00
04/19/2018	complaint	Review preliminary draft of plaintiff's MSJ. Prepare editorial comments for same. Track down prior versions of plaintiff declarations in soft copy format, update and revise same, and review with clients to obtain an executed copies.	750.00 hr	7.90	7.90	5,925.00
04/19/2018	complaint	Receive, download, internally file and review reply brief on ex parte application and court's order denying application.	750.00 hr	0.50	0.50	375.00
04/23/2018	complaint	Receive, download, internally file and review stipulation for order approving class notice language.	750.00 hr	0.20	0.20	150.00
04/24/2018	complaint	Receive, download, internally file and review of court order on stipulation approving class notice language.	750.00 hr	0.50	0.50	375.00
04/25/2018	complaint	Review class notice and provide administrator with minor revisions to correct firm name and add toll-free number.	750.00 hr	1.00	1.00	750.00
04/27/2018	complaint	Communications with client Patton.	750.00 hr	0.50	0.50	375.00
05/01/2018	complaint	Draft correspondence to cocounsel in SCOTUS case.	750.00 hr	0.20	0.20	150.00
05/01/2018	complaint	Review opposition to Scotus petition.	750.00 hr	2.80	2.80	2,100.00
05/07/2018	complaint	Telephonic conference with class member.	750.00 hr	0.30	0.30	225.00
05/09/2018	complaint	Confer with cocounsel regarding status of Discovery and respond to correspondence from opposing counsel.	750.00 hr	1.30	1.30	975.00
05/09/2018	complaint	Receipt and review correspondence from Co-Counsel and response to same. Intra-office teleconferences regarding discovery issues. Draft intra-office correspondence.	750.00 hr	1.40	1.40	1,050.00
05/09/2018	complaint	Review correspondence among counsel.	750.00 hr	0.20	0.20	150.00
05/10/2018	complaint	Telephonic conference with class member.	750.00 hr	0.20	0.20	150.00
05/15/2018	complaint	Confer with Adam Tamburelli regarding status of Discovery and review response to opposing counsel regarding same.	750.00 hr	0.80	0.80	600.00
05/16/2018	complaint	Receipt and review correspondence from and Draft correspondence to Co-Counsel.	750.00 hr	0.50	0.50	375.00

05/16/2018	complaint	Receipt and review of correspondence from and to client in response to Co-Counsel Draft additional special interrogatories.	750.00 hr	0.20	0.20	150.00
05/16/2018	complaint	Continued research and drafting of interrogatories and correspondence to Co-Counsel.	750.00 hr	0.50	0.50	375.00
05/16/2018	complaint	Review discovery to determine time needed to respond. Telephonic conference with client Patton. Draft correspondence to Co-Counsel.	750.00 hr	1.40	1.40	1,050.00
05/18/2018	complaint	Receive, download, internally file and review notices of appearance of multiple attorneys for defendant.	750.00 hr	0.40	0.40	300.00
05/18/2018	complaint	Telephonic conference with client G Ortega.	750.00 hr	0.30	0.30	225.00
05/21/2018	complaint	Review and respond to correspondence among counsel.	750.00 hr	0.30	0.30	225.00
05/22/2018	complaint	Draft correspondence to Co-Counsel. Review and respond to multiple items of correspondence.	750.00 hr	0.50	0.50	375.00
05/22/2018	complaint	Revise special interrogatories set 4. Conduct further research re: same.	750.00 hr	0.50	0.50	375.00
05/23/2018	complaint	Commence drafting Plaintiff's response to Defendant's request for production of documents set number 3.	750.00 hr	3.90	3.90	2,925.00
05/25/2018	complaint	Finalize drafting of and serve Plaintiff's response to Defendant's request for production of documents set number 3.	750.00 hr	3.80	3.80	2,850.00
06/04/2018	complaint	Review notice of denial of petition for writ of certiorari might defendant to the US Supreme Court.	750.00 hr	0.40	0.40	300.00
06/04/2018	complaint	Receive, download, internally file a 2nd ex parte application for leave to file motion for summary judgment.	750.00 hr	0.30	0.30	225.00
06/05/2018	complaint	Receive, download, internally file and review Def.'s response to 2nd ex parte application for leave to file motion for summary judgment.	750.00 hr	0.70	0.70	525.00
06/06/2018	complaint	Receive, download, internally file and review scheduling order permitting bilateral motions for summary judgment.	750.00 hr	0.30	0.30	225.00
06/06/2018	complaint	Receive, download, internally file and review reply to Def.'s response to 2nd ex parte application for leave to file motion for summary judgment and court order denying ex parte application.	750.00 hr	0.40	0.40	300.00
06/08/2018	complaint	Prepare for and participate in conference call. Review cocounsel's memorandum regarding scheduling issues. Follow-up conferences with cocounsel.	750.00 hr	2.70	2.70	2,025.00
06/09/2018	complaint	Review optional responses to request for 60 depositions. Confer with cocounsel regarding same. Monitor communications with defense counsel	750.00 hr	3.00	3.00	2,250.00
06/10/2018	complaint	Telephonic conference with client Ortega.	750.00 hr	0.40	0.40	300.00
06/10/2018	complaint	Draft correspondence to clients.	750.00 hr	0.50	0.50	375.00
06/10/2018	complaint	Telephonic conference with client Patton.	750.00 hr	0.60	0.60	450.00
06/10/2018	complaint	Revise MSJ brief.	750.00 hr	2.00	2.00	1,500.00
06/11/2018	complaint	Research Judge Klausner's local rules with respect to formatting of filings, particularly the requirement for internal reference in briefs to all supporting documents that includes a docket number.	750.00 hr	1.90	1.90	1,425.00
06/12/2018	complaint	Receive, download, internally file Plaintiffs' motion for summary judgment.	750.00 hr	0.90	0.90	675.00
06/14/2018	complaint	Commence organization for depositions noticed by defendant in Sacramento, Modesto, Los Angeles, Irvine, Palo Alto, and Ontario.	750.00 hr	1.90	1.90	1,425.00
06/14/2018	complaint	Teleconference with Candice Rosevear and follow-up regarding same to prepare for expert testimony.	750.00 hr	2.30	2.30	1,725.00
06/15/2018	complaint	Continued preparation for deposition of class members.	750.00 hr	3.30	3.30	2,475.00
06/18/2018	complaint	Review Def.'s data dictionary. Coordinate with Mark Bradley and witnesses to schedule depositions.	750.00 hr	3.90	3.90	2,925.00

06/18/2018	complaint	Review Defendant's notice of intent to depose in ex parte filing permitting up to 30 depositions. Internal communications regarding same.	750.00 hr	0.50	0.50	375.00
06/19/2018	complaint	Receive, download, internally file and review of court's order regarding Def.'s ex parte application to take additional depositions.	750.00 hr	0.20	0.20	150.00
06/19/2018	complaint	Receive, download, internally file and preliminary review of Def.'s opposition application to file under seal related to Plaintiffs' motion for summary judgment including all 57 exhibits and memorandum in opposition to renewed Motion for summary judgment along with 57 additional exhibits.	750.00 hr	5.80	5.80	4,350.00
06/19/2018	complaint	Receive, download, internally file and preliminary review of Def.'s opposition to Plaintiffs' motion for summary judgment including all 31 exhibits.	750.00 hr	2.60	2.60	1,950.00
06/20/2018	complaint	Receive, download, internally file and preliminary review of defendant's application to file documents (including 28 exhibits) under seal and request to remove incorrectly file documents.	750.00 hr	2.50	2.50	1,875.00
06/20/2018	complaint	Receive, download, internally file and review of Plaintiffs' opposition to ex parte application or to take additional depositions.	750.00 hr	0.80	0.80	600.00
06/22/2018	complaint	Receive, download, internally file and review of court order granting defendant's motion to remove incorrectly file documents and granting application to file under seal.	750.00 hr	0.40	0.40	300.00
06/25/2018	complaint	Review Def.'s opposition to Motion for summary judgment, and confer with Adam regarding same. Prepare objections to evidentiary submissions. To confirm the scheduling of depositions and prepare deponents for same.	750.00 hr	5.30	5.30	3,975.00
06/25/2018	complaint	Review Def.'s opposition to Motion for summary judgment, and confer with Adam regarding same. Prepare objections to evidentiary submissions. To confirm the scheduling of depositions and prepare deponents for same.	750.00 hr	5.30	5.30	3,975.00
06/25/2018	complaint	Receive, download, internally file and review court order denying ex parte application for leave to take additional depositions.	750.00 hr	0.40	0.40	300.00
06/26/2018	complaint	Commence drafting meet and confer letter to Bradley Schwan regarding responses to written Discovery.	750.00 hr	3.20	3.20	2,400.00
06/26/2018	complaint	Draft lengthy correspondence to cocounsel. Attempt to coordinate with opposing counsel to schedule depositions for class members. Schedule with contingency plans, and seek to contact all class members whose deposition been noticed. Review stipulation regarding pretrial dates. Conduct further follow-up regarding scheduling calls.	750.00 hr	5.30	5.30	3,975.00
06/27/2018	complaint	Obtain suggested revisions from cocounsel on meet and confer letter, finalize, and serve on Bradley Schwan.	750.00 hr	2.00	2.00	1,500.00
06/27/2018	complaint	Revise and at a joint statement regarding proposed stipulation and provide comments to cocounsel Adam Tamburelli.	750.00 hr	1.20	1.20	900.00
06/27/2018	complaint	Travel to and defend deposition of witness/class member.	750.00 hr	8.40	8.40	6,300.00
06/27/2018	complaint	Receive, download, internally file and review stipulation for order set pretrial dates, notice of appearance of counsel for plaintiff, Barbara Duvan-Clarke and joint statement regarding proposed stipulation.	750.00 hr	0.60	0.60	450.00
06/28/2018	complaint	Continue preparing witnesses for depositions, organizing counsel to cover 8 depositions throughout California, and also prepare for depositions noticed by plaintiff.	750.00 hr	4.20	4.20	3,150.00
06/28/2018	complaint	Teleconference with experts including preparation for the same.	750.00 hr	1.30	1.30	975.00
06/28/2018	complaint	Receive, download, internally file and review of court order denying stipulation for order set pretrial dates.	750.00 hr	0.30	0.30	225.00

07/02/2018	complaint	Receive, download, internally file and commence preliminary review of defendant's application to file documents under seal with 37 documents, sealed declaration along with 38 exhibits, Defendant's motion for partial summary judgment with 42 exhibits and Motion for decertification with 46 exhibits.	750.00 hr	9.00	9.00	6,750.00
07/03/2018	complaint	Draft additional meet and confer to Bradley Schwan regarding Defendant's discovery responses.	750.00 hr	1.80	1.80	1,350.00
07/03/2018	complaint	Draft additional meet and confer to Bradley Schwan regarding Defendant's discovery responses. Teleconference with cocounsel. Prepare for PMK depositions.	750.00 hr	2.40	2.40	1,800.00
07/03/2018	complaint	Receive, download, internally file and review order regarding application to file under seal pursuant to protective order.	750.00 hr	0.30	0.30	225.00
07/05/2018	complaint	Receive and review scheduling notice regarding Plaintiffs' motion for partial summary judgment.	750.00 hr	0.20	0.20	150.00
07/05/2018	complaint	Receive, download, internally file and review Plaintiff's ex parte application for relief from deadlines related to certain expert witnesses and sealed documents of supporting exhibits regarding the notice of Motion and Motion for partial summary judgment filed by defendant with 36 attachments.	750.00 hr	5.20	5.20	3,900.00
07/06/2018	complaint	Prepare objections to declarations of McMahon and Edelman.	750.00 hr	4.60	4.60	3,450.00
07/07/2018	complaint	Review rule 26 disclosures and determine what additional changes must be made in compliance with the rule.	750.00 hr	6.30	6.30	4,725.00
07/09/2018	complaint	Receive, download, internally file and review Plaintiff's application file exhibits under seal, opposition to defendant's Motion for partial summary judgment and opposition to Motion for decertification.	750.00 hr	3.80	3.80	2,850.00
07/10/2018	complaint	Receive, download, internally file and review of sealed declaration and related documents.	750.00 hr	1.60	1.60	1,200.00
07/16/2018	complaint	Receive, download, internally file and review of application file documents ISO Defendant's reply under seal, sealed declaration, and reply briefs ISO defendants MSJ and motion to decertify as well as order granting plaintiffs ex parte application for relief from deadlines related to expert witnesses.	750.00 hr	4.00	4.00	3,000.00
07/17/2018	complaint	Receive, download, internally file and review of Defendant's motion for leave to take additional depositions along with 19 attachments.	750.00 hr	2.90	2.90	2,175.00
07/20/2018	complaint	Receive, download, internally file and review Def.'s response to plaintiff's objections to defendant's evidence ISO reply ISO motion to decertify.	750.00 hr	0.80	0.80	600.00
07/23/2018	complaint	Receive, download, internally file and review of court's order granting in part Plaintiffs' motion for partial summary judgment. Review implications of same, and conduct conference with cocounsel.	750.00 hr	3.00	3.00	2,250.00
07/24/2018	complaint	Receive, download, internally file and review of stipulation to continue pretrial conference and Plaintiffs' reply brief in opposition to Motion for leave to take additional depositions.	750.00 hr	0.60	0.60	450.00
07/25/2018	complaint	Prepare and serve discovery responses.	750.00 hr	7.10	7.10	5,325.00
07/25/2018	complaint	Telephonic conference with client G Ortega.	750.00 hr	0.60	0.60	450.00
07/25/2018	complaint	Receive, download, internally file and review of court scheduling notice taking hearings on the defendant's motions for decertification and summary judgment off calendar and motions under submission.	750.00 hr	0.30	0.30	225.00
07/26/2018	complaint	Receive, download, internally file and review of court order advancing pretrial conference.	750.00 hr	0.30	0.30	225.00

Date	Event Type	Description	Hours	Rate	Amount
07/27/2018	complaint	Receive, download, internally file and review of court order regarding stipulation to continue pretrial conference.	750.00 hr	0.30	225.00
08/01/2018	complaint	Receive, download, internally file and review of notice of supplemental authority ISO opposition to Motion to decertify the class.	750.00 hr	0.40	300.00
08/01/2018	complaint	Receive, download, internally file and review of court order regarding stipulation to adjourn final pretrial conference.	750.00 hr	0.20	150.00
08/06/2018	complaint	Prepare draft motions in limine and assist in editing motions drafted by Adam Tamburelli.	750.00 hr	4.80	3,600.00
08/06/2018	complaint	Receive, download, internally file and review of response to court order regarding stipulation to adjourn final pretrial conference.	750.00 hr	0.30	225.00
08/07/2018	complaint	Prepare draft motions in limine and assist in editing motions drafted by Adam Tamburelli.	750.00 hr	3.40	2,550.00
08/07/2018	complaint	Receive, download, internally file and review of court order on Motion for decertification and Motion for partial summary judgment. Confer with cocounsel and clients. Also download and review minutes regarding Defendant's motion for leave to take additional depositions.	750.00 hr	2.80	2,100.00
08/08/2018	complaint	Prepare draft motions in limine and assist in editing motions drafted by Adam Tamburelli.	750.00 hr	7.50	5,625.00
08/08/2018	complaint	Receive, download, internally file and review of notice of withdrawal of motion for leave regarding discovery.	750.00 hr	0.30	225.00
08/10/2018	complaint	Assist in finalizing motions in limine for filing.	750.00 hr	4.00	3,000.00
08/15/2018	complaint	Receive, download, internally file and initial review of memoranda of contentions of fact and law filed by both sides, joint exhibit list, witness list and joint stipulation to state the case pending Ninth Circuit's ruling on Plaintiff's 23f petition and defendant's motion in limine to exclude supplemental, amended expert opinions.	750.00 hr	3.90	2,925.00
08/17/2018	complaint	Receive, download, internally file and review Court's orders denying application to seal documents and denying stipulation to stay trial pending petition for permission to appeal pursuant to Federal Rules of Civil Procedure 23 (F).	750.00 hr	0.60	450.00
08/22/2018	complaint	Prepare draft pretrial conference order.	750.00 hr	5.30	3,975.00
08/23/2018	complaint	Continue revisions to draft pretrial conference order.	750.00 hr	4.20	3,150.00
08/24/2018	complaint	Finalize revisions to draft pretrial conference order, incorporating joint portions of same, file and serve.	750.00 hr	3.80	2,850.00
08/28/2018	complaint	Receive, download, internally file and review Def.'s voir dire questions and finalize and file Plaintiff's voir dire questions, and download and internally file court-filed documents.	750.00 hr	4.30	3,225.00
08/30/2018	complaint	Receive, download, internally file and review declaration of Adam Tamburelli ISO plaintiff's motion in limine number 5, narrative statement of expert qualifications by both sides.	750.00 hr	0.70	525.00
09/04/2018	complaint	Travel to and attend pretrial conference. Confer with cocounsel after hearing.	750.00 hr	4.80	3,600.00
09/05/2018	complaint	Receive, download, internally file and review Order granting application file under seal.	750.00 hr	0.20	150.00
09/06/2018	complaint	Receive, download, internally file and review Def.'s Supp. to Motion in limine #1 to preclude testimony etc. that activity based pay does not violate California law.	750.00 hr	2.50	1,875.00
09/12/2018	complaint	Receive, download, internally file and review notice of settlement.	750.00 hr	0.20	150.00
09/19/2018	complaint	Receive, download, internally file and review orders regarding notice of settlement and scheduling of future proceedings.	750.00 hr	1.30	975.00

09/26/2018	complaint	Receive, download, internally file and review of Plaintiff's motion to reschedule certain settlement approval deadlines and exceed page limitations.	750.00 hr	0.30		225.00
09/28/2018	complaint	Receive, download, internally file and review Court's orders on stipulation to reschedule certain settlement approval deadlines and exceed page limitations. Update calendar to reflect new court orders.	750.00 hr	0.70	0.70	525.00
10/02/2018	complaint	Receive, download, and internally file a motion for preliminary approval and stipulation for leave to file 2nd amended complaint.	750.00 hr	0.50	0.50	375.00
10/03/2018	complaint	Receive, download, and internally file order approving stipulation for leave to file 2nd amended complaint.	750.00 hr	0.20	0.20	150.00
11/27/2018	complaint	Receive, download, internally file and review of court orders granting preliminary approval. Confer with clients and cocounsel.	750.00 hr	2.00	2.00	1,500.00
11/30/2018	complaint	Receive, download, internally file and review of joint ex parte application to include supplemental letter with class notice.	750.00 hr	0.30	0.30	225.00

Total Labor For Paul Cullen **1594.80** **1594.80** **1,196,100.00**
 Total Expense For Paul Cullen 0.00 0.00
 Total For Paul Cullen **1,196,100.00**

The Cullen Law Firm, APC - Client Summary

#15244

Date Start: 12/1/2006 | Date End: 12/28/2018 | Clients: Ortega, Gerardo v. JB Hunt | Projects: complaint,Complaint | Users: Craig S Pynes | Account Managers: All

Date	Project	Description	Rate/ Unit Price	Labor Time/ Quantity	Billable Time/ Cost Price	Bill Amt/ Sell Price
Ortega, Gerardo v. JB Hunt						
Craig Pynes						
08/15/2011	complaint	Review and respond to emails with Paul re: DUI issue; telephone conference with him re: same; telephone calls to prospective counsel re: same;	695.00 hr	0.30	0.30	208.50
08/19/2011	complaint	Meet with Stan and Paul re: rehabilitating and defending Ortega against his drunk driving issue; review emails exchanged with Mr. Ortega re: same;	695.00 hr	0.20	0.20	139.00
03/28/2012	complaint	Discuss with Paul re: anticipated impact of Brinker/ Brinkley decision;	695.00 hr	0.10	0.10	69.50
04/20/2012	complaint	Discuss with Paul re: coordinating workup with Kiley;	695.00 hr	0.10	0.10	69.50
04/24/2012	complaint	Discuss with Paul re: workup in light of Brinker decision;	695.00 hr	0.10	0.10	69.50
05/08/2012	complaint	Review notice of decision; discuss case cert issues with Paul;	695.00 hr	0.25	0.25	173.75
05/11/2012	complaint	Review letter from Littler re: basis for their reconsideration motion; prepare email to Paul re: same;	695.00 hr	0.20	0.20	139.00
05/14/2012	complaint	Review order re: judicial reassignment; discuss same with Christina; discuss same with Paul;	695.00 hr	0.25	0.25	173.75
05/15/2012	complaint	Review information on new judge; discuss same with Christina; prepare email to Paul re: same; review minute order re: magistrate judge assignment;	695.00 hr	0.30	0.30	208.50
05/18/2012	complaint	Review civil minutes re: case transfer; review emails re: same;	695.00 hr	0.20	0.20	139.00
08/06/2012	complaint	Discuss with Paul re: case status and further workup;	695.00 hr	0.10	0.10	69.50
08/10/2012	complaint	Review STATEMENT Joint Statement Regarding Lifting of Stay and Scheduling of Status and email re: same;	695.00 hr	0.20	0.20	139.00
08/13/2012	complaint	Review Joint Statement re: Lifting Stay and email re: same;	695.00 hr	0.20	0.20	139.00
08/23/2012	complaint	Review Scheduling Notice;	695.00 hr	0.10	0.10	69.50
08/27/2012	complaint	Meet with Christina re: this morning's hearing; discuss results of hearing with her and Stan;	695.00 hr	0.30	0.30	208.50
08/28/2012	complaint	Review Minutes of court's CMC ruling; review emails and discuss with other attorneys;	695.00 hr	0.20	0.20	139.00
08/31/2012	complaint	Review new UD complaint against client; prepare emails to Paul and M & S re: same; meet with Mark re: same; discuss same with Paul;	695.00 hr	0.60	0.60	417.00
09/10/2012	complaint	Review court minutes re: lifting of stay;	695.00 hr	0.10	0.10	69.50
09/17/2012	complaint	Review Summons and Complaint against Ortega; review and respond to emails re: same;	695.00 hr	0.40	0.40	278.00
09/27/2012	complaint	Begin reviewing motion to decertify class action and supporting documents; discuss workup and calendaring with Paul; calculate due date for same;	695.00 hr	1.20	1.20	834.00
10/01/2012	complaint	Meet with Sandy re: calendaring applicable deadlines; review applicable code sections re: same; prepare email to Paul re: same and Christina's workup on ex parte application on same; review and respond to emails re: same; review and respond to emails re: stipulation and proposed order on continuing deadlines and hearing date on motion to decertify	695.00 hr	1.90	1.90	1,320.50

		class; prepare stipulation and proposed order on same; review and respond to emails re: same; discuss same with Paul;				
10/03/2012	complaint	Review emails re: changes to stipulation to extend hearing date and deadlines; review revised stipulation;	695.00 hr	0.25	0.25	173.75
10/05/2012	complaint	Review court's Minute Order and final stipulation;	695.00 hr	0.20	0.20	139.00
10/08/2012	Complaint	Review order granting Joint Stipulation and email re: same;	695.00 hr	0.20	0.20	139.00
10/11/2012	complaint	Review and respond to emails re: upcoming deadlines;	695.00 hr	0.20	0.20	139.00
10/16/2012	complaint	Review motion to decertify class;	695.00 hr	1.50	1.50	1,042.50
10/18/2012	complaint	Attend internal meeting re: workup on opposition to motion to decertify class; meet with Paul re: same;	695.00 hr	1.90	1.90	1,320.50
10/19/2012	complaint	Research re: actual injury and individualized proof issues for opposition to motion to decertify class; discuss same with Christina; prepare section addressing same;	695.00 hr	2.80	2.80	1,946.00
10/22/2012	complaint	Meet with Paul re: case status and workup;	695.00 hr	0.20	0.20	139.00
10/25/2012	complaint	Extended discussion with Kiley re: workup on opposition to motion for decertification;	695.00 hr	0.40	0.40	278.00
10/25/2012	complaint	Review multiple cases cited in moving papers and key cases; discuss motion and case workup with Paul and Christina;	695.00 hr	2.40	2.40	1,668.00
10/26/2012	complaint	Discuss with Paul re: status of workup on motion for class certification; meet with Christina re: workup issues on Opposition brief and evidentiary objections; review opposition brief and paystub section and prepare email to her re: same; continue preparing my portion of opposition brief; prepare emails re: same; review and revise evidentiary objections; discuss same with Christina; discuss revisions with Kiley;	695.00 hr	3.50	3.50	2,432.50
10/29/2012	complaint	Review revised versions of Opposition to Motion to Decertify Class Action and multiple emails re: same; research and draft request for judicial notice for exhibits in support of opposition brief; review online materials re: signed and passed Senate Bill;	695.00 hr	2.80	2.80	1,946.00
11/28/2012	complaint	Review reply brief and emails re: same;	695.00 hr	0.40	0.40	278.00
11/30/2012	complaint	Review Reply in support of Decertification and request for judicial notice;	695.00 hr	0.80	0.80	556.00
12/06/2012	complaint	Review detailed email from Christina H. re: reply brief and further workup on same;	695.00 hr	0.20	0.20	139.00
12/10/2012	complaint	Review and respond to emails with Christina H. re: workup issues on decert reply; review JB Hunt reply brief on decert;	695.00 hr	1.60	1.60	1,112.00
12/11/2012	complaint	Review and respond to email with Christina H. re: further briefing on decert motion; discuss same with her;	695.00 hr	0.20	0.20	139.00
12/12/2012	complaint	Meet with Christina re: research on various issues; research same; prepare email to Christina re: same; discuss same with Paul;	695.00 hr	2.70	2.70	1,876.50
12/13/2012	complaint	Work with Jody re: locating cases for case notebook;	695.00 hr	0.40	0.40	278.00
12/13/2012	complaint	Research issues for Monday's decert hearing; prepare multiple emails to Christina H. re: same;	695.00 hr	2.70	2.70	1,876.50
12/14/2012	complaint	Further research for Monday's Decert hearing; review and respond to email with Stan re: same; meet with Christina re: same; review and respond to emails with Christina re: same; read and annotate key cases; make copies of same; meetings with Stan and Christina re: same; review article analyzing SB 1255; prepare for formal firm meeting re: wage statement issues; meet with Christina to discuss issues;	695.00 hr	4.10	4.10	2,849.50
12/17/2012	complaint	Review emails re: Sunday's conference call; discuss workup with Paul; review online re: tentative ruling;	695.00 hr	0.40	0.40	278.00

Date	Case Type	Description	Hours	Rate	Amount	Balance
12/18/2012	complaint	Review court filing discuss with various persons re: same;	695.00 hr	0.30	208.50	208.50
12/19/2012	complaint	Extended discussion with Stan re: anticipated issues and workup on pre-emption issues and cross- MSJs;	695.00 hr	0.40	278.00	
01/02/2013	complaint	Review emails re: circulating and sending out notice; review Balasanyan decision and emails re: same;	695.00 hr	0.75	521.25	
01/03/2013	complaint	Review email re: changes to LC 226 and review statute; prepare email to Paul re: same;	695.00 hr	0.20	139.00	
01/31/2013	complaint	Review notice of Scheduling Conference and emails re: same;	695.00 hr	0.20	139.00	
02/05/2013	complaint	Review system re: key letters from last year; discuss same with Christina;	695.00 hr	0.20	139.00	
02/08/2013	complaint	Review email from court re: rescheduling status conference;	695.00 hr	0.10	69.50	
02/11/2013	complaint	Discuss case issues with Stan and Mark; discuss conference call stay issues with Paul;	695.00 hr	0.40	278.00	
02/25/2013	complaint	Review motion to stay and supporting documents;	695.00 hr	1.25	868.75	
02/26/2013	complaint	Review motion to stay documents and emails re: same;	695.00 hr	0.80	556.00	
03/04/2013	complaint	Review Opposition to Motion to Stay and supporting documents;	695.00 hr	1.00	695.00	
04/23/2013	complaint	Review stay decision and emails re: same; discuss same with Stan;	695.00 hr	0.50	347.50	
04/25/2013	complaint	Review email re: notice and settlement issues; discuss same with Stan;	695.00 hr	0.25	173.75	
05/02/2013	complaint	Review meet and confer letter re: anticipated motion for judgment on the pleadings on FAAAA claim; prepare email to Paul re: same; discuss same with Paul;	695.00 hr	0.50	347.50	
05/03/2013	complaint	Review order re: case reassignment and emails re: same;	695.00 hr	0.20	139.00	
05/08/2013	complaint	Review meet and confer letter re: FAAAA issues;	695.00 hr	0.25	173.75	
05/09/2013	complaint	Review file and prepare email to Lou Marlin re: case status and workup;	695.00 hr	0.40	278.00	
05/13/2013	complaint	Review Pelkey decision; review and respond to emails re: same;	695.00 hr	1.25	868.75	
05/16/2013	complaint	Review emails re: meet and confer letter; review letter;	695.00 hr	0.25	173.75	
05/20/2013	complaint	Review MINUTE ORDER IN CHAMBERS and emails re: same;	695.00 hr	0.20	139.00	
05/24/2013	complaint	Review JB Hunt's motion for judgment on the pleadings and supporting declarations;	695.00 hr	0.80	556.00	
05/28/2013	complaint	Review court's SCHEDULING NOTICE on motion for judgment on the pleadings and email re: same; continue reviewing motion for judgment on the pleadings and supporting documents;	695.00 hr	1.40	973.00	
06/04/2013	complaint	Discuss with Paul and Christina re: case status and opposition to FAAAA motion;	695.00 hr	0.25	173.75	
06/10/2013	complaint	Review Joint Statement Re Trial Schedule and Status of Case and related documents; review and respond to emails re: calendaring deadlines on D's motion for judgment on the pleadings;	695.00 hr	0.60	417.00	
06/13/2013	complaint	Review Scheduling Notice; discuss with Paul re: results of his meeting with Stan and Mark;	695.00 hr	0.30	208.50	
06/20/2013	Complaint	Review and respond to emails re: 1) Defendant's Motion for Judgment on the Pleadings; and 2) Scheduling Conference; discuss with Paul re: attorneys fees split;	695.00 hr	0.30	208.50	
06/25/2013	complaint	Review Opposition to Motion for Judgment on the Pleadings and supporting documents;	695.00 hr	1.60	1,112.00	
06/26/2013	complaint	Continue reviewing opposition to motion for judgment on the pleadings;	695.00 hr	0.50	347.50	
07/02/2013	Complaint	Review reply brief in support of motion for judgment on the pleadings and emails re: same;	695.00 hr	1.50	1,042.50	

Date	Case Type	Description	Hours	Rate	Amount
07/03/2013	complaint	Review Scheduling Notice	695.00 hr	0.20	139.00
07/08/2013	complaint	Review article threatening attorneys with sanctions in Wage sets; review emails re: same;	695.00 hr	0.50	347.50
07/09/2013	complaint	Review emails re: judge's participation in pilot program;	695.00 hr	0.10	69.50
07/16/2013	complaint	Review Request for Judicial Notice and accompanying supporting documents on motion for judgment on the pleadings;	695.00 hr	0.30	208.50
07/18/2013	complaint	Discussions re: today's hearing;	695.00 hr	0.20	139.00
07/19/2013	complaint	Review Notice of Reassignment of case; review MINUTES OF MOTION HEARING AND SCHEDULING CONFERENCE;	695.00 hr	0.30	208.50
07/22/2013	complaint	Review Minutes Re Motion for JOP and Scheduling Conference setting Trial Date; review transcript order;	695.00 hr	0.25	173.75
07/23/2013	complaint	Review recent decision of Schwann v. Fedex Ground Package System; review and respond to emails re: upcoming deadlines; review second set of production requests;	695.00 hr	0.80	556.00
07/24/2013	complaint	Review court notice re: transcript order; review and respond to multiple emails re: scheduling issues;	695.00 hr	0.25	173.75
07/26/2013	complaint	Discuss with Paul re: obtaining depo transcripts; follow up with Angela re: same;	695.00 hr	0.30	208.50
07/30/2013	complaint	Prepare PMK deposition notice;	695.00 hr	0.30	208.50
07/31/2013	Complaint	Review NOTICE OF FILING TRANSCRIPT	695.00 hr	0.10	69.50
08/01/2013	complaint	Review Transcript of hearing 7-18-13;	695.00 hr	0.40	278.00
08/05/2013	complaint	Discuss with Paul re: status and workup;	695.00 hr	0.20	139.00
08/07/2013	Complaint	Review Joint STIPULATION for Leave to for Approval of Class Notice Language	695.00 hr	0.20	139.00
08/09/2013	complaint	Review court order re: language for class notice; discuss same with Paul;	695.00 hr	0.30	208.50
08/14/2013	complaint	Review and respond to emails re: JBH cases; compile cases for notebook; begin reviewing same;	695.00 hr	1.50	1,042.50
08/15/2013	Complaint	Review and respond to emails re: compiling and adding to notebooks; print out additional cases from westlaw and begin reading numerous cases for MSJ workup; discuss with Paul re: notebook compilation and workup on MSJ; meet with Stan, Christina and Leslie re: workup on MSJ; continue reviewing cases; review Interrogatories, Set 2, and Request for Production, Set 3	695.00 hr	3.50	2,432.50
08/16/2013	Complaint	Continue reviewing notebook cases; discuss same with Stan;	695.00 hr	2.75	1,911.25
08/19/2013	Complaint	Review REQUEST FOR JUDICIAL NOTICE re MOTION for Judgment on the Pleadings; continue reviewing notebook cases; review Burnham decision; discuss same with Stan, Paul and Kiley;	695.00 hr	2.70	1,876.50
08/20/2013	Complaint	Review request for judicial notice and request to strike improper argument in same; review emails re: same;	695.00 hr	0.40	278.00
08/21/2013	Complaint	Review Defendant's Ex Parte Application to Defer Class Notice and our Opposition to same; discuss same with Paul;	695.00 hr	0.80	556.00
08/22/2013	Complaint	Review court order granting defendant's ex parte application and email re: same;	695.00 hr	0.20	139.00
08/23/2013	Complaint	Review and respond to emails re: upcoming schedule;	695.00 hr	0.20	139.00
08/27/2013	Complaint	Review Notice of Appearance or Withdrawal of Counsel: for attorney Fatemeh S Mashouf counsel for Defendant J. B. Hunt Transport, Inc	695.00 hr	0.20	139.00
08/28/2013	Complaint	Continue reviewing Piece Rate Cases;	695.00 hr	1.75	1,216.25

Total Labor For Craig Pynes	72.50	50,387.50
Total Expense For Craig Pynes	0.00	0.00
Total For Craig Pynes		50,387.50

Barbara Duvan-Clarke

Date	Description	Labor Time	Rate	Bill Amount
6/11/2018	A105 Communicate (in firm) Call with PTC re motion for summary judgment requirements	0.20	\$625.00	\$125.00
6/22/2018	A103 Draft/revise Draft and attempt to file notice of appearance	0.30	\$625.00	\$187.50
6/22/2018	A103 Draft/revise Draft/revise meet and confer letter; email same to PTC	0.90	\$625.00	\$562.50
6/22/2018	A105 Communicate (in firm) Call with PTC re meet and confer and defendant's opp to MSJ	0.20	\$625.00	\$125.00
6/22/2018	A105 Communicate (in firm) Call with PTC re meet and confer letter	0.30	\$625.00	\$187.50
6/22/2018	A105 Communicate (in firm) Read/review emails re scheduling	0.10	\$625.00	\$62.50
6/25/2018	A104 Review/analyze Review/analyze Defendant's responses to RFA and Special Rogs	0.80	\$625.00	\$500.00
6/27/2018	A102 Research Research motion to compel filing requirements; email findings to PTC	0.50	\$625.00	\$312.50
6/27/2018	A103 Draft/revise Draft/revise meet and confer letter	0.50	\$625.00	\$312.50
6/27/2018	A103 Draft/revise Draft/revise meet and confer letter and send to PTC	0.30	\$625.00	\$187.50
6/27/2018	A103 Draft/revise Finalize and file notice of appearance of counsel	0.20	\$625.00	\$125.00
6/27/2018	A103 Draft/revise Research and draft/revise meet and confer letter	1.00	\$625.00	\$625.00
6/27/2018	A105 Communicate (in firm) Call with PTC re meet and confer letter	0.30	\$625.00	\$187.50
6/27/2018	A105 Communicate (in firm) Call with PTC re meet and confer revisions	0.10	\$625.00	\$62.50
6/27/2018	A105 Communicate (in firm) Call with PTC re motion to compel requirements	0.10	\$625.00	\$62.50
6/27/2018	A105 Communicate (in firm) Read/reply to email from PTC	0.10	\$625.00	\$62.50
6/27/2018	A107 Communicate (other outside counsel) Read/review emails between PTC and AT re meet and confer letter	0.10	\$625.00	\$62.50
6/28/2018	A107 Communicate (other outside counsel) Read/review email chain re Alfonzo Rhodes	0.10	\$625.00	\$62.50
6/28/2018	A108 Communicate (other external) Read/review final meet and confer letter sent to opposing counsel by PTC	0.10	\$625.00	\$62.50
7/2/2018	A104 Review/analyze Review incoming motion for summary judgment documents	0.10	\$625.00	\$62.50
7/3/2018	A108 Communicate (other external) Multiple emails with opposing counsel and co-counsel re obtaining copies of filed documents	0.20	\$625.00	\$125.00
7/7/2018	A102 Research Research grounds for objection to Edelman declaration; email findings to PTC	0.50	\$625.00	\$312.50

7/7/2018	A102 Research Research incomplete declaration evidence	0.50	\$625.00	\$312.50
7/7/2018	A103 Draft/revise Draft objection to Declaration of Edelman	0.30	\$625.00	\$187.50
7/7/2018	A103 Draft/revise Draft/revise objection to McMahon declaration	0.80	\$625.00	\$500.00
7/7/2018	A103 Draft/revise Draft/revise proposed language for objection to McMahon Declaration	0.30	\$625.00	\$187.50
7/7/2018	A103 Draft/revise Final revision to objection to Decl of McMahon	0.20	\$625.00	\$125.00
7/7/2018	A103 Draft/revise Revisions to objection to declaration of Edelman	0.20	\$625.00	\$125.00
7/7/2018	A104 Review/analyze Review evidence in support of defendant's expert declarations	0.20	\$625.00	\$125.00
7/7/2018	A104 Review/analyze Review motion to decertify class	0.40	\$625.00	\$250.00
7/7/2018	A105 Communicate (in firm) Call with PTC re declarations in support of motion to decertify class	0.30	\$625.00	\$187.50
7/7/2018	A105 Communicate (in firm) Call with PTC re objections	0.30	\$625.00	\$187.50
7/7/2018	A105 Communicate (in firm) Read email from PTC re decl of Edelman	0.10	\$625.00	\$62.50
7/7/2018	A105 Communicate (in firm) Read response by PTC to my emails	0.10	\$625.00	\$62.50
7/7/2018	A105 Communicate (in firm) Read response from PTC to my email	0.10	\$625.00	\$62.50
7/7/2018	A105 Communicate (in firm) Read/reply to email from PTC re McMahon decl	0.10	\$625.00	\$62.50
7/7/2018	A105 Communicate (in firm) Read/review proposed response; read/review continued email chain from co-counsel	0.20	\$625.00	\$125.00
7/7/2018	A107 Communicate (other outside counsel) Email objections to Declaration of McMahon to co-counsel	0.10	\$625.00	\$62.50
7/7/2018	A107 Communicate (other outside counsel) Send proposed objection to Edelman declaration to co-counsel	0.10	\$625.00	\$62.50
7/8/2018	A104 Review/analyze Review/analyze draft of opp to motion to de-certify	0.70	\$625.00	\$437.50
7/8/2018	A105 Communicate (in firm) Read/review email from PTC re depo transcripts	0.10	\$625.00	\$62.50
7/8/2018	A107 Communicate (other outside counsel) Read/reply to email from co-counsel re draft of opp to motion to decertify	0.10	\$625.00	\$62.50
7/9/2018	A102 Research Research Judge's standing order re page limit	0.10	\$625.00	\$62.50
7/9/2018	A103 Draft/revise Draft/revise objections to evidence	0.80	\$625.00	\$500.00

7/9/2018	A105 Communicate (in firm) Call with PTC re final revisions to opp motion for decertification	0.10	\$625.00	\$62.50
7/9/2018	A105 Communicate (in firm) Email Judge's standing order re page limit to PTC	0.10	\$625.00	\$62.50
7/9/2018	A105 Communicate (in firm) Read/reply to email from PTC re standing order	0.10	\$625.00	\$62.50
7/9/2018	A107 Communicate (other outside counsel) Read/review multiple emails between PTC and co-counsel re opp to MSJ	0.20	\$625.00	\$125.00
7/11/2018	A108 Communicate (other external) Read PTC email to co-counsel with Rule 26 disclosures and attachment	0.10	\$625.00	\$62.50
7/11/2018	A108 Communicate (other external) Read/review response from co-counsel re Rule 26 disclosures	0.10	\$625.00	\$62.50
7/17/2018	A104 Review/analyze Read/review Reply briefing and order re timing	0.40	\$625.00	\$250.00
7/25/2018	A104 Review/analyze Read/review court's order on plaintiffs' partial msj	0.20	\$625.00	\$125.00
7/26/2018	A105 Communicate (in firm) Call with PTC re ruling on plaintiffs' motion for partial summary judgement	0.20	\$625.00	\$125.00
7/30/2018	A105 Communicate (in firm) Call with PTC re upcoming trial and motions in limine	0.20	\$625.00	\$125.00
8/1/2018	A105 Communicate (in firm) Call with PTC re trial prep	0.10	\$625.00	\$62.50
8/1/2018	A108 Communicate (other external) Read/reply to email from co-counsel re meeting tomorrow.	0.10	\$625.00	\$62.50
8/2/2018	A105 Communicate (in firm) Meeting with Marlin & Saltzman	1.70	\$625.00	\$1062.50
8/2/2018	A108 Communicate (other external) Conference call with opposing counsel re pretrial matters	1.30	\$625.00	\$812.50
8/2/2018	E109 Local travel Travel from meeting with Marlin & Saltzman	1.50	\$625.00	\$937.50
8/2/2018	E109 Local travel Travel to meeting with Marlin & Saltzman	1.90	\$625.00	\$1187.50
8/3/2018	A105 Communicate (in firm) Call with PTC re client calls for trial witnesses	0.60	\$625.00	\$375.00
8/3/2018	A105 Communicate (in firm) Follow up email with PTC re client calls for trial witnesses	0.10	\$625.00	\$62.50
8/4/2018	A106 Communicate (with client) Call with DeFalco re trial testimony	0.40	\$625.00	\$250.00
8/4/2018	A106 Communicate (with client) Call with Jason Hampton re trial testimony	0.40	\$625.00	\$250.00
8/4/2018	A106 Communicate (with client) Call with Tony Hall re trial witness	0.50	\$625.00	\$312.50
8/4/2018	A106 Communicate (with client) Calls to class members on list; left messages and updated notes	1.40	\$625.00	\$875.00
8/4/2018	A106 Communicate (with client) Follow up email to Jason Hampton re EDD testimony	0.10	\$625.00	\$62.50
8/4/2018	A106 Communicate (with client) Left message for class member re testifying	0.10	\$625.00	\$62.50

8/4/2018	A107 Communicate (other outside counsel) Email team re status of witness calls	0.10	\$625.00	\$62.50
8/4/2018	A107 Communicate (other outside counsel) Read/review email from M&S re client list for calls	0.10	\$625.00	\$62.50
8/4/2018	A107 Communicate (other outside counsel) Read/review emails from Adam and Stan re experts and trial theories	0.20	\$625.00	\$125.00
8/5/2018	A105 Communicate (in firm) Call with PTC re pretrial items	0.30	\$625.00	\$187.50
8/6/2018	A105 Communicate (in firm) Read/reply to email from PTC re witness contacts	0.10	\$625.00	\$62.50
8/6/2018	A106 Communicate (with client) Call with Javier Cruz re testimony	0.20	\$625.00	\$125.00
8/6/2018	A106 Communicate (with client) Call with Richard Fuentes re trial testimony	0.50	\$625.00	\$312.50
8/6/2018	A106 Communicate (with client) Left follow up messages for clients re testifying	0.30	\$625.00	\$187.50
8/6/2018	A107 Communicate (other outside counsel) Email with PTC re MIL list	0.10	\$625.00	\$62.50
8/6/2018	A107 Communicate (other outside counsel) Follow up email to M&S re proposed MIL addition	0.10	\$625.00	\$62.50
8/6/2018	A107 Communicate (other outside counsel) Read/reply to email from M&S re MILs	0.10	\$625.00	\$62.50
8/6/2018	A107 Communicate (other outside counsel) Read/reply to email from M&S re MILs	0.10	\$625.00	\$62.50
8/7/2018	A102 Research Research for MILs	0.30	\$625.00	\$187.50
8/7/2018	A104 Review/analyze Review/analyze cases for MILs	0.30	\$625.00	\$187.50
8/7/2018	A105 Communicate (in firm) Multiple emails with PTC re conference call	0.10	\$625.00	\$62.50
8/7/2018	A106 Communicate (with client) Read/reply to email from Jason Hampton	0.10	\$625.00	\$62.50
8/7/2018	A107 Communicate (other outside counsel) Read/reply to email from SS re MILs	0.10	\$625.00	\$62.50
8/7/2018	A107 Communicate (other outside counsel) Read/review email from SS re MIL exemplars	0.10	\$625.00	\$62.50
8/8/2018	A102 Research Research for motions in limine	0.30	\$625.00	\$187.50
8/8/2018	A103 Draft/revise Draft motion in limine	0.10	\$625.00	\$62.50
8/8/2018	A104 Review/analyze Read/review court's ruling on defendant's motion for decertification and summary adjudication	0.20	\$625.00	\$125.00
8/8/2018	A105 Communicate (in firm) Call with PTC re decertification ruling	0.10	\$625.00	\$62.50
8/8/2018	A106 Communicate (with client) Call with Stephen Creech	0.20	\$625.00	\$125.00
8/9/2018	A102 Research Research for MIL No. 11	0.20	\$625.00	\$125.00
8/9/2018	A102 Research Research LC 226 issue	0.20	\$625.00	\$125.00
8/9/2018	A102 Research Run background research on plaintiffs for motion in limine	0.40	\$625.00	\$250.00
8/9/2018	A103 Draft/revise Draft MIL No. 10	1.00	\$625.00	\$625.00
8/9/2018	A103 Draft/revise Draft/revise MIL No. 10 based on call with client	0.20	\$625.00	\$125.00
8/9/2018	A103 Draft/revise Draft/revise MIL No. 11	0.70	\$625.00	\$437.50
8/9/2018	A103 Draft/revise Draft/revise MIL No. 12	0.60	\$625.00	\$375.00
8/9/2018	A105 Communicate (in firm) Call with PTC re motions in limine and procedural posture	0.20	\$625.00	\$125.00

8/9/2018	A105 Communicate (in firm) Read/reply to 2 emails from PTC re status of MILs	0.10	\$625.00	\$62.50
8/9/2018	A106 Communicate (with client) Call with PTC and client for MIL#10	0.30	\$625.00	\$187.50
8/9/2018	A107 Communicate (other outside counsel) Email co-counsel re LC 226 issue	0.10	\$625.00	\$62.50
8/9/2018	A107 Communicate (other outside counsel) Email to co-counsel re MIL Nos 10-12	0.10	\$625.00	\$62.50
8/9/2018	A107 Communicate (other outside counsel) Read/reply to email from SS replying to my email re MILs	0.10	\$625.00	\$62.50
8/9/2018	A107 Communicate (other outside counsel) Read/reply to emails from SS and AT re research	0.10	\$625.00	\$62.50
8/9/2018	A107 Communicate (other outside counsel) Read/reply to emails re Labor Code violations	0.10	\$625.00	\$62.50
8/9/2018	A107 Communicate (other outside counsel) Read/review email chain re proposed stip to continue	0.10	\$625.00	\$62.50
8/9/2018	A107 Communicate (other outside counsel) Read/review email from PTC and response by SS re transfer to state court	0.10	\$625.00	\$62.50
8/9/2018	A107 Communicate (other outside counsel) Send email to co-counsel re MILs	0.10	\$625.00	\$62.50
8/10/2018	A102 Research Research 226 issue	0.40	\$625.00	\$250.00
8/10/2018	A103 Draft/revise Pull cites from research for Memo to co-counsel	0.10	\$625.00	\$62.50
8/10/2018	A107 Communicate (other outside counsel) Conference call with co-counsel re discussion points following decertification order	0.70	\$625.00	\$437.50
8/10/2018	A107 Communicate (other outside counsel) Email to co-counsel re findings re 226 issue	0.10	\$625.00	\$62.50
8/10/2018	A107 Communicate (other outside counsel) Read/review multiple email chains with co-counsel re witnesses and evidence for trial	0.10	\$625.00	\$62.50
8/11/2018	A104 Review/analyze Review Defendant's motions in limine	0.20	\$625.00	\$125.00
8/11/2018	A104 Review/analyze Review Plaintiffs' motions in limine as filed	0.10	\$625.00	\$62.50
8/11/2018	A107 Communicate (other outside counsel) Read/review email exchange re time estimates for witnesses	0.10	\$625.00	\$62.50
8/14/2018	A106 Communicate (with client) Call with David Corrie re trial witness; inform him of judge's ruling on decert motion	0.10	\$625.00	\$62.50
8/15/2018	A104 Review/analyze Read/review defense motion in limine re supplemental expert report	0.10	\$625.00	\$62.50
8/15/2018	A107 Communicate (other outside counsel) Read/review email exchange re supplemental expert report	0.10	\$625.00	\$62.50
8/16/2018	A108 Communicate (other external) Read/review email from opposing counsel responding to AT's email re motion in limine	0.10	\$625.00	\$62.50
8/20/2018	A104 Review/analyze Review order from judge denying joint stip to continue pending appeal	0.10	\$625.00	\$62.50
8/24/2018	A105 Communicate (in firm) Call with PTC re status of interlocutory appeal and trial prep	0.20	\$625.00	\$125.00
8/28/2018	A105 Communicate (in firm) Call with PTC re oppositions to motions in limine	0.10	\$625.00	\$62.50
8/30/2018	A108 Communicate (other external) Read/review email between AT and opposing counsel re motions in limine	0.10	\$625.00	\$62.50

9/7/2018	A105 Communicate (in firm) Call with PTC re settlement	0.10	\$625.00	\$62.50
9/12/2018	A104 Review/analyze Read/review notice of settlement	0.10	\$625.00	\$62.50
SUBTOTALS FOR BARBARA DUVAN-CLARKE		36.70		\$22,937.50

EXHIBIT B

**To the Declaration of Paul T. Cullen In Support of Plaintiffs'
Motion for Attorneys' Fees, Costs, and Incentive Awards**

**CULLEN LAW FIRM, APC
 COSTS LEDGER FOR ORTEGA V. JB HUNT
 AS OF 12/27/2018**

3/14/2007	Whitmont-photocopies	\$ 191.91
11/16/2007	Filing Fee	\$ 320.00
11/29/2007	FedEx-service of S&C	\$ 73.71
3/3/2008	ABC Legal-Statement of Related Cases, Interested parties	\$ 35.00
3/6/2008	ABC Legal-file Addendum to Joint 26(f) report	\$ 35.00
4/29/2008	IVIZE-copy docs for production	\$ 134.21
6/12/2008	Postage-Ortega personnel file	\$ 4.80
6/16/2008	Parking Ortega Depo	\$ 20.00
6/17/2008	Century Plaza Garage-Parking	\$ 20.00
6/17/2008	Century Plaza Towers-parking Ortega depo	\$ 32.00
6/27/2008	Batza-investigative services	\$ 739.48
6/27/2008	Salvatierra depo	\$ 609.00
7/10/2008	Parking Patton Depo	\$ 32.00
7/17/2008	CopyPage Records Retrieval-Patton	\$ 75.78
7/31/2008	IVIZE-copy of Patton Depo#1	\$ 69.82
8/14/2008	IVIZE - copy of Patton Depo#2	\$ 37.97
8/14/2008	CopyPage Records Retrieval-Patton	\$ 170.49
8/22/2008	Parking Ortega Depo	\$ 32.00
8/26/2008	Barkley Crt Rptrs-Depo Moncrief	\$ 1,911.65
9/1/2008	Stamps.com-mail Belaire West let letters	\$ 28.72
9/12/2008	Barkley Crt Rptrs-Depo Regalado	\$ 2,595.04
9/12/2008	Barkley Crt Rptrs-Depo transcript	\$ 185.00
9/29/2008	IVIZE-Ortega Depo	\$ 259.30
9/29/2008	Veritext-Leonard Garcia Depo	\$ 1,791.50
11/21/2008	Court parking	\$ 16.50
12/1/2008	ABC Legal -file Request for Judicial Notice	\$ 96.50
1/5/2009	Integrity Legal Corp-photocopies	\$ 221.87
1/15/2009	Brannen Enterprises file ex parte	\$ 101.00
1/23/2009	Veritext-video of Tony Vargas Depo	\$ 1,337.50
1/23/2009	PACER	\$ 28.32
2/12/2009	Veritext-Depo Tony Vargas	\$ 1,649.30
2/12/2009	Veritext-Depo Michael Graves	\$ 852.05
2/12/2009	Integrity Legal Corp-photocopies	\$ 221.87
4/15/2009	Messenger Express-Mtn for Cert, Resp OSC	\$ 141.50
7/15/2009	Messenger Express-courtesy copy	\$ 113.50
12/16/2012	Biltmore Hotel - lodging before hearing	\$ 295.89
12/26/2013	ABC Legal-file Notice of Motion	\$ 261.50
1/2/2014	ABC Legal-file Opposition	\$ 236.00
5/18/2016	Southwest - flight to mediation	\$ 357.33
6/7/2016	Cab fare from mediation to airport	\$ 61.55
6/7/2016	Hotel	\$ 475.00
6/7/2016	Parking at Airport	\$ 24.00
4/1/2018	United-Flight to Mediation	\$ 737.20
4/2/2018	Uber to Airport	\$ 25.17
4/2/2018	Taxi to Mediation	\$ 61.25

4/2/2018	Uber to Airport	\$ 89.41
6/27/2018	Parking for Depo	\$ 44.00
6/27/2018	Mileage to/from Depo	\$ 37.62
6/29/2018	Parking for Depo	\$ 44.00
6/29/2018	Mileage to/from Depo	\$ 37.62
8/22/2018	Mileage to Litigation Team Meeting - Barbara	\$ 52.64
8/22/2018	Mileage to Litigation Team Meeting - Paul	\$ 39.93
4/18/2018	Quik Pick delivery to oc	\$ 40.75
9/4/2018	Mileage to Court	\$ 37.40
9/4/2018	Parking at Court	\$ 14.00
11/20/2018	Global Economics - Expert Witnesses and Data Consultants	\$ 34,944.10
		\$ 52,100.65