

MARLIN & SALTZMAN

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

THE CULLEN LAW FIRM, APC

Paul T. Cullen, Esq. (SBN 193575)
19360 Rinaldi Street, #647
Porter Ranch, California 91326
Telephone: (626) 744-9125
Facsimile: (626) 744-9436
paul@cullenlegal.com

Attorneys for Plaintiffs and the Settlement Class

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

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

Plaintiffs,

v.

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

Defendants.

CASE NO. 07-CV-08336-RGK-AFM

(Hon. R. Gary Klausner)

**DECLARATION OF STANLEY D.
SALTZMAN IN SUPPORT OF
PLAINTIFFS' MOTION FOR
APPROVAL OF ATTORNEYS' FEES,
COSTS, AND INCENTIVE AWARDS**

Date: February 11, 2019

Time: 9:00 a.m.

Room: 850

Trial: February 19, 2019

1 I, Stanley D. Saltzman, declare as follows:

2 1. I am an attorney licensed to practice in all Courts in the State of California.
3 I am a partner with the firm of Marlin & Saltzman LLP, and Co-Class Counsel for the
4 settlement class in the above-captioned action. I make this Declaration in support of
5 Plaintiffs' Motion for Approval of Attorneys' Fees, Costs, and Incentive Awards in the
6 above matter. Unless otherwise indicated, I have personal knowledge of the facts set
7 forth herein and could competently testify to them if called as a witness.

8 2. I graduated initially from the University of Montreal School of Law in
9 1977 (a totally French-language law school) and then from the Southwestern University
10 School of Law here in Los Angeles, in 1979, at which time I was admitted to the
11 California Bar. I have been practicing litigation for more than thirty-nine years, and co-
12 founded the firm of Marlin & Saltzman back in 1985. Throughout my practice, I have
13 specialized in a variety of complex multi-party cases, of all nature and kind, have tried
14 many cases to verdict, and for the last twenty years have specialized in plaintiffs' side
15 contingency class actions, including employment class actions, unfair competition and
16 deceptive business practice cases, and numerous consumer class actions against product
manufacturers and retailers.

17 3. Marlin & Saltzman has had a unique firm history since commencing
18 operations in 1985. Prior to transitioning to plaintiffs' side representation (mostly in
19 class actions) approximately twenty years ago, the firm had previously focused entirely
20 on the defense of class and complex litigation, such that numerous exemplar defendant
21 side cases are therefore also included in the listing of exemplar cases set forth below.
22 The transition to the plaintiff's side began about twenty years ago, and took about five
23 years to complete. Since the transition was completed about fifteen years ago, the firm
24 has focused on both employment and consumer class action cases.

25 4. Since the transition to the plaintiffs' cause, the firm has been fortunate
26 enough, through extremely hard work and often intense litigation, to achieve settlement
27 and trial results which have yielded over \$900,000.000.00 in payments to the class

1 members and clients in our cases. In addition, there is also a currently-pending trial
2 verdict, in the amount of \$60,800,000.00 for wages and 17200 restitution, and statutory
3 fees totaling an additional \$13,000,000.00, which was awarded in a class action trial in
4 which I was co-counsel for the class. The four-week class trial was held before the
5 Honorable Susan Illston, presiding, in the Northern District of California, in the matter
6 of *Ridgeway v. Walmart Stores Inc.*, case no. C-08-5221 SI. That verdict is not included
7 in the above-stated total recovery amount, as the Defendant's appeal in the case, and
8 the Class' cross-appeal, is currently pending.

9 5. Marlin & Saltzman is extremely experienced in litigating class action
10 cases, with well over one hundred class actions and complex commercial cases having
11 been handled, and it has acted as lead counsel or co-lead counsel in almost all of these
12 matters. I have been personally involved in most of the matters, and have been lead
13 counsel within the firm on over seventy five of the matters. More information on our
14 firm is available at the firm website www.marlinsaltzman.com.

15 6. In relation to the previously granted motion for preliminary approval of the
16 settlement, I offered a full and complete declaration (Dkt. No. 347-1) setting forth both
17 my personal experience and his firm's extensive experience and success in class action
18 and employment litigation.

19 7. In addition, my declaration also sets forth in great detail the litigation
20 history of this long-standing action, which has now encompassed eleven years since
21 filing. Rather than repeat all this information at length herein, I respectfully refer this
22 Court to the prior Saltzman Declaration (Docket No. 347-1) and the prior declaration
23 of Co-Class Counsel Paul T. Cullen (Docket No. 347-6). Additionally, in the
24 forthcoming Motion for Final Approval of the Settlement, I will further address these
25 issues relating to the handling of the litigation without unnecessary duplication.
26 However, a brief discussion thereof follows.

26 **Background of the Litigation**

27 8. The original Complaint was filed on November 19, 2007.

1 9. In the operative Second Amended Complaint, Plaintiffs allege the
2 following claims: (1) violations of Labor Code sections 226.7 and 512, and section 11
3 of the Industrial Welfare Commission (“IWC”) Wage Orders (failure to provide a meal
4 period); (2) violations of Labor Code sections 226.7 and 512, and section 12 of the IWC
5 Wage Orders (failure to provide a rest period); (3) violations of Labor Code section 226
6 (failure to provide accurate wage statements); (4) violations of Labor Code section 1194
7 (failure to pay California minimum wage); (5) violations of Labor Code sections 221 to
8 223 (failure to pay wages at the agreed rate); (6) violations of Labor Code section 203
9 (failure to pay wages due upon termination of employment); (7) violations of the
10 Business and Professions Code, section 17200 *et seq.*; and (8) violations of the Labor
11 Code Private Attorneys General Act of 2004 (“PAGA”), California Labor Code section
12 2698, *et seq.*

13 10. The Parties have aggressively litigated this action for eleven years, with a
14 Class period reaching back to November 19, 2003.

15 **Discovery and Investigation Leading up to Class Certification**

16 11. From its inception, the case was heavily litigated, including extensive pre-
17 certification discovery covering both liability and damages, and production of extensive
18 payroll and pay-related databases, payroll records, Department of Transportation logs,
19 and other driver logs. Plaintiffs also obtained corporate policy documents relating to
20 Defendant’s pay plans and related documents, all geared towards possible certification
21 of the case. Plaintiffs deposed multiple corporate witnesses, including Rule 30(b)(6)
22 designees. Defendant also deposed both proposed class representatives. Thereafter,
23 Plaintiffs moved for class certification on March 16, 2009. Dkt. 59. The Court granted
24 the motion on May 18, 2009, but stayed the case pending the Brinker decision. Dkt. 64.

25 **Post-Certification Litigation**

26 12. Following certification and the lifting of the stay, Defendant filed its first
27 motion for decertification on September 27, 2012. Dkt. 77. After full briefing, that
28 motion was denied on December 18, 2012. Dkt. 87. Plaintiffs then renewed their request

1 for dissemination of class notice. In response, Defendant again moved for a complete
2 stay of the case—this time pending the decision by the Ninth Circuit in the *Dilts*
3 preemption case. Plaintiffs successfully opposed that stay, but the Court again deferred
4 the class notice. Thereafter, Defendant moved for judgment on the pleadings as to the
5 meal and rest break claims based on FAAAA preemption, which motion was granted on
6 October 2, 2013. Dkt. 124. The Court again deferred Class notice. Defendant then
7 followed with a preemption summary judgment motion directed at Plaintiffs’ wage
8 claims on October 18, 2013. Dkt. 125. That motion was also granted by the Court. Dkt.
9 168.

10 13. Plaintiffs then appealed both of the above preemption rulings. After full
11 briefing and a three-year delay, Plaintiffs fully prevailed on their appeal, and the two
12 orders were vacated. *See Ortega v. J.B. Hunt*, 694 Fed.Appx. 589 (9th Cir. 2017).

13 14. Defendant then sought en banc review by the Ninth Circuit, which was
14 denied, and then petitioned for a writ of certiorari to the U.S. Supreme Court. After full
15 briefing, the petition was denied.

16 15. Thereafter, with this Court having set a very prompt trial date, the Parties
17 engaged in what can only be described as frenetic, final pre-trial discovery proceedings
18 involving at times as many as twenty lawyers combined on the two sides. This Court
19 eventually issued its two partial summary judgment rulings in July and August, which
20 were strongly favorable to the Plaintiffs. Unfortunately for the Plaintiffs, however, the
21 Court then also decertified the class, which had been certified almost nine years earlier.

22 16. The Order decertifying the class triggered yet another course of furious
23 briefing involving Plaintiffs’ Rule 23(f) petition and their concurrent motion to stay the
24 individual trial, while the Parties also engaged in massive efforts to comply with the
25 many pre-trial filing requirements. This included almost twenty motions in limine filed
26 and opposed, trial briefs, memoranda of contentions of fact and law, stipulations as to
27 facts, proposed jury instructions, a final proposed pre-trial order, and much more.

28 17. At the same time, the Parties prepared the joint exhibit and witness lists,

1 met with and interviewed potential trial witnesses, and worked with their respective
2 experts to finalize their reports and arrange their depositions. While the decertification
3 order served to limit the trial to the two representative Plaintiffs, both sides recognized
4 the critical importance of the trial to the still sought-after class action, as eventual post-
5 trial appeals of both certification and all legal and factual issues would undoubtedly
6 relate to and impact the proposed settlement class as a whole if it was re-instated by the
7 Ninth Circuit.

8 18. While all of the foregoing matters progressed at break-neck speed, the
9 Parties maintained an open settlement dialogue. Plaintiffs insisted that those
10 negotiations be on a class-wide basis, as they recognized their fiduciary obligations to
11 the class, which they were actively pursuing via their Rule 23(f) Petition and, in the
12 alternative, intended to pursue in post-trial appellate review of this Court's
13 decertification order. Thus, at all times, Plaintiffs would only engage in class-wide
14 negotiations, never entertaining the idea of obtaining any undue benefit to themselves
15 by way of a "golden parachute" type settlement wherein they might obtain an outsized
16 payment to themselves in exchange for giving up the claims of the class members for
17 whom they had been standing up for the entire eleven years of litigation. Thus, Plaintiffs
18 never considered individual settlements.

18 **Mediation**

19 19. The Parties engaged in formal mediation sessions on June 7, 2016 and
20 April 2, 2018, utilizing the services of widely respected class action mediator Mark S.
21 Rudy, Esq. Despite devoting substantial time and efforts to the process, the mediations
22 failed. However, the Parties continued settlement discussions, and Mr. Rudy continued
23 to speak with lead counsel for each side on a regular basis, including several calls with
24 lead Plaintiffs' counsel during the week in which the settlement was finally reached.

25 **Settlement**

26 20. For reasons addressed in support of preliminary approval, and for reasons
27 described herein, and based on my thirty-nine (39) years maintaining an active litigation

1 practice, I believe that plaintiffs have prosecuted this case passionately and effectively
2 throughout its existence. As stated in the preliminary approval process, and as re-stated
3 now, I continue to believe that the Settlement is fair, adequate, reasonable, and that the
4 Settlement sensibly accounts for the risks and benefits of potential further litigation,
5 including appeals.

6 21. To be sure, this consolidated class action presented a high degree of risk.
7 Class Counsel and the settlement class easily could have recovered little or nothing
8 because, for example, (i) Plaintiffs could have lost at trial; (ii) this Court could have
9 found Defendant's pay plans to be legal; (iii) the Ninth Circuit or the U.S. Supreme
10 Court could have upheld the Court's ruling that federal law preempts California law;
11 and/or (iv) during the case, there was the constant threat that long-pending proposed
12 federal legislation intended by the proponents to effectively wipe out Plaintiffs'
13 claims—actually passed by the House of Representatives—would be signed into law.
14 Moreover, the risk of decertification and its resulting impact on the case effectively
15 materialized approximately six weeks before the trial date, exemplifying the high level
16 of risk always inherent in complex class actions.

17 22. Given the uncertainty and expense of continued litigation in light of these
18 risks, I believe that the Settlement represents an extraordinary recovery for the claims
19 presented by the settlement class members. The Notice of Proposed Class Action
20 Settlement and Hearing, attached hereto as **Exhibit 1**, provides an overview of the
21 principal terms of the Settlement.

22 23. Based on the final Class list, slightly more than 12,000 drivers are now
23 eligible to receive distributions. These claims are against the settlement fund of
24 \$15,000,000. Class members worked for as little as less than a week to as much as many
25 years. In this regard, gross allocations will range from less than \$100 for a week or less,
26 up to as much as \$12,000 (less approved deductions prior to distribution), based on the
27 number of workweeks each driver worked.

1 **Attorneys' Fees**

2 24. The settlement agreement provides that Plaintiffs' Counsel collectively
3 may apply to the Court for an award of attorneys' fees up to one-third (1/3) of the non-
4 reversionary \$15,000,000.00 fund. Consistent with the settlement agreement, Plaintiffs'
5 counsel now seek a fee award of \$5,000,000. As discussed below, this request represents
6 a slightly negative multiplier as it is actually below the lodestar for Class Counsel in
7 this case.

8 25. I personally was involved in all major facets of the litigation over the entire
9 eleven years of the litigation. I played a lead role in investigating claims on behalf of
10 those drivers, crafting ongoing pleadings, conducting written discovery, taking and
11 defending depositions, communicating with Class members, and preparing Plaintiffs'
12 motions and oppositions as they relate to the case, including all briefing relating to Class
13 certification, summary judgment, and judgment on the pleadings. In addition, I
14 participated in all the mediation and settlement negotiations leading to the pending
15 Settlement. As such, I am intimately familiar with the work each attorney involved in
16 this case has performed.

17 26. The attorneys at my firm and I, as well as my firm's paralegals, have kept
18 contemporaneous or near-contemporaneous records of our hours worked on this case
19 by billing our time in increments of one-tenth (1/10) of an hour into our timekeeping
20 system. I have access to that timekeeping system, and I access it regularly for purposes
21 of assessing the number of attorney and paralegal hours spent working on the various
22 cases our law firm handles. I relied on these timekeeping records to prepare this
23 declaration.

24 27. In this case Marlin & Saltzman has invested, on a wholly contingent basis,
25 **6,227.85** hours of legal work over the course of eleven years. Collectively, our firm's
26 adjusted lodestar on this case is **\$4,043,793**, based on current hourly rates, which are
27 consistent with prevailing market rates in the relevant community for attorneys of
comparable skill, experience and qualifications (*i.e.*, the Central District of California).

Our firm's billing records for this action are attached hereto as **Exhibit 2**.

28. The following chart summarizes Marlin & Saltzman's billing records for each attorney and paralegal at the firm who worked on this case, along with their hourly rate, years of experience, and their total lodestar:

| <u>Timekeeper</u> | <u>Experience (Years)</u> | <u>Hours</u> | <u>Rate</u> | <u>Lodestar</u> |
|---|-------------------------------|--------------|-------------|-----------------|
| Stanley Saltzman | 39 | 1,769.60 | \$825 | \$1,459,920 |
| Marcus Bradley (before leaving firm in 2016) | 24 | 119.1 | \$750 | \$89,325 |
| William Daniels | 24 | 99.2 | \$750 | \$74,400 |
| Christina Humphrey | 17 | 1,076.7 | \$725 | \$780,607.50 |
| Stephen O'Dell | 31 | 102.6 | \$695 | \$71,307 |
| Anthony Baird | 21 | 47.4 | \$695 | \$32,943 |
| Craig Pynes | 32 | 96.9 | \$695 | \$67,345.50 |
| Adam Tamburelli | 12 | 1,044.60 | \$650 | \$678,990 |
| Kiley Grombacher | 12 | 36.4 | \$650 | \$23,660 |
| Leslie Joyner | 9 | 578.95 | \$650 | \$376,317.50 |
| David Leimbach | 9 | 239.5 | \$650 | \$155,675 |
| Brad Fagnani | 10 | 9 | \$595 | \$5,355 |
| Cody Kennedy | 4 | 8.5 | \$495 | \$5,335 |

Paralegals

| | | | | |
|----------------|----|-----------------|-------|--------------------|
| Susan Joseph | 18 | 955.05 | \$225 | \$214,886.25 |
| Denise Bauwens | 25 | 2.25 | \$225 | \$506.25 |
| Jody Rosen | 10 | 37.1 | \$225 | \$8,347.50 |
| TOTALS | | 6,227.85 | | \$4,043,793 |

29. The hourly rates proposed for myself, the attorneys at my firm, and my firm's paralegals are reasonable based on both my experience as a class action lawyer and the hourly rates that have been approved by judges in this District and other federal district courts in California, as set forth in Plaintiffs' motion. They have never been questioned by the judges in these cases.

30. Additionally, the above hourly rates are also reasonable in light of the Laffey Matrix, which, explained in the instant motion, has been utilized by courts in this and other Districts to set reasonable rates for attorneys' fees. Attached as **Exhibit 3** to this declaration is a true and correct copy of the current Laffey Matrix, which is also available at <http://www.laffeymatrix.com/see.html>. As explained in the motion, the Laffey Matrix is adjusted for the cost of living in the Washington, D.C. area, which has a lower cost of living than the Los Angeles area, but which has a nearly identical mean wage for lawyers according to the U.S. Bureau of Labor Statistics, therefore not requiring an adjustment for Los Angeles rates. The rates that the attorneys at my firm who performed the vast majority of work on this case are below those listed in the Laffey Matrix. Indeed, the reasonable hourly rate for an attorney of my experience level (20+ years out of law school, and in my case 39 years) is \$894 per hour, while my hourly rate is \$825, the reasonable hourly rate for attorneys of Mr. Tamburelli and Ms. Humphrey's experience level (11-19 years out of law school) is \$742, while their hourly rates are \$650 and \$725, respectively, and the reasonable hourly rates for Leslie Joyner and David Leimbach are \$658, while their hourly rates are \$650.

31. Additionally, to facilitate the Court's analysis of the reasonableness of the attorneys' fees and costs request, below is a chart breaking down the hours and lodestar amount for each firm that performed work for Plaintiffs and the settlement class over the total of the eleven years life of the case. I have gathered all this information from each of the firms' partners, as well as the costs incurred, and Co-Class Counsel Paul T. Cullen is submitting a separate declaration in support. Additionally, Marcus J. Bradley, who was employed with Marlin & Saltzman until 2016, but continued to work on the case after leaving the firm, has submitted a separate declaration time he incurred since he left Marlin & Saltzman in 2016. Any time he incurred on this matter prior to leaving Marlin & Saltzman is captured in the time submitted by Marlin & Saltzman. As set forth in the below chart, the combined hours of all the firms involved in this matter result in a combined lodestar of **\$5,498,318.00**, based on legal work totaling **8,178.65** hours.

| <u>Firm</u> | <u>Hours Worked</u> | <u>Lodestar</u> |
|---------------------|---------------------|--------------------|
| Marlin & Saltzman | 6,227.85 | \$4,043,793 |
| The Cullen Law Firm | 1,704 | \$1,269,425 |
| Bradley/Grombacher | 246.8 | \$185,100 |
| TOTAL | 8,178.65 | \$5,498,318 |

32. Each of the three law firms played important roles in the handling of the litigation. All counsel cooperated fully whenever called upon, whether it related to discovery needs, distinct research projects, or drafting necessary motions or other pleadings.

33. The above total does not include the time that will be necessary to complete the final approval process such as the drafting the final approval papers, preparation for the final approval hearing, all other efforts necessary to effectuate the settlement, and responding to settlement class members' inquiries regarding distribution of the funds. I anticipate that that process could take up to an additional 100 hours.

1 34. At all times, Plaintiffs' attorneys made good-faith efforts to reduce
2 duplication of efforts.

3 35. When handling a case that requires this much work and which lasts this
4 long, it is inevitable that other cases we may have been able to take on had to be passed
5 on, due to basic limitations on attorney time available. Even today, in our 24 hour/7 day
6 workweek world, there are limits and they must be respected. Additionally, other cases
7 which we have taken on, and in the past have handled, have resulted in numerous
8 situations where we simply fail to achieve any recovery, despite our best efforts, and as
9 a result (often despite years of litigation effort), we recover nothing for our fees and
10 costs in those cases. In my experience, contingency fee awards of one-third of the
11 settlement fund in complex employment class actions are fairly common, especially
12 when taking into account these very real contingency risks and litigation risks that
13 sometimes result in recovering nothing at all. Moreover, as stated above, we simply
14 could not pursue other case opportunities, in part because a significant amount of both
15 my time and so many others was committed to this action.

15 **Costs Incurred**

16 36. To date, Marlin & Saltzman has incurred costs in this litigation in the
17 amount of \$423,262.33, after writing off costs for online research expenses and travel-
18 related meal expenses. My firm's cost records for this matter are attached hereto as
19 **Exhibit 4.**

20 37. Over half of that total (\$290,565) was fees for the experts retained by Class
21 Counsel. The experts performed their own calculations and analyses, and assisted
22 counsel in conducting the arduous task of analyzing the Defendant's voluminous
23 payroll records, time records, trip sheets, etc., both for purposes of opposing
24 Defendant's motion to decertify and for calculating damages. Additional large expense
25 categories included within the cost records include \$50,000 paid to retained appellate
26 counsel at the Washington, D.C. appellate firm of Gupta Wessler PLLC for their work
27 on Plaintiffs' opposition to Defendant's Supreme Court certiorari petition and Plaintiffs'

1 Rule 23(f) petition (Class Counsel handled the successful Ninth Circuit preemption
2 appeal directly); \$35,664.58 paid to the Class Administrators for the mailing of the pre-
3 certification notice and the original class notice; \$42,356.23 paid to the various court
4 reporting services for deposition transcripts and services; and \$13,750.00 paid to the
5 mediator, Mark Rudy, Esq.

6 38. The collective expenditure of costs on this matter by Class Counsel, totals
7 **\$475,362.98**, as set forth below and as supported in the concurrently-filed declaration
8 of Paul T. Cullen:

| <u>Firm</u> | <u>Costs</u> |
|---------------------|---------------------|
| Marlin & Saltzman | \$423,262.33 |
| The Cullen Law Firm | \$52,100.65 |
| TOTAL | \$475,362.98 |

14 39. These costs reflect the type of expenses typically billed by attorneys to
15 their paying clients in the marketplace, and include such costs as the above noted
16 payments to experts, court reporter services, and travel expenses to date.

17 **Incentive Awards**

18 40. Pursuant to the settlement agreement, the Parties further agreed that the
19 named Plaintiffs—who have executed broad general releases—may apply for incentive
20 awards from the Settlement fund not to exceed \$15,000 for each Representative
21 Plaintiff.

22 41. These two Plaintiffs each assisted in every way possible throughout their
23 respective tenures as putative, certified, and now settlement Class Representatives,
24 including participating in gathering evidence to advance the claims set forth in the
25 consolidated amended pleadings; assisting in seeking and responding to discovery;
26 preparing and sitting for their depositions; providing key insights into the policies and
27 practices of Defendant; providing declarations in connection with Plaintiffs' motion to

1 certify the class, Plaintiffs' motion for summary judgment, and Plaintiffs' opposition to
2 Defendant's motion for summary judgment, assisting with settlement considerations,
3 and preparing for imminent trial. These Plaintiffs also placed their employment
4 prospects at risk by putting their names on a complaint against one of the largest
5 transportation companies in America. Further still, both Plaintiffs agreed to execute a
6 general release of claims, which release is broader than the release signed by unnamed
7 Class members. Mr. Ortega and Mr. Patton have also provided declarations in support
8 of this request.

9 42. These Plaintiffs were at all times responsive to Class Counsel's needs in
10 prosecuting this litigation and they thoughtfully fulfilled their duties as Class
11 Representatives. We could not have achieved the success that we did here without their
12 help. During the course of the litigation, I personally interacted with each of the
13 Plaintiffs, and based on that interaction and in consultation with the other attorneys on
14 this case, I can attest that each was involved no less than 80 hours on the low end, and
15 probably as much as 90 hours. Despite the very difficult time constraints imposed on
16 them as truck drivers on the road both in California and across the country, they always
17 responded to my inquiries, phone calls and emails promptly, thus facilitating our
18 handling of issues as they arose.

19 43. The aggregate requested incentive awards of \$30,000 falls well below 1%
20 of the Settlement (roughly 0.2%). Settlement class members were advised via Class
21 Notice that the requested incentive awards would be requested at the Final Approval
22 Hearing and that Final Settlement Class Members would have the opportunity to object.
23 As such, we request that these incentive awards be approved for these drivers, who truly
24 put themselves out for the benefit of the class in this case.

25 //

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27 //

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1 I declare under penalty of perjury under the laws of the United States that the
2 foregoing is true and correct.

3 Executed on December 28, 2018 in Agoura Hills, California.

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5 By: /s/ Stanley D. Saltzman
6 Stanley D. Saltzman
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EXHIBIT 1

**To the Declaration of Stanley D. Saltzman In Support of Plaintiffs'
Motion for Attorneys' Fees, Costs, and Incentive Awards**

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

NOTICE OF CLASS ACTION SETTLEMENT

PLEASE READ CAREFULLY AS
THIS NOTICE MAY AFFECT YOUR RIGHTS

CPT ID: «ID» 
«EmployeeName»
«Address1» «Address2»
«City», «State» «Zip»
«IMBarCode»

| | |
|--|---|
| GERARDO ORTEGA and MICHAEL D. PATTON, individually and on behalf of themselves, all other others similarly situated, and the general public, Plaintiffs, vs. J.B. HUNT TRANSPORT, INC., an Arkansas Corporation, and DOES 1-100, inclusive, Defendant. | CASE NO.: 2:07-cv-08336-RGK (AFMx) JUDGE: Honorable R. Gary Klausner COURTROOM: 850 NOTICE OF CLASS ACTION SETTLEMENT |
|--|---|

I. WHY DID I GET THIS NOTICE?

This notice explains that a settlement has been reached in the case entitled *Gerardo Ortega, et al. v. J.B. Hunt Transport, Inc.*, Case No. 2:07-cv-08336-RGK (AFMx) (the “Lawsuit”). You are receiving this notice because the records of J.B. Hunt Transport, Inc. (“J.B. Hunt”) indicate that you are a member of the proposed “Settlement Class” of employees included in the Lawsuit, because you are a current or former J.B. Hunt employee who worked as a California-based local or regional intermodal or local or regional Dedicated Contract Services driver at some point during the time period of November 19, 2003 to December 8, 2018. As a member of the proposed Settlement Class, you are eligible to receive a portion of the settlement amount.

This is **not** a notice of a lawsuit against you. **You are not being sued.** The Lawsuit was brought on behalf of all Settlement Class members, for their benefit. Your participation, or non-participation, in the Settlement will not affect your employment with J.B. Hunt in any way whatsoever.

The Court has ordered that this notice be sent to you because J.B. Hunt’s records indicate that you are a member of the Settlement Class. The purpose of this notice is to inform you of the proposed Settlement of the Lawsuit. The notice is also intended (i) to describe the Settlement, including how the Settlement monies will be allocated and how the Settlement may affect you, and (ii) to advise you of your rights and options with respect to the Settlement.

II. WHAT IS THE CLASS ACTION LAWSUIT ABOUT?

Plaintiffs Gerardo Ortega, Michael D. Patton, and Alfredo Salvatierra commenced the Lawsuit by filing a complaint against Defendant J.B. Hunt in *Gerardo Ortega, Alfredo Salvatierra, and Michael D. Patton v. J.B. Hunt Transport, Inc.*, Case No. BC 380997, Los Angeles County Superior Court, on November 19, 2007, which J.B. Hunt removed under the Class Actions Fairness Act to the Central District of California on December 27, 2007.

Plaintiffs subsequently amended their complaint to remove Mr. Salvatierra as a named plaintiff (“First Amended Complaint”) on November 17, 2008. Plaintiffs further amended their First Amended Complaint on October 1, 2018 (“Second Amended Complaint”).

Plaintiffs allege the following claims: (1) violations of Labor Code sections 226.7 and 512, and section 11 of the Industrial Welfare Commission (IWC) Wage Orders (failure to provide a meal period); (2) violations of Labor Code sections 226.7 and 512, and section 12 of the IWC Wage Orders (failure to provide a rest period); (3) violations of Labor Code section 226 (failure to provide accurate wage statements); (4) violations of Labor Code section 1194 (failure to pay California minimum wage); (5) violations of Labor Code sections 221 to 223 (failure to pay wages at the agreed rate); (6) violations of Labor Code section 203 (failure to pay wages due upon termination of employment); (7) violations of the Business and Professions Code, section 17200 et seq.; and (8) violations of the Labor Code Private Attorneys General Act of 2004 (“PAGA”), California Labor Code section 2698 et seq.

Plaintiffs moved for class certification of the claims asserted in the First Amended Complaint on March 16, 2009. On May 18, 2009, the district court granted Plaintiffs’ motion for class certification and certified a class consisting of “all of Defendant’s California-based, local and regional intermodal and local and regional [Dedicated Contract Services] DCS drivers who worked for Defendant in the four years prior to the filing of the original complaint in this action and/or through to the time of trial in this case.” At the same time it certified the class, the district court stayed the Lawsuit pending the decision in *Brinker Restaurant Corp. v. Superior Court*, 53 Cal. 4th 1004 (2012), which related to California’s meal break laws. Three years later, *Brinker* was decided and the stay lifted, at which point J.B. Hunt moved to decertify the class. The district court denied J.B. Hunt’s motion to decertify on December 18, 2012.

On October 2, 2013, the district court granted J.B. Hunt’s motion for judgment on the pleadings to dismiss Plaintiffs’ meal and rest break claims from the Lawsuit. Subsequently, on June 4, 2014, the district court granted J.B. Hunt’s motion for summary judgment and dismissed all remaining claims. Plaintiffs appealed the district court’s orders to the Ninth Circuit, which ultimately vacated the district court’s orders and remanded the Lawsuit to the district court. While the appeal was pending in the Ninth Circuit, the Lawsuit was stayed in the district court. J.B. Hunt filed a petition for a writ of certiorari with the United States Supreme Court on February 5, 2018, which was denied on June 4, 2018.

On April 30, 2018, notice of the district court’s May 18, 2009 order granting certification was disseminated to the putative class members.

On June 11, 2018, Plaintiffs filed a renewed motion for partial summary judgment, which the district court granted in part and denied in part on July 23, 2018. J.B. Hunt filed a motion for partial summary judgment and a motion for decertification on July 2, 2018. The district court granted in part and denied in part J.B. Hunt’s motion for partial summary judgment on August 8, 2018. In addition, on August 8, 2018, the district court granted J.B. Hunt’s motion for decertification.

J.B. Hunt contends that it has complied with all applicable state and federal laws, and J.B. Hunt continues to deny each and all of the claims in the Lawsuit.

For the purpose of avoiding the time and expense of further litigation, the ultimate outcome of which is uncertain, and to provide a fair and reasonable resolution of this legal dispute, Plaintiffs and J.B. Hunt have

negotiated a settlement whereby J.B. Hunt has agreed to pay \$15,000,000.00 to resolve the matter, and Settlement Class Members will be eligible to receive a portion of this amount. This Settlement is **not** an admission by J.B. Hunt of any liability.

III. WHO IS INCLUDED IN THIS CLASS ACTION LAWSUIT?

The proposed Settlement Class is defined to include the following individuals:

All California-based, local and regional intermodal and local and regional Dedicated Contract Services (DCS) drivers employed by J.B. Hunt Transport, Inc. at any time between November 19, 2003 and December 8, 2018.

IV. WHAT DOES THE PROPOSED SETTLEMENT OFFER?

Under the terms of the parties' proposed settlement, the following will occur if the Settlement is given final approval by the Court:

A. J.B. Hunt will pay Fifteen Million Dollars (\$15,000,000.00) to settle the claims of all Settlement Class Members.

B. A claims administrator has been appointed by the Court to administer the Settlement. The claims administrator will pay from the \$15,000,000.00: (1) Plaintiffs' costs of litigation, up to the amount of \$500,000.00; (2) The expenses of administering the Settlement, estimated at approximately \$80,000.00; (3) Plaintiffs' counsel's attorneys' fees, up to \$5,000,000.00; (4) A service award of \$15,000.00 to each Plaintiff; and (5) \$375,000.00 to the California Labor & Workforce Development Agency, representing 75% of the \$500,000.00 allocated to the settlement of Plaintiffs' claim for penalties under the Private Attorneys General Act of 2004 (California Labor Code sections 2698, *et seq.*) ("PAGA"). The remainder of the \$15,000,000.00, currently estimated to be at least \$9,015,000.00, will be available to be distributed to all Settlement Class Members; this amount is called the Net Settlement Fund ("NSF").

C. The amount stated above to be distributed to the Settlement Class Members will be divided among all Settlement Class Members as follows. After the amounts described in paragraph IV.B, above, are deducted, the resulting NSF will be divided by the total number of "qualified weeks" worked by all Settlement Class Members during the Class Period, to produce a "Weekly Settlement Value." A "qualified week" is any week in which a Settlement Class Member was employed by J.B. Hunt in California as a local or regional intermodal or local or regional DCS driver during the time period November 19, 2003 through December 8, 2018 (the "Class Period"). You will be eligible to receive a Settlement payment tied to the total number of qualified weeks you worked for J.B. Hunt during the Class Period multiplied by the Weekly Settlement Value, less applicable withholdings, unless you choose to opt out of (*i.e.*, not participate in) the Settlement. The Parties estimate that for each year of employment, a Settlement Class Member employed as a local or regional intermodal or local or regional DCS driver will be entitled to receive approximately \$800, prior to the deductions referenced in Section IV.B. Therefore, for example, one year would be around \$800, five years would be around \$4,000, and ten years would be around \$8,000, before the case deductions described above. These are estimates, only.

D. If the Court grants final approval of the settlement agreement and you do not opt out of the settlement, then you will release J.B. Hunt and all of J.B. Hunt's past and present successors, subsidiaries, parents, holding companies, sister and affiliated companies, divisions and other related entities, as well as the successors, predecessors, shareholders, subsidiaries, investors, parent, sister and affiliated companies, officers, directors, partners, assigns, agents, employees, principals, heirs, administrators, attorneys, vendors, accountants, auditors, consultants, fiduciaries, insurers, reinsurers, employee benefit plans, and representatives of each of them, both individually and in their official capacities, past or present, as well as all persons acting by, through, under or in concert with any of these persons or entities (the "Released Parties"), from any and all claims, debts, liabilities, demands, obligations, guarantees, penalties, costs,

expenses, attorneys' fees, damages, liquidated damages, action or causes of action whatever kind or nature, whether known or unknown, existing or potential, recognized now or hereafter, expected or unexpected, contingent or accrued, as long as they arise out of the causes of action alleged in the Action, as well as any claim that arises out of the factual allegations alleged in the Action against J.B. Hunt or the Released Parties or any of them, under any state, municipal or federal statute, ordinance, regulation, order, common law or equity, including and not limited to J.B. Hunt's provision of meal or rest breaks or alleged failure to provide meal or rest breaks, J.B. Hunt's alleged failure to pay all wages, and J.B. Hunt's provision of wage statements, including but not limited to claims under California Labor Code sections 201, 203, 210, 218.5, 218.6, 221, 222, 223, 226, 226.2, 226.7, 512, 558, 1194, 1197, 1182, California Code of Civil Procedure sections 1021.5, 3287(b), and 3289, California Business & Professions Code section 17200 et. seq., California's Labor Code Private Attorneys General Act of 2004, California Labor Code section 2698 et seq. (including, but not limited to, section 2699), IWC Wage Order 9-2001 (including, but not limited to, sections 4, 7, 11, 12), and any related claims for compensatory, consequential, punitive or exemplary damages, statutory damages, declaratory relief, injunctive relief, penalties, interest (whether pre- or post-judgment), disbursements, and/or attorneys' fees and costs (the "Released Class Claims"). Released Class Claims include all claimed or unclaimed compensatory, consequential, incidental, liquidated, punitive and exemplary damages, restitution, interest, costs and fees, injunctive or equitable relief, and any other remedies available at law or equity allegedly owed or available to the Settlement Class arising or reasonably flowing from the Complaint, First Amended Complaint, or Second Amended Complaint against J.B. Hunt and the Released Parties for the time period from the beginning of each claim's applicable statute of limitations, up to and including the date of final approval of the settlement.

V. WHAT ARE MY OPTIONS?

A. *You may accept your share of the \$15,000,000.00 settlement and be bound by the release of all claims described above. In order to receive your Settlement award, you do not need to do anything.* Settlement awards will be paid by check after the Settlement is given final approval by the Court. The checks will be mailed to you by the claims administrator. Your check will remain valid and negotiable for one hundred twenty (120) days from the date on which it is mailed. After those one hundred twenty (120) days expire, the check will become void and your Settlement share will be sent to a non-interested non-profit organization to be designated by the Plaintiffs and Defendant prior to the final fairness hearing on the Settlement and subject to the Court's approval; *or*

B. *You may opt out of the Settlement, and thus not participate in it, in which case you will not receive your share of the Settlement and you will not be bound by the terms of the Settlement.* In order to express your intention to opt out, you must send a written request for exclusion, by U.S. mail, to the claims administrator, Ortega, et al. v. J.B. Hunt Transport, Inc. Settlement Administrator, c/o CPT Group, Inc., located at 50 Corporate Park, Irvine CA 92606, by no later than January 11, 2019 (30 calendar days after mailing of this Notice). In order to be considered valid, your request for exclusion *must* include: (1) the following language or substantially similar language: "I elect to opt out of the *Ortega v. J.B. Hunt Transport, Inc.* class action settlement. I understand that by doing so, I will not be able to participate in the settlement, and will not receive a share of the settlement proceeds,"; (2) your full name, address, telephone number, and last four digits of your Social Security number; and (3) your signature affixed to that statement.

C. *You may object to the settlement.* The procedures for objecting to the settlement are described below on page 5 in Section VIII of this form.

VI. WHAT ARE THE PROCEDURES FOR PAYMENT?

A. The claims administrator will calculate your share of the Settlement based upon your "qualified weeks" worked, and will issue and mail you a check.

B. Forty percent (40%) of your share of the Settlement award will be considered wages from which ordinary W-2 tax withholdings will be deducted. No tax deductions shall be made from the remaining sixty percent (60%), which will be issued as 1099 “other income”. You will be given IRS tax forms for each of these amounts, if applicable. You are responsible for paying the correct amount of taxes on each portion of your share of the Settlement.

C. It is important for the Parties to the Lawsuit to have your current address in order to be able to send you other mailings regarding the Lawsuit. You should contact the claims administrator to report any change of your address after you receive this Notice. Failure to report a change of address may result in you not receiving your share of the settlement money.

VII. HEARING ON PROPOSED SETTLEMENT

A Final Fairness Hearing, at which the Court will decide whether or not the proposed settlement is fair, reasonable, and adequate, will be held on February 11, 2019, at 9:00 a.m., in Courtroom 850 of the Roybal Federal Building and U.S. Courthouse, located at 255 East Temple Street, Los Angeles, CA 90012. The Court may adjourn or continue the hearing without further notice to you.

You are not required to attend the hearing. Counsel for Plaintiffs and the Settlement Class will answer any questions the Court may have. However, you are welcome to attend the hearing at your own expense.

VIII. PROCEDURES FOR OBJECTING TO SETTLEMENT

A. You may object to the proposed settlement as unfair, unreasonable, and/or inadequate. You will not be heard or entitled to contest the approval of the terms and conditions of the proposed settlement, or, if approved, the judgment to be entered approving the settlement, unless you formally object to the settlement on or before January 11, 2019 (30 calendar days after mailing of this Notice).

B. To object to the Settlement, you must file a written objection, along with copies of any papers in support of your position, with the Clerk of the United States District Court for the Central District of California, located at 350 West First Street, Los Angeles, CA 90012. You also must serve your objection and supporting papers on all counsel for the parties, as listed below. In your written objection, you must also verify that you are a member of the Settlement Class, and include your full name, current address and telephone number. The notice of objection must also be signed by you.

C. If you do not object in this manner as described, you will have given up your right to object to the Settlement. If you file an objection, you do not have to come to the Court to talk about it. As long as you submit your written objection on time, the Court will consider it. You may also pay your own lawyer to appear in Court on your behalf.

D. If you do not make your objection in the manner provided for in this Notice, you will be deemed to have waived such objection and shall forever be barred from making any objection to or appealing the fairness, reasonableness, or adequacy of the Settlement.

IX. EXAMINATION OF COURT PAPERS AND QUESTIONS

This Notice summarizes the Settlement. For more detailed information, you may review Plaintiffs’ Motion for Preliminary Approval of Class Action Settlement, and all other settlement related documents and motions, which are posted for your review at www.cptgroup.com/jbhuntsettlement. Additionally, all papers filed in the Lawsuit, including Plaintiffs’ Motion for Preliminary Approval of Class Action Settlement and all settlement related documents and motions are on file with the Clerk of the Court, case number 2:07-cv-08336-RGK (AFMx), which is located in the office of the Clerk of the Court for the United States District Court for the Central District of California at 350 West First Street, Los Angeles, CA 90012, and is available for viewing during regular office hours (Mon. – Fri., 10:00 a.m. to 4:00 p.m.). Finally, the pleadings and all other records from this Lawsuit may also be examined by accessing the Court docket in

this case through the Court's online Public Access to Court Electronic Records (PACER) system, at <https://ecf.cacd.uscourts.gov>. There may be a fee required to review the materials via the online PACER system.

If you have any questions, you can call the Claims Administrator at 1-888-906-3520 or any of the attorneys representing the Settlement Class (see below for Class Counsel's phone number).

ATTORNEYS REPRESENTING THE SETTLEMENT CLASS

Marlin & Saltzman, LLP

Stanley D. Saltzman
Adam M. Tamburelli
29800 Agoura Road, Suite 210
Agoura Hills, California 91301
Tel: (818) 991-8080; Fax: (818) 991-8081
ssaltzman@marlinsaltzman.com
atamburelli@marlinsaltzman.com

The Cullen Law Firm, APC

Paul T. Cullen
19360 Rinaldi Street, #647
Porter Ranch, California 91326
Tel: (626) 744-9125 Fax: (626) 744-9436

ATTORNEYS REPRESENTING J.B. HUNT TRANSPORT, INC.

(Not to be Contacted by Settlement Class Members)

Gibson, Dunn & Crutcher LLP


Scott A. Edelman
Diana M. Feinstein
2029 Century Park East
Los Angeles, California 90067

PLEASE DO NOT CALL OR OTHERWISE ATTEMPT TO CONTACT THE COURT, J.B. HUNT, J.B. HUNT'S CORPORATE OFFICE AND/OR MANAGERS, OR THE ATTORNEYS REPRESENTING J.B. HUNT REGARDING THIS SETTLEMENT. HOWEVER, YOU MAY ALWAYS CONTACT YOUR MANAGER OR J.B. HUNT'S HUMAN RESOURCES DEPARTMENT DIRECTLY WITH ANY QUESTIONS CONCERNING YOUR HOURS, WAGES, OR PAY GENERALLY, OR OTHER EMPLOYMENT-RELATED MATTERS, BUT YOU SHOULD NOT DISCUSS THE LAWSUIT OR SETTLEMENT WITH THEM IN ANY WAY.

CORTE DEL DISTRITO DE LOS ESTADOS UNIDOS
DISTRITO CENTRAL DE CALIFORNIA

AVISO DEL ACUERDO DE DEMANDA COLECTIVA

POR FAVOR LÉALO CUIDADOSAMENTE YA QUE
ESTE AVISO PUEDE AFECTAR SUS DERECHOS

CPT ID: «ID» 
«EmployeeName»
«Address1» «Address2»
«City», «State» «Zip»
«IMBarCode»

GERARDO ORTEGA y MICHAEL D. PATTON,
individualmente y en nombre de sí mismos, todos los
demás situados similarmente, y el público general,

Demandantes,

vs.

J.B. HUNT TRANSPORT, INC., una Corporación de
Arkansas, y OTROS 1-100, ambos inclusivos,

Demandado.

NÚMERO DE CASO: 2:07-cv-08336-RGK (AFMx)
JUEZ: Honorable R. Gary Klausner
SALA DE CORTE: 850

**AVISO DEL ACUERDO DE DEMANDA
COLECTIVA**

I. ¿POR QUÉ RECIBÍ ESTE AVISO?

Este aviso explica que un acuerdo ha sido alcanzado en el caso titulado *Gerardo Ortega, et al. v. J.B. Hunt Transport, Inc.*, Número de Caso 2:07-cv-08336-RGK (AFMx) (la “Demanda”). Usted está recibiendo este aviso porque los registros de J.B. Hunt Transport, Inc. (“J.B. Hunt”) indican que usted es un miembro de la “Clase Propuesta del Acuerdo” de los empleados incluidos en la Demanda, porque usted es un empleado de J.B. Hunt actual o anterior que trabajó como un conductor basado en California local o regional de “intermodal” o un conductor local o regional de Dedicated Contract Services en algún momento durante el período de tiempo del 19 de noviembre del 2003 al 8 de diciembre del 2018. Como un miembro de la Clase Propuesta del Acuerdo, usted es elegible a recibir una porción de la cantidad del acuerdo.

Esto **no** es un aviso de una demanda en contra de usted. **Usted no está siendo demandado.** La Demanda fue presentada en nombre de todos los miembros de la Clase del Acuerdo, para su beneficio. Su participación, o no participación, en el Acuerdo no afectará su empleo con J.B. Hunt de ninguna manera.

La Corte ha ordenado que este aviso sea enviado a usted porque los registros de J.B. Hunt indican que usted es un miembro de la Clase del Acuerdo. El propósito de este aviso es para informarle del Acuerdo propuesto de la Demanda. Este aviso también tiene la intención de (i) describirle el Acuerdo, incluyendo como el dinero del Acuerdo se asignará y como el Acuerdo puede afectarlo, y (ii) informarle de sus derechos y opciones con respecto al Acuerdo.

II. ¿DE QUÉ SE TRATA LA DEMANDA COLECTIVA?

Los Demandantes Gerardo Ortega, Michael D. Patton y Alfredo Salvatierra comenzaron la Demanda al presentar una queja en contra del Demandado J.B. Hunt en *Gerardo Ortega, Alfredo Salvatierra, and Michael*

D. Patton v. J.B. Hunt Transport, Inc., Número de Caso BC 380997, Corte Superior del Condado de Los Angeles, el 19 de noviembre del 2007, la cual J.B. Hunt removió bajo la “Class Actions Fairness Act” al Distrito Central de California el 27 de diciembre del 2007.

Posteriormente, los Demandantes enmendaron su queja para remover al Sr. Salvatierra como un demandante nombrado (“Primera Queja Enmendada”) el 17 de noviembre del 2008. Los Demandantes enmendaron además su Primera Queja Enmendada el 1 de octubre del 2018 (“Segunda Demanda Enmendada”).

Los Demandantes alegan los siguientes reclamos: (1) violaciones de las secciones 226.7 y 512 del Código Laboral y la sección 11 de las Ordenes Salariales de la Comisión de Bienestar Industrial de California (“IWC,” por sus siglas en inglés) (falta de proporcionar los períodos de comida); (2) violaciones de las secciones 226.7 y 512 del Código Laboral, y la sección 12 de las Ordenes Salariales de IWC (falta de proporcionar los períodos de descanso); (3) violaciones de la sección 226 del Código Laboral (falta de proporcionar las declaraciones salariales precisas); (4) violaciones de la sección 1194 del Código Laboral (falta de pagar el salario mínimo de California); (5) violaciones de las secciones 221 al 223 del Código Laboral (falta de pagar los salarios a la tasa acordada); (6) violaciones de la sección 203 del Código Laboral (falta de pagar los salarios debidos a la terminación de empleo); (7) violaciones de la sección 17200, et seq. del Código de Negocios y Profesiones; y (8) violaciones de la Ley del Procurador General Privado del 2004 (“PAGA,” por sus siglas en inglés) de la sección 2698 et seq. del Código Laboral de California.

Los Demandantes solicitaron para la certificación de la clase de los reclamos afirmados en la Primera Queja Enmendada el 16 de marzo del 2009. El 18 de mayo del 2009, la corte del distrito concedió la petición de los Demandantes para la certificación de la clase y certificó una clase que consiste de “todos los conductores de los Demandados basados en California locales o regionales de “intermodal” y conductores locales o regionales de Dedicated Contract Services (“DCS,” por sus siglas en inglés) que trabajaron para el Demandado en los cuatro años antes de que se presentará al queja original en esta demanda y/o hasta el momento del juicio en este caso.” Al mismo tiempo se certificó la clase, la corte del distrito suspendió la Demanda en espera de la decisión en *Brinker Restaurant Corp. v. Superior Court*, 53 Cal. 4th 1004 (2012), que se relaciona a las leyes de los períodos de comida de California. Tres años después, *Brinker* se decidió y se retiró la suspensión, en cual momento J.B. Hunt pidió que no se certificará la clase. La corte el distrito negó la petición de J.B. Hunt de descertificar el 18 de diciembre del 2012.

El 2 de octubre del 2013, la corte del distrito concedió la petición de J.B. Hunt para una sentencia sobre los alegatos de despedir los reclamos de los períodos de comida y de descanso de los Demandantes de la Demanda. Posteriormente, el 4 de junio del 2014, la corte del distrito concedió la petición de J.B. Hunt para una sentencia resumida y suspendió todos los reclamos que permanecían. Los Demandantes apelaron las ordenes de la corte del distrito al Noveno Circuito, que finalmente dejó vacantes las órdenes de la corte del distrito y remitieron la Demanda a la corte del distrito. Mientras la apelación estaba pendiente en el Noveno Circuito, la Demanda fue suspendida en la corte del distrito. J.B. Hunt presentó una petición de una orden de certificación ante la Corte Suprema de los Estados Unidos el 5 de febrero del 2018, que fue denegada el 4 de junio del 2018.

El 30 de abril del 2018, un aviso de la orden del 18 de mayo del 2009 de la corte del distrito concediendo la certificación se distribuyó a los miembros de la clase putativos.

El 11 de junio del 2018, los Demandantes presentaron una petición renovada de juicio sumario parcial, que la corte del distrito otorgó en parte y denegó en parte el 23 de julio del 2018. J.B. Hunt presentó una petición para un juicio sumario parcial y una petición de descertificación el 2 de julio del 2018. La corte del distrito concedió en parte y denegó en parte la petición de J.B. Hunt del juicio sumario parcial el 8 de agosto del 2018. Además, el 8 de agosto del 2018, la corte del distrito concedió la petición de J.B. Hunt de la descertificación.

J.B. Hunt sostiene que ha cumplido con todas las leyes aplicables estatales y federales, y J.B. Hunt continúa negando todos y cada uno de los reclamos en la Demanda.

Para el propósito de evitar el tiempo y gasto de un litigio continuo, cuyo resultado final es incierto, y para proporcionar una resolución justa y razonable de esta disputa legal, los Demandantes y J.B. Hunt han negociado un acuerdo donde J.B. Hunt ha acordado pagar \$15,000,000.00 para resolver el asunto, y los Miembros de la

Clase del Acuerdo serán elegibles a recibir una porción de esta cantidad. Este Acuerdo no es una admisión por parte de J.B. Hunt de cualquier responsabilidad.

III. ¿QUIÉN ESTA INCLUIDO EN ESTA DMENADA COLECTIVA?

La Clase Propuesta del Acuerdo se define para incluir a las siguientes personas:

Todos los conductores basados en California locales o regionales de “intermodal” o conductores locales o regionales de Dedicated Contract Services (“DCS,” por sus siglas en inglés) empleados por J.B. Hunt Transport, Inc. en cualquier momento entre el 19 de noviembre del 2003 y el 8 de diciembre del 2018.

IV. ¿QUÉ OFRECE EL ACUERDO PROPUESTO?

Bajo los términos del acuerdo propuesto de las partes, lo siguiente ocurrirá si el Acuerdo es concedido la aprobación final de la Corte:

A. J.B. Hunt pagará Quince Millones de Dólares (\$15,000,000.00) para resolver los reclamos de todos los Miembros de la Clase del Acuerdo.

B. Un administrador de reclamos ha sido asignado por la Corte para administrar el Acuerdo. El administrador de reclamos pagará de los \$15,000,000.00: (1) los costos de litigio de los Demandantes, hasta la cantidad de \$500,000.00; (2) Los gastos de administrar el Acuerdo, estimados a ser aproximadamente de \$80,000.00; (3) Los honorarios de abogados de los abogados de la clase de los Demandantes, hasta \$5,000,000.00; (4) Una adjudicación de servicio de \$15,000.00 a cada Demandante; y (5) \$375,000.00 a la Agencia del Trabajo y Desarrollo de Fuerza Laboral de California, que representa el 75% de los \$500,000.00 asignados al acuerdo del reclamo de los Demandantes de las sanciones bajo la Ley del Procurador General Privado del 2004 (las secciones 2698, *et seq.* del Código Laboral de California) (“PAGA”). Lo que resta de los \$15,000,000.00, que actualmente se estiman a ser de por lo menos \$9,015,000.00, estarán disponibles para ser distribuidos a todos los Miembros de la Clase del Acuerdo; esta cantidad se llama el Fondo Neto del Acuerdo (“NSF,” por sus siglas en inglés).

C. La cantidad que se menciona arriba se distribuirá a los Miembros de la Clase del Acuerdo se dividirá entre todos los Miembros de la Clase del Acuerdo como sigue. Después de que las cantidades descritas arriba en el párrafo IV.B, sean deducidas, el NSF que resulta se dividirá por el número total de “semanas calificadas” trabajadas por todos los Miembros de la Clase del Acuerdo durante el Período de la Clase, para producir un “Valor del Acuerdo Semanal.” Una “semana calificada” es cualquier semana en la cual un Miembro de la Clase del Acuerdo fue empleado por J.B. Hunt en California como un conductor local o regional “intermodal” o un conductor de DCS local o regional durante el periodo de tiempo del 19 de noviembre del 2003 hasta el 8 de diciembre del 2018 (el “Período de la Clase”). Usted será elegible a recibir un pago del Acuerdo igual al número total de semanas calificadas que usted trabajó para J.B. Hunt durante el Período de la Clase multiplicado por el Valor del Acuerdo Semanal, menos las retenciones aplicables, a menos de que decida optar por salir (*es decir*, no participar en) del Acuerdo. Las Partes estiman que, por cada año de empleo, un Miembro de la Clase del Acuerdo empleado como un conductor local o regional “intermodal” o un conductor de DCS local o regional tendrá derecho a recibir aproximadamente \$800, antes de las deducciones que se mencionan en la Sección IV.B. Por lo tanto, por ejemplo, un año sería alrededor de \$800, cinco años serían alrededor de \$4,000, y diez años serían alrededor de \$8,000, antes de las deducciones del caso descritas arriba. Estas solamente son estimaciones.

D. Si la Corte concede la aprobación final de la resolución del acuerdo y usted no opta por salir del acuerdo, entonces usted liberará a J.B. Hunt y todos los pasados y presentes sucesores, subsidiarias, matrices, empresas controladoras, compañías hermanas y afiliadas, divisiones y otras entidades relacionadas de J.B. Hunt, así como los sucesores, predecesores, accionistas, subsidiarias, inversionistas, matrices, compañías hermanas y afiliadas, funcionarios, directores, socios, asignados, agentes, empleados, principales, herederos, administradores, abogados, vendedores, contadores, auditores, asesores, fiduciarios, aseguradores, reaseguradores, planes de beneficio de los empleados, y los representantes de cada uno de ellos, ambos individualmente y en sus capacidades oficiales, pasados y presentes, así como todas las personas mediante, a

través de, bajo o en conjunto con cualquiera de esas personas o entidades (las “Partes Liberadas”), de cualquiera y todos los reclamos, deudas, responsabilidades, demandas, obligaciones, garantías, sanciones, costos, gastos, honorarios de abogados, daños, daños liquidados, acciones o causas de acción de cualquier tipo o naturaleza, ya sean conocidos o desconocidos, existentes o potenciales, reconocidos ahora o de aquí en adelante, esperados o inesperados, contingentes o acumulados, siempre y cuando ellos surjan de las causas de acción alegadas en la Demanda, así como cualquier reclamo fuera de las alegaciones de hecho alegadas en la Demanda en contra de J.B. Hunt o las Partes Liberadas o cualquiera de ellos, bajo cualquiera estatuto estatal, municipal o federal, ordenanza, regulación, orden, ley común o equidad, incluyendo y no limitado a la disposición de J.B. Hunt de los períodos de comida y de descanso o la supuesta falta de proporcionar los períodos de comida o de descanso. La supuesta falta de J.B. Hunt de pagar todos los salarios, y la disposición de J.B. Hunt de las declaraciones salariales, incluyendo pero no limitado a los reclamos bajo las secciones 201, 203, 210, 218.5, 218.6, 221, 222, 223, 226, 226.2, 226.7, 512, 558, 1194, 1197, 1182 del Código Laboral de California, las secciones 1021.5, 3287(b), y 3289 del Código de Procedimiento Civil de California, la sección 17200 et seq. del Código de Negocios y Profesiones de California, la Ley del Procurador General Privado del 2004 del Código Laboral de California, la sección 2698 et seq. del Código Laboral de California (incluyendo, pero no limitado a, la sección 2699), la Orden Salarial 9-2001 de la IWC (incluyendo, pero no limitado a, las secciones 4, 7, 11, 12), y cualquiera de los reclamos relacionados de los daños compensatorios, consecuentes, punitivos o ejemplares, daños estatutarios, compensación declaratoria, medidas cautelares, sanciones, interés (si antes o después de la sentencia), distribuciones, y/o los honorarios y costos de los abogados (los “Reclamos de la Clase Liberados”). Los Reclamos de la Clase Liberados incluyen todos los daños compensatorios, consecuentes, incidentales, liquidados, punitivos y ejemplares reclamados o no reclamados, restitución, interés, costos y honorarios, medidas cautelares o equitativas, y cualquier otra compensación disponible en la ley o equidad supuestamente debidas o disponibles a la Clase del Acuerdo surgiendo o resultando razonablemente de la Queja, de la Primera Queja Enmendada, o de la Segunda Queja Enmendada en contra de J.B. Hunt y las Partes Liberadas del período de tiempo desde el comienzo del estatuto de limitaciones aplicable de cada reclamo, hasta e incluyendo la fecha de la aprobación final del acuerdo, incluida dicha fecha.

V. ¿CUÁLES SON MIS OPCIONES?

A. *Usted puede aceptar su parte del acuerdo de \$15,000,000.00 y estar obligado por la liberación de todos los reclamos descritos arriba. Para recibir su parte de su adjudicación del Acuerdo, usted no necesita hacer nada.* Las adjudicaciones del Acuerdo se pagarán por cheque después de que el Acuerdo sea concedido la aprobación final por la Corte. Los cheques se enviarán por correo a usted por el administrador de reclamos. Su cheque permanecerá válido y negociable por ciento veinte (120) días a partir de la fecha en la cual fue enviado por correo. Después de que se caduquen los ciento veinte (120) días, el cheque se anulará y su parte del Acuerdo se enviará a una organización sin fines de lucro que se designará por los Demandantes y el Demandado antes de la audiencia de equidad final sobre el Acuerdo y sujeto a la aprobación de la Corte; o

B. *Usted puede optar por salir del Acuerdo, y por lo tanto no participar en él, en cual caso usted no recibirá su parte del Acuerdo y no estará obligado por los términos del Acuerdo.* Para expresar su intención de optar por salir, usted debe enviar una solicitud escrita de exclusión, mediante el correo de los EE.UU, al administrador de reclamos, Ortega, et al. v. J.B. Hunt Transport, Inc. Settlement Administrator, c/o CPT Group, Inc, ubicado en 50 Corporate Park, Irvine CA 92606, a no más tardar el 11 de enero del 2019 (30 días naturales después del envío por correo de este Aviso). Para que sea considerada válida, su solicitud de exclusión **debe** incluir: (1) el siguiente lenguaje o un lenguaje sustancialmente similar: “Elijo optar por salir del acuerdo de demanda colectiva de *Ortega v. J.B. Hunt Transport, Inc.* Entiendo que, al hacerlo, yo seré capaz de participar en el acuerdo, y no recibiré una parte de los fondos del acuerdo,”; (2) su nombre completo, dirección, número de teléfono, y los últimos cuatro dígitos de su número de Seguro Social; y (3) su firma pegada a esa declaración.

C. *Usted puede objetar al acuerdo.* Los procedimientos para objetar al acuerdo se describen a continuación en la Sección VIII de esta forma.

VI. ¿CUÁLES SON LOS PROCEDIMIENTOS PARA UN PAGO?

A. El administrador de reclamos calculará su parte del Acuerdo según sus “semanas calificadas” trabajadas, y le emitirá y le enviará por correo un cheque.

B. Cuarenta por ciento (40%) de su parte de la adjudicación del Acuerdo se considerará salarios de los cuales se deducirán las retenciones fiscales ordinarias de W-2. No se harán las deducciones fiscales del sesenta por ciento (60%) que resta, el cual se emitirá como 1099 “otros ingresos.” Se le darán las formas de impuestos del IRS de cada una de estas cantidades, si es aplicable. Usted es responsable de pagar la cantidad correcta de impuestos sobre cada porción de su parte del Acuerdo.

C. Es importante que las Partes en la Demanda tengan su dirección actual para poder enviarle otros correos con respecto a la Demanda. Debe comunicarse con el administrador de reclamos para informar cualquier cambio en su dirección después de recibir este Aviso. La falta de reportar un cambio de dirección puede resultar en que usted no reciba su parte del dinero del acuerdo.

VII. AUDIENCIA SOBRE EL ACUERDO PROPUESTO

Una Audiencia de Equidad Final, en la cual la Corte decidirá si el Acuerdo propuesto es justo, razonable, y adecuado, se llevará a cabo el 11 de febrero del 2019, a las 9:00 a.m., en la Sala de Corte 850 de Roybal Federal Building y la Sala de Corte de los EE.UU, ubicada en 255 East Temple Street, Los Angeles, CA 90012. La Corte puede suspender o continuar la audiencia sin previo aviso.

No está obligado a asistir a la audiencia. Los Abogados de los Demandantes y de la Clase del Acuerdo contestarán cualquier pregunta que la Corte pueda tener. Sin embargo, usted es bienvenido a asistir la audiencia por su propia cuenta.

VIII. PROCEDIMIENTOS PARA OBJETAR AL ACUERDO

A. Usted puede objetar al acuerdo propuesto como injusto, irrazonable y/o inadecuado. Usted no será escuchado o tendrá derecho a cuestionar la aprobación de los términos y condiciones del acuerdo propuesto, o, si es aprobado, la sentencia se dictará aprobando el acuerdo, a menos de que usted objete de manera formal al acuerdo en o antes del 11 de enero del 2019 (30 días naturales después del envío por correo de este Aviso).

B. Para objetar al Acuerdo, usted debe presentar una objeción escrita, junto con las copias de cualquiera de los documentos en apoyo de su posición, con el Secretario de la Corte del Distrito de los Estados Unidos para el Distrito Central de California, ubicada en 350 West First Street, Los Angeles, CA 90012. También debe entregar su objeción y los documentos de apoyo a todos los abogados de las partes, como se indica a continuación. En su objeción escrita, usted también debe verificar que usted es un miembro de la Clase del Acuerdo, e incluir su nombre completo, dirección actual y número de teléfono. El aviso de objeción también debe ser firmado por usted.

C. Si usted no objeta de esta manera como se describe, usted renunciará su derecho a objetar al Acuerdo. Si usted presenta una objeción, usted no necesita venir a la Corte para hablar sobre ella. Siempre y cuando usted presente su objeción escrita a tiempo, la Corte la considerará. Usted también puede pagar a su propio abogado para que comparezca en la Corte en su nombre.

D. Si usted no hace su objeción de la manera proporcionada en este Aviso, usted se considerará haber renunciado dicha objeción y estará para siempre prohibido de hacer alguna objeción de o apelar a la equidad, razonabilidad, o adecuación del Acuerdo.

IX. EXAMINACIÓN DE LOS DOCUMENTOS DE LA CORTE Y PREGUNTAS

Este Aviso resume el Acuerdo. Para más información detallada, usted puede revisar la Petición de la Aprobación Preliminar del Acuerdo de Demanda Colectiva de los Demandantes, y todos los demás documentos y peticiones del acuerdo relacionados, que fueron publicados para su revisión en www.cptgroup.com/jbhuntsettlement. Además, todos los documentos presentados en la Demanda, incluyendo la Petición de la Aprobación Preliminar del Acuerdo de Demanda Colectiva de los Demandantes y todos los documentos y peticiones del acuerdo relacionados están archivados ante el Secretario de la Corte, número de caso 2:07-cv-08336-RGK (AFMx), que está ubicado en la oficina del Secretario de la Corte para la Corte del Distrito de los Estados Unidos del Distrito Central de California en 350 West First Street, Los Angeles, CA 90012, y está disponible para su revisión durante las horas regulares de trabajo (lunes – viernes, 10:00 a.m. a las 4:00 p.m.). Finalmente, los alegatos y

todos los demás registros de esta Demanda también pueden ser examinados al acceder el expediente de la Corte en este caso a través del Sistema de Acceso Público a los Registros Electrónicos de la Corte (“PACER,” por sus siglas en inglés), en <https://ecf.cacd.uscourts.gov>. Es posible que se requiera una tarifa para revisar los materiales a través del sistema en línea de PACER.

Si usted tiene alguna pregunta, usted puede llamar al Administrador de Reclamos al 1-888-906-3520 o cualquiera de los abogados que representan a la Clase del Acuerdo (ver a continuación para el número de teléfono de los Abogados de la Clase).

ABOGADOS QUE REPRESENTAN A LA CLASE DEL ACUERDO

Marlin & Saltzman, LLP
Stanley D. Saltzman
Adam M. Tamburelli
29800 Agoura Road, Suite 210
Agoura Hills, California 91301
Tel: (818) 991-8080; Fax: (818) 991-8081
ssaltzman@marlinsaltzman.com
atamburelli@marlinsaltzman.com

The Cullen Law Firm, APC
Paul T. Cullen
19360 Rinaldi Street, #647
Porter Ranch, California 91326
Tel: (626) 744-9125 Fax: (626) 744-9436

ABOGADOS QUE REPRESENTAN A J.B. HUNT TRANSPORT, INC.

(No Deben Ser Contactados por los Miembros de la Clase del Acuerdo)

Gibson, Dunn & Crutcher LLP
Scott A. Edelman
Diana M. Feinstein
2029 Century Park East
Los Angeles, California 90067

POR FAVOR NO LLAME O DE OTRA MANERA INTENTE CONTACTAR A LA CORTE, A J.B. HUNT, A LA OFICINA Y/O A LOS GERENTES DE J.B. HUNT CON RESPECTO A ESTE ACUERDO. SIN EMBARGO, USTED SIEMPRE PUEDE CONTACTAR A SU GERENTE O AL DEPARTAMENTO DE RECURSOS HUMANOS DE J.B. HUNT DIRECTAMENTE CON CUALQUIER PREGUNTA CON RESPECTO A SUS HORAS, SALARIOS O PAGO GENERALMENTE, U OTROS ASUNTOS RELACIONADOS AL EMPLEO, PERO NO DEBE DISCUTIR LA DEMANDA O EL ACUERDO CON ELLOS DE NINGUNA MANERA.

EXHIBIT 2

**To the Declaration of Stanley D. Saltzman In Support of Plaintiffs'
Motion for Attorneys' Fees, Costs, and Incentive Awards**

| <u>Billing Date</u> | <u>Timekeeper</u> | <u>Hours</u> | <u>Description</u> |
|---------------------|----------------------|--------------|--|
| 3/11/2008 | Stanley D. Saltzman | 2.3 | Review original Complaint in the JBH action; Review Answer filed by Defendant; and review the removal papers. |
| 3/11/2008 | Stanley D. Saltzman | 2.5 | Review of policies provided by clients relating to all the drivers. |
| 3/18/2008 | Stanley D. Saltzman | 4.3 | Study previous discovery responses served by Defendant earlier in the case. |
| 3/25/2008 | William Daniels | 2 | Review written discovery propounded by defendants including deposition notices of plaintiffs, special interrogatories, and request for production. Confer with litigation team re same. |
| 3/25/2008 | Christina A. Humphre | 2 | Review written discovery propounded by defendants including deposition notices of plaintiffs, special interrogatories and request for production. Communications with litigation team re same. |
| 4/22/2008 | William Daniels | 1.3 | Review drafts of deposition notices for defendant representatives and person most knowledgeable prepared by co-counsel. Communications re same. |
| 5/1/2008 | William Daniels | 4 | Review and revise plaintiffs Request for Production Set One prepared by co-counsel. Communications re same. |
| 5/2/2008 | William Daniels | 0.3 | Review final Plaintiffs Final Request for Production. Communications re same. |
| 5/12/2008 | William Daniels | 5 | Review and edit draft of Plaintiffs Response to Special Interrogatories, Set One prepared by co-counsel. Communications re same. |
| 5/13/2008 | William Daniels | 0.3 | Review final Response of Plaintiff Ortega to Special Interrogatories. Communications re same. |
| 5/14/2008 | William Daniels | 3.3 | Review plaintiff documents and responses to defendants special interrogatories and request for production. Communications with team re same. |
| 5/15/2008 | William Daniels | 3.6 | Review plaintiff documents and responses to defendants special interrogatories and request for production. Communications with team re same. |
| 5/16/2008 | William Daniels | 1 | Review final responses of plaintiffs to defendants special interrogatories and request for productions. Communication with team re same. |
| 6/4/2008 | Susan Joseph | 5.8 | Review, organize and memorialize documents produced by defendant. Review plaintiff personnel files. |
| 6/4/2008 | William Daniels | 2.7 | Review and edit draft of plaintiff ORtegass Special Interrogatories to J.B. Hunt. Communications with co-counsel re same. |
| 6/11/2008 | William Daniels | 0.5 | Review defendants Amended Notice of Deposition of Plaintiff Gerardo Ortega. Communications with co-counsel re same. |
| 6/15/2008 | William Daniels | 8.5 | Prepare for deposition of Plaintiff Gerardo Ortega. Work with case team re same. (partial) |
| 6/16/2008 | William Daniels | 7.5 | Prepare for deposition of Plaintiff Michael Patton. Work with case team re same. (partial) |
| 6/17/2008 | William Daniels | 12.5 | Prepare for, travel to, and attend deposition of Plaintiff Michael Patton. |
| 6/18/2008 | William Daniels | 13 | Prepare for, travel to, attend deposition of Plaintiff Gerardo Ortega. Meet with plaintiff post depo. |
| 6/24/2008 | William Daniels | 2.7 | Review plaintiffs' personnel files. |
| 7/23/2008 | Susan Joseph | 8 | Document review and prepare exhibits for deposition of defendant's PMK Sherry Moncrief. |

MARLIN SALTZMAN, LLP
Timekeeper Report From 3/11/08 to 12/28/18

| <u>Billing Date</u> | <u>Timekeeper</u> | <u>Hours</u> | <u>Description</u> |
|---------------------|----------------------|--------------|---|
| 7/23/2008 | William Daniels | 5.5 | Review and analysis of JBH policies and procedures to prepare for depo of corporate witness Regalado |
| 7/24/2008 | William Daniels | 10.5 | Prepare for and take deposition of defendant's PMK Sherry Moncrief. Communications with litigation team re same. |
| 7/24/2008 | Christina A. Humphre | 11 | Prepare for and attend deposition of defendant's PMK Sherry Moncrief. Communicatoin with litigation team re same. |
| 7/24/2008 | Susan Joseph | 8 | Document review and prepare witness packet for deposition of defendant's PMK Aaron Regalado. |
| 7/25/2008 | William Daniels | 12.5 | Complete preparation for and take the deposition of defendant's PMK Aaron Regalado. Communications with litigation team re same. |
| 7/25/2008 | Christina A. Humphre | 12.5 | Prepare for and attend deposition of defendant's PMK Aaron Regalado. Communications with litigation team re same. |
| 8/21/2008 | Marcus J. Bradley | 7.5 | Prepare for deposition of defendant's PMK Leonard Garcia. |
| 8/21/2008 | Susan Joseph | 5 | Document review and prepare exhibits for deposition of defendant's PMK Leonard Garcia. |
| 8/22/2008 | Marcus J. Bradley | 12 | Prepare for, travel to, and attend deposition of Defendant's PMK Leonard Garcia. Communications with litigation team re same. |
| 9/2/2008 | Christina A. Humphre | 1.2 | Prepare drafdt Stipulation and Order to continue deadline for certification motion and related dates. |
| 9/18/2008 | Stephen O'Dell | 2.3 | Prepare first draft (partial) of first amended complaint and confer with Mr. Daniels re scope of proposed revisions. |
| 9/19/2008 | Stephen O'Dell | 2.7 | Legal research re combining the 1st and 2nd causes of action under Armenta theory |
| 9/23/2008 | Stephen O'Dell | 4.4 | Extensive further work on First Amended Complaint, incorporating the Armenta theory in the first cause of action |
| 10/22/2008 | Stephen O'Dell | 1.2 | Review updated draft of FAC, with input from others on the team. |
| 11/5/2008 | William Daniels | 1.3 | Review documents forwarded by putative class member; correspondence re same. |
| 11/10/2008 | Stephen O'Dell | 3.2 | Legal research re scope of D's right to discovery into class member communications with class counsel about facts of case - pre-certification |
| 11/11/2008 | Stephen O'Dell | 2.7 | Further research re. whether identities of class member callers can be compelled to disclosure; memo to team re the same |
| 11/17/2008 | Stanley D. Saltzman | 4.5 | Review and analysis of Defendant's Motion for Determination of Legal Issue - meal break requirements |
| 11/18/2008 | Christina A. Humphre | 9.5 | REsearch regarding the D's motion on meal break standard and its prematurity |
| 11/18/2008 | Stanley D. Saltzman | 7.5 | Legal research regarding opp to D's motion on meal break issue |
| 11/21/2008 | Stanley D. Saltzman | 6.5 | Continue research re pending meal break motion, and commence outlining issue responses. |
| 11/21/2008 | Christina A. Humphre | 9.5 | Further drafting of opposition to motion |
| 11/22/2008 | Christina A. Humphre | 12.5 | Drafting of opposition to motion to determine legal issue re meal break requirements |
| 11/22/2008 | Stanley D. Saltzman | 10 | Work on research and drafting of opp to motion on meal breaks. |
| 11/23/2008 | Stanley D. Saltzman | 8.3 | Continue work on oppo to motion for determination of legal standard |
| 11/23/2008 | Christina A. Humphre | 12.5 | Finalize research and drafting of opposition to critical motion on legal standard for meal break claim. |

| <u>Billing Date</u> | <u>Timekeeper</u> | <u>Hours</u> | <u>Description</u> |
|---------------------|----------------------|--------------|--|
| 11/24/2008 | Christina A. Humphre | 7.5 | Review input from co-counsel re oppo to motion on meal breaks - incorporate some of the suggested edits and arguments; prepare final draft for partner review. |
| 11/24/2008 | Stanley D. Saltzman | 6.3 | Review and edit final draft of motion opp. Prepare final version based on Ms. Humphrey's draft; and sign off on final draft for filing. |
| 11/24/2008 | Stephen O'Dell | 3.8 | Review near-final draft of opposition to D's motion for Ruling on Legal Standard to apply to meal and rest break claims |
| 12/1/2008 | Stanley D. Saltzman | 4.5 | Review D's Reply to our opp to its motion on meal break legal standard. |
| 12/2/2008 | Stanley D. Saltzman | 5.3 | Work on prep for oral argument on D's motion, set for following week |
| 12/3/2008 | Christina A. Humphre | 7.5 | Work on prep for hearing on motion; meet with Mr. Saltzman to update on D's Reply memorandum. |
| 12/3/2008 | Susan Joseph | 3.5 | Time spent responding to multiple class member contacts with the firm. |
| 12/4/2008 | Stanley D. Saltzman | 0.2 | Review Court's brief order denying D's motion on legal issues based on it being premature. |
| 12/16/2008 | Stanley D. Saltzman | 5.7 | Review draft of motion prepared by Mr. Cullen, requesting extension of cert motion deadline; and offer edits and input. |
| 12/18/2008 | Stanley D. Saltzman | 4.3 | Review of updated draft of cert extension motion; edit the same and return to Mr. Cullen for final prep. |
| 12/18/2008 | Susan Joseph | 7.5 | Receiving calls from class members; interview them; memos to file |
| 12/19/2008 | Christina A. Humphre | 4 | Final edits to Cullen motion requesting more time to file cert motion. |
| 12/19/2008 | Susan Joseph | 7 | Receiving calls from class members; interview them; memos to file |
| 12/21/2008 | Marcus J. Bradley | 8.7 | Prepare for deposition of defendant's PMK Leonard Garcia, including review of testimony of prior witnesses |
| 12/21/2008 | Susan Joseph | 4 | Document review and prepare exhibits for deposition of defendant's PMK Leonard Garcia. |
| 12/21/2008 | William Daniels | 1.2 | Review notices of plaintiffs' depositions. Confer with litigation team re same. |
| 12/22/2008 | Marcus J. Bradley | 12.5 | Prepare for, travel to, and attend deposition of defendant's PMK Leonard Garcia. Communication with litigation team re same. |
| 12/22/2008 | Stanley D. Saltzman | 3.7 | Review and analysis of D's opp to our ex parte motion for more time on cert motion. |
| 12/22/2008 | Stanley D. Saltzman | 8.5 | Entire day handling calls from class members; memos to file |
| 12/22/2008 | Susan Joseph | 7.5 | Receiving calls from class members; interview them; memos to file |
| 12/23/2008 | Christina A. Humphre | 5 | Further study of D's opp to our ex parte for further time. |
| 12/23/2008 | Susan Joseph | 4 | Multiple class member contacts and interviews; memos to file for each interview. |
| 1/7/2009 | Stanley D. Saltzman | 13 | Prepare for and attend deposition of defendant's PMK Tony Vargas. Communications with litigation team re same. |
| 1/7/2009 | Christina A. Humphre | 12 | Prepare for deposition of defendant's PMK Robert Schoenberger, as needed for cert motion |
| 1/7/2009 | Susan Joseph | 4 | Review documents and prepare exhibits for deposition of defendant's PMK Robert Schoenberger. Communciations with litigation team re same. |

| <u>Billing Date</u> | <u>Timekeeper</u> | <u>Hours</u> | <u>Description</u> |
|---------------------|----------------------|--------------|--|
| 1/8/2009 | Susan Joseph | 6 | Document review and prepare exhibits for deposition of defendant's PMK Tony Vargas. Communications with litigation team re same. |
| 1/8/2009 | Christina A. Humphre | 12.2 | Prepare for, travel to, and take deposition of defendant's PMK Robert Schoenberger. Communications with litigation team re same. |
| 1/9/2009 | Stanley D. Saltzman | 5.5 | Commence outlining P's motion for certification, and issues to address |
| 1/9/2009 | Christina A. Humphre | 7.5 | Work with SDS on cert motion outline, and review research conducted to date. |
| 1/10/2009 | Christina A. Humphre | 10 | Commence review of depositions taken to date, to study for testimony to be relied upon in motion to certify. |
| 1/12/2009 | Christina A. Humphre | 9.3 | Continue review of the many depositions taken in relation to use in cert motion. |
| 1/12/2009 | Stanley D. Saltzman | 4.5 | Work on discovery review for cert purposes. |
| 1/14/2009 | Christina A. Humphre | 10.5 | Work on cert motion research, and study of discovery to use. |
| 1/15/2009 | Stanley D. Saltzman | 3.5 | Review of multiple memos of class member contacts |
| 1/16/2009 | Christina A. Humphre | 6.5 | Certification motion research, and meet with Mr. Saltzman re the many issues that need to be addressed. |
| 1/16/2009 | Stanley D. Saltzman | 6 | Work with Ms. Humphrey on cert motion matters, and strategize the same. |
| 1/16/2009 | Susan Joseph | 7.5 | Continue returning calls from class members; interview them; memos to file |
| 1/20/2009 | Stanley D. Saltzman | 6.3 | Review numerous summaries of interviews with JBH drivers, for possible use as declarants in support of our motion to certify. |
| 1/22/2009 | Christina A. Humphre | 10.5 | Commence drafting of cert motion issues. |
| 1/22/2009 | Susan Joseph | 5 | Further calls to/from class members; interview them; memos to file |
| 1/24/2009 | Stanley D. Saltzman | 7.5 | Cert motion research, and review of Humphrey outline. |
| 1/27/2009 | Christina A. Humphre | 10.3 | Work on Cert motion drafting |
| 1/27/2009 | Stanley D. Saltzman | 8.5 | Review motion issues, and research re same. Study cases previously presented for cert and results to date. |
| 1/30/2009 | Stanley D. Saltzman | 6.5 | Extensive team meeting to go over all depo testimony needed, discovery obtained, etc., all in relation to cert motion (billed only by the two primary motion drafters) - Saltzman and Humphrey |
| 1/30/2009 | Christina A. Humphre | 6.5 | Extensive team meeting to go over all depo testimony needed, discovery obtained, etc., all in relation to cert motion (billed only by the two primary motion drafters) - Saltzman and Humphrey |
| 2/2/2009 | Susan Joseph | 7 | Assist attorney Humphrey with certification motion |
| 2/2/2009 | Christina A. Humphre | 9.5 | Continue working on cert motion - legal research re rest break law as it is evolving in recent cases and as relates to the facts developed |
| 2/4/2009 | Christina A. Humphre | 8.5 | Work on certification motion |
| 2/4/2009 | Stanley D. Saltzman | 6.5 | Study Regalado depo testimony for cert motion purposes |
| 2/4/2009 | Susan Joseph | 6.5 | Continue taking and returning calls from class members |
| 2/5/2009 | Marcus J. Bradley | 7.7 | Review of outline of certification motion, and discuss impact of corporate witness testimony obtained in depositions taken by me. |
| 2/10/2009 | Christina A. Humphre | 8 | Further work on drafting of certification motion, and research re the same. |

| <u>Billing Date</u> | <u>Timekeeper</u> | <u>Hours</u> | <u>Description</u> |
|---------------------|----------------------|--------------|---|
| 2/11/2009 | Stanley D. Saltzman | 9.3 | Research re. issues relating to cert motion, and review of all applicable JBH policies that apply. |
| 2/11/2009 | Susan Joseph | 7.3 | Review of all policies produced by defendant, as needed for motion to certify |
| 2/12/2009 | Susan Joseph | 8 | Study data produced by D with regard to ability to track hours in the data and the driver logs |
| 2/12/2009 | Susan Joseph | 4.3 | Review and organize further documents produced by D and note discrepancies in the bates numbers. |
| 2/13/2009 | Stanley D. Saltzman | 6.5 | Study driver logs as a means to reliably measure time worked and not paid |
| 2/13/2009 | Stanley D. Saltzman | 3 | Study hard data provided in productions by JBH, to show meal breaks taken or not taken. |
| 2/16/2009 | Christina A. Humphre | 7.5 | Further study of available supporting depo testimony for cert issues - common policies and practices |
| 2/16/2009 | Stanley D. Saltzman | 7.5 | Work with Ms. Humphrey to track the deposition testimony needed for the cert motion |
| 2/16/2009 | Susan Joseph | 9 | Work on summarizing of corporate witness depositions |
| 2/18/2009 | Christina A. Humphre | 12.5 | Extended day working on cert brief drafting |
| 2/18/2009 | Susan Joseph | 7 | Receiving and returning calls from class members; interview them; memos to file |
| 2/19/2009 | Christina A. Humphre | 8.3 | Continue work on cert motion, and further review of supporting depo testimony |
| 2/20/2009 | Stanley D. Saltzman | 5.5 | Cert motion review and comments |
| 2/20/2009 | Christina A. Humphre | 7.5 | Extensive review of our two plaintiffs' testimony as relates to motion to certify. |
| 2/20/2009 | Christina A. Humphre | 1.3 | Telecon with Plaintiff Ortega regarding his testimony and anticipated declaration. |
| 2/23/2009 | Susan Joseph | 7.5 | Study data produced by Defendant |
| 2/24/2009 | Susan Joseph | 6.3 | Continue data analysis |
| 2/25/2009 | Susan Joseph | 8.5 | Prepare various data reports for attorneys working on JBH certification motion |
| 2/26/2009 | Stanley D. Saltzman | 8.5 | Analysis of data reports by lead paralegal Susan Joseph, and work with the data to try to lay out exemplar days worked and time unpaid. |
| 2/26/2009 | Christina A. Humphre | 10 | Return to certification motion drafting after week off the project. |
| 2/27/2009 | Christina A. Humphre | 8 | Motion drafting - certification |
| 2/27/2009 | Stanley D. Saltzman | 7 | Work on motion and on data to be applied. |
| 2/27/2009 | Marcus J. Bradley | 6.5 | Further review of JBH witness testimony elicited in depositions, for use in the motion to certify |
| 3/2/2009 | Stanley D. Saltzman | 7.5 | Work on cert motion - three weeks before due date. |
| 3/2/2009 | Christina A. Humphre | 8.5 | Cert motion- drafting legal arguments and gathering supporting facts |
| 3/2/2009 | Susan Joseph | 8 | As requested by attorneys, digging into the policies and depos to find supporting facts for the motion to certify. |
| 3/3/2009 | Christina A. Humphre | 10 | Continue motion drafting, and circulate sections completed to partner for review. |
| 3/4/2009 | Stanley D. Saltzman | 7.3 | Review of sections of motion in draft form; edit as needed and send on to paralegal to search depositions for supporting testimony. |

| <u>Billing Date</u> | <u>Timekeeper</u> | <u>Hours</u> | <u>Description</u> |
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| 3/4/2009 | Christina A. Humphre | 8.5 | Further motion work |
| 3/4/2009 | Susan Joseph | 8 | Continue doing calls with class members; interview them; memos to file |
| 3/5/2009 | Susan Joseph | 10 | Full day digging into testimony to support current draft of motion |
| 3/5/2009 | Christina A. Humphre | 9.3 | Work on motion. All day |
| 3/6/2009 | Stanley D. Saltzman | 6.3 | Continue editing motion and then refer to partner for his input. |
| 3/6/2009 | Christina A. Humphre | 6.8 | Work on motion |
| 3/7/2009 | Marcus J. Bradley | 6.5 | At request of Mr. Saltzman, review and analysis of entire draft motion; discuss issues with Mr. Saltzman and Ms. Humphrey |
| 3/7/2009 | Stanley D. Saltzman | 3.5 | Confer with Bradley and Humphrey on status of motion |
| 3/7/2009 | Christina A. Humphre | 3.5 | Confer with partners Bradley and Saltzman re motion |
| 3/9/2009 | Christina A. Humphre | 8.5 | Drafting of cert section addressing common issues of law and fact; plus begin to frame declarations of class reps. |
| 3/9/2009 | Stanley D. Saltzman | 4.3 | Update research re Armenta theory and application to piece rate case for truck drivers. |
| 3/9/2009 | Stanley D. Saltzman | 5.2 | Begin to match of final testimony of JBH witnesses to the 8 unique unpaid tasks alleged in the case. |
| 3/9/2009 | Susan Joseph | 8.5 | Entire day working on trying to match data entries to tasks claimed as unpaid. |
| 3/10/2009 | Christina A. Humphre | 9.3 | Work on motion to certify all claims |
| 3/11/2009 | Christina A. Humphre | 7.2 | Work on drafting of declarations of the two plaintiffs; plus consider testimony of several possible class member declarants who may be used to support the motion. |
| 3/11/2009 | Susan Joseph | 10 | Reach out to many class members re possible use as declarants |
| 3/12/2009 | Stanley D. Saltzman | 6.5 | Extensive additional reviews of motion draft and edit the same. |
| 3/12/2009 | Christina A. Humphre | 8.5 | Work on the meal and rest break sections of the motion to certify |
| 3/13/2009 | Stanley D. Saltzman | 5.7 | Work with Ms. Humphrey and Ms. Joseph on outlining damages section of the brief and possible use of the data provided to support the damages claims. |
| 3/13/2009 | Susan Joseph | 7.5 | Work on damages presentation, and confer with attorneys regarding the same. |
| 3/13/2009 | Christina A. Humphre | 9 | Drafting of damages argument for the cert motion and confer with Saltzman and Joseph regarding the same. |
| 3/14/2009 | Stanley D. Saltzman | 8 | Entire Saturday spent cutting down various arguments to begin to get motion within page limits. |
| 3/16/2009 | Christina A. Humphre | 7.7 | Work on several motion sections to begin to complete the motion. |
| 3/16/2009 | Stanley D. Saltzman | 5.5 | Drafting of Saltzman declaration re. facts and adequacy to support the cert motion. |
| 3/16/2009 | Susan Joseph | 8 | Further time spent working on returning and taking calls from class members; interview them; memos to file |
| 3/16/2009 | Cody R. Kennedy | 8.5 | Study all memos re interviews to determine if we want to include some as declarations in the cert motion |
| 3/17/2009 | Susan Joseph | 9.3 | Draft extensive declaration re. supporting facts and begin to pull all the supporting deposition testimony to be cited. |
| 3/17/2009 | Christina A. Humphre | 11.5 | Extensive re-write of the motion, to finalize the issue presentation and reduce excess pages from the current draft. |
| 3/17/2009 | Stanley D. Saltzman | 5.5 | Assist with issue re-organization and re-outlining of the brief to get within limits. |

MARLIN SALTZMAN, LLP
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| <u>Billing Date</u> | <u>Timekeeper</u> | <u>Hours</u> | <u>Description</u> |
|---------------------|----------------------|--------------|--|
| 3/18/2009 | Christina A. Humphre | 9.3 | Final editing and further work on the supporting declarations to be submitted. |
| 3/18/2009 | Susan Joseph | 8 | Entire day locating and pulling all supporting depo testimony and selecting final exhibits from the policy documents to be used in support of the motion to certify |
| 3/19/2009 | Stanley D. Saltzman | 6.5 | Final edit of motion, final review and approval of depo cites and policy docs to be submitted. |
| 3/19/2009 | Christina A. Humphre | 7 | Final filing day edits of all segments of the motion, to ready it for filing. |
| 3/19/2009 | Susan Joseph | 5 | Assist with all final motion preparation to ready it for filing. |
| 3/23/2009 | Susan Joseph | 7.5 | Continue to study available policy documents as needed for eventual Reply brief; email to D counsel re some of the policies being incomplete |
| 3/23/2009 | Susan Joseph | 8.3 | Further time spent conducting class member interviews. |
| 3/30/2009 | Stanley D. Saltzman | 3.5 | Review letter from D counsel regarding preemption and applicability of the Blackwell case issued by Judge Sabraw in SD; refer to associate for further research |
| 3/30/2009 | Stephen O'Dell | 4 | Research re. the Blackwell decision, as it relates to both Mendonca and Rowe |
| 3/30/2009 | Stanley D. Saltzman | 1.7 | Exchange of detailed and comprehensive emails with lead counsel for the D regarding Blackwell and FAAAA preemption, and his client's position that it needs to file a motion to deny cert to be heard with our cert motion |
| 3/31/2009 | Stephen O'Dell | 4.5 | Further research re preemption issues |
| 4/1/2009 | Christina A. Humphre | 5.5 | Continue to reach out to and interview class member drivers. |
| 4/1/2009 | Stephen O'Dell | 8.5 | Continue research and analysis of preemption defenses asserted by D in its recent letter. |
| 4/2/2009 | Susan Joseph | 7.5 | Further class member interviews |
| 4/3/2009 | Susan Joseph | 5.5 | Prepare and organize various reports of class member interviews for the attorney team |
| 4/7/2009 | Christina A. Humphre | 8.5 | Entire day spent talking with class member contacts; memo file |
| 4/9/2009 | Christina A. Humphre | 6.5 | Further return calls to class members |
| 4/13/2009 | Stephen O'Dell | 6.3 | Research (further) re preemption issues; and commence drafting of extensive memo re the same. |
| 4/14/2009 | Stanley D. Saltzman | 6.5 | Initial read-through of D's opposition to our cert motion; including the brief, the many decs (partial review of the 29 declarations filed), and all of the other papers and objections filed by it. |
| 4/14/2009 | Christina A. Humphre | 8 | Review and analysis of the entire certification opposition filing by JBH |
| 4/14/2009 | Susan Joseph | 7.5 | Entire day reviewing and beginning to organize the opposition papers, and specifically the many opp declarations, to facilitate their immediate review for the reply brief. |
| 4/14/2009 | Stanley D. Saltzman | 2.2 | Review D's Second Amended Initial Disclosure, with many additional witnesses |
| 4/14/2009 | Susan Joseph | 5.5 | Continue returning calls from class members; interview them; memos to file |
| 4/15/2009 | Stanley D. Saltzman | 9.5 | Legal research regarding cases cited by D, and extent to which its opp deals with merits as opposed to certification standards. |

| <u>Billing Date</u> | <u>Timekeeper</u> | <u>Hours</u> | <u>Description</u> |
|---------------------|----------------------|--------------|---|
| 4/15/2009 | Christina A. Humphre | 8.5 | Study entire oppo to our cert motion - confer with Saltzman re same. |
| 4/16/2009 | Marcus J. Bradley | 8.5 | Study all of the declarations submitted by the D in opp to the certification motion; begin to sort them by issues so that they can be addressed more easily in the reply brief. |
| 4/16/2009 | Stanley D. Saltzman | 6.3 | Study JBH's objections to our decs and exhibits; begin to draft reply as needed and if needed to be filed. |
| 4/17/2009 | Marcus J. Bradley | 8 | Begin to work on possible detailed objections to the 29 declarations filed by JBH. |
| 4/17/2009 | Christina A. Humphre | 8.3 | Begin to outline issues to be raised in the reply brief on cert. |
| 4/17/2009 | Susan Joseph | 4.5 | Return further class member calls. |
| 4/19/2009 | Stanley D. Saltzman | 6 | Review and analysis of outline of issues created by Humphrey in reply to the opp. |
| 4/20/2009 | Christina A. Humphre | 8.5 | Drafting of Reply memorandum to JBH's oppo brief. |
| 4/20/2009 | Stanley D. Saltzman | 6 | Work with Ms. Humphrey on reply brief. |
| 4/21/2009 | Stanley D. Saltzman | 9.5 | Continue work on Reply brief re certification. |
| 4/21/2009 | Christina A. Humphre | 8 | Assist with Reply brief re cert |
| 4/22/2009 | Marcus J. Bradley | 7.3 | Drafting of P's objections to Defendant's RJN and its evidence submitted in support of its opposition. |
| 4/22/2009 | Stanley D. Saltzman | 11 | Continue drafting of reply brief (take over primary drafting due to Ms. Humphrey being out). |
| 4/22/2009 | Susan Joseph | 8.5 | Finish reviewing and categorizing of all of the declarations submitted by D with its cert opposition. |
| 4/23/2009 | Stanley D. Saltzman | 12 | Completion of draft of reply brief on all legal issues. |
| 4/23/2009 | Christina A. Humphre | 4.2 | Review draft of reply brief drafted by Saltzman |
| 4/23/2009 | Marcus J. Bradley | 5.3 | Edit draft of reply brief. |
| 4/23/2009 | Susan Joseph | 7.5 | Assist with editing and final organizing of the reply brief due on the 27th. |
| 4/24/2009 | Stanley D. Saltzman | 9 | Continue work on the reply memorandum |
| 4/24/2009 | Christina A. Humphre | 5 | Review and edit reply brief forwarded by Saltzman |
| 4/26/2009 | Stanley D. Saltzman | 8 | Near final drafting of the reply brief for cert motion. |
| 4/27/2009 | Stanley D. Saltzman | 6 | Complete final editing of the reply brief and forward to Ms. Humphrey for final review by her |
| 4/27/2009 | Christina A. Humphre | 3.5 | Final edits of reply brief. |
| 4/27/2009 | Susan Joseph | 4.3 | Work on final edits and organization of the brief. |
| 4/30/2009 | Stanley D. Saltzman | 3.3 | Review of D's Notice of Lodging of new decisions, research the decisions. |
| 4/30/2009 | Stanley D. Saltzman | 1.5 | Drafting of Oppo to D's notice of lodging new decisions |
| 5/4/2009 | Susan Joseph | 8.5 | Entire day returning calls to class member drivers to interview them |
| 5/18/2009 | Stanley D. Saltzman | 3.3 | Study Court's ruling granting class cert on most issues, and then partially staying the case as regards the meal and rest break claims; consider court's invitation of joint statement regarding whether or not to proceed with the rest of the case during the |
| 5/18/2009 | Christina A. Humphre | 4 | Review and analysis of court's certification ruling. Confer with Mr. Saltzman and with co-counsel Paul Cullen. |
| 5/18/2009 | Marcus J. Bradley | 5 | Begin to gather other state and federal cases where Brinker issue is in play to see how the judges are handling the "stay" issue. |
| 5/21/2009 | Christina A. Humphre | 6 | Research re other cases and handling of partial stays in relation to remaining issues. |

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|---------------------|----------------------|--------------|--|
| 6/1/2009 | Christina A. Humphre | 4.5 | Drafting of proposed Class Notice, and exchange views with D regarding whether or not it can be issued pending determination of whether the court will stay the whole case |
| 6/2/2009 | Stanley D. Saltzman | 2.2 | Review and edit draft of notice of certification; confer with co-counsel re the same; and exchange emails with D regarding its position on the same. |
| 6/4/2009 | Stanley D. Saltzman | 4.7 | Begin to outline P's position statement for the Court ordered joint statement on whether or not to stay or proceed with the rest of the case. |
| 6/4/2009 | Stanley D. Saltzman | 0.8 | Confer with Mr. Lidman re D's overall position - predictably, to stay the whole case. |
| 6/8/2009 | Stanley D. Saltzman | 3.3 | Continue to work on P's position statement on the stay issue |
| 6/9/2009 | Christina A. Humphre | 2.5 | Review draft of position statement prepared by Mr. Saltzman |
| 6/11/2009 | Stanley D. Saltzman | 7.5 | Extended time re-drafting and organizing our section of the joint statement, and analyzing by each claim for the Court. |
| 6/12/2009 | Stanley D. Saltzman | 3.3 | Further work on joint statement - P's section. Discuss with defense counsel. |
| 6/14/2009 | Stanley D. Saltzman | 3.3 | Prepare final draft of Plaintiffs' portion of the Joint Statement re Stay of Case; confer with defense counsel re getting the joint document ready to file tomorrow |
| 6/19/2009 | Stanley D. Saltzman | 0.3 | Review Court's Order staying entire case pending decision in the Brinker case |
| 7/8/2009 | Susan Joseph | 7.5 | Continue to work with the data produced by D to further understand the feasibility of determining damages, once the case is removed from the stay. |
| 7/17/2009 | Susan Joseph | 6 | Further work with the data provided by D |
| 7/20/2009 | Stanley D. Saltzman | 3.5 | Confer with Ms. Joseph re. use of the data, and what additional data we will eventually need. |
| 7/20/2009 | Susan Joseph | 3.5 | Confer with Mr. Saltzman re use of the data produced and analyzed. |
| 5/25/2010 | Susan Joseph | 0.5 | Telephone call from class member re status |
| 6/14/2010 | Denise Bauwens | 0.25 | Provide status to class member. |
| 7/1/2010 | Denise Bauwens | 0.25 | Provide status to class member. |
| 7/16/2010 | Denise Bauwens | 0.25 | Provide status to class member. |
| 7/22/2010 | Denise Bauwens | 0.25 | Provide status to class member. |
| 7/22/2010 | Denise Bauwens | 0.25 | Provide status to class member. |
| 8/26/2010 | Denise Bauwens | 0.25 | Class member called for status. |
| 10/12/2010 | Denise Bauwens | 0.25 | Take inquiry from putative class member re status of the case. |
| 11/1/2010 | Denise Bauwens | 0.25 | Contacted by class member for status. |
| 11/11/2010 | Christina A. Humphre | 1.1 | Spoke to 3 class members re status of case and new potential case; set up an in-person meeting. |
| 1/31/2011 | Susan Joseph | 0.25 | Class member contact |
| 8/19/2011 | Craig Pynes | 1.2 | Meet with Stan and Paul re: Mr. Ortega's call about a personal issue that could relate to the case; review emails exchanged with Gerardo re: same; |
| 3/28/2012 | Craig Pynes | 0.2 | Discuss with Paul re: anticipated impact of Brinker/ Brinkley decision; |
| 5/8/2012 | Craig Pynes | 0.4 | Review notice of decision re: Brinker/ Brinkley and emails re: same; discuss case cert issues with Paul; |

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| 5/11/2012 | Craig Pynes | 0.5 | Review letter from Littler re: basis for their reconsideration motion; prepare email to Paul re: same; |
| 5/14/2012 | Craig Pynes | 0.25 | Review order re: judicial reassignment; discuss same with Christina; discuss same with Paul; |
| 5/15/2012 | Craig Pynes | 0.3 | Review information on new judge; discuss same with Christina; prepare email to Paul re: same; review minute order re: magistrate judge assignment; |
| 5/18/2012 | Craig Pynes | 0.2 | Review civil minutes re: case transfer; review emails re: same; |
| 6/14/2012 | Denise Bauwens | 0.25 | J.B. Hunt truck driver called for status. |
| 8/6/2012 | Craig Pynes | 0.1 | Discuss with Paul re: case status and further workup; |
| 8/10/2012 | Craig Pynes | 0.2 | Review Joint Statement Regarding Lifting of Stay and Scheduling of Status and email re: same; |
| 8/10/2012 | Christina A. Humphre | 0.2 | Edited proposed joint statement to lift stay and request for status conference. Teleconference with opposing counsel re lifting stay and doc. |
| 8/13/2012 | Craig Pynes | 0.2 | Review Joint Statement re: Lifting Stay and email re: same; |
| 8/23/2012 | Craig Pynes | 0.1 | Review Scheduling Notice; |
| 8/24/2012 | Christina A. Humphre | 0.5 | prepared a joint case management statement. |
| 8/27/2012 | Leslie H. Joyner | 4 | Attend Court hearing with Ms. Humphrey |
| 8/27/2012 | Christina A. Humphre | 4 | attended case management conference in Central District Los Angeles. |
| 8/27/2012 | Craig Pynes | 0.3 | Meet with Christina re: this morning's hearing; discuss results of hearing with her and Stan; |
| 8/28/2012 | Craig Pynes | 0.2 | Review Minutes of court's CMC ruling; review emails and discuss with other attorneys; |
| 9/10/2012 | Craig Pynes | 0.2 | Review court minutes re: lifting of stay and emails re: same; |
| 9/27/2012 | Craig Pynes | 2.2 | Begin reviewing motion to decertify class action and supporting documents; discuss workup and calendaring with partners; calculate due date for same; |
| 10/1/2012 | Craig Pynes | 1.9 | 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: |
| 10/1/2012 | Christina A. Humphre | 0.3 | spoke with Scott Lidman and co-counsel Paul Cullen re stip for briefing schedule re motion for decertification. |
| 10/1/2012 | Christina A. Humphre | 5.5 | Initial review of motion for decertification and all declarations/additional docs. |
| 10/1/2012 | Stanley D. Saltzman | 4 | Review and analysis of D's motion to decertify, and the 27 declarations filed therewith. (partial) |
| 10/2/2012 | Stanley D. Saltzman | 6 | Completion of review of decert motion. Confer re timing and approach to opp |
| 10/2/2012 | Christina A. Humphre | 5 | Conclude initial review of motion to decertify filed by D |
| 10/3/2012 | Craig Pynes | 0.25 | Review emails re: changes to stipulation to extend hearing date and deadlines; review revised stipulation; |
| 10/4/2012 | Christina A. Humphre | 2.2 | Work with D to arrive at agreed briefing schedule to deal with decert motion and prepare and submit stip to the court. |
| 10/5/2012 | Craig Pynes | 0.2 | Review court's Minute Order and final stipulation; |
| 10/8/2012 | Craig Pynes | 0.2 | Review order granting Joint Stipulation and email re: same; |
| 10/9/2012 | Craig Pynes | 0.1 | Review court's order on stip to extend briefing deadlines; |

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| <u>Billing Date</u> | <u>Timekeeper</u> | <u>Hours</u> | <u>Description</u> |
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| 10/9/2012 | Stanley D. Saltzman | 4.2 | Study in detail the Walmart/Dukes decision relied on so heavily by D in its decertification motion. Refer to Mr. O'Dell for thorough study of the underlying briefs in the Supreme Court |
| 10/11/2012 | Craig Pynes | 0.2 | Review and respond to emails re: upcoming deadlines; |
| 10/12/2012 | Stephen O'Dell | 8.5 | Obtain Supreme Court briefs in the Dukes case to study per request of Mr. Saltzman; commence analysis thereof |
| 10/13/2012 | Stephen O'Dell | 8 | Continue to analyze the Supreme Court briefs in the Dukes case per request of Mr. Saltzman |
| 10/15/2012 | Stephen O'Dell | 3.8 | Also obtain and review the appellate briefs in the Ellis v. Costco decision. Report to the partners re the same, in relation to the opp to the decertification motion. |
| 10/16/2012 | Craig Pynes | 3.5 | Study assigned sections of the motion to decertify class |
| 10/18/2012 | Craig Pynes | 1.9 | Attend internal meeting re: workup on opposition to motion to decertify class; meet with Paul re: same; |
| 10/19/2012 | Craig Pynes | 5.8 | Research re: actual injury and individualized proof issues for opposition to motion to decertify class; discuss same with Christina; prepare section addressing same; |
| 10/22/2012 | Craig Pynes | 0.2 | Meet with Paul re: case status and workup; |
| 10/24/2012 | Jody Rosen | 2.2 | Printing post Brinker and misc. cases and preparing binders |
| 10/24/2012 | Jody Rosen | 4.3 | Preparation of binders with documents |
| 10/24/2012 | Jody Rosen | 2.2 | Printing post Brinker and misc. cases and preparing binders |
| 10/24/2012 | Christina A. Humphre | 6 | Researched cases that have since come down since Brinker, certified piece rate cases, and FAAAA cases. |
| 10/25/2012 | Craig Pynes | 0.4 | Extended discussion with Kiley re: workup on opposition to motion for decertification; |
| 10/25/2012 | Jody Rosen | 1.7 | Printing post Brinker and misc. cases and preparing binders |
| 10/25/2012 | Craig Pynes | 2.4 | Review multiple cases cited in moving papers and key cases; discuss motion and case workup with Paul and Christina; |
| 10/25/2012 | Christina A. Humphre | 9 | Read and analyzed cases and memos re opp to decert motion including post brinker cases and cases pertaining to cert of piece rate question. |
| 10/25/2012 | Stanley D. Saltzman | 7.5 | Assist with strategizing and drafting opp to decert motion |
| 10/25/2012 | Kiley L. Grombacher | 5.6 | Commence drafting of extensive objections to many of the D's supporting declarations. |
| 10/26/2012 | Craig Pynes | 3.5 | 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 review opposition brief and paystub section and prepare email to her re: same; continue |
| 10/26/2012 | Christina A. Humphre | 8.5 | Drafted Opp Motion to Decert - intro, reexamined Dukes. |
| 10/26/2012 | Kiley L. Grombacher | 6.3 | Complete drafting of evidentiary objections re. the motion to decertify |
| 10/27/2012 | Christina A. Humphre | 9 | Researched factual assertions in record and drafted Opp Motion to Decert. |
| 10/27/2012 | Stanley D. Saltzman | 9.5 | Work with attorneys on opp to decert and with paralegals on gathering relevant evidence to rebut D's arguments. |
| 10/28/2012 | Christina A. Humphre | 8 | Drafted Opp to Motion for Decert. Confer with Mr. Saltzman and work with him on the near-final draft |
| 10/28/2012 | Stanley D. Saltzman | 7.5 | Assist with drafting of near-final version of opp to decert |

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|---------------------|----------------------|--------------|--|
| 10/29/2012 | Craig Pynes | 5.8 | 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; |
| 10/29/2012 | Christina A. Humphre | 6 | Final edit to opp motion for decertification. |
| 10/29/2012 | Stanley D. Saltzman | 5.5 | Review and final edits to opp to decert and approve for filing. |
| 11/28/2012 | Craig Pynes | 0.4 | Review reply brief and emails re: same; |
| 11/30/2012 | Craig Pynes | 0.8 | Review Reply in support of Decertification and request for judicial notice; |
| 12/3/2012 | Stanley D. Saltzman | 8.5 | Review and analysis of D's reply brief re its decert motion. Discuss with Ms. Humphrey and Mr. Pynes |
| 12/3/2012 | Christina A. Humphre | 8 | Entire day studying D's reply brief to begin prep for oral argument on the 17th. |
| 12/6/2012 | Craig Pynes | 0.2 | Review detailed email from Christina H. re: reply brief and further workup on same; |
| 12/6/2012 | Stanley D. Saltzman | 5.3 | Continue to prep for hearing on D's decert motion |
| 12/7/2012 | Leslie H. Joyner | 3 | decertification - 226 claims |
| 12/10/2012 | Craig Pynes | 1.6 | Review and respond to emails with Christina H. re: workup issues on decert reply; review JB Hunt reply brief on decert; |
| 12/10/2012 | Stanley D. Saltzman | 6 | Further motion prep, and confer with Ms. Humphrey |
| 12/10/2012 | Christina A. Humphre | 4.5 | Assist with prep for oral argument on decert motion |
| 12/11/2012 | Craig Pynes | 0.2 | Review and respond to email with Christina H. re: further briefing on decert motion; discuss same with her; |
| 12/12/2012 | Craig Pynes | 2.7 | Meet with Christina re: research on various issues; research same; prepare email to Christina re: same; discuss same with Paul; |
| 12/13/2012 | Craig Pynes | 0.4 | Work with Jody re: locating cases for case notebook; |
| 12/13/2012 | Jody Rosen | 1.7 | searched for pertinent cases, copied and prepared binder for Decertification Motion Hearing |
| 12/13/2012 | Craig Pynes | 4.7 | Further detailed research into the "injury" component of 226 wage statement claims; prepare multiple emails to Christina H. re: same; 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 |
| 12/14/2012 | Craig Pynes | 7.5 | prepared binders for motion for decertification |
| 12/14/2012 | Jody Rosen | 1.7 | preparing Binders for Motion for Decertification |
| 12/14/2012 | Jody Rosen | 0.8 | Entire day prepping for decert hearing on Monday, and "mooting" the expected arguments. |
| 12/14/2012 | Stanley D. Saltzman | 7.5 | Work with Mr. Saltzman in extensive prep for critical hearing on decert. |
| 12/14/2012 | Christina A. Humphre | 7.5 | Review emails re: Sunday's conference call; discuss workup with Paul; review online re: tentative ruling; |
| 12/17/2012 | Craig Pynes | 0.4 | Attend hearing on decert motion in downtown federal courthouse. |
| 12/17/2012 | Stanley D. Saltzman | 5 | Attend decertification motion hearing in District Court. |
| 12/17/2012 | Christina A. Humphre | 5 | Review court ruling; discuss with various persons; review emails re: same; |
| 12/18/2012 | Craig Pynes | 0.3 | Extended discussion with Stan re: anticipated issues and workup on pre-emption issues and cross- MSJs; |
| 12/19/2012 | Craig Pynes | 2.5 | |

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| <u>Billing Date</u> | <u>Timekeeper</u> | <u>Hours</u> | <u>Description</u> |
|---------------------|----------------------|--------------|--|
| 12/19/2012 | Stanley D. Saltzman | 2.5 | Extended meeting with Mr. Pynes regarding work needed on preemption and MSJ issues. |
| 1/2/2013 | Craig Pynes | 0.75 | Review emails re: circulating and sending out notice; review Balasanyan decision and emails re: same; |
| 1/3/2013 | Craig Pynes | 3.2 | Review email re: changes to LC 226 and review statute; Conduct initial research re this potential issue and problem |
| 1/31/2013 | Craig Pynes | 0.2 | Review notice of Scheduling Conference and emails re: same; |
| 2/5/2013 | Craig Pynes | 0.2 | Review system re: key letters from last year; discuss same with Christina; |
| 2/5/2013 | Christina A. Humphre | 3.2 | draft meet and confer email to opposing counsel re motion for a stay; reviewed pertinent cases supporting wage claim as an independent claim; reviewed files to 5/9 correspondence. |
| 2/8/2013 | Craig Pynes | 0.1 | Review email from court re: rescheduling status conference; |
| 2/11/2013 | Christina A. Humphre | 1.2 | Email and discussion as to whether we should stipulate to stay of meal and rest breaks in prep for conference call with judge. |
| 2/11/2013 | Craig Pynes | 1.2 | Discuss case issues with Stan and Christina; discuss conference call stay issues with Paul; |
| 2/12/2013 | Craig Pynes | 0.1 | Review court order on defense counsel's request for a stay; |
| 2/12/2013 | Stanley D. Saltzman | 0.5 | Review Court's order re Defendant request to file stay motion; confer re response to the motion. |
| 2/25/2013 | Craig Pynes | 1.3 | Review motion to stay and supporting documents; discuss same with Paul; |
| 2/26/2013 | Craig Pynes | 0.8 | Review motion to stay documents and emails re: same; |
| 2/26/2013 | Stanley D. Saltzman | 4.5 | Review and analysis of D's new motion to stay all proceedings pending decisions on Dilts and Campbell cases dealing with FAAAA |
| 2/26/2013 | Stanley D. Saltzman | 5.5 | Pull the briefing in the Dilts and Campbell cases from the Ninth Circuit, to review re our opp to the motion to stay based on those cases. |
| 2/27/2013 | Stanley D. Saltzman | 8.5 | Entire day studying the Dilts and Campbell briefing as relates to the new motion to stay filed by JBH; look for distinguishing factors that make our case different from those, so that stay is not appropriate. |
| 2/28/2013 | Stanley D. Saltzman | 6.7 | Continue work on the opp to the motion to stay; commence drafting the same. |
| 2/28/2013 | Kiley L. Grombacher | 7.5 | Assist Mr. Saltzman with research regarding standards for a stay to be issued, and the lack of applicability to our situation with JBH. |
| 2/28/2013 | Stanley D. Saltzman | 2.7 | Meet with Ms. Grombacher to go over her research and to draft those sections of the opp brief re the stay. |
| 3/1/2013 | Stanley D. Saltzman | 6.5 | Draft the broad arguments for opp to stay and send on to Ms. Grombacher for her input. |
| 3/1/2013 | Kiley L. Grombacher | 5 | Work with Mr. Saltzman on opposition brief regarding the motion to stay. |
| 3/2/2013 | Stanley D. Saltzman | 8 | Entire day Saturday re-working the brief to oppose the motion to stay. |
| 3/4/2013 | Kiley L. Grombacher | 12 | Review Opposition to Motion to Stay and supporting documents; work all day on final changes and edits |
| 3/4/2013 | Stanley D. Saltzman | 12 | Full day finishing up the opp to the motion to stay, with Ms. Grombacher's assistance. |

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| <u>Billing Date</u> | <u>Timekeeper</u> | <u>Hours</u> | <u>Description</u> |
|---------------------|----------------------|--------------|--|
| 3/8/2013 | Christina A. Humphre | 1.5 | prep and meeting with JB Hunt counsel on discovery/pre-cert letter and proceeding with case. |
| 3/8/2013 | Leslie H. Joyner | 1.5 | meeting with OPC and meeting notes |
| 3/8/2013 | Stanley D. Saltzman | 1.5 | Meeting with Defense counsel at our office re case issues, including notice of cert and discovery matters |
| 3/9/2013 | Stanley D. Saltzman | 5 | opposed motion to stay case. |
| 3/11/2013 | Stanley D. Saltzman | 1.2 | edited/finalized opp motion to stay case. |
| 4/2/2013 | Craig Pynes | 1.2 | retrieve and review Massachusetts case addressing FAAAA preemption; review Law 260 and emails re: same; |
| 4/23/2013 | Susan Joseph | 0.5 | |
| 4/23/2013 | Stanley D. Saltzman | 0.5 | Review Court's stay denial and emails re: same to all counsel |
| 4/25/2013 | Craig Pynes | 0.25 | Review email re: notice and settlement issues; discuss same with Stan; |
| 4/30/2013 | Susan Joseph | 0.5 | |
| 5/1/2013 | Susan Joseph | 2 | |
| 5/2/2013 | Stanley D. Saltzman | 1.6 | Review meet and confer letter from Defendant re: anticipated motion for judgment on the pleadings on FAAAA claim; initial research re the same. |
| 5/3/2013 | Craig Pynes | 0.2 | Review order re: case reassignment and email re: same; |
| 5/6/2013 | Christina A. Humphre | 1.9 | Drafted meet and confer letter re FAAAA preemption motion |
| 5/8/2013 | Craig Pynes | 0.25 | Review meet and confer letter re: FAAAA issues; |
| 5/9/2013 | Craig Pynes | 0.4 | Prepare email to re: case status and workup; |
| 5/13/2013 | Craig Pynes | 1.25 | Review Pelkey decision; review and respond to emails re: same; |
| 5/16/2013 | Craig Pynes | 0.25 | Review emails re: meet and confer letter; review letter; |
| 5/20/2013 | Craig Pynes | 0.2 | Review MINUTE ORDER IN CHAMBERS and emails re: same; |
| 5/21/2013 | Craig Pynes | 0.2 | Review and respond to emails re: trial and pre-trial deadlines; |
| 5/24/2013 | Craig Pynes | 3.8 | Review JB Hunt's motion for judgment on the pleadings and supporting declarations; |
| 5/27/2013 | Stanley D. Saltzman | 4.5 | Study the FAAAA issues moved on by the D in its MJOP |
| 5/28/2013 | Craig Pynes | 1.4 | 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; |
| 5/28/2013 | Christina A. Humphre | 0.9 | reviewed retainer agreement and letter to client Saucillo |
| 6/3/2013 | Christina A. Humphre | 0.3 | reviewed minute order re trial dates; email; discussion with Stan re trial dates. |
| 6/4/2013 | Craig Pynes | 0.25 | Discuss with Paul and Christina re: case status and opposition to FAAAA motion; |
| 6/5/2013 | Leslie H. Joyner | 8.5 | SCOTUS jurisprudence on FAAAA in light of Pelkey |
| 6/5/2013 | Christina A. Humphre | 2.8 | Drafted motion for permission to send class notice. |
| 6/10/2013 | Craig Pynes | 0.4 | Review Joint Statement Re Trial Schedule and Status of Case; review and respond to emails re: calendaring deadlines on D's motion for judgment on the pleadings; |
| 6/11/2013 | Leslie H. Joyner | 12 | Draft Opp MJOP |
| 6/11/2013 | Susan Joseph | 8 | Review prior discovery and draft discovery |
| 6/11/2013 | Christina A. Humphre | 5.5 | Study Defendant's motion for judgment on the pleadings; discussed internally; and researched legal issues. |
| 6/11/2013 | Stanley D. Saltzman | 6 | Meetings re. opposition to MJOP; research and outlining of issues to be addressed. |
| 6/12/2013 | Leslie H. Joyner | 10.5 | drafting, revise intro with stan and CAH, review cases |

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| <u>Billing Date</u> | <u>Timekeeper</u> | <u>Hours</u> | <u>Description</u> |
|---------------------|----------------------|--------------|---|
| 6/12/2013 | Susan Joseph | 7 | Review prior discovery and draft discovery requests |
| 6/12/2013 | Christina A. Humphre | 6.1 | Researched Pilkey and scope of FAAAA preemption. |
| 6/12/2013 | Stanley D. Saltzman | 8.3 | Work with attorney Joyner in opposing the MJOP. |
| 6/13/2013 | Craig Pynes | 0.4 | Review Scheduling Notice; discuss with Paul re: attorneys fees split; |
| 6/13/2013 | Stanley D. Saltzman | 8 | Study Dilts and Campbell case briefs to use in our opp to the MJOP |
| 6/14/2013 | Susan Joseph | 4 | Review prior discovery and draft discovery requests |
| 6/14/2013 | Leslie H. Joyner | 8.5 | Draft Opp MJOP |
| 6/14/2013 | Stanley D. Saltzman | 8.2 | Work on opposition to the MJOP |
| 6/17/2013 | Leslie H. Joyner | 10.25 | drafting Opp mjop, legal research re: dormant commerce clause |
| 6/18/2013 | Leslie H. Joyner | 8.5 | Draft opp mjop; confer with Mr. Saltzman |
| 6/19/2013 | Leslie H. Joyner | 16.5 | legal research, draft opposition, revise intro, draft new sections on transportation, reread seminal cases: rowe, murphey, morales, pelkey, brinker |
| 6/19/2013 | Susan Joseph | 5 | |
| 6/19/2013 | Stanley D. Saltzman | 10.5 | Work with Ms. Joyner in drafting opp to MJOP; research and re-read all key cases. |
| 6/20/2013 | Leslie H. Joyner | 8.5 | continue drafting, revising - research and draft section on IWC wage order history and applicability and counter arg by D that WO 9 targets motor carriers |
| 6/21/2013 | Leslie H. Joyner | 9 | Finish final draft and hand off to SDS and CAH for the weekend review |
| 6/21/2013 | Christina A. Humphre | 6 | Reviewed Dilts briefing 9th Cir. for opp FAAAA. |
| 6/22/2013 | Christina A. Humphre | 14 | Edited/drafted Opp Motion for judgment pleadings. |
| 6/22/2013 | Stanley D. Saltzman | 10.5 | Weekend work on the opp to the MJOP |
| 6/24/2013 | Leslie H. Joyner | 10.25 | draft proposed order, finish field preemption section, legal research for CAH on SJ/MTD in district court cases, pull exhibits, draft CAH declaration, draft RFJN, mark citations in doc and add TOA, assist CAH with filing. |
| 6/24/2013 | Susan Joseph | 6 | Work on opposition to FAAAA Motion |
| 6/24/2013 | Craig Pynes | 1.6 | Review Opposition to Motion for Judgment on the Pleadings and supporting documents; edit the WO 9 section |
| 6/24/2013 | Christina A. Humphre | 11 | Edited, finalized, p & as opp and all documents filed in support of opp to motion for judgment on the pleadings. |
| 6/24/2013 | Stanley D. Saltzman | 8.5 | Assist with final drafting of the opposition due tonight to the MJOP |
| 6/25/2013 | Susan Joseph | 1 | Pull Cardenas briefing |
| 7/2/2013 | Craig Pynes | 1.5 | Review reply brief in support of motion for judgment on the pleadings and emails re: same; |
| 7/3/2013 | Stanley D. Saltzman | 3.5 | Analyze JBH's Reply brief re the MJOP; refer to associate for follow up research |
| 7/8/2013 | Craig Pynes | 0.5 | Review article threatening attorneys with sanctions in wage suits; review emails re: same; |
| 7/8/2013 | Leslie H. Joyner | 4.5 | Study Reply brief and memo to SDS and CAH re the same. |
| 7/9/2013 | Craig Pynes | 0.1 | Continue preparing Evidentiary Objections to defendants' declarations in support of their Opposition to Plaintiff's motion for Conditional Cert; discuss same with Paul; |
| 7/15/2013 | Leslie H. Joyner | 1 | review new case filed by JBH and send email - prepare motion docs for hearing |

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| <u>Billing Date</u> | <u>Timekeeper</u> | <u>Hours</u> | <u>Description</u> |
|---------------------|----------------------|--------------|--|
| 7/16/2013 | Craig Pynes | 0.5 | Review Request for Judicial Notice and accompanying supporting documents on motion for judgment on the pleadings; review and respond to emails re: scheduling on motion for judgment on the pleadings and related items; |
| 7/17/2013 | Christina A. Humphre | 5.5 | prepared for hearing on Def Judgment on Pleaedings FAAAA re meals and breaks. |
| 7/17/2013 | Stanley D. Saltzman | 3.5 | Assist with prep for tomorrow's hearing on the MJOP |
| 7/18/2013 | Craig Pynes | 0.2 | Discussions re: today's hearing; |
| 7/18/2013 | Leslie H. Joyner | 8.5 | Prepare for and attend MJOP |
| 7/18/2013 | Christina A. Humphre | 6 | Attended motion for judgment on pleadings re FAAAA meals and breaks. |
| 7/18/2013 | Stanley D. Saltzman | 6 | Attend MJOP hearing |
| 7/19/2013 | Leslie H. Joyner | 1.7 | Draft PMK Notice |
| 7/19/2013 | Craig Pynes | 0.3 | Review Notice of Reassignment of case; review MINUTES OF MOTION HEARING AND SCHEDULING CONFERENCE |
| 7/22/2013 | Craig Pynes | 0.3 | Review Minutes Re Motion for JOP and Scheduling Conference setting Trial Date; review transcript order; |
| 7/22/2013 | Leslie H. Joyner | 0.5 | Notice of new decision Schwann |
| 7/22/2013 | Christina A. Humphre | 1.1 | Reviewed Request for Production 2 being served. |
| 7/22/2013 | Christina A. Humphre | 0.5 | Emailed opposing counsel re: class list and class noticed. Reviewed prior communications re same issue., |
| 7/22/2013 | Stanley D. Saltzman | 1.1 | Reviewed and edited requests for production being propounded on defendant. |
| 7/23/2013 | Craig Pynes | 0.8 | Review recent decision of Schwann v. Fedex Ground Package System; review and respond to emails re; upcoming deadlines; review second set of production requests; |
| 7/24/2013 | Craig Pynes | 0.25 | Review court notice re: transcript order; review and respond to multiple emails re: scheduling issues; |
| 7/25/2013 | Christina A. Humphre | 0.3 | email opposing counsel re class list and scheduling issues. |
| 7/25/2013 | Christina A. Humphre | 2.7 | Pulled all piece rate cases for prep for MSJ on liability/depositions PMKs. |
| 7/26/2013 | Craig Pynes | 0.3 | Discuss with Paul re; obtaining depo transcripts; follow up with Angela re: same; |
| 7/26/2013 | Susan Joseph | 1 | Draft PMKnotice; letter re same; depositions to Paul Cullen |
| 7/29/2013 | Craig Pynes | 0.2 | Discuss with Paul re; obtaining depo transcripts; follow up with Angela re: same; |
| 7/30/2013 | Craig Pynes | 0.3 | Prepare PMK deposition notice; |
| 7/31/2013 | Craig Pynes | 0.1 | Review NOTICE OF FILING TRANSCRIPT |
| 8/1/2013 | Craig Pynes | 0.4 | Review Transcript of hearing 7-18-13 and email re: same; |
| 8/5/2013 | Craig Pynes | 0.25 | Discuss with Paul re: status and workup; |
| 8/7/2013 | Leslie H. Joyner | 1.2 | Work on stipulation re class notice |
| 8/7/2013 | Leslie H. Joyner | 0.4 | class notice language/cole |
| 8/7/2013 | Craig Pynes | 0.2 | Review Joint STIPULATION for Leave to for Approval of Class Notice Language |
| 8/9/2013 | Craig Pynes | 0.3 | Review court order re: language for class notice; discuss same with Paul; |
| 8/12/2013 | Susan Joseph | 4 | Research; review plaintiff driverlogs; draft subpoena; review Graves Depo |

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| <u>Billing Date</u> | <u>Timekeeper</u> | <u>Hours</u> | <u>Description</u> |
|---------------------|----------------------|--------------|---|
| 8/12/2013 | Stanley D. Saltzman | 1.4 | Draft final version of class notice; telecon with D counsel re same and re their position that notice should again be deferred. |
| 8/13/2013 | Leslie H. Joyner | 2 | Pull FAC and Answer; review Affirmative defenses for contention rogs, set up rogs |
| 8/13/2013 | Susan Joseph | 0.5 | |
| 8/13/2013 | Susan Joseph | 4 | Draft subpoena; draft RFPs |
| 8/13/2013 | Leslie H. Joyner | 5.5 | Legal research re. piece rate cases for MSJ purposes; review trial court docs |
| 8/14/2013 | Craig Pynes | 1.5 | Review and respond to emails re: JBH cases; Review and respond to emails re: JBH cases; compile cases for notebook; begin reviewing same; |
| 8/14/2013 | Leslie H. Joyner | 8.5 | Go through piece rate court files - federal and state - and pull expert information for experts used by P's in those cases |
| 8/14/2013 | Christina A. Humphre | 1 | Meet and confer with opposing counsel re discovery 30(b)(6) depositions and rpd set no. 2. |
| 8/15/2013 | Craig Pynes | 3.6 | 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 |
| 8/15/2013 | Leslie H. Joyner | 1.5 | Finalize Contention rogs, send to CAH for review and revise |
| 8/15/2013 | Susan Joseph | 1 | Research re experts |
| 8/15/2013 | Leslie H. Joyner | 3 | re; equitable defense to LC sections 203, 221-223, 226(a), 226.7 and 1194 |
| 8/15/2013 | Christina A. Humphre | 2 | Met with Leslie to discuss Motion for judgment on the pleadings, reviewed answer to determine scope of motion for judgment on the pleadings. |
| 8/15/2013 | Christina A. Humphre | 4 | Reviewed/edited interrogatories, set no. 2, rfp no. 3 - reviewed answer for contention rogs. |
| 8/15/2013 | Leslie H. Joyner | 2 | Draft M&C letter to opc regarding intent to file a motion to strike affirmative defenses |
| 8/16/2013 | Leslie H. Joyner | 0.6 | Finalize M&C letter, send to CAH |
| 8/16/2013 | Leslie H. Joyner | 4.5 | Locate and pull court docs/records from various piece rate cases - locate expert CVs for experts used in Dilts |
| 8/16/2013 | Christina A. Humphre | 6 | Researched experts for JB hunt - IT expert, economist, and driver log expert. |
| 8/16/2013 | Craig Pynes | 2.75 | Continue reviewing notebook cases; discuss same with Stan; Work on expert searches for further case handling; telecons with various P counsel handling other piece rate cases; confer with Ms. Humphrey re the same. |
| 8/16/2013 | Stanley D. Saltzman | 5.5 | Continue reviewing notebook cases; review Burnham decision; discuss same with Stan, Paul and Kiley; |
| 8/19/2013 | Craig Pynes | 2.7 | Review of D's submission of new case for pending MJOP - the Burnham case. Draft request to strike improper argument set forth in the notice |
| 8/19/2013 | Stanley D. Saltzman | 3.3 | Draft proposed short counter argument to the D's submission on the Burnham case |
| 8/19/2013 | Stanley D. Saltzman | 2.5 | Review request for judicial notice and request to strike improper argument in same; review emails re: same; |
| 8/20/2013 | Craig Pynes | 0.4 | |

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| <u>Billing Date</u> | <u>Timekeeper</u> | <u>Hours</u> | <u>Description</u> |
|---------------------|----------------------|--------------|---|
| 8/20/2013 | Christina A. Humphre | 2.4 | Review D's Ex Parte Application to Defer Notice; Draft opposition thereto (partial) |
| 8/20/2013 | Stanley D. Saltzman | 1.2 | Review and edit draft of opp to D's request to stay notice. |
| 8/21/2013 | Leslie H. Joyner | 0.75 | Draft LWDA letter for eventual new client PAGA claims |
| 8/21/2013 | Craig Pynes | 0.8 | Review Defendant's Ex Parte Application to Defer Class Notice and our Opposition to same; discuss same with Paul; |
| 8/21/2013 | Christina A. Humphre | 1 | Final draft of opp to request to stay notice. |
| 8/22/2013 | Stanley D. Saltzman | 0.5 | Review court order granting defendant's ex parte application and email re: same; Confer with co-counsel re same. |
| 8/23/2013 | Craig Pynes | 0.2 | Review and respond to emails re: upcoming schedule; |
| 8/26/2013 | Susan Joseph | 6 | Meet with CAH; telephone conference; research; PMK depositions |
| 8/27/2013 | Craig Pynes | 0.2 | Review Notice of Appearance or Withdrawal of Counsel: for attorney Fatemeh S Mashouf counsel for Defendant J. B. Hunt Transport, Inc |
| 8/28/2013 | Craig Pynes | 3.75 | Continue reviewing Piece Rate Cases; |
| 9/3/2013 | Christina A. Humphre | 1.5 | Interviewed expert Barbara Luna for potential damages analysis. |
| 9/3/2013 | Stanley D. Saltzman | 1.5 | Joint interview of potential expert Barbara Luna |
| 9/5/2013 | Christina A. Humphre | 2.5 | Meeting with SDS re proof of damages and upcoming 30(b)(6) depositions/strategy going forward. |
| 9/5/2013 | Stanley D. Saltzman | 2.5 | Meeting with Ms. Humphrey re approaches to damages proof. |
| 9/6/2013 | Susan Joseph | 1 | |
| 9/9/2013 | Susan Joseph | 1 | |
| 9/11/2013 | Leslie H. Joyner | 1.25 | ESI - Litigation hold, third parties |
| 9/12/2013 | Leslie H. Joyner | 3.5 | ESI; duties of litigants; third parties |
| 9/19/2013 | Christina A. Humphre | 7.5 | Reviewed cases and evidence gathered to date to support P's MSJ. |
| 9/19/2013 | Stanley D. Saltzman | 8 | Entire day working on evidence review and deposition testimony to support our anticipated MSJ on liability |
| 9/23/2013 | Susan Joseph | 0.5 | Review class list and report on stats |
| 9/23/2013 | Christina A. Humphre | 1.3 | Spoke with Scott Lidman re: sending out notice and wrote email to partners apprising them of the situation. |
| 9/26/2013 | Christina A. Humphre | 8.7 | Reviewed all major cases applying to piece rate issue in prep to file MSJ. |
| 9/26/2013 | Stanley D. Saltzman | 8 | Work on MSJ on liability - studying all depositions taken to date to determine what other issues need to be dealt with by depositions prior to being able to file our motion. |
| 9/27/2013 | Christina A. Humphre | 9.8 | Re-read all depositions and evidence submitted in support of class cert in prep to write MSJ. |
| 9/27/2013 | Stanley D. Saltzman | 7.5 | Continue study of cases and evidence for MSJ. |
| 10/1/2013 | Christina A. Humphre | 3.5 | Review Omnitrac data; memo re same |
| 10/2/2013 | Susan Joseph | 3 | Confer with CAH re Qualcomm data; update memo and email re same |
| 10/2/2013 | Christina A. Humphre | 4 | Reviewed ruling on def motion for judgment on the pleadings, summarized and analyzed major findings. |
| 10/2/2013 | Stanley D. Saltzman | 3 | Review and analysis of Court ruling granting D's MJOP |
| 10/3/2013 | Susan Joseph | 1.5 | Conference call with Lindsay Parker and CAH re Omnitrac data; update memo re same |
| 10/3/2013 | Christina A. Humphre | 1.5 | Conference call with Lindsay from Omnitrac regarding data produced. |

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|---------------------|----------------------|--------------|---|
| 10/3/2013 | Stanley D. Saltzman | 2.3 | Further study of Court's ruling on MJOP |
| 10/3/2013 | Stanley D. Saltzman | 4 | Research and study our appellate options in light of the Court's ruling on D's MJOP |
| 10/5/2013 | Stanley D. Saltzman | 5.5 | Review and analysis of the appellate briefs filed in the Dilts case, for concepts to deal with the likely appeal of the Court's ruling on the MJOP |
| 10/6/2013 | Susan Joseph | 2 | Prepare witness packet for Omnitracs depo |
| 10/7/2013 | Susan Joseph | 1 | Prepare witness packet for Qualcomm depo |
| 10/7/2013 | Christina A. Humphre | 8.6 | Preparation for deposition of Qualcomm/Omnitracs rep by reviewing docs produced by Omnitracs, deposition of Michael Graves, and other docs produced by JB hunt; organize all documents to be used in the depo. |
| 10/8/2013 | Susan Joseph | 1.5 | Qualcomm depo |
| 10/8/2013 | Christina A. Humphre | 12.5 | Travelled to and from San Diego and deposed Omnitracs witness there, Mike Hein. |
| 10/9/2013 | Christina A. Humphre | 0.2 | email to opposing counsel re Defendant's position regarding class notice being sent. |
| 10/11/2013 | Susan Joseph | 2 | |
| 10/11/2013 | Leslie H. Joyner | 2.5 | Meet & Confer re Rogs and RFPs |
| 10/14/2013 | Christina A. Humphre | 0.3 | conference call with opposing counsel re Defendant's position for Plaintiffs to send out class notice. |
| 10/15/2013 | Christina A. Humphre | 1.1 | Edited letter re meet and confer on Defendant's responses to Plaintiff's Interrogatories Set. 2 and Plaintiff's Request for Production Set 3. Reviewed discovery responses and answer to first amended complaint along with edit. |
| 10/15/2013 | Christina A. Humphre | 3.7 | reviewed discovery responses to RPD 2, emails documenting meet and confer, drafted meet and confer letter re Def responses to RFP 2. |
| 10/16/2013 | Susan Joseph | 2 | Conf with CAH re PMK notice; draft PMK notice |
| 10/16/2013 | Christina A. Humphre | 0.6 | input further edits to meet and confer letter of 10/16 re Def Resp to RPD 2 based on review of prior emails. |
| 10/16/2013 | Christina A. Humphre | 0.2 | Drafted email to other trucking attorneys re experts they are using in their cases. |
| 10/16/2013 | Christina A. Humphre | 0.1 | Discussed with Susan drafting 30(b)(6) with discovery requests to oppose FAAAA motion. |
| 10/21/2013 | Susan Joseph | 0.25 | Revise PMK notice |
| 10/21/2013 | Susan Joseph | 4 | Review MSJ briefing and declarations |
| 10/21/2013 | Susan Joseph | 1.5 | Confer with CAH and LHJ |
| 10/21/2013 | Leslie H. Joyner | 1 | Conference with CAH, SJ re: D's MSJ, evidence needed, arguments in opposition |
| 10/21/2013 | Leslie H. Joyner | 0.1 | additional time and other remedies for discovery needed in order to respond to MSJ |
| 10/21/2013 | Christina A. Humphre | 5.5 | Reviewed Declaration of Scott Lidman re newly filed MSJ, Memorandum of Points and Authorities and 1 hour case management meeting to discuss approach in dealing with issues. |
| 10/21/2013 | Stanley D. Saltzman | 7.5 | Initial review and analysis of D's comprehensive motion for summary judgment and the many declarations and exhibits filed therewith. |
| 10/22/2013 | Susan Joseph | 1.5 | Meet with SDS, CAH, LHJ re MSJ |

Timekeeper Report From 3/11/08 to 12/28/18

| <u>Billing Date</u> | <u>Timekeeper</u> | <u>Hours</u> | <u>Description</u> |
|---------------------|----------------------|--------------|---|
| 10/22/2013 | Leslie H. Joyner | 4.3 | Review motion filed by JBH; identify issues for opposition |
| 10/22/2013 | Leslie H. Joyner | 1.6 | Prepare depo notice for 5 corporate declarants re Motion for SJ |
| 10/22/2013 | Leslie H. Joyner | 2 | meeting with SDS, CAH, SJ re: responding to MSJ; legal arguments; disputed facts; outline approach |
| 10/22/2013 | Stanley D. Saltzman | 2.5 | Study expert's report in support of D's MSJ. |
| 10/23/2013 | Leslie H. Joyner | 3 | Further work on depo notices of MSJ declarants |
| 10/23/2013 | Christina A. Humphre | 1.2 | re approach to MSJ. |
| 10/23/2013 | Susan Joseph | 3 | Review declarations; memo re same |
| 10/23/2013 | Leslie H. Joyner | 0.8 | add document requests, definitions to 5 deposition notices re corporate declarations iso D's MSJ |
| 10/23/2013 | Leslie H. Joyner | 8.25 | Reveiw and take notes on MSJ and SUF; set up Oppsoition and begin some thoughts on intro; Set up notes document breaking down arguments, legal research related to evidence underlying declarations and remedies for failure to provide, legal research on timi |
| 10/24/2013 | Susan Joseph | 7 | Various activities related to MSJ opposition including preparation of depo notices, confer with team, review evidence, briefing |
| 10/24/2013 | Christina A. Humphre | 5.5 | Spent time reviewing documents/data needed, looking at local rules, and drafted meet and confer email to opposing counsel re opposing their MSJ. |
| 10/24/2013 | Leslie H. Joyner | 12 | Legal research on MSJ requirements, local rules, rule 11 and rule 56 sanctions; review discovery propounded and responses. Review motion for cert, complaint, reply iso cert, opp decert and evaluate plaintiffs position re: compensation scheme. Various intr |
| 10/25/2013 | Leslie H. Joyner | 10 | Continue work on all MSJ matters addressed on 10-24-13 |
| 10/25/2013 | Stanley D. Saltzman | 8.5 | Extensive background work on MSJ opposition, including study of many prior motions and rulings in this matter, as well as in the Ruan case. |
| 10/28/2013 | Leslie H. Joyner | 0.9 | prepare memo summarizing issues with MSJ - collect supporting docs |
| 10/28/2013 | Leslie H. Joyner | 2 | consolidate legal and factual research on D's MSJ into a memo, organiz and print pleadings and emails for 9:00 am meeting before 10 am conference call |
| 10/29/2013 | Susan Joseph | 1.5 | Meet with CAH and LHJ re MSJ and Meet and Confer |
| 10/29/2013 | Susan Joseph | 0.5 | Conf call with defense counsel (meet and confer) |
| 10/29/2013 | Susan Joseph | 1.4 | Research experts |
| 10/29/2013 | Leslie H. Joyner | 1.5 | prepare information for case team for issue to raise/address on call with Lidman, review motion/complaint re: representation, meeting re: call; Conference call with lidman, CAH, SDS, and SJ |
| 10/29/2013 | Christina A. Humphre | 1.5 | and conference call with defense counsel re MSJ and discovery. |
| 10/31/2013 | Susan Joseph | 6 | Review and process documents; memo re same; e-mail re same |
| 11/1/2013 | Susan Joseph | 1 | Review discovery |
| 11/1/2013 | Susan Joseph | 0.5 | Tel con with defense counsel (meet and confer) |
| 11/4/2013 | Susan Joseph | 3 | |
| 11/4/2013 | Susan Joseph | 1.25 | Conference call with Dr Belzer and Ms. Humphrey re possible retention as expert. |
| 11/4/2013 | Susan Joseph | 0.5 | Review meet and confer letter; notes re discovery |

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| <u>Billing Date</u> | <u>Timekeeper</u> | <u>Hours</u> | <u>Description</u> |
|---------------------|----------------------|--------------|--|
| 11/4/2013 | Christina A. Humphre | 4.7 | Performed legal research re damages models for calculation of damages in this case. |
| 11/4/2013 | Christina A. Humphre | 2.3 | Discussion of damage models re. JB Hunt, and issues concerning illegal piece rates with Mr. Saltzman. |
| 11/4/2013 | Christina A. Humphre | 1.1 | Interviewed potential expert for damages. |
| 11/4/2013 | Stanley D. Saltzman | 2.3 | Discussion with Ms. Humphrey re damage models and piece rate issues re. JB Hunt |
| 11/5/2013 | Susan Joseph | 4 | Document processing and review; memo re same; prepare witness packets (Ashmore) |
| 11/5/2013 | Christina A. Humphre | 10 | Legal research regarding relationship between contract prices between cargo shippers and carriers and relationship to FAAAA. |
| 11/5/2013 | Stanley D. Saltzman | 7.5 | Work with Ms. Humphrey on trucking industry pricing models, and relationship to piece rate work, as it relates to D's MSJ. |
| 11/6/2013 | Susan Joseph | 6 | Document processing, review, databasing; memo re same. |
| 11/6/2013 | Susan Joseph | 0.5 | Tel conf with defense counsel re depositions and discovery |
| 11/6/2013 | Christina A. Humphre | 0.5 | conference call with Scott Lidman and Kevin Lilly re data and depositions moving forward. |
| 11/6/2013 | Stanley D. Saltzman | 8 | Continue work on study of pricing models, as addressed by Dr. Topel in his expert report. |
| 11/7/2013 | Susan Joseph | 6 | Document processing, databasing, review |
| 11/7/2013 | Christina A. Humphre | 1 | interviewed potential expert re relationship between contract prices and wages of employees. |
| 11/8/2013 | Susan Joseph | 6 | Document processing, databasing, review |
| 11/8/2013 | Susan Joseph | 1 | Draft PMK notice |
| 11/11/2013 | Christina A. Humphre | 0.5 | Discussion Stan strategy in moving motion date and proposed stip to move. |
| 11/11/2013 | Christina A. Humphre | 0.3 | Spoke to Lidman re stipualtion to move hearing date MSJ and moving trial date. |
| 11/12/2013 | Susan Joseph | 8 | Document processing, organization and review; depo prep (Ashmore, Regalado) |
| 11/12/2013 | Stanley D. Saltzman | 8.5 | Prepared for deposition of Aaron Regalado by reviewing declaration, documents produced, and preparing outline; review of MSJ to determine his exact role in the moving papers |
| 11/12/2013 | Christina A. Humphre | 11.2 | Reviewed declaration of Aaron Regalado, prior deposition transcript, read entire JB Hunt motion and declarations in support of MSJ, reviewed documents and other depo testimony in preparation for deposition of Aaron Regalado. |
| 11/13/2013 | Susan Joseph | 8 | Document processing, organization and review; depo prep (Walker, Broadstreet, Field) |
| 11/13/2013 | Stanley D. Saltzman | 9.2 | Travel to Littler offices in Century City for depo of Aaron Regalado, took deposition and travelled back to AH. |
| 11/13/2013 | Stanley D. Saltzman | 10.5 | Traveled to Century city and conducted deposition of Aaron Regalado; return to Agoura Hills office and meet with Ms Humphrey re depo results. |
| 11/14/2013 | Susan Joseph | 3 | Document processing, organization and review; depo prep (Walker, Broadstreet, Field) |
| 11/14/2013 | Stanley D. Saltzman | 4.5 | Review Regalado deposition; basic notes of same to assist with prep for the depositions to be taken in Arkansas next week. |
| 11/14/2013 | Susan Joseph | 5.5 | Review rough of Regalado depo; prepare witness packets |

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| <u>Billing Date</u> | <u>Timekeeper</u> | <u>Hours</u> | <u>Description</u> |
|---------------------|----------------------|--------------|---|
| 11/14/2013 | Leslie H. Joyner | 6 | Draft first draft of opposition section on Cole/Gonzalez case issues. |
| 11/14/2013 | Christina A. Humphre | 11.5 | Extensive preparation for three corporate witness depositions next week in Ark in relation to the D's MSJ. |
| 11/15/2013 | Susan Joseph | 8 | Document processing, organization and review; depo prep (Walker, Broadstreet, Field); Meet with CAH and LHJ re same |
| 11/15/2013 | Susan Joseph | 7.5 | Prepare witness packets |
| 11/15/2013 | Leslie H. Joyner | 3.5 | Review and memo various piece rate cases |
| 11/15/2013 | Leslie H. Joyner | 9.8 | review declarations ISO d's MSJ and notes thereon, review court order granting MJOP, mark facts in D's SS to be disputed, mark D's ps and as re: false premise and "efficiency" in light of Court's order granting MJOP |
| 11/15/2013 | Christina A. Humphre | 10 | Continued prep for the 3 critical depositions next week in Arkansas |
| 11/15/2013 | Stanley D. Saltzman | 9 | Assist with preparation for the three JBH witness depositions next week at JBH offices in Arkansas |
| 11/16/2013 | Susan Joseph | 4 | Document processing, organization and review; depo prep (Walker) |
| 11/16/2013 | Susan Joseph | 4 | Prepare witness packets |
| 11/18/2013 | Leslie H. Joyner | 6.5 | Work on factual background section of Opp MSJ |
| 11/18/2013 | Susan Joseph | 6 | Prepare witness packets |
| 11/18/2013 | Christina A. Humphre | 16 | Travelled to Fayetteville, Arkansas for depositions of PMK and individuals in JB Hunt. |
| 11/18/2013 | Stanley D. Saltzman | 9.3 | In office further prep for the three important depositions beginning tomorrow in Arkansas, to be taken by Ms. Humphrey |
| 11/19/2013 | Susan Joseph | 7.5 | Prepare witness packets |
| 11/19/2013 | Christina A. Humphre | 2.5 | Early morning further prep for Deposition of Benton Walker. |
| 11/19/2013 | Christina A. Humphre | 9.1 | Took deposition of Benton Walker. |
| 11/19/2013 | Christina A. Humphre | 2.8 | Evening prep for deposition of Frank Broadstreet, following taking the Walker deposition. |
| 11/20/2013 | Susan Joseph | 7.5 | Prepare witness packets |
| 11/20/2013 | Christina A. Humphre | 2.6 | Evening preparation for deposition tomorrow of Darren Field. |
| 11/20/2013 | Christina A. Humphre | 10.1 | Deposition of Frank Broadstreet. |
| 11/21/2013 | Susan Joseph | 3.75 | Prepare witness packets |
| 11/21/2013 | Christina A. Humphre | 6 | Deposition of Darren Field. |
| 11/21/2013 | Leslie H. Joyner | 7.5 | review evidence produced, motion, revised declarations iso MSJ, Create outline for opposition |
| 11/21/2013 | Leslie H. Joyner | 7.3 | Draft legal standard and FAAAA preemption (generally) sections of opp. MSJ |
| 11/22/2013 | Leslie H. Joyner | 5.25 | Review rough depo transcript of Regalado and draft factual history section of Opp msj |
| 11/22/2013 | Christina A. Humphre | 12.5 | Travelled back to Agoura Hills from Fayetteville, AK where depositions took place. |
| 11/25/2013 | Leslie H. Joyner | 0.6 | Draft stip and proposed order re trial and related dates |
| 11/25/2013 | Leslie H. Joyner | 8.5 | Draft opposition to d's MSJ |
| 11/25/2013 | Susan Joseph | 1 | |
| 11/25/2013 | Christina A. Humphre | 5.3 | Review current draft of the MSJ opp in light of the testimony last week in the three depositions taken in Arkansas, plus Regalado's depo. |

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| <u>Billing Date</u> | <u>Timekeeper</u> | <u>Hours</u> | <u>Description</u> |
|---------------------|----------------------|--------------|---|
| 11/25/2013 | Stanley D. Saltzman | 2.5 | Meeting of motion opp team to go over issues in light of the four depos taken to date. |
| 11/25/2013 | Christina A. Humphre | 2.5 | Meeting of motion opp team to go over issues in light of the four depos taken to date. |
| 11/25/2013 | Leslie H. Joyner | 2.5 | Meeting of motion opp team to go over issues in light of the four depos taken to date. |
| 11/25/2013 | Susan Joseph | 2.5 | Meeting of motion opp team to go over issues in light of the four depos taken to date. |
| 11/26/2013 | Leslie H. Joyner | 7.4 | Draft opposition to defendant's MSJ |
| 11/26/2013 | Leslie H. Joyner | 3.2 | Pull Burnham v. Ruan briefing and review. |
| 11/26/2013 | Leslie H. Joyner | 2.2 | Revise outline for Opposition |
| 11/26/2013 | Christina A. Humphre | 4.3 | Pull and review Cardenas case briefing, review Quezada decision and briefing |
| 11/27/2013 | Leslie H. Joyner | 6 | draft opposition to D's MSJ |
| 11/27/2013 | Leslie H. Joyner | 0.5 | Revise stip to move trial dates and proposed order |
| 12/2/2013 | Leslie H. Joyner | 2.75 | Pull cert and decert briefing, review and note relevant statements for material issues in dispute (further) |
| 12/2/2013 | Leslie H. Joyner | 3.5 | Review facts from D's earlier decert motion and D's Opp to our Cert motion to use for Statement of genuine issues |
| 12/2/2013 | Leslie H. Joyner | 3.3 | Set up outline for Pl's motion for summary j. pm D's compensation system |
| 12/2/2013 | Christina A. Humphre | 1.1 | completed stipualtion to continue trial date. |
| 12/2/2013 | Christina A. Humphre | 6.5 | Performed research re Ruan re def motion summ judgment on FAAAA. |
| 12/2/2013 | Leslie H. Joyner | 10 | Draft and revise section on false premise based on prior pleadings and D's statements therein, work on other sections of brief, work on statement of genuine issues, |
| 12/3/2013 | Leslie H. Joyner | 9 | Draft introduction to opposition to JBH's MSJ, finalize section on false premise, reorganize structure and provide revised outline to SDS and CAH, review notes from certification briefing re: JBH's change in position and incorporate into body; Draft SDS d |
| 12/3/2013 | Leslie H. Joyner | 7.4 | Begin drafting P's MSJ on unlawful payment scheme; set and and begin working on proposed statement while drafting factual section; draft proposed order, set up my supporting declaration |
| 12/4/2013 | Susan Joseph | 3.5 | Opposition to Defendant's MSJ |
| 12/4/2013 | Susan Joseph | 3 | Prepare witness packet for Topel deposition |
| 12/4/2013 | Leslie H. Joyner | 7.5 | Work on Armenta and its progeny sections in both Plaintiffs' msj and Opp MSJ, simultaneously |
| 12/5/2013 | Leslie H. Joyner | 2.25 | piece rate cases: Ontiveros, cardenas, Armenta, Nordstrom, Gonzalez, Quezada for Opp MSJ |
| 12/5/2013 | Leslie H. Joyner | 2.25 | piece rate cases: Ontiveros, cardenas, Armenta, Nordstrom, Gonzalez, Quezada for Plaintiffs' MSJ onJBH's compensation system |
| 12/5/2013 | Leslie H. Joyner | 2.5 | Work on piece rate case authority section of P's MSJ on illegality of JBH's compensation scheme |
| 12/5/2013 | Leslie H. Joyner | 3.5 | Finish first draft of Opposition, Restructure "false Premise" section, revise Armenta section, draft and revise Quezada sectionj |
| 12/6/2013 | Leslie H. Joyner | 2.75 | Revise Armenta and Quezada sections of opp MSJ |
| 12/6/2013 | Leslie H. Joyner | 2.5 | review stsmt of GI and field depo. transcript |

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| <u>Billing Date</u> | <u>Timekeeper</u> | <u>Hours</u> | <u>Description</u> |
|---------------------|----------------------|--------------|---|
| 12/6/2013 | Stanley D. Saltzman | 7.5 | Review and analysis of extensive first draft of opp to D's MSJ; begin to reformulate certain arguments. |
| 12/6/2013 | Christina A. Humphre | 7.7 | Commence prep for deposition of D's expert next week, including review of prior expert declarations submitted by him, and discussion with our potential expert on the subject. |
| 12/7/2013 | Leslie H. Joyner | 11 | draft motion for summary judgment on JBH's compensation scheme: Summary of facts section (and work in separate statement) draft subsections on each unpaid activity; draft section on california law requirements and summarize relevant portions of DLSE opinion |
| 12/7/2013 | Stanley D. Saltzman | 6.5 | Further work on opposition to MSJ |
| 12/8/2013 | Christina A. Humphre | 3.2 | Reviewed Armenta, Reinhardt, Quezada in preparation to write MSJ, discussed significance of holdings with Leslie Joyner. |
| 12/8/2013 | Christina A. Humphre | 3.1 | reviewed Nordstrom, Gonzalez, Bluford, and briefing in Gonzalez and Nordstrom in preparation to write MSJ. |
| 12/8/2013 | Christina A. Humphre | 3.3 | Drafted outline of MSJ Plaintiffs are going to file. |
| 12/8/2013 | Stanley D. Saltzman | 9 | Work on Plaintiffs' motion for summary judgment, to be filed soon after our opp to D's MSJ. |
| 12/9/2013 | Susan Joseph | 0.5 | |
| 12/9/2013 | Leslie H. Joyner | 0.75 | DRaft Meet and Confer Letter re Plaintiffs' MSJ |
| 12/9/2013 | Leslie H. Joyner | 11 | Put together section on illegality of JBH's pay scheme; flesh out california law on requirement that employees be compensated for all time worked, define and describe remaining unpaid activities, draft sections (and separate statement) on facts underlying |
| 12/9/2013 | Christina A. Humphre | 6.5 | Preparation for the deposition of D's expert witness, Topel |
| 12/9/2013 | Stanley D. Saltzman | 6.5 | Work with Ms. Humphrey to prepare for depo of expert witness Topel, tomorrow. |
| 12/10/2013 | Susan Joseph | 8.75 | Opposition to Defendant's MSJ |
| 12/10/2013 | Leslie H. Joyner | 11.2 | Continue drafting P's MSJ - revise case section - move cardenas up, finish factual and legal sections on 226; draft section and sep. stmt on pay stub and settlement summary shortcomings; Revise section on California wage law. Draft argument of MSJ on wage |
| 12/10/2013 | Stanley D. Saltzman | 5.3 | Assist with prep for deposition of Kris Ashmore, to be taken tomorrow by Paul Cullen |
| 12/10/2013 | Christina A. Humphre | 7.3 | Deposition of D's expert, Robert Topel; confer with partners re results of the same. |
| 12/11/2013 | Susan Joseph | 12 | Opposition to Defendant's MSJ |
| 12/11/2013 | Leslie H. Joyner | 12.25 | revise and finalize first draft except for small sections on LC 203 and the UCL. |
| 12/12/2013 | Leslie H. Joyner | 3.5 | incorporate co-counsel's revisions and suggestions into MSJ; make revisions and edit |
| 12/12/2013 | Susan Joseph | 12.5 | Opposition to Defendant's MSJ |
| 12/12/2013 | Leslie H. Joyner | 3 | Pull facts and evidence for Separate statement ISO MSJ |
| 12/12/2013 | Leslie H. Joyner | 1.5 | review and mark Regalado depo testimony |
| 12/13/2013 | Leslie H. Joyner | 9.2 | Review depo testimony of Regalado, Field, Broadstreet, Ashmore for section on driver wage relation to customer pricing. Code Regalado and Field in Summation. |
| 12/13/2013 | Susan Joseph | 13 | Opposition to Defendant's MSJ |

Timekeeper Report From 3/11/08 to 12/28/18

| <u>Billing Date</u> | <u>Timekeeper</u> | <u>Hours</u> | <u>Description</u> |
|---------------------|----------------------|--------------|---|
| 12/13/2013 | Stanley D. Saltzman | 9.3 | Further near-final editing of opposition brief; review and approve various deposition excerpts; and discuss final approach to Topel assertions. |
| 12/13/2013 | Christina A. Humphre | 8 | Assist with editing and reorganizing of opposition brief re. D's MSJ |
| 12/14/2013 | Leslie H. Joyner | 3.5 | Draft section on driver wage and its relationship to customer costs. |
| 12/14/2013 | Leslie H. Joyner | 1.2 | Draft Notice of manual filing, notice and application to file under seal, declaration of CAH, proposed order granting. |
| 12/14/2013 | Susan Joseph | 11.5 | Work on preparing opposition to Defendant's MSJ |
| 12/14/2013 | Jody Rosen | 7 | reviewed and prepared spreadsheet of Dray % |
| 12/14/2013 | Christina A. Humphre | 6.3 | Continue edit and revising opp to MSJ |
| 12/15/2013 | Susan Joseph | 12.5 | Opposition to Defendant's MSJ |
| 12/15/2013 | Jody Rosen | 11.5 | Pulled pertinent deposition testimony and prepared for the filing of the Motion. |
| 12/15/2013 | Leslie H. Joyner | 10 | work on pulling cites for disputed facts, work on portions of stmt of genuine issues, finalize section on driver wage |
| 12/15/2013 | Christina A. Humphre | 4.3 | Draft argument to rebut Topel assertions, per testimony elicited at his deposition. |
| 12/16/2013 | Susan Joseph | 7.5 | Final preparation of Opposition to Defendant's MSJ |
| 12/16/2013 | Susan Joseph | 13 | Opposition to Defendant's MSJ |
| 12/16/2013 | Leslie H. Joyner | 14 | Create charts for opposition, review depo testimony and pull citations to evidence, finalize statement disputed issues, draft and finalize objections to evidence, file opposition and supporting papers under seal |
| 12/16/2013 | Jody Rosen | 4 | Pulled deposition testimony to be sent to the courts for the filing of a Motion. |
| 12/16/2013 | Stanley D. Saltzman | 10.5 | Assist with all final prep of opposition papers; gathering final exhibits; and final versions of declarations to be filed in opp. |
| 12/17/2013 | Leslie H. Joyner | 7.5 | Revise Statement of genuine issues for errata, revise exhibits to CAH decl. for errata |
| 12/18/2013 | Susan Joseph | 8 | MSJ |
| 12/18/2013 | Stanley D. Saltzman | 8 | Transition to the drafting process of P's MSJ, to be filed on 12-24 |
| 12/18/2013 | Christina A. Humphre | 10.5 | Work with Ms. Joyner in drafting multiple sections of P's liability based MSJ |
| 12/19/2013 | Susan Joseph | 14 | MSJ |
| 12/19/2013 | Stanley D. Saltzman | 9 | Continue work on P's MSJ on liability issues - wage statements, hours worked, training time |
| 12/19/2013 | Christina A. Humphre | 6.5 | Line up testimony needed to support our MSJ relief from the many depositions taken to date; correlate to the arguments already drafted, and edit the same. |
| 12/19/2013 | Christina A. Humphre | 3.3 | Begin drafting client declarations to support the MSJ to be filed next week. |
| 12/20/2013 | Susan Joseph | 9 | MSJ |
| 12/20/2013 | Stanley D. Saltzman | 5.5 | Further work on MSJ - edit sections written by Ms. Joyner, and research further newer piece rate cases. |
| 12/20/2013 | Christina A. Humphre | 10.5 | Work on MSJ - edits, case cites, insert supporting testimony from depositions, and select final supporting exhibits from the JBH policy manuals. |
| 12/21/2013 | Susan Joseph | 10.5 | MSJ |
| 12/22/2013 | Susan Joseph | 6 | MSJ |

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| <u>Billing Date</u> | <u>Timekeeper</u> | <u>Hours</u> | <u>Description</u> |
|---------------------|----------------------|--------------|---|
| 12/22/2013 | Leslie H. Joyner | 11.5 | Work on sepearate statement, evidence for declaration |
| 12/22/2013 | Christina A. Humphre | 10.5 | Assist with drafting of the Separate Statement to support the MSJ |
| 12/23/2013 | Susan Joseph | 11 | MSJ |
| 12/23/2013 | Leslie H. Joyner | 6.5 | Finalize P's MSJ |
| 12/24/2013 | Leslie H. Joyner | 6.8 | Finalize all docs for P's MSJ and send to be filed |
| 12/24/2013 | Stanley D. Saltzman | 6 | Final editing of the main brief to get it within page limits; final approval of all supporting documents to be filed. |
| 12/26/2013 | Leslie H. Joyner | 6.5 | Work on and prepare redacted copies of filing for P's opposition to defendant's motion for sj |
| 1/2/2014 | Christina A. Humphre | 1.5 | Re-read Plaintiffs Opp MSJ and then read reply brief. |
| 1/10/2014 | Christina A. Humphre | 0.5 | Reviewed ex parte motion by JB Hunt to move Plaintiff's MSJ date. |
| 1/10/2014 | Christina A. Humphre | 0.2 | conference with Stan Saltzman re: whether or not to agree to |
| 1/10/2014 | Christina A. Humphre | 0.2 | Defendnat's ex parte to move the hearing date on Plaintiff's motion. |
| 1/10/2014 | Christina A. Humphre | 0.2 | Drafted email to opposing counsel re proposed stip moving hearing date on plaintiff's msj. |
| 1/10/2014 | Leslie H. Joyner | 7.25 | Review all motion papers in prep for next week's hearing on D's MSJ |
| 1/10/2014 | Christina A. Humphre | 1.5 | Draft and file P's response to D's request to defer notice again, and to also defer P's MSJ hearing date |
| 1/13/2014 | Christina A. Humphre | 7.5 | Extensive preparation for Monday's hearing on the D's FAAAA motion for summary judgment |
| 1/15/2014 | Susan Joseph | 2 | Draft subpoena |
| 1/15/2014 | Stanley D. Saltzman | 5.5 | Work with Christina H and Leslie to prepare for hearing on D's MSJ |
| 1/15/2014 | Christina A. Humphre | 5.5 | Motion prep with Mr. Saltzman and Ms. Joyner - hearing on monday. |
| 1/15/2014 | Leslie H. Joyner | 5.5 | Prep for motion hearing on Monday with Mr. Saltzman and Ms. Humphrey |
| 1/17/2014 | Leslie H. Joyner | 6 | Hearing in District court on Defendant's Motion for SJ (includes drive time to and back - Agoura Hills) |
| 1/17/2014 | Christina A. Humphre | 6 | Drive to downtown District Court, attend hearing on D's MSJ, and return drive to Agoura Hills. |
| 1/21/2014 | Christina A. Humphre | 0.7 | interviewed J.B. Hunt class member Justus Rooters and updated his info. |
| 1/21/2014 | Christina A. Humphre | 0.6 | interviewed class member Tammy Gregory and updated her info. |
| 1/30/2014 | Christina A. Humphre | 0.5 | spoke to class member Alvin Holt. |
| 2/9/2014 | Christina A. Humphre | 1.2 | Exchange of emails with D counsel re whether to proceed with briefing in the Ninth, or await decision of the Supremes on the Dilts petition for review. |
| 2/20/2014 | Leslie H. Joyner | 1.8 | Review Evidence Code regarding submitting Massachusetts v. Coakley to the court although published sept. 2013 |
| 4/4/2014 | Susan Joseph | 0.25 | |
| 5/29/2014 | Susan Joseph | 0.5 | |
| 6/4/2014 | Stanley D. Saltzman | 2.5 | Review and analysis of Court's ruling granting D's MSJ on FAAAA; brief conference with Ms. Humphrey re her thoughts. |
| 6/4/2014 | Christina A. Humphre | 3 | Study ruling granting FAAAA preemption; review appellate docket in Dilts; confer with Mr. Saltzman |
| 6/5/2014 | Christina A. Humphre | 4.5 | Study appellate review rules pertaining to both the MJOP and the MSJ, both based on preemption. Re-review the rulings involved. |

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| <u>Billing Date</u> | <u>Timekeeper</u> | <u>Hours</u> | <u>Description</u> |
|---------------------|----------------------|--------------|--|
| 6/5/2014 | Stanley D. Saltzman | 1.7 | Review appellate rules |
| 6/19/2014 | Susan Joseph | 0.25 | |
| 6/20/2014 | Stanley D. Saltzman | 2.5 | Further study of appellate rules and deadlines, specifically as it relates to appealing two separate orders in the same appeal |
| 6/20/2014 | Christina A. Humphre | 3 | Research appeal issues; confer with Mr. Saltzman; prepare first draft of Notice of Appeal |
| 6/25/2014 | Stanley D. Saltzman | 2.5 | Initial review of D's Cost bill, and research grounds to oppose the same. |
| 6/26/2014 | Christina A. Humphre | 1 | Prepare final draft of Notice of Appeal. |
| 6/27/2014 | Christina A. Humphre | 4 | Research and then draft opposition to the Cost Bill submitted by D |
| 6/28/2014 | Christina A. Humphre | 1.3 | Review Ninth Circuit's initial appeal documents, including the Time Schedule Order. |
| 7/1/2014 | Susan Joseph | 0.25 | |
| 7/1/2014 | Stanley D. Saltzman | 1.3 | Review, edit and revise our opp to D's cost bill |
| 7/2/2014 | Christina A. Humphre | 1.7 | reviewed JB Hunt's application for costs; performed legal research into preemption of Rule 54 over LC 1194; and court's discretion in awarding costs. |
| 7/2/2014 | Christina A. Humphre | 1.2 | Prepare final draft of opposition to D's Bill of Costs; direct the filing of same |
| 7/3/2014 | Christina A. Humphre | 2.1 | Drafted Opposition to JB Hunt's Motion for Costs. |
| 7/7/2014 | Susan Joseph | 1.5 | Preprepare and file mediation questionnaire |
| 7/8/2014 | Stanley D. Saltzman | 0.7 | Review D's Reply re its Bill of Costs |
| 7/10/2014 | Stanley D. Saltzman | 4.5 | Detailed read and analysis of the Ninth Circuit's Dilts decision; confer with Mr. Gupta regarding the same, and its application to our case; and research issues arising from the fact that our Notice of Appeal is already filed. |
| 7/24/2014 | Susan Joseph | 0.25 | |
| 7/30/2014 | Christina A. Humphre | 1 | Prepare detailed Transcript Designation form |
| 9/26/2014 | Stanley D. Saltzman | 6.7 | Work on motion to remand from the Ninth to the district court |
| 10/22/2014 | Stanley D. Saltzman | 2.5 | Review new decision by Judge Guilford reconsidering his own prior wage preemption ruling, relying on the new Ninth Cir. decision in Dilts; numerous emails with all counsel involved in the Ruan decision. |
| 10/31/2014 | Stanley D. Saltzman | 0.7 | Telephonic Setting Assessment Conference |
| 10/31/2014 | Christina A. Humphre | 0.7 | Attend telephonic Assessment conference |
| 12/1/2014 | Christina A. Humphre | 1.5 | Second Assessment Conference; attended by me, M Bradley and K Grombacher (all billed here - half hour each) |
| 3/24/2015 | Stanley D. Saltzman | 2.5 | Drafting of stip and emails to Ninth about staying briefing pending Dilts, D's agreement to same, and receipt of confirmation from the Ninth that briefing dates have been vacated. |
| 5/19/2015 | Christina A. Humphre | 2.5 | Review recent rulings in district court in the Taylor matter and the Ninth in the CRST matter regarding impact of Dilts; confer with SDS re handling options for our appeal. |
| 5/20/2015 | Christina A. Humphre | 0.8 | Exchange of emails with D counsel re. possible remand to the district court to reconsider in light of Dilts, prior to briefing in the Ninth |
| 6/20/2015 | Christina A. Humphre | 3.5 | Reviewed Dilts and J.B. Hunt ruling on MSJ, drafted joint report to mediator; sent to D counsel |

Timekeeper Report From 3/11/08 to 12/28/18

| <u>Billing Date</u> | <u>Timekeeper</u> | <u>Hours</u> | <u>Description</u> |
|---------------------|----------------------|--------------|--|
| 6/22/2015 | Christina A. Humphre | 1.6 | made revisions to joint statement to 9th circuit mediator, looked up cole v. crst and reviewed. |
| 6/23/2015 | Christina A. Humphre | 1.7 | reviewed joint statement and edited for changes to statement in light of J.B. Hunt's position. |
| 8/24/2015 | Christina A. Humphre | 1.3 | spoke to Scott Lidman re status of motion for remand schedule and opening briefing schedule. Drafted proposed schedule and reviewed rules re 9th Circuit motions. |
| 9/24/2015 | Leslie H. Joyner | 9.5 | Legal Research re. Motion for remand back to the district court, from the Ninth; pull cases citing dilts |
| 9/24/2015 | Stanley D. Saltzman | 5.5 | Assist with research re motion to remand to the district court; outline brief |
| 9/25/2015 | Leslie H. Joyner | 9.5 | Work on Motion for Remand |
| 9/26/2015 | Leslie H. Joyner | 11.2 | Motion for remand |
| 9/26/2015 | Stanley D. Saltzman | 8.5 | Assist with appellate motion for remand |
| 9/28/2015 | Leslie H. Joyner | 8.5 | Finish first draft of motion for remand |
| 9/28/2015 | Christina A. Humphre | 5.2 | edited and reviewed motion for remand. |
| 9/28/2015 | Stanley D. Saltzman | 6.5 | Continue work on remand motion; review all of D's prior filings on the issue and incorporate responding arguments. |
| 9/29/2015 | Leslie H. Joyner | 7.5 | finalize motion |
| 9/29/2015 | Stanley D. Saltzman | 3.3 | Review and final approval of motion to remand case to the district court. |
| 10/20/2015 | Stanley D. Saltzman | 3.7 | Review D's opposition to our motion to remand to the district court |
| 10/23/2015 | Stanley D. Saltzman | 3.3 | Research re. D's opposition to our motion to remand |
| 10/27/2015 | Leslie H. Joyner | 11 | Draft Reply ISO Remand |
| 10/27/2015 | Stanley D. Saltzman | 4 | Work on Reply to opp to motion to remand. |
| 10/28/2015 | Leslie H. Joyner | 14 | draft reply iso motion for remand |
| 10/28/2015 | Christina A. Humphre | 4.2 | reviewed Dilts, opening brief, and opposition for remand. |
| 10/29/2015 | Leslie H. Joyner | 6 | finish draft reply |
| 10/29/2015 | Stanley D. Saltzman | 3.8 | Reviewed final draft of reply brief re. motion to remand. |
| 10/29/2015 | Leslie H. Joyner | 2.5 | revise and finalize reply |
| 1/20/2016 | Stanley D. Saltzman | 1.2 | Review of order by Ninth denying motion to remand; confer with counsel re further handling |
| 3/22/2016 | Susan Joseph | 5 | Review all data in-house, at request of Ms. Humphrey, to see what will need to be updated to conduct a mediation. |
| 4/15/2016 | Christina A. Humphre | 2.5 | Numerous emails over the last few weeks re setting up a mediation with Mr. Rudy; the need to move the briefing schedule in the Ninth to accomodate that; and the data needed to prepare for the mediation. |
| 4/15/2016 | Stanley D. Saltzman | 3.5 | Numerous attorney conferences regarding data needed to prepare for a mediation. |
| 4/17/2016 | Stanley D. Saltzman | 1.3 | Several telecons with D counsel regarding necessary data to conduct a meaningful mediation. |
| 5/15/2016 | Stanley D. Saltzman | 1.5 | Several follow up emails and calls re. data needed for the mediation |
| 5/30/2016 | Stanley D. Saltzman | 1.5 | Internal conferences regarding need to cancel the mediation if the data is not received from D asap; draft proposed email to send to D counsel |
| 5/30/2016 | Christina A. Humphre | 0.6 | Call from Mr. Lidman in response to our "cancel" email, regarding imminent transmission of necessary data. |

Timekeeper Report From 3/11/08 to 12/28/18

| <u>Billing Date</u> | <u>Timekeeper</u> | <u>Hours</u> | <u>Description</u> |
|---------------------|----------------------|--------------|--|
| 5/30/2016 | Stanley D. Saltzman | 7.5 | Commence drafting of detailed mediation brief to provide to Mr. Rudy |
| 5/31/2016 | Susan Joseph | 5.5 | Initial quick review of data received and commence working with it to determine any problems to be addressed. |
| 5/31/2016 | Stanley D. Saltzman | 6 | Continue drafting of mediation brief for Mr. Rudy |
| 5/31/2016 | Marcus J. Bradley | 4.6 | Review and edit Mr. Saltzman's first draft of mediation brief (extensive) |
| 5/31/2016 | Christina A. Humphre | 3.3 | Receipt of data from D, and conduct initial quick overview |
| 6/1/2016 | Susan Joseph | 8.5 | Damages Analysis and Presentation |
| 6/1/2016 | Stanley D. Saltzman | 3.7 | Work with Ms. Joseph regarding data analysis to add info into the working draft of the mediation brief. |
| 6/1/2016 | Stanley D. Saltzman | 4 | Continue working on mediation brief. Currently 15 single spaced pages. |
| 6/2/2016 | Susan Joseph | 8 | Damages Analysis and Presentation |
| 6/2/2016 | Christina A. Humphre | 8.5 | Work on breakdown of damages for each claim, based on data in-house for several years, plus that just produced last week. |
| 6/3/2016 | Susan Joseph | 7 | Damages Analysis and Presentation |
| 6/3/2016 | Stanley D. Saltzman | 5 | Completion of the liability portions of the mediation brief; transmit to Mr. Rudy (damages sections still to be completed) |
| 6/4/2016 | Susan Joseph | 5.5 | Damages Analysis and Presentation |
| 6/4/2016 | Stanley D. Saltzman | 6.3 | Work with data analysis to determine damages for the mediation |
| 6/5/2016 | Susan Joseph | 5.5 | Damages Analysis and Presentation |
| 6/6/2016 | Stanley D. Saltzman | 5.5 | Travel from Agoura Hills office to San Francisco for mediation tomorrow |
| 6/6/2016 | Marcus J. Bradley | 5.5 | Travel to San Francisco for mediation on 6-7-16 |
| 6/6/2016 | Christina A. Humphre | 5.5 | Travel to San Francisco for mediation on 6-7-16 |
| 6/7/2016 | Stanley D. Saltzman | 8.5 | Attend mediation with Mr. Rudy |
| 6/7/2016 | Marcus J. Bradley | 8.5 | Attend mediation with Mr. Rudy |
| 6/7/2016 | Christina A. Humphre | 8.5 | Attend mediation with Mr. Rudy |
| 6/7/2016 | Stanley D. Saltzman | 5 | Return travel to Agoura Hills post-mediation |
| 6/7/2016 | Marcus J. Bradley | 5 | Return travel to Agoura Hills post-mediation |
| 6/7/2016 | Christina A. Humphre | 5 | Return travel to Agoura Hills post-mediation |
| 6/8/2016 | Stanley D. Saltzman | 5.5 | Post-mortem on the failed mediation, including all participants time billed in this one entry. (four participants) |
| 6/10/2016 | Stanley D. Saltzman | 8 | Four participant meeting for two hours, regarding the opening brief on appeal, which now needs to be addressed (all billed in this one entry) |
| 6/30/2016 | Stanley D. Saltzman | 0.4 | Email to Mr. Lidman regarding the failed mediation, to understand what went down. |
| 6/30/2016 | Stanley D. Saltzman | 0.5 | Telecon with Mr. Lidman regarding the mediation |
| 8/4/2016 | David C. Leimbach | 8 | Review all prior briefing to begin to frame our opening brief |
| 8/4/2016 | Stanley D. Saltzman | 8 | Work with Mr. Leimbach in preparing to address the opening brief on appeal |
| 8/7/2016 | David C. Leimbach | 10 | Continue to study the entire record to frame the appeal issues for the two rulings being challenged; study Dilts ruling and its underlying briefing. |

Timekeeper Report From 3/11/08 to 12/28/18

| <u>Billing Date</u> | <u>Timekeeper</u> | <u>Hours</u> | <u>Description</u> |
|---------------------|---------------------|--------------|--|
| 8/8/2016 | Stanley D. Saltzman | 8.5 | Study all Dilts briefing for our brief purposes; extended telecon with Mr. Gupta (the author of the Dilts brief) re our issues as compared to the Dilts issues. |
| 8/11/2016 | David C. Leimbach | 7.5 | Outline all issues to be briefed, as to both rulings being challenged. |
| 8/12/2016 | Stanley D. Saltzman | 8.5 | Review Mr. Leimbach's outline of issues; revise same somewhat; research re the same. |
| 8/12/2016 | David C. Leimbach | 8.5 | Commence drafting of appellate brief |
| 8/13/2016 | David C. Leimbach | 10.5 | Continue work on draft of opening brief |
| 8/13/2016 | Stanley D. Saltzman | 9.5 | Draft entire section of the brief addressing the history of the FAAAA, and its interpretation in the Dilts briefs and decision. |
| 8/14/2016 | David C. Leimbach | 8.4 | Continue work on draft of opening brief |
| 8/15/2016 | David C. Leimbach | 11.3 | Continue work on draft of opening brief |
| 8/15/2016 | Stanley D. Saltzman | 8.5 | Continue work on background section of the appeal brief. |
| 8/16/2016 | David C. Leimbach | 8.7 | Continue work on draft of opening brief |
| 8/17/2016 | David C. Leimbach | 9.8 | Continue work on draft of opening brief |
| 8/17/2016 | Stanley D. Saltzman | 10.3 | Extensive review, edit and re-write of select sections of the brief. |
| 8/18/2016 | David C. Leimbach | 8.4 | Further work on draft of opening brief |
| 8/19/2016 | David C. Leimbach | 9.2 | draft opening brief |
| 8/20/2016 | David C. Leimbach | 9.7 | draft opening brief |
| 8/20/2016 | Stanley D. Saltzman | 6.5 | Assist with ongoing drafting of opening brief on appeal |
| 8/21/2016 | David C. Leimbach | 10.3 | Further work on draft of opening brief |
| 8/21/2016 | Stanley D. Saltzman | 7.5 | Further brief work - almost there |
| 8/22/2016 | David C. Leimbach | 12.2 | prepare exhibits, records, finalize brief |
| 8/22/2016 | Stanley D. Saltzman | 8.5 | Work with Mr. Leimbach on final editing and prep of the brief for filing. |
| 8/22/2016 | Stanley D. Saltzman | 2.5 | Final review of the record on appeal and our citations to it in the brief. |
| 9/30/2016 | David C. Leimbach | 8 | Extensive work throughout the month of September assisting and co-drafting filings with the Defendant to seal its "confidential" records in the appellate record |
| 10/28/2016 | Stanley D. Saltzman | 7.5 | Further work throughout October assisting with the sealing of confidential documents in the record on appeal - working with the Defendant's counsel to do so. |
| 11/6/2016 | David C. Leimbach | 8.5 | Entire day reading through and digesting D's Answering Brief on appeal |
| 11/9/2016 | David C. Leimbach | 6.5 | Re-review the Dilts briefing to begin to formulate thoughts on how to respond to D's brief. |
| 11/13/2016 | David C. Leimbach | 3.5 | Re-research Mendonca and its progeny for Reply brief purposes. |
| 11/14/2016 | David C. Leimbach | 2.3 | Review joint motion by the ATA and the CA Trucking Assoc to file amicus brief |
| 11/15/2016 | David C. Leimbach | 6.5 | Read and analyze amicus brief by the ATA and the CA Trucking Association; email to SDS re the same (he is in trial up north) |
| 12/10/2016 | David C. Leimbach | 9.9 | Prepare outline for reply brief |
| 12/11/2016 | David C. Leimbach | 10.2 | Work on drafting of reply brief |
| 12/12/2016 | David C. Leimbach | 8.1 | Continued work on drafting of reply brief |
| 12/12/2016 | Stanley D. Saltzman | 6.5 | Read through D's Answering brief - first day back in the office after two successive trials through November and early December |
| 12/13/2016 | David C. Leimbach | 9.5 | draft reply brief |
| 12/13/2016 | Stanley D. Saltzman | 5 | Review outline of arguments prepared by Mr. Leimbach |

Timekeeper Report From 3/11/08 to 12/28/18

| <u>Billing Date</u> | <u>Timekeeper</u> | <u>Hours</u> | <u>Description</u> |
|---------------------|---------------------|--------------|---|
| 12/14/2016 | David C. Leimbach | 9.6 | Work on drafting of reply brief |
| 12/15/2016 | David C. Leimbach | 10 | Work on drafting of reply brief |
| 12/15/2016 | Stanley D. Saltzman | 8.5 | Review working draft of the Reply brief; edit same; and confer with David re additional issues to be included. |
| 12/16/2016 | David C. Leimbach | 9.4 | Continue working on draft of reply brief |
| 12/18/2016 | Stanley D. Saltzman | 9 | Final review of near-final draft of Reply brief; back to Mr. Leimbach to conclude the brief |
| 12/18/2016 | David C. Leimbach | 5 | Finalize Reply brief; approve for filing. |
| 12/20/2016 | Stanley D. Saltzman | 0.3 | Review Court's Notice re potential hearing dates for oral argument; review each time frame and respond to court with specific dates "not available". |
| 1/24/2017 | Stanley D. Saltzman | 0.4 | Review Ninth Cir. notice of oral argument date, and guidelines for hearing. |
| 1/24/2017 | Stanley D. Saltzman | 0.2 | Prepare Acknowledgment of Hearing date and time. |
| 3/26/2017 | Stanley D. Saltzman | 3.5 | Begin to prepare for next week's oral argument on the appeal of the FAAAA-based judgment |
| 3/27/2017 | Stanley D. Saltzman | 5.5 | Continue to prepare for appellate argument; one hour "moot" in the office |
| 3/27/2017 | Stephen O'Dell | 2.5 | Prepare for and then participate in one hour "Moot" of oral argument issues; provide feedback to SDS |
| 3/28/2017 | Stanley D. Saltzman | 1.2 | Review Court's order granting leave to the Amicus requests; quick re-review of the joint brief filed by them |
| 3/29/2017 | Stephen O'Dell | 4.5 | Begin review and evaluation of amicus brief (including brief legal research re authorities cited therein) |
| 3/29/2017 | Stanley D. Saltzman | 8.5 | Entire day reviewing briefs, including the amicus brief just ordered permitted yesterday. |
| 3/30/2017 | Stephen O'Dell | 5.7 | Continue to research authorities in amicus brief and analyze the same |
| 3/30/2017 | Stephen O'Dell | 3.3 | Prepare memo to appellate team re amici brief and analysis |
| 3/31/2017 | Stanley D. Saltzman | 9 | Further review of briefs; afternoon spent outlining entire argument issue by issue and prepping typed outline |
| 4/2/2017 | Stanley D. Saltzman | 4 | Review and practice presentation of argument; revise presentation accordingly. |
| 4/3/2017 | Stephen O'Dell | 4.5 | Prepare for and participate in appellate argument preparation meetings (multiple sessions) |
| 4/3/2017 | Stanley D. Saltzman | 8 | Further prep for hearing in the Ninth, tomorrow. Conduct additional "moot" presentations in the office |
| 4/4/2017 | Stanley D. Saltzman | 6.5 | Drive to Pasadena Court for oral argument in the Ninth Circ, participate in hearing, meeting with co-counsel after hearing and then return to Aqoura Hills office. |
| 7/25/2017 | Stanley D. Saltzman | 0.2 | Prepare and file, in the Ninth Circuit, a Notice of Denial of review by the Supreme Court in the BeavEx matter referred to during our oral argument. |
| 7/31/2017 | Stanley D. Saltzman | 1.2 | Review Ninth Circuit's Memorandum decision reversing both rulings and thus reverse the Judgment entered in D's favor; brief review of applicable deadlines for further likely challenges by D |
| 8/1/2017 | Stanley D. Saltzman | 0.3 | Telephone call from Mr Lidman re D request for extension of time to file Petition for Rehearing |
| 8/1/2017 | Stanley D. Saltzman | 0.4 | Review of D's Unopposed Request for extension to seek rehearing |

Timekeeper Report From 3/11/08 to 12/28/18

| <u>Billing Date</u> | <u>Timekeeper</u> | <u>Hours</u> | <u>Description</u> |
|---------------------|---------------------|--------------|--|
| 8/9/2017 | Stanley D. Saltzman | 0.2 | Review Court's order approving of request for further time to seek rehearing. |
| 9/20/2017 | Stanley D. Saltzman | 6.5 | Review of Petition for Rehearing en banc, and amicus brief filed by ATA in support thereof |
| 9/24/2017 | Stanley D. Saltzman | 3.3 | Further review of both en banc petition briefs by D and the amicus on its side. |
| 11/7/2017 | Stanley D. Saltzman | 0.1 | Review Court's order denying en banc review. |
| 11/15/2017 | Stanley D. Saltzman | 0.1 | Review Mandate issued by the Ninth. |
| 11/17/2017 | Stanley D. Saltzman | 0.3 | Review Notice of Re-Assignment of case to Judge Klausner |
| 11/26/2017 | Susan Joseph | 3 | Develop contact questionnaire for calls with class members |
| 1/18/2018 | Stanley D. Saltzman | 0.6 | Review of Notice of Trial Date; and brief discussion of notice needing to go out and timing for our MSJ |
| 1/18/2018 | Stanley D. Saltzman | 6 | Four person trial planning meeting; 1.5 hours with all billed through this entry. |
| 1/18/2018 | Stanley D. Saltzman | 1.2 | Email to Mr. Lilly and Mr. Lidman, counsel for D, regarding trial date and need for immediate updated data to get ready for trial, plus new depositions; email to Mr. Gupta regarding his willingness to handle our opp to the expected Supreme Court petition |
| 1/25/2018 | Stanley D. Saltzman | 1.5 | Follow up emails with Mr. Gupta re Supreme Court representation; telecon with him regarding all the issues to be addressed by JBH; discuss fee for his firm's work |
| 2/2/2018 | Stanley D. Saltzman | 2.2 | Numerous emails and calls with D counsel regarding possible stip to move trial date in light of its Supreme Court petition; review initial drafts of stip and confer re changes needed to make it workable to present to the Court. |
| 2/5/2018 | Stanley D. Saltzman | 4.5 | First review of D's Supreme Court petition for review |
| 2/6/2018 | Stanley D. Saltzman | 1.2 | Transmit petition for review over to Deepak Gupta, along with my initial thoughts re the same |
| 2/12/2018 | Stanley D. Saltzman | 1.5 | Ongoing negotiations over scope of possible stipulation to move trial date pending supreme court review decision |
| 2/12/2018 | Stanley D. Saltzman | 2.2 | Review updated stipulation and edit as to five key points; confer with co-counsel re same; and return to D counsel |
| 2/13/2018 | Stephen O'Dell | 0.5 | Participate in telephone conference with appellate counsel re considerations for opposing petition for writ of certiorari to the U.S. Supreme Court |
| 2/13/2018 | Stephen O'Dell | 0.1 | Review notice of change of handling attorney |
| 2/13/2018 | Stanley D. Saltzman | 1.5 | Telecong with Mr. Gupta to go over his thoughts on the petition and approach to response brief. |
| 2/16/2018 | Stanley D. Saltzman | 2.5 | Further detailed edits to revised version of proposed stip to submit to the court, and email to D counsel re my thoughts thereon |
| 2/21/2018 | Stanley D. Saltzman | 1.3 | Further ongoing negotiations over stip and proposed order to move trial date pending Supreme court review decision; multiple cross revisions and updates |
| 3/2/2018 | Adam Tamburelli | 5.5 | Review and analyze Defendant's petition for writ of certiorari; review cases cited therein. |
| 3/2/2018 | Stanley D. Saltzman | 2.5 | Multiple calls and emails with Mr. Gupta, to get him up to speed on issues relating to the opposition he is working on to the Supreme court review petition. |

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| <u>Billing Date</u> | <u>Timekeeper</u> | <u>Hours</u> | <u>Description</u> |
|---------------------|---------------------|--------------|--|
| 3/6/2018 | Stanley D. Saltzman | 1 | Numerous calls and emails with Mr. Lilly regarding another mediation; and re Notice needing to be sent out. |
| 3/7/2018 | Stanley D. Saltzman | 1.4 | Extended email to lead D lawyer re mediation, trial issues, notice and depositions. |
| 3/7/2018 | Stanley D. Saltzman | 0.7 | Several calls and emails re confirming mediation for April 2, 2018 |
| 3/10/2018 | Stanley D. Saltzman | 8.5 | Entire day reviewing the 7 amicus briefs filed yesterday in the Supreme Court, by the allies of the D |
| 3/12/2018 | Stanley D. Saltzman | 5 | Further analysis of the various amicus briefs filed in D's support (7 briefs). |
| 3/13/2018 | Adam Tamburelli | 11 | Review and analysis of the many amicus briefs filed in support of the D |
| 3/20/2018 | Adam Tamburelli | 8.5 | Review and analyze file to determine information needed from defendant for mediation and next steps going forward in case; review prior summary judgment briefs to determine outstanding issues and disputed areas of law after intervening court rulings. |
| 3/20/2018 | Stanley D. Saltzman | 1.3 | Further work on the final Notice language, and obtaining the up to date class list. Numerous emails and calls |
| 3/21/2018 | Adam Tamburelli | 7.1 | Conduct legal research regarding Labor Code section 226.2, including legislative history and challenges to statute; draft detailed memorandum regarding same. |
| 3/22/2018 | Adam Tamburelli | 2.5 | Continue drafting detailed memorandum regarding Labor Code section 226.2 language. |
| 3/28/2018 | Adam Tamburelli | 0.2 | Review emails from Defendant's counsel regarding class notice. |
| 3/28/2018 | Adam Tamburelli | 2.9 | Conduct legal research regarding whether section 226.2 is retroactive; prepare memorandum regarding same. |
| 3/28/2018 | Adam Tamburelli | 0.3 | Prepare email to co-counsel summarizing research and issues that need further clarification. |
| 3/28/2018 | Stanley D. Saltzman | 0.3 | Further follow ups re the class list to allow for notice to be mailed out. |
| 3/28/2018 | Stanley D. Saltzman | 5.5 | Work on first draft of updated mediation brief, using the last one as the basis and including all the new law and developments, including our 226.2 research |
| 3/29/2018 | Adam Tamburelli | 1.2 | Prepare memorandum regarding outline of argument re applicability of Labor Code section 226.2. |
| 3/29/2018 | Adam Tamburelli | 6.1 | Review and analyze memorandum regarding Labor Code section 226.2 from co-counsel; conduct nationwide legal research regarding similar statutory language; draft memorandum regarding conclusions. |
| 3/29/2018 | Stanley D. Saltzman | 6 | Further work on updated mediation brief to send to Mr. Rudy |
| 3/30/2018 | Adam Tamburelli | 3 | Travel to San Francisco for mediation. |
| 3/30/2018 | Adam Tamburelli | 1.5 | Review and revise mediation memorandum. |
| 3/30/2018 | Stanley D. Saltzman | 5.3 | Completion of mediation brief, including all updated pre-trial issues; send to Mr. Rudy |
| 4/1/2018 | Adam Tamburelli | 5.9 | Review prior pleadings, briefs, mediation memoranda, and damage models in preparation for mediation. |
| 4/1/2018 | Stanley D. Saltzman | 6 | Travel from Agoura Hills to San Francisco, for mediation tomorrow morning. |
| 4/2/2018 | Adam Tamburelli | 6 | Attend mediation in San Francisco. |
| 4/2/2018 | Adam Tamburelli | 5.5 | Return travel from San Francisco to Agoura Hills after mediation. |

Timekeeper Report From 3/11/08 to 12/28/18

| <u>Billing Date</u> | <u>Timekeeper</u> | <u>Hours</u> | <u>Description</u> |
|---------------------|---------------------|--------------|---|
| 4/2/2018 | Susan Joseph | 4 | Data review and analysis. |
| 4/2/2018 | Stanley D. Saltzman | 6 | Mediation with Mr. Rudy in San Francisco |
| 4/2/2018 | Stanley D. Saltzman | 5.5 | Return travel home from San Fran following mediation |
| 4/3/2018 | Adam Tamburelli | 3 | Strategy session with Stan Staltzman and paralegal regarding damages presentation and potential experts. |
| 4/3/2018 | Adam Tamburelli | 1 | Review and analyze Defendant's recently-issued linterrogatories and requests for production of documents. |
| 4/3/2018 | Adam Tamburelli | 5 | Conduct legal research regarding Judge Klausner's prior rulings on motions for class certification/decertification; prepare memorandum regarding same. |
| 4/3/2018 | Susan Joseph | 6 | Case management meeting with attorneys; condcut data review and analysis. |
| 4/3/2018 | Stanley D. Saltzman | 3 | Case presentation strategy session with AT and Ms. Joseph |
| 4/4/2018 | Adam Tamburelli | 9.1 | Conduct legal research of cases relevant to our prior and anticipated motion for summary judgment; review Defendant's prior summary judgment and judgment on the pleading briefs and the cases cited therein; review trial plans and jury instructions in simil |
| 4/4/2018 | Adam Tamburelli | 0.2 | Review multiple emails between counsel regarding class notice and outstanding discovery. |
| 4/4/2018 | Susan Joseph | 7.25 | Review OBC data. |
| 4/4/2018 | Stanley D. Saltzman | 5.5 | Review all prior MSJ briefing to determine issues to cover with our next MSJ filing |
| 4/5/2018 | Susan Joseph | 1 | File review; case management meeting with attorneys re trial. |
| 4/5/2018 | Susan Joseph | 7.5 | Extensive review of all prior discovery to determine issues still needing follow u; confer with AT re the same |
| 4/6/2018 | Susan Joseph | 4 | Review file. Data review for mediation. Memo re same. |
| 4/6/2018 | Stanley D. Saltzman | 3.5 | Review research done to date on application and impact of 226.2 to our case. |
| 4/7/2018 | Adam Tamburelli | 11.5 | Conduct legal research on potential damages on certain causes of action, including penalties unde rLabor Code section 203 and interest; draft memorandum regarding same. |
| 4/8/2018 | Adam Tamburelli | 6.5 | Review prior discovery responses to determine final additional discovery needed from Defendant before trial to update data and determine current policies and procedures. |
| 4/9/2018 | Adam Tamburelli | 8.5 | Conduct additional legal research regarding issues relevant to anticipated motion for summary judgment, including recent case law and cases pending before courts of appeal. |
| 4/10/2018 | Adam Tamburelli | 9.8 | Review prior statement of uncontroverted facts, exhibits thereto, and declarations, in support of previous MSJ to determine additional evidence needed to support motion for summary judgment; review discovery responses for additional support. |
| 4/10/2018 | Susan Joseph | 6 | Data review and analysis; Communications re same. |
| 4/11/2018 | Adam Tamburelli | 2.5 | Review Defendant's 30(b)(6) witnesses deposition transcripts for admissions relevant to motion for summary judgment and damages. |
| 4/11/2018 | Adam Tamburelli | 9.1 | Begin drafting new MSJ and supporting memorandum. |
| 4/11/2018 | Adam Tamburelli | 6.9 | Continue drafting memorandum re MSJ; conduct additional legal research. |
| 4/11/2018 | Susan Joseph | 6 | Data review and analysis; communications re same. |

Timekeeper Report From 3/11/08 to 12/28/18

| <u>Billing Date</u> | <u>Timekeeper</u> | <u>Hours</u> | <u>Description</u> |
|---------------------|---------------------|--------------|---|
| 4/12/2018 | Adam Tamburelli | 2 | Conduct legal resarch regarding availability of interest on Labor Code section 226 damages and prepare memorandum regarding same. |
| 4/12/2018 | Adam Tamburelli | 1 | Exchange multiple emails with co-counsel regarding discovery issues and strategy, including Defendant's excessive interrogatories and our forthcoming interrogatories; eviue Defendant's document production to ensure completeness. |
| 4/12/2018 | Adam Tamburelli | 0.9 | Review and analyze Plaintiffs' draft Requests for Admissions. |
| 4/12/2018 | Adam Tamburelli | 7 | Continue drafting memorandum re MSJ; conference with Stanley Saltzman regarding strategy. |
| 4/12/2018 | Susan Joseph | 6 | Data review and analysis; document review; communications re same. |
| 4/13/2018 | Adam Tamburelli | 0.2 | Exchange mulitple emails with co-counsel regarding discovery requests and strategy. |
| 4/13/2018 | Adam Tamburelli | 8.3 | Draft declaration in support of MSJ; Continue drafting memorandum re MSJ. |
| 4/14/2018 | Adam Tamburelli | 6.5 | Additional legal research regarding MSJ claims and newly-decided cases. Working with SDS |
| 4/14/2018 | Stanley D. Saltzman | 6.5 | Work on Saturday with AT on research of all issues for new MSJ |
| 4/16/2018 | Adam Tamburelli | 3.9 | Review file, conduct legal research, and draft ex parte application for leave to file a motion for summary judgment and proposed order; file application. |
| 4/16/2018 | Adam Tamburelli | 0.8 | Email Defendant's counsel regquesting meet and confer on ex parte application and other issues; prepare for and attend conference call with Defendant's counsel and Paul Cullen regarding outstanding pretrial issues, class notice, and meet & confer regardin |
| 4/16/2018 | Adam Tamburelli | 2.5 | Review file and draft joint stipulation for dissemination of class notice and proposed order; circulate to Defendant's counsel for review. |
| 4/16/2018 | Adam Tamburelli | 0.2 | Send follow-up email to Defendant's counsel confirming agreement during telephonic discussion. |
| 4/16/2018 | Adam Tamburelli | 3.5 | Review draft interrogatories and requests for admission prepared by co-counsel, and edit the same. |
| 4/16/2018 | Susan Joseph | 8 | Design and build class member contact form; confer with staff re file and data review. |
| 4/16/2018 | Stanley D. Saltzman | 2.5 | Review and revise, after input from AT, draft discovery prepared by Mr. Cullen |
| 4/16/2018 | Stanley D. Saltzman | 5.5 | Review current draft of MSJ being prepared by AT |
| 4/17/2018 | Stephen O'Dell | 0.5 | Review draft of ex parte application |
| 4/17/2018 | Adam Tamburelli | 9.5 | Continue drafting memorandum of P's & A' re new MSJ; review prior briefs on motions to determine Defendant's anticipated defenses. |
| 4/17/2018 | Susan Joseph | 8.5 | Organize and prepare files for trial issues; communications with attorney re status of review. |
| 4/18/2018 | Adam Tamburelli | 0.1 | Send follow-up email to Defendant's counsel regarding class notice stipulation. |
| 4/18/2018 | Adam Tamburelli | 0.8 | Review Defendant's "non-opposition" to Plaintiffs' Ex Parte motion; conduct legal research regarding same. |

Timekeeper Report From 3/11/08 to 12/28/18

| <u>Billing Date</u> | <u>Timekeeper</u> | <u>Hours</u> | <u>Description</u> |
|---------------------|---------------------|--------------|--|
| 4/18/2018 | Adam Tamburelli | 1.5 | Draft reply in support of ex parte application for leave to file motion for summary judgment; file brief. |
| 4/18/2018 | Adam Tamburelli | 11.3 | Revise MSJ and supporting memorandum; verify citations to Statement of Uncontroverted Facts; verify factual support in said Statement. |
| 4/18/2018 | Susan Joseph | 7 | Assist with summary judgement motion (separate statement); continue organizing files for trial. |
| 4/19/2018 | Adam Tamburelli | 6 | Meet with Stan Saltzman regarding draft MSJ; make suggested revisions and perform additional legal research; circulate draft for review. |
| 4/19/2018 | Adam Tamburelli | 1.1 | Review clients' deposition transcripts to confirm testimony about rest breaks. |
| 4/19/2018 | Adam Tamburelli | 0.4 | Review email from Defendant's counsel and attached revisions to stipulation re class notice, class notice language, and proposed order; respond to email. |
| 4/19/2018 | Adam Tamburelli | 1.6 | Review and revise declarations of Plaintiffs for in light of renewed MSJ; circulate for signature. |
| 4/19/2018 | Susan Joseph | 6.5 | Review evidence re MSJ; assist with MSJ. |
| 4/20/2018 | Adam Tamburelli | 7.7 | Review deposition transcripts to find additional facts for MSJ. |
| 4/20/2018 | Adam Tamburelli | 0.5 | Review court order denying leave to file MSJ; discuss strategy with Stanley Saltzman. |
| 4/20/2018 | Stanley D. Saltzman | 8 | Assist with review of all prior evidence and records as needed to support claims being asserted in our new MSJ. |
| 4/22/2018 | Stanley D. Saltzman | 8.5 | Further data analysis to support claims in our MSJ; review updated draft from AT |
| 4/23/2018 | Adam Tamburelli | 0.5 | Accept revisions to class notice, stipulation, and proposed order; prepare for filing and file documents. |
| 4/23/2018 | Adam Tamburelli | 7.3 | Further work on MSJ - updated |
| 4/23/2018 | Adam Tamburelli | 0.2 | Exchange emails with Defendant's counsel regarding the class list. |
| 4/24/2018 | Stephen O'Dell | 2.8 | Review legislative history materials and email excerpts to Mr. Tamburelli and Mr. Saltzman |
| 4/25/2018 | Susan Joseph | 3 | Prepare class member questionnaire. |
| 4/25/2018 | Adam Tamburelli | 0.5 | Review court order granting dissemination of class notice; send final draft of class notice to administrator; review multiple emails from administrator and counsel regarding finalizing notice. |
| 4/27/2018 | Stanley D. Saltzman | 6.5 | Review initial draft of opp to D's cert petition, discuss with Mr. Gupta (author of the brief), and discuss with Mr. Tamburelli |
| 4/27/2018 | Adam Tamburelli | 0.2 | Review emails between counsel and administrator regarding class notice issues. |
| 4/27/2018 | Adam Tamburelli | 7.5 | Review first draft of brief in opposition to petition for writ of cert; discuss with Stan Saltzman. |
| 4/29/2018 | Stanley D. Saltzman | 4.5 | Conclude review of opposition brief (draft) and provide input to Mr. Gupta. |
| 4/30/2018 | Adam Tamburelli | 5 | Conclude review of draft Brief in Opposition to Cert; email Deepak Gupta with comments. |
| 4/30/2018 | Susan Joseph | 1 | Class contacts and interviews. |
| 5/1/2018 | Adam Tamburelli | 3.3 | Review final draft version of Brief in Opposition to Cert and accompanying emails. |

Timekeeper Report From 3/11/08 to 12/28/18

| <u>Billing Date</u> | <u>Timekeeper</u> | <u>Hours</u> | <u>Description</u> |
|---------------------|---------------------|--------------|--|
| 5/1/2018 | Stanley D. Saltzman | 3 | Final review of near-final draft of cert petition opposition, and final input to Mr. Gupta and his team |
| 5/2/2018 | Adam Tamburelli | 0.6 | Discuss case with class members calling in response to class notice. |
| 5/3/2018 | Adam Tamburelli | 0.7 | Discuss case with class members calling in response to class notice. |
| 5/4/2018 | Adam Tamburelli | 0.1 | Review report from class notice administrator. |
| 5/7/2018 | Susan Joseph | 2 | Develop contact questionnaire. |
| 5/9/2018 | Adam Tamburelli | 2.5 | Review draft objections to Defendant's discovery requests, and edit as needed |
| 5/9/2018 | Adam Tamburelli | 0.3 | Review prior emails and draft email to Defendant's counsel requesting update on discovery issues. |
| 5/9/2018 | Adam Tamburelli | 1.4 | Telephone call with Paul Cullen regarding status of our discovery responses; respond to email from Defendant's counsel regarding same. |
| 5/11/2018 | Adam Tamburelli | 0.1 | Review class notice report from administrator. |
| 5/11/2018 | Adam Tamburelli | 0.5 | Speak with multiple callers calling in response to class notice. |
| 5/15/2018 | Adam Tamburelli | 0.3 | Review and respond to Defendant's counsel's email regarding discovery extension and related issues. |
| 5/15/2018 | Stanley D. Saltzman | 2.5 | Research re "regular rate of pay" to be used in various damage calculations |
| 5/16/2018 | Adam Tamburelli | 4 | Exchange numerous emails with co-counsel regarding draft new interrogatories to issue and definitions; legal research regarding definition of "regular rate of compensation"; review and respond to proposed new language. |
| 5/16/2018 | Adam Tamburelli | 1.1 | Review draft additional special interrogatories to send to defendant; exchange email among co-counsel regarding previous discovery relevant to new interrogatories; review prior interrogatories and damages matrix. |
| 5/17/2018 | Stanley D. Saltzman | 3.3 | Work on numerous different discovery issues all pending at the same time. |
| 5/17/2018 | Adam Tamburelli | 2.5 | Exchange further emails with co-counsel regarding proposed interrogatory language and status of responses to Defendant's discovery requests; review Defendant's discovery requests and conduct legal research regarding discovery to absent class members. |
| 5/18/2018 | Adam Tamburelli | 0.1 | Review report of administrator regarding class notice. |
| 5/18/2018 | Adam Tamburelli | 0.3 | Review appearances of counsel for Defendant; research new attorneys. |
| 5/21/2018 | Adam Tamburelli | 0.1 | Review email from administrator regarding opt-out requests. |
| 5/21/2018 | Adam Tamburelli | 0.2 | Exchange emails with Defendant's counsel regarding data production and other discovery issues. |
| 5/22/2018 | Adam Tamburelli | 0.6 | Exchange emails with co-counsel regarding amended 30(b)(6) deposition notice and revised interrogatories; review revised documents and respond. |
| 5/23/2018 | Stanley D. Saltzman | 2.5 | Prepare for and attend conference call with AT and Defendant's counsel regarding categories of information set forth in Plaintiffs' Rule 30(b)(6) deposition notice; review prior deposition testimony and notices to determine scope of conference. |

Timekeeper Report From 3/11/08 to 12/28/18

| <u>Billing Date</u> | <u>Timekeeper</u> | <u>Hours</u> | <u>Description</u> |
|---------------------|---------------------|--------------|---|
| 5/23/2018 | Adam Tamburelli | 2.5 | Prepare for and attend conference call with Stan Saltzman and Defendant's counsel regarding categories of information set forth in Plaintiffs' Rule 30(b)(6) deposition notice; review prior deposition testimony and notices to determine scope of conference. |
| 5/23/2018 | Adam Tamburelli | 0.3 | Draft confirmation email memorializing conference call with Defendant's counsel. |
| 5/24/2018 | Adam Tamburelli | 0.5 | Review draft contact questionnaire for contact with class members, and make suggestions on same. |
| 5/25/2018 | Adam Tamburelli | 0.4 | Review email from Defendant's counsel regarding new data production forthcoming; discuss with team. |
| 5/25/2018 | Adam Tamburelli | 0.3 | Discuss case with class member in response to call. |
| 5/25/2018 | Adam Tamburelli | 0.9 | Review draft responses to Defendant's document requests; exchange numerous emails with co-counsel regarding same. |
| 5/25/2018 | Adam Tamburelli | 0.2 | Review and analyze weekly report from class notice administrator. |
| 5/31/2018 | Adam Tamburelli | 0.1 | Exchange emails with Defendant's counsel regarding password for data production. |
| 5/31/2018 | Adam Tamburelli | 0.9 | Exchange numerous emails with our expert and data copying service regarding Defendant's amended production of data, including methods of transferring and sharing data. Discuss issues with paralegal. |
| 6/1/2018 | Adam Tamburelli | 2.5 | Review new additional data produced by Defendant. |
| 6/1/2018 | Adam Tamburelli | 0.2 | Review and respond to Defendant's counsel's request for an extension of discovery; discuss with co-counsel. |
| 6/1/2018 | Adam Tamburelli | 0.5 | Review emails from class members regarding ultimatums from management; discuss with Stan Saltzman regarding effect on case. |
| 6/1/2018 | Susan Joseph | 5.5 | Review of additional data just produced by D |
| 6/3/2018 | Susan Joseph | 6.5 | Further initial review of new data produced by D |
| 6/3/2018 | Stanley D. Saltzman | 6.5 | Work with Ms. Joseph in review of new data produced by D |
| 6/4/2018 | Adam Tamburelli | 0.1 | Review email from expert regarding receipt of data. |
| 6/4/2018 | Stanley D. Saltzman | 2.5 | Review order from Supreme Court denying certorari; case meeting with co-counsel and appellate counsel. |
| 6/4/2018 | Stanley D. Saltzman | 1.3 | Several calls and emails with D counsel regarding whether D would join in request for leave to file MSJ motion(s) |
| 6/4/2018 | Susan Joseph | 0.2 | Communications with expert consultant re damagaes. |
| 6/4/2018 | Adam Tamburelli | 0.3 | Prepare for and engage in telephone call with Defendant's counsel regarding meet and confer pursuant to Plaintiffs' second ex parte application for leave to file a MSJ. |
| 6/4/2018 | Adam Tamburelli | 1.7 | Review Supreme Court Order List denying certorari; discuss implications and strategy with co-counsel and appellate counsel. |
| 6/4/2018 | Adam Tamburelli | 3.5 | Draft second ex parte application for leave to file a MSJ and proposed order. |
| 6/5/2018 | Adam Tamburelli | 6.5 | Review Defendant's Response to Plaintiffs' Second Ex Parte Application for leave to file MSJ; conduct legal research regarding filing serial motions to decertify; draft Reply brief; circulate to co-counsel with notes. |
| 6/5/2018 | Adam Tamburelli | 0.1 | Review email from administrator regarding final count for opt-outs. |

Timekeeper Report From 3/11/08 to 12/28/18

| <u>Billing Date</u> | <u>Timekeeper</u> | <u>Hours</u> | <u>Description</u> |
|---------------------|---------------------|--------------|---|
| 6/5/2018 | Stanley D. Saltzman | 5.5 | Renew preparation of MSJ, now that Supreme Court has denied review |
| 6/6/2018 | Adam Tamburelli | 2.4 | Review and analyze Defendant's lengthy letter regarding production of data. |
| 6/6/2018 | Adam Tamburelli | 6.5 | Return to work on the P MSJ, following denial of cert by the Supreme Court |
| 6/6/2018 | Adam Tamburelli | 0.6 | Revise reply in support of Second Ex Parte application; file. |
| 6/6/2018 | Adam Tamburelli | 0.1 | Review and respond to Defendant's counsel's email requesting discovery extension. |
| 6/6/2018 | Adam Tamburelli | 0.3 | Circulate email to co-counsel regarding meet and confer conversation, discovery we need to produce, and upcoming deadlines. |
| 6/6/2018 | Adam Tamburelli | 0.4 | Telephone call with co-counsel regarding discovery issues; review follow-up email. |
| 6/7/2018 | Adam Tamburelli | 0.6 | Review Defendant's counsel's proposed stipulation regarding scheduling order; discuss with co-counsel; draft email response. |
| 6/7/2018 | Adam Tamburelli | 4.3 | Review and analyze Defendant's responses to Plaintiffs' discovery requests (RFAs, RFPs, and Interrogatories); prepare notes of responses. |
| 6/7/2018 | Adam Tamburelli | 5 | Further work on MSJ, and gathering of supporting evidence. |
| 6/7/2018 | Susan Joseph | 1.1 | Coordinate conference call with damages expert. Preapre for and attend conference call with damages expert. Communications re same. |
| 6/7/2018 | Adam Tamburelli | 1 | Review and analyze Court Orders regarding Plaintiffs' second Ex Parte Application; conference call with Stan Saltzman and Paul Cullen to discuss discovery going forward. |
| 6/8/2018 | Adam Tamburelli | 1.1 | Conference call with Defendant's counsel regarding proposed scheduling order and related issues; prepare memorandum of call and agreements; discuss with co-counsel. |
| 6/8/2018 | Adam Tamburelli | 2 | Review voluminous prior emails in which we pressed Defendant for a class list and issuance class notice after the mandate from the 9th Circuit in analyzing and preparing a response to Defendant's counsel's request for 60 depositions in 3 weeks; prepare me |
| 6/8/2018 | Adam Tamburelli | 0.1 | Review letter from Defendant's counsel regarding new discovery production. |
| 6/8/2018 | Adam Tamburelli | 0.1 | Exchange emails with Defendant's counsel regarding conference call scheduling. |
| 6/8/2018 | Stanley D. Saltzman | 6.5 | Work on MSJ |
| 6/8/2018 | Stanley D. Saltzman | 4.5 | Assist with work on MSJ |
| 6/8/2018 | Susan Joseph | 1 | Prepare for and attend conference call with damages expert. Communications re same. |
| 6/8/2018 | Susan Joseph | 0.75 | Review contact form; status of class contacts; backend administration of contact database. |
| 6/9/2018 | Adam Tamburelli | 1.6 | Review file and attempt to verify Defendant's data production, including what was prodced, what was supposed to be replaced, and what is still outstanding; exchange emails with Defendant's counsel and expert regarding same. |

Timekeeper Report From 3/11/08 to 12/28/18

| <u>Billing Date</u> | <u>Timekeeper</u> | <u>Hours</u> | <u>Description</u> |
|---------------------|---------------------|--------------|---|
| 6/9/2018 | Adam Tamburelli | 4.5 | In response to Defendant's request to depose 60 absent class members, conduct legal research on the law regarding depositions of absent class members and search for analogous cases from Judge Klausner and other judges in the C.D. Cal.; discuss with co-cou |
| 6/9/2018 | Adam Tamburelli | 3.5 | Continue work on MSJ preparation |
| 6/10/2018 | Adam Tamburelli | 10.5 | Revise motion for summary judgment, including removing pages to get within the Court's page limitation. |
| 6/10/2018 | Adam Tamburelli | 0.3 | Telephone conference with co-counsel regarding revisions to motion for summary judgment and related documents. |
| 6/10/2018 | Adam Tamburelli | 0.2 | Exchange multiple emails with expert witness regarding status of document production and data missing. |
| 6/10/2018 | Stanley D. Saltzman | 6.5 | Assist with near final editing of MSJ, and supporting declarations. |
| 6/11/2018 | Adam Tamburelli | 0.6 | Prepare and file motion for summary judgment and related documents and exhibits. |
| 6/11/2018 | Adam Tamburelli | 3.1 | Final revisions to motion for summary judgment, including incorporating revisions of co-counsel; prepare tables of contents and authorities; check citations; finalize. |
| 6/11/2018 | Adam Tamburelli | 6.8 | Review all exhibits to my declaration and cross-reference Statement of Uncontroverted Facts; add new exhibit to declaration and include in SUF; review and revise SUF to incorporate revisions and additions, including citations to docket numbers; verify cit |
| 6/11/2018 | Adam Tamburelli | 0.6 | Draft proposed order regarding our motion for summary judgment. |
| 6/11/2018 | Adam Tamburelli | 0.3 | Respond to Defendant's counsel's email regarding 60 absent class member depositions. |
| 6/11/2018 | Adam Tamburelli | 0.5 | Exchange multiple emails with Defendant's counsel and expert regarding missing data production and verifying the data actually produced by Defendant. |
| 6/11/2018 | Adam Tamburelli | 0.3 | Review attachment A to discovery letter from Defendant's counsel; forward to expert. |
| 6/11/2018 | Adam Tamburelli | 0.6 | Review updated declarations from clients; prepare for filing with separate exhibits. |
| 6/11/2018 | Stanley D. Saltzman | 7.3 | Assist with all final items to get MSJ ready for filing today |
| 6/12/2018 | Adam Tamburelli | 0.3 | Review email from Defendant's counsel regarding moving MSJ hearing date; discuss with Stan Saltzman; review responsive email exchanges. |
| 6/12/2018 | Adam Tamburelli | 0.4 | Review class list from administrator; review related emails about updated class list; review finalized class list. |
| 6/12/2018 | Adam Tamburelli | 0.3 | Review email from Defendant's counsel regarding production of updated data; arrange for disk drive to be sent to expert; email expert regarding same. |
| 6/12/2018 | Susan Joseph | 8 | Review class list data; communications re same. Design and prepare class contact questionnaire form. |
| 6/13/2018 | Susan Joseph | 0.5 | Review file re numerosity declaration |
| 6/13/2018 | Adam Tamburelli | 1.5 | Draft letters to send to class members regarding potential witnesses; discuss strategy regarding telephone calls with co-counsel. |

Timekeeper Report From 3/11/08 to 12/28/18

| <u>Billing Date</u> | <u>Timekeeper</u> | <u>Hours</u> | <u>Description</u> |
|---------------------|-------------------|--------------|---|
| 6/13/2018 | Adam Tamburelli | 0.2 | Exchange emails with co-counsel regarding recent discovery production and call with expert. |
| 6/13/2018 | Adam Tamburelli | 1 | Conduct legal research regarding timing of expert witness disclosures and scope thereof in preparation for call with expert and scheduling with Defendant's counsel. |
| 6/13/2018 | Adam Tamburelli | 6.5 | Continue to work with and study the data produced by D ten days ago. |
| 6/13/2018 | Adam Tamburelli | 0.2 | Exchange emails with expert regarding production of new drive and setting up conference call. |
| 6/14/2018 | Adam Tamburelli | 6.6 | Review file and prepare list of items for inclusion in expert report, including examples of methodology, for circulation to co-counsel for comment and discussion. |
| 6/14/2018 | Adam Tamburelli | 1.5 | Prepare for and engage in conference call with experts and Paul Cullen. |
| 6/14/2018 | Adam Tamburelli | 2.5 | Review and analyze Defendant's most recent supplemental discovery production (dates 6.11 and 6.13) |
| 6/14/2018 | Adam Tamburelli | 0.5 | Final review and revisions 3 letters to class members; prepare for mailing. |
| 6/14/2018 | Adam Tamburelli | 1.5 | Review letter from Defendant's counsel regarding meet and confer on depositions of absent class members; conduct legal research regarding the citations set forth in the letter; email co-counsel regarding strategy. |
| 6/14/2018 | Adam Tamburelli | 0.6 | Prepare for and engage in meet and confer call with Defendant's counsel; draft email to co-counsel summarizing issues discussed. |
| 6/14/2018 | Adam Tamburelli | 1 | Review Defendant's notices of depositions of 8 absent class members; prepare summary email and send to co-counsel for discussion and deposition planning. |
| 6/15/2018 | Adam Tamburelli | 0.5 | Review email from Defendant's counsel along with list of updated class members for proposed additional depositions and LR 37.2 stipulation; Review LR 37.2 and respond to email. |
| 6/15/2018 | Adam Tamburelli | 1 | Exchange emails with co-counsel regarding discovery responses pertaining to damages issues in connection with expert report; review prior memoranda regarding same. |
| 6/15/2018 | Adam Tamburelli | 0.5 | Conference call with all co-counsel regarding planning for depositions and related case strategy. |
| 6/15/2018 | Adam Tamburelli | 1.1 | Review Defendant's new document/data production; forward to expert witnesses. |
| 6/15/2018 | Adam Tamburelli | 0.8 | Discuss Defendant's counsel's meet and confer with Stan Saltzman; respond to opposing counsel. |
| 6/15/2018 | Adam Tamburelli | 1.5 | Prepare for and engage in conference call with expert witnesses and Paul Cullen. |
| 6/15/2018 | Adam Tamburelli | 4.5 | Review prior document production from Defendant to determine if they previously produced the same amount of settlement statements (millions of TIFF files) or if the production is new; review prior correspondence from Defendant's counsel. |
| 6/16/2018 | Adam Tamburelli | 8.9 | Organize and catalogue discovery responses and document production from both sides; review and take notes for reference and future use. |

Timekeeper Report From 3/11/08 to 12/28/18

| <u>Billing Date</u> | <u>Timekeeper</u> | <u>Hours</u> | <u>Description</u> |
|---------------------|-------------------|--------------|--|
| 6/18/2018 | Adam Tamburelli | 0.3 | Meet and confer telephone conference with Defendant's counsel regarding their forthcoming ex parte application for leave to take additional depositions. |
| 6/18/2018 | Adam Tamburelli | 4 | Initial review of Defendant's ex parte application for leave to take additional depositions; summarize arguments in email to co-counsel; research same |
| 6/18/2018 | Adam Tamburelli | 0.5 | Exchange numerous emails with co-counsel regarding scheduling of absent class member depositions and calls with potential witnesses. |
| 6/18/2018 | Adam Tamburelli | 0.2 | Review and respond to Defendant's counsel's email regarding their motion to seal. |
| 6/19/2018 | Adam Tamburelli | 1 | Review Defendant's counsel's Declaration regarding its filing errors; review Defendant's newly-filed documents; review emails from Defendant's counsel. |
| 6/19/2018 | Adam Tamburelli | 0.2 | Review Defendant's amended Ex Parte application. |
| 6/19/2018 | Adam Tamburelli | 0.2 | Review Defendant's application to file documents under seal. |
| 6/19/2018 | Adam Tamburelli | 0.1 | Review court order regarding Defendant's Ex Parte Application re depositions. |
| 6/19/2018 | Adam Tamburelli | 1.9 | Prepare for and engage in call with our experts; prepare memorandum of discussion and action required list for co-counsel. Engage in multiple telephone conferences with defendant's counsel regarding Defendant's erroneous filing issues related to its opposition to Plaintiffs' MSJ; review the docket and compare with courtesy copies provided by counsel to determine errors; discuss |
| 6/19/2018 | Adam Tamburelli | 8.5 | Conduct legal research and draft opposition to Defendant's ex parte application to take additional depositions. |
| 6/20/2018 | Adam Tamburelli | 0.2 | Draft email to Defendant's counsel following up on conference call with disputed facts. |
| 6/20/2018 | Adam Tamburelli | 1.5 | Review proposed scheduling order and strategize and calculate new proposed dates in preparation for conference call with Defendant's counsel regarding scheduling issues; engage in conference call. |
| 6/20/2018 | Adam Tamburelli | 3 | Review and revise opposition to Defendant's ex parte application; circulate for review of co-counsel; discuss strategy with co-counsel; incorporate changes. |
| 6/20/2018 | Adam Tamburelli | 0.2 | Review additional data dictionary from defendant's counsel. |
| 6/20/2018 | Adam Tamburelli | 0.4 | Review notes and consult with Paul Cullen regarding issues raised in conference call with Defendant's counsel; draft email to Defendant's counsel regarding issues raised. |
| 6/20/2018 | Adam Tamburelli | 1.2 | Revise draft stipulation for scheduling order; circulate to co-counsel for review with notes. |
| 6/20/2018 | Adam Tamburelli | 9 | Extensive work on comprehensive 30 page response to D's ex parte app to take further depositions |
| 6/20/2018 | Adam Tamburelli | 0.3 | Review Defendant's application to file documents under seal and request to remove incorrect entries from docket. |
| 6/20/2018 | Adam Tamburelli | 0.5 | Review Defendant's meet and confer letter regarding its Requests for Production; consult with Paul Cullen re same. |
| 6/20/2018 | Adam Tamburelli | 0.1 | Review numerous emails between counsel regarding scheduling absent class member depositions. |

Timekeeper Report From 3/11/08 to 12/28/18

| <u>Billing Date</u> | <u>Timekeeper</u> | <u>Hours</u> | <u>Description</u> |
|---------------------|---------------------|--------------|---|
| 6/21/2018 | Adam Tamburelli | 12 | Begin conducting legal research for reply re MSJ; review cases cited by Defendant. |
| 6/21/2018 | Stanley D. Saltzman | 8 | Review and analysis of D's opposition to our MSJ; research the same; confer with AT |
| 6/22/2018 | Adam Tamburelli | 7 | Begin drafting reply in support of MSJ. |
| 6/22/2018 | Bradley R. Fagnani | 3.1 | Review defendant's evidentiary objections to plaintiffs' evidence ISO their motion for summary judgment. Draft plaintiffs' response. |
| 6/22/2018 | Tony Baird | 4 | Prepare draft objections |
| 6/23/2018 | Adam Tamburelli | 9.3 | Continue drafting reply brief; conduct additional legal research. Review and analyze Defendant's objections and responses to Plaintiffs' SUF in support of their MSJ; review supporting declarations; organize thoughts as to what needs to be done by Reply deadline |
| 6/23/2018 | Stanley D. Saltzman | 9.5 | |
| 6/24/2018 | Adam Tamburelli | 12.3 | Continue drafting reply brief; review prior court orders and prior pleadings filed by Defendant to verify arguments in opposition and cites therein. |
| 6/24/2018 | Stanley D. Saltzman | 7.5 | Assist with framing of our Reply ISO of our MSJ; research various issues |
| 6/24/2018 | Stanley D. Saltzman | 3 | Work on our Expert Designations |
| 6/24/2018 | Tony Baird | 5.5 | Work on draft objections to the docs submitted with the opposition to our MSJ. Assist re: MSJ reply |
| 6/25/2018 | Adam Tamburelli | 0.5 | Meet and confer with Defendant's counsel and Stan Saltzman regarding Defendant's forthcoming motion for summary judgment and motion for class certification; discuss strategy afterwards. |
| 6/25/2018 | Adam Tamburelli | 12.7 | Make final edits to Reply re MSJ, review all testimony and declarations and draft opposition to Defendant's Statement of Additional Facts, review and revise response to Defendant's Objections to Evidence, Draft Objections to Defendant's evidence; file doc |
| 6/25/2018 | Stanley D. Saltzman | 8.3 | Assist with all final drafting of our Reply to D's opp to our MSJ; work with AT to organize everything for filing tonight |
| 6/25/2018 | Stanley D. Saltzman | 3.5 | Work on our Expert Designation in case it needs to be filed today; work with experts on report |
| 6/25/2018 | Stanley D. Saltzman | 0.4 | Review MJ order denying D's ex parte app for additional depositions |
| 6/25/2018 | Susan Joseph | 4.75 | Data and document review; communications re same; communications with data expert. |
| 6/26/2018 | Adam Tamburelli | 5.1 | Prepare expert designation for two experts pending extension of time to designate, pursuant to FRCP 26; research requirements under Federal Rules; research case law regarding information necessary to include in expert designation. |
| 6/26/2018 | Adam Tamburelli | 3.9 | Discuss issues with expert witnesses; review underlying discovery related to assumptions for experts to use in reports. |
| 6/26/2018 | Susan Joseph | 6 | Continued data review and analysis; communications with data expert; case management conference with attorneys. |
| 6/27/2018 | Adam Tamburelli | 14.6 | Review documents produced in discovery, prior pleadings, and declarations filed by Defendant and begin organizing for responding to motions, trial preparation and review. |

Timekeeper Report From 3/11/08 to 12/28/18

| <u>Billing Date</u> | <u>Timekeeper</u> | <u>Hours</u> | <u>Description</u> |
|---------------------|---------------------|--------------|---|
| 6/27/2018 | Susan Joseph | 6.75 | Continued data and document review; communications with data expert; communications with litigation team; draft depo summary template; prepare data production timeline. |
| 6/27/2018 | Bradley R. Fagnani | 4.8 | Review case file to assist with trial prep as needed |
| 6/28/2018 | Adam Tamburelli | 12.8 | Continue reviewing and organizing documents produced in discovery, prior pleadings, and declarations. |
| 6/28/2018 | Susan Joseph | 6 | Communications with data expert; confer with attorneys; review data and documents re efficiency study and prior defense expert declaration; meet with paralegal assistant and law clerk re pre-trial issues. |
| 6/28/2018 | Bradley R. Fagnani | 0.8 | Instructing interns re: deposition summaries. |
| 6/29/2018 | Adam Tamburelli | 1.6 | Review Defendant's new document production; take notes for use in oppositions to forthcoming motions. |
| 6/29/2018 | Adam Tamburelli | 0.2 | Exchange emails with defendant's counsel regarding 30(b)(6) depositions. |
| 6/29/2018 | Adam Tamburelli | 0.3 | Review court order denying scheduling stipulation; discuss strategy with co-counsel regarding expert disclosures. |
| 6/29/2018 | Bradley R. Fagnani | 0.3 | Review deposition summary |
| 6/29/2018 | Adam Tamburelli | 4 | Exchange emails with Defendant's counsel regarding scheduling Rule 30(b)(6) depositions; draft notices of depositions with document requests for 3 deponents; circulate for review; review declarations and prior testimony of deponents in determining deposit |
| 6/29/2018 | Adam Tamburelli | 7.1 | Review file and conduct legal research to develop trial plan; review trial plans in similar cases; begin preparing outline of trial plan for motion to decertify/trial preparation purposes. |
| 6/30/2018 | Adam Tamburelli | 1.7 | Consult with co-counsel regarding scheduling and strategy and draft notices of depositions of Ashmore, Rodriguez, and Wofford with document requests; serve on Defendant's counsel and exchange emails regarding deposition location. |
| 7/1/2018 | Adam Tamburelli | 14 | Continue reviewing and organizing evidence, discovery, and deposition testimony previously produced by Defendants in anticipation of forthcoming motions for summary judgment and to decertify the class. |
| 7/2/2018 | Adam Tamburelli | 3.3 | Review prior emails and file notes regarding timeline of discovery production; draft ex parte application for relief from deadlines regarding data-related experts. |
| 7/2/2018 | Adam Tamburelli | 7.5 | Additional review and organization of discovery and testimony produced in case to date in anticipation of forthcoming motions; discuss strategy with co-counsel. |
| 7/2/2018 | Stanley D. Saltzman | 7 | Extended trial planning session in anticipation of decert motion, and for general trial preparation purposes. |
| 7/2/2018 | Susan Joseph | 6 | Communications with litigation team and data expert; continued review of data and documents; trial preparation. |
| 7/3/2018 | Adam Tamburelli | 16 | Begin reviewing Defendant's motion to decertify class and related exhibits, and Defendant's motion for summary judgment and related exhibits; take notes and devise and discuss strategy among team for responses; discuss Defendant's expert report and relate |

Timekeeper Report From 3/11/08 to 12/28/18

| <u>Billing Date</u> | <u>Timekeeper</u> | <u>Hours</u> | <u>Description</u> |
|---------------------|---------------------|--------------|---|
| 7/3/2018 | Adam Tamburelli | 0.3 | Meet and confer emails and call with Defendant's counsel regarding our forthcoming ex parte application for relief from certain expert witness deadlines. |
| 7/3/2018 | Stanley D. Saltzman | 6.5 | Read and review D's motions to decertify and for Summary Judgment |
| 7/4/2018 | Adam Tamburelli | 11 | Begin conducting legal research, outlining, and drafting opposition to Defendant's motion to decertify the Class; review objections and responses to our notices of depositions. |
| 7/4/2018 | Stanley D. Saltzman | 5.5 | Further analysis and research re D's two motions filed this week. |
| 7/5/2018 | Stanley D. Saltzman | 1.2 | Confer in depth with AT regarding renewed ex parte, and MSJ issues |
| 7/5/2018 | Stanley D. Saltzman | 4.5 | Assist with MSJ issues and drafting of our opp to D's MSJ |
| 7/5/2018 | Susan Joseph | 7.5 | Assist with preparation of plaintiff's opposition to defendant's decertification motion.; continued data review; communications with data expert. |
| 7/5/2018 | Susan Joseph | 5 | Trial preparation, including preparation of trial exhibit list. |
| 7/5/2018 | Adam Tamburelli | 3.1 | Discuss ex parte application with Stan Saltzman; review and revise ex parte application and engage in meet and confer with Defendant's counsel re same; prepare proposed order; revise exhibits. |
| 7/5/2018 | Adam Tamburelli | 1.2 | Confer with co-counsel regarding strategy for deposition of Ashmore; review rough draft of transcript. |
| 7/5/2018 | Adam Tamburelli | 8.3 | Continue reviewing exhibits and drafting opposition to motion to decertify class. |
| 7/5/2018 | Adam Tamburelli | 1.5 | Review relevant declarations from Defendant in preparation for telephone conference with experts; engage in call with experts. |
| 7/5/2018 | Adam Tamburelli | 0.5 | Exchange numerous emails with Defendant's counsel regarding various issues, including meet and confer regarding discovery. |
| 7/6/2018 | Adam Tamburelli | 15 | Continue drafting opposition to motion to decertify; work with experts in preparing response and separate report; begin drafting declatation. |
| 7/7/2018 | Adam Tamburelli | 16 | Continued legal research regarding opposition to motion to decertification and motion for summary judgment; review declarations and exhibits to MSJ; review Defendant's Statement of Uncontroverted Facts; review and revise draft of opposition to MSJ; conti |
| 7/7/2018 | Stanley D. Saltzman | 1.5 | Conference calls with our experts to develop response to some decert motion issues |
| 7/7/2018 | Susan Joseph | 0 | Assist with preparation of plaintiff's opposition to defendant's decertification motion. |
| 7/8/2018 | Adam Tamburelli | 15.5 | Review and revise opposition to decertification and opposition to MSJ; review draft expert report and continue working with experts on report; review transcripts of depositions taken this week; analyze voluminous pay plans attached to Edelman Declaration. |
| 7/8/2018 | Stanley D. Saltzman | 8.5 | Assist with opps to D's motions to decertify and for SJ |
| 7/8/2018 | Susan Joseph | 12 | Assist with preparation of plaintiff's opposition to defendant's decertification motion. |

Timekeeper Report From 3/11/08 to 12/28/18

| <u>Billing Date</u> | <u>Timekeeper</u> | <u>Hours</u> | <u>Description</u> |
|---------------------|---------------------|--------------|---|
| 7/9/2018 | Adam Tamburelli | 15.5 | Finalize opposition for motion to decertify, declaration in support, objections to defendant's evidence, draft proposed order, prepare exhibits, finalize trial plan; finalize opposition to motion for summary judgment; respond to Defendant's Statement of U |
| 7/9/2018 | Stanley D. Saltzman | 12.5 | Further assistance with final prep of opps to the two D motions. |
| 7/10/2018 | Susan Joseph | 10 | Assist with preparation of plaintiff's opposition to defendant's decertification motion. |
| 7/11/2018 | Adam Tamburelli | 0.9 | Review email and updated data from Defendant's counsel; exchange emails with our experts regarding relaying data to them; initiate FTP file transfer to transmit data to experts. |
| 7/11/2018 | Susan Joseph | 6 | Assist with preparation of plaintiff's opposition to defendant's decertification motion. |
| 7/12/2018 | Adam Tamburelli | 3.5 | Legal research regarding standards for expert witness reports, rebuttal reports, and related issues under Rule 26(a); research standards for updating such reports; prepare memorandum and discuss strategy internally. |
| 7/12/2018 | Adam Tamburelli | 4.5 | Research Standing Order, Local Rules, and Rule 26 to determine relevant deadlines and filing requirements in preparation for pretrial strategy and work plan. |
| 7/12/2018 | Adam Tamburelli | 2.8 | Review Exhibits to Declaration of Scott Edelman in detail to determine difference in pay plans; take notes and begin preparing memorandum for expert. |
| 7/13/2018 | Adam Tamburelli | 4 | Identify specific witnesses to disclose and their areas of testimony for Supplemental Rule 26(a) Disclosures; research basis for damage calculations; revise Supplemental Disclosures; serve on Defendant's counsel. |
| 7/13/2018 | Adam Tamburelli | 1 | Review and analyze Defendant's Fifth Amended Rule 26 Disclosures. |
| 7/13/2018 | Adam Tamburelli | 0.9 | Review email from the Court; meet and confer with Defendant's counsel via multiple calls and emails; respond to Clerk's question. |
| 7/14/2018 | Adam Tamburelli | 11.3 | Review Court orders, Local Rules, and Judge's Standing ORders and put together trial preparation booklet and guide for trial team; begin planning disclosure and trial-prep strategy. |
| 7/15/2018 | Adam Tamburelli | 6.9 | Review and analyze Defendant's portion of the L.R. 37.2 stipulation regarding forthcoming motion to compel additional depositions of absent class members; prepare outline for Plaintiffs' section and review deposition testimony and declarations from driver |
| 7/15/2018 | Adam Tamburelli | 4.9 | Begin going through discovery produced in case to determine which documents to use as exhibits and for support re expert declaration. |
| 7/15/2018 | Stanley D. Saltzman | 7.5 | Extensive work on issues needed for the expert declaration; data and evidence reviews for the same |
| 7/16/2018 | Adam Tamburelli | 6 | Continue drafting Plaintiffs' portion of L.R. 37-2 stipulation; conduct additional legal research; finalize and serve on Defendant's counsel with exhibits; review emails from Defendant's counsel regarding same; review finalized draft for submission from D |
| 7/16/2018 | Adam Tamburelli | 1.5 | Review questions from experts about information contained in data; prepare for and engage in conference call with experts and Stan Saltzman and Paul Cullen; discuss strategy after call. |

Timekeeper Report From 3/11/08 to 12/28/18

| <u>Billing Date</u> | <u>Timekeeper</u> | <u>Hours</u> | <u>Description</u> |
|---------------------|---------------------|--------------|---|
| 7/16/2018 | Adam Tamburelli | 3.6 | Begin reviewing and preparing chart of all declarations filed by Defendants in the case for use in time estimates and quick reference. |
| 7/16/2018 | Adam Tamburelli | 0.1 | Review and respond to Defendant's counsel's request for consent re motion to seal. |
| 7/16/2018 | Adam Tamburelli | 1.5 | Exchange emails with Defendant's counsel regarding problems with courtesey copies of sealed exhibits; download and compile Defendant's unredacted expert report and redacted exhibits and Correa unredacted declaration for initial review and production to ex |
| 7/16/2018 | Stanley D. Saltzman | 4.5 | Assist with drafting of Plaintiffs' portion of L.R. 37-2 stipulation; and research re the same. |
| 7/16/2018 | Susan Joseph | 6 | Confer with damages expert; case management meeting with trial team; trial preparation. |
| 7/17/2018 | Adam Tamburelli | 2.5 | Review and analyze Defendant's motion for summary judgment and Response to Plaintiff's Evidentiary Objections; check citations to record and legal citations therein. |
| 7/17/2018 | Adam Tamburelli | 4.5 | Review and analyze Defendant's Reply ISO its Motion to Decertify and numerous Declarations and Exhibits thereto; check citations to the record and legal citations thereto; prepare notes for file; discuss strategy with Stan Saltzman. |
| 7/17/2018 | Adam Tamburelli | 1.8 | Telephone call with experts; review filings for Defendant's Declarations related to out-of-state drivers; discuss questions with Stan Saltzman. |
| 7/17/2018 | Adam Tamburelli | 0.1 | Review court order granting extension of time for experts; email experts re same. |
| 7/17/2018 | Adam Tamburelli | 2.1 | Review file, including deposition testimony and declarations, and discovery, to determine current evidence regarding the amount of time drivers spend on various tasks for provision to expert; discuss with paralegal and co-counsel. |
| 7/17/2018 | Adam Tamburelli | 0.9 | Review relevant statutes regarding penalties and interest for communication to experts; prepare memorandum of how to apply statutes to damage calculations; discuss with Stan Saltzman. |
| 7/17/2018 | Stanley D. Saltzman | 3.3 | Work on expert issues |
| 7/17/2018 | Stanley D. Saltzman | 5 | Study D's reply brief in support of its MSJ, as to both oral argument preparation and trial approach issues. |
| 7/17/2018 | Susan Joseph | 6 | Confer with damages expert; download, format and review class contacts; review timeline of data production; communicaitons with litigation team. |
| 7/17/2018 | Susan Joseph | 6.5 | Communications with litigation team and expert, including emails and conference call; revise class contact questionnaire; prepare trial exhibit list. |
| 7/18/2018 | Stanley D. Saltzman | 7.5 | Continue to study D's approach to its MSJ and decert motion, as relates to our approach to trial for the class. |
| 7/18/2018 | Adam Tamburelli | 6.5 | Review and analyze Declarations in Support of Defendant's REPLY ISO Motion to Decertify; conduct legal research and draft objections thereto. |
| 7/18/2018 | Adam Tamburelli | 2.5 | Further analyze Defendant's Rebuttal Declaration re experts; prepare for and engage in conference call with experts. |

Timekeeper Report From 3/11/08 to 12/28/18

| <u>Billing Date</u> | <u>Timekeeper</u> | <u>Hours</u> | <u>Description</u> |
|---------------------|---------------------|--------------|--|
| 7/18/2018 | Adam Tamburelli | 0.1 | Review and respond to Class Administrator's email regarding rescinding opt-out. |
| 7/18/2018 | Adam Tamburelli | 0.2 | Email co-counsel regarding status of class member interviews, including additional letters going to class members and summary of interviews to date. |
| 7/19/2018 | Susan Joseph | 6.5 | Trial preparation including work on trial exhibit list; communications with litigation team re same. |
| 7/22/2018 | Adam Tamburelli | 0.9 | Review and respond to emails among co-counsel regarding Defendant's data production errors; review and analyze email from experts regarding analysis of data production error letter from Defendant's counsel. |
| 7/22/2018 | Adam Tamburelli | 3.5 | Study entire history of data production, as to ongoing errors and problems with it from the D |
| 7/22/2018 | Stanley D. Saltzman | 3 | Complete review of data productions by D and the problems that continue. |
| 7/23/2018 | Adam Tamburelli | 0.5 | Prepare for and engage in Conference call with Stan Saltzman, Paul Cullen, and Defendant's counsel regarding newly-discovered data production errors. |
| 7/23/2018 | Adam Tamburelli | 1 | Conference call with Stan Saltzman and Paul Cullen regarding Defendant's data production errors and strategy; review Defendant's counsel's emails and letter regarding same to prepare. |
| 7/23/2018 | Adam Tamburelli | 0.9 | Review letter from Defendant's counsel regarding designating portions of deposition transcripts as "confidential," review relevant portions of deposition transcripts. |
| 7/23/2018 | Adam Tamburelli | 0.2 | Review supplemental email from Defendant's counsel regarding corrected information on class member data. |
| 7/23/2018 | Adam Tamburelli | 1.2 | Review and analyze updated spreadsheet of class member interview results for 70+ class members. |
| 7/23/2018 | Susan Joseph | 5 | Communicaitons with trial team and expert, including emails and conference call; download and review defendant data and documents; forward same to expert; class member contact; continue trial preparation. |
| 7/23/2018 | Adam Tamburelli | 1.5 | Initial review and analysis of Defendants' expert disclosures and expert reports. |
| 7/24/2018 | Adam Tamburelli | 1.9 | Review and analyze Defendant's supplemental memorandum re its motion to depose absent class members; draft and file Plaintiffs' supplemental memorandum. |
| 7/24/2018 | Adam Tamburelli | 2.8 | Review report of Gordon Klemp (Defendant's Expert) and supporting materials; prepare memorandum for co-counsel and file. |
| 7/24/2018 | Adam Tamburelli | 0.5 | Review and respond to emails among co-counsel regarding Court's ruling on Plaintiffs' MSJ |
| 7/24/2018 | Adam Tamburelli | 0.1 | Review email from Defendant's counsel confirming details of telephone conference. |
| 7/24/2018 | Stanley D. Saltzman | 5.5 | Data analysis with experts and co-counsel; study initial results of updated reports |
| 7/24/2018 | Stanley D. Saltzman | 3.4 | Work on our repsonse to the D's renewed motion to try to obtain more class members depositions at this late date. |

Timekeeper Report From 3/11/08 to 12/28/18

| <u>Billing Date</u> | <u>Timekeeper</u> | <u>Hours</u> | <u>Description</u> |
|---------------------|---------------------|--------------|--|
| 7/24/2018 | Susan Joseph | 8 | Prepare trial exhibit list; general review and organization re trial. |
| 7/24/2018 | Adam Tamburelli | 0.5 | Review and analyze Defendant's response to Plaintiffs' objections to evidence re Motion to Decertify Reply. |
| 7/24/2018 | Adam Tamburelli | 1 | Review and analyze court order granting Plaintiffs' motion for summary judgment in part; discuss order and strategy going forward with Stan Saltzman. |
| 7/24/2018 | Adam Tamburelli | 0.3 | Review two draft stipulations and declaration from Defendant's counsel regarding moving pretrial conference date; respond to email. |
| 7/24/2018 | Adam Tamburelli | 0.6 | Telephone call and exchange emails with experts regarding data production problems. |
| 7/24/2018 | Adam Tamburelli | 1.5 | Meet with Stan Saltzman to prepare for pre Local Rule 16-2 meeting with Defendant's counsel; engage in said telephone conference with Defendant's counsel. |
| 7/24/2018 | Adam Tamburelli | 2.7 | Review and analyze proposed reply declaration from experts in opposition to McMahon's rebuttal declaration; prepare memorandum regarding McMahon Rebuttal Declaration, our objections, and Defendant's responses to our objections, analyzing whether to bring |
| 7/25/2018 | Stanley D. Saltzman | 5 | Study Topel's extensive expert report; confer re the same with our experts |
| 7/25/2018 | Stanley D. Saltzman | 3.5 | General trial prep, focusing on driver witnesses to be called to support the claims; review numerous memos re the various drivers who have contacted us. |
| 7/25/2018 | Susan Joseph | 7 | Preparation of trial exhibit list, and trial exhibits including document review and organization. |
| 7/25/2018 | Adam Tamburelli | 1.6 | Review file and prepare draft deposition subpoena with requests for production of documents for Robert Topel; circulate for review. |
| 7/25/2018 | Adam Tamburelli | 0.1 | Review court order taking Defendant's MSJ and Motion to Decertify under submission. |
| 7/25/2018 | Adam Tamburelli | 4.8 | Review and analyze expert report of Dr. Robert Topel, Defendant's expert, and exhibits thereto; prepare memorandum regarding same. Conduct legal research regarding relevancy under FRE 702 and 401; research relevancy of "industry standards" |
| 7/25/2018 | Adam Tamburelli | 0.5 | Exchange emails with experts regarding status; research and email experts California minimum wage history. |
| 7/25/2018 | Adam Tamburelli | 2.2 | Prepare summary of the laws regarding statutory damages, penalties, and interest for experts to rely on in their report. |
| 7/25/2018 | Adam Tamburelli | 0.6 | Review and revise draft discovery responses. |
| 7/26/2018 | Adam Tamburelli | 2 | Review court order advancing pretrial conference; discuss effect with Stan Saltzman; review emails among all counsel about further moving pretrial conference; update deadlines in trial workbook and adjust strategy. |
| 7/26/2018 | Adam Tamburelli | 3.3 | Research FRCP, Local Rules, and case law regarding technical requirements and timing requirements for document requests to experts and related issues; prepare subpoena to Dr. Topel with document requests; circulate for review. |
| 7/27/2018 | Adam Tamburelli | 0.9 | Revise notice of deposition and document requests to Topel; circulate to co-counsel. |

Timekeeper Report From 3/11/08 to 12/28/18

| <u>Billing Date</u> | <u>Timekeeper</u> | <u>Hours</u> | <u>Description</u> |
|---------------------|---------------------|--------------|---|
| 7/27/2018 | Adam Tamburelli | 0.8 | Email assumptions for statutory damages, penalties, and interest to experts; telephone call with expert regarding status of report and various calculations. |
| 7/27/2018 | Adam Tamburelli | 1.6 | Prepare for and engage in conference call with Stan Saltzman and Scott Edelman regarding Defendant's non-data experts; review expert reports, prior rulings re FAAAA, and discuss with Stan Saltzman. |
| 7/27/2018 | Adam Tamburelli | 0.6 | Review email from Defendant's counsel regarding new data production; download data; transfer data to experts via FTP transfer; email experts regarding data. |
| 7/27/2018 | Adam Tamburelli | 1.6 | Review and summarize the deposition of Vargas (no longer with JBH) to determine whether to include his deposition testimony for trial purposes. |
| 7/30/2018 | Adam Tamburelli | 12 | Continue reviewing and cataloguing all prior deposition testimony and declarations for trial purposes and witness disclosure; draft and circulate preliminary witness list; review and analyze Defendant's preliminary witness list; exchange emails with Defen |
| 7/30/2018 | Adam Tamburelli | 0.7 | Telephone call with experts regarding forthcoming report. |
| 8/1/2018 | Adam Tamburelli | 2.9 | Revise and finalize Motion in Limine list; prepare for and engage in meet and confer with Defendant's counsel regarding motions in limine. |
| 8/3/2018 | Adam Tamburelli | 7.7 | Work with experts in getting report finalized and issued, including engaging in multiple telephone conferences with experts, reviewing multiple drafts of the reports (including information and data relied upon), reviewing file to investigate and confirm f |
| 8/3/2018 | Adam Tamburelli | 0.5 | Review new production of documents relevant to Defendant's expert. |
| 8/3/2018 | Adam Tamburelli | 0.6 | Review Defendant's revised preliminary exhibit list. |
| 8/3/2018 | Adam Tamburelli | 0.2 | Review and analyze email from Defendant's counsel regarding erroneous production on July 20; foward to experts. |
| 8/3/2018 | Adam Tamburelli | 0.1 | Review draft joint stipulation regardng pretrial dates. |
| 8/5/2018 | Adam Tamburelli | 10 | Prepare for deposition of Gordon Klemp (JBH expert), including reading report and attached materials, preparing outline, reviewing data produced to support his report, and conducting outside research. |
| 8/6/2018 | Adam Tamburelli | 8 | Prepare for and take deposition of Defendant's expert Gordon Klemp (including 2.5 hours travel) |
| 8/6/2018 | Adam Tamburelli | 1.5 | Meeting regarding motions in limine; email co-counsel motions in limine instruction along with examples. |
| 8/6/2018 | Adam Tamburelli | 0.2 | Review emails from Defendant's counsel regarding motion in limine and further meet and confer. |
| 8/6/2018 | Tony Baird | 7.5 | Review MIL needs on JB hunt. Begin initial research |
| 8/6/2018 | Stanley D. Saltzman | 9.3 | Supervise and work on numerous motions in limine, with various attorneys in the firm |
| 8/7/2018 | Adam Tamburelli | 1.5 | Prepare for and attend follow-up meet and confer with Defendant's counsel and Stan Saltzman; discuss strategy after. |
| 8/7/2018 | Adam Tamburelli | 1.5 | Lengthy telephone conference with our expert witnesses about Topel expert report, new data production, and next steps in the case. |

Timekeeper Report From 3/11/08 to 12/28/18

| <u>Billing Date</u> | <u>Timekeeper</u> | <u>Hours</u> | <u>Description</u> |
|---------------------|---------------------|--------------|--|
| 8/7/2018 | Adam Tamburelli | 0.8 | Research file and declarations regarding orientation pay; prepare memorandum for co-counsel. |
| 8/7/2018 | Adam Tamburelli | 2 | Begin researching law in preparation for drafting motions in limine. |
| 8/7/2018 | Stanley D. Saltzman | 7.7 | Continue working on Motions in Limine |
| 8/7/2018 | Stephen O'Dell | 6.3 | Review file re preparation of motion in limine re representative evidence |
| 8/7/2018 | Adam Tamburelli | 4 | Attend hearing re Defendant's motion for leave to take additional depositions (including travel time) |
| 8/7/2018 | Stephen O'Dell | 4.2 | Legal research re motion in limine re representative evidence |
| 8/7/2018 | Stephen O'Dell | 3.8 | Draft motion in limine re representative evidence |
| 8/7/2018 | Tony Baird | 7.5 | Research and prepare motion in L. |
| 8/8/2018 | Tony Baird | 5.4 | Work on Motions in Lim |
| 8/8/2018 | Stanley D. Saltzman | 8.5 | Analysis of all case issues in light of decertification; confer with appellate counsel re handling of the Rule 23f petition; discuss new issues with experts; and basically reconfigure case handling to protect all issues while the case goes through appeal |
| 8/8/2018 | Stanley D. Saltzman | 0.7 | Telecon with D counsel regarding Rule 23f issues; possible stay issues and case handling in light of decert |
| 8/8/2018 | Adam Tamburelli | 3.3 | Case planning in light of decert |
| 8/8/2018 | Adam Tamburelli | 3 | Review court order regarding decertification and summary judgment; confer with Stan Saltzman and co-counsel regarding strategy; conduct legal research regarding motions to reconsider and Rule 23(f) petition. |
| 8/8/2018 | Adam Tamburelli | 0.5 | Multiple telephone conferences with experts regarding court ruling and strategy going forward. |
| 8/8/2018 | Adam Tamburelli | 1 | Telephone conference with Scott Edelman and Stan Saltzman regarding various issues related to the Court's orders; discuss with Stan Saltzman afterwards. |
| 8/8/2018 | Adam Tamburelli | 0.2 | Email Defendant's counsel regarding confidentiality issues and filing Gordon Klemp's report. |
| 8/9/2018 | Stanley D. Saltzman | 6.5 | Finalize several of the MIL's; ready to file tomorrow. |
| 8/9/2018 | Stanley D. Saltzman | 3.3 | Work on expert issues, following decertification and need to reconfigure the report of the experts |
| 8/9/2018 | Tony Baird | 8.5 | Work on Motions in L. |
| 8/10/2018 | Adam Tamburelli | 14 | Continue drafting motions in limine; review and revise drafts from co-counsel; prepare application to seal and related declarations; file documents and serve on defendant's counsel. |
| 8/10/2018 | Adam Tamburelli | 2 | Prepare for and engage in two meet and confer conferences with Defendant's counsel regarding trial issues, including witness and exhibit issues, claims to be pursued, and similar issues; discuss strategy with co-counsel. |
| 8/10/2018 | Adam Tamburelli | 1.1 | Review updated exhibit list and discuss issues with Paul Cullen; send along to Defendant's counsel with explanation. |
| 8/10/2018 | Stanley D. Saltzman | 12 | Entire day finalizing all the motions in limine, to prepare them for final and for filing. worked on ten of them. |
| 8/10/2018 | Tony Baird | 9 | Review revise and assist on several MIL's. |
| 8/11/2018 | Stanley D. Saltzman | 10 | Work on the joint witness and exhibit lists, as required by court rules and deadline |

Timekeeper Report From 3/11/08 to 12/28/18

| <u>Billing Date</u> | <u>Timekeeper</u> | <u>Hours</u> | <u>Description</u> |
|---------------------|---------------------|--------------|---|
| 8/12/2018 | Adam Tamburelli | 2.9 | Assemble relevant briefs, declarations, and orders for Deepak Gupta for preparation of Rule 23(f) petition; prepare case history and procedural summary for review. |
| 8/12/2018 | Adam Tamburelli | 6.9 | Review prior depositions and declarations; revise witness list after decertification order; send to Defendant's counsel with explanation. |
| 8/12/2018 | Stanley D. Saltzman | 8 | Continue to work on joint exhibit and witness lists, narrowing down our driver witnesses and those needed from the D side |
| 8/13/2018 | Adam Tamburelli | 10.5 | Conduct research and begin drafting memorandum of contentions of fact and law. |
| 8/13/2018 | Adam Tamburelli | 1.5 | Review witness and exhibit lists; engage in meet and confer call with Defendant's counsel; discuss lists with Stan Saltzman and Susan Joseph. |
| 8/13/2018 | Adam Tamburelli | 0.5 | Exchange emails with Deepak Gupta regarding Rule 23(f) petition. |
| 8/13/2018 | Adam Tamburelli | 0.2 | Telephone conference with Paul Cullen regarding deposition designations. |
| 8/13/2018 | Stanley D. Saltzman | 1.3 | Speak with Mr. Gupta regarding his thoughts on the Rule 23 petition on decert; outline issues as we see them. |
| 8/13/2018 | Stanley D. Saltzman | 9.5 | Extensive review and research re the 23f petition, to be drafted by Gupta with our input |
| 8/14/2018 | Adam Tamburelli | 13.3 | Conduct additional legal research regarding damages on all claims and issues related to claims and defenses triable to the jury vs. the Court; exchange emails with Defendant's counsel regarding claims and affirmative defenses to be abandoned; continue dra |
| 8/14/2018 | Adam Tamburelli | 0.9 | Review revised witness list from Defendant; make further revisions and serve on Defendant's counsel; review Defendant's further revisions and respond to email about objections. |
| 8/14/2018 | Stanley D. Saltzman | 3.5 | Continue work on the Rule 23f petition and issues to raise. |
| 8/14/2018 | Stanley D. Saltzman | 4.3 | Work with AT on the memo of facts and law to be filed soon. |
| 8/14/2018 | Stanley D. Saltzman | 5.5 | Final work on the memo of facts and law to be filed tonight |
| 8/14/2018 | Adam Tamburelli | 1.7 | Review updated joint exhibit list; send to Defendant's counsel; review numerous emails among counsel regarding further updates, including Defendant's counsel's proposed new format and sample thereof; discuss final revisions to exhibit list and review rele |
| 8/14/2018 | Adam Tamburelli | 0.3 | Telephone conference with our expert witness regarding issues relating to new amended/updated report. |
| 8/14/2018 | Adam Tamburelli | 0.3 | Review updated exhibit list and circulate to Defendant's counsel. |
| 8/15/2018 | Adam Tamburelli | 0.5 | Review and analyze Defendant's Motion in Limine to Exclude Plaintiffs' Supplemental Amended Expert Report |
| 8/15/2018 | Adam Tamburelli | 0.4 | Email Defendant's counsel regarding broken agreement regarding experts; exchange further responses regarding same. |
| 8/15/2018 | Stanley D. Saltzman | 5.5 | Work with our experts in refining the expert report down to meet the needs of the case in light of decert; and to more specifically address the individual plaintiffs' damages. |
| 8/15/2018 | Stanley D. Saltzman | 6 | Analyze D's memo of facts and law, and study its approach to trial and any need for us to adjust ours |
| 8/15/2018 | Adam Tamburelli | 1.5 | Review defendant's document production to verify information and documents to include in supplemental expert report. |
| 8/15/2018 | Adam Tamburelli | 0.8 | Engage in multiple telephone calls with experts and Stan Saltzman regarding revisions to expert report. |

Timekeeper Report From 3/11/08 to 12/28/18

| <u>Billing Date</u> | <u>Timekeeper</u> | <u>Hours</u> | <u>Description</u> |
|---------------------|---------------------|--------------|--|
| 8/15/2018 | Adam Tamburelli | 4.5 | Review multiple versions of expert report; discuss with Stan Saltzman and Paul Cullen; conduct extensive legal research on "actual damages" under Labor Code section 226. |
| 8/15/2018 | Adam Tamburelli | 0.6 | Draft amended expert disclosure and compile documents; produce amended expert disclosure with report to Defendant's counsel; review counsel's email regarding forthcoming motion in limine re same. |
| 8/15/2018 | Adam Tamburelli | 0.5 | Review Defendant's changes to joint stipulation regarding a stay; exchange emails with counsel regarding same; prepare and file stipulation and proposed order. |
| 8/15/2018 | Adam Tamburelli | 2.5 | Review, analyze, and take notes on Defendant's Memorandum of Contentions of Fact and Law; review citations to documents and law therein. |
| 8/16/2018 | Adam Tamburelli | 0.2 | Review email from clerk and submit additional proposed order to chambers. |
| 8/16/2018 | Adam Tamburelli | 2.5 | Review email from Defendant's counsel regarding new expert report; telephone conference with expert regarding underlying data relied upon as requested by Defendant's counsel; review data and produce to Defendant's counsel. |
| 8/16/2018 | Adam Tamburelli | 0.1 | Review email from Defendant's counsel regarding stipulated facts; email co-counsel regarding same. |
| 8/16/2018 | Stanley D. Saltzman | 5 | Trial planning meeting with AT to re-construct our trial approach to the individual cases. |
| 8/16/2018 | Adam Tamburelli | 5 | Trial planning meeting with SDS for the individual case trial |
| 8/17/2018 | Adam Tamburelli | 0.4 | Review emails between counsel regarding stipulated facts. |
| 8/17/2018 | Adam Tamburelli | 0.3 | Review emails among counsel discussing agreement regarding deposing our expert; discuss with Stan Saltzman. |
| 8/17/2018 | Stanley D. Saltzman | 8 | Work on Plaintiffs' proposed Jury Instructions, to be exchanged with D |
| 8/19/2018 | Stanley D. Saltzman | 9 | Entire day reviewing, editing and offering suggestions on the Rule 23f petition to be filed in a couple of days. |
| 8/20/2018 | Adam Tamburelli | 0.2 | Review Court Order denying stipulation to stay trial; discuss strategy with Stan Saltzman. |
| 8/20/2018 | Adam Tamburelli | 0.7 | Conduct legal research regarding motion to stay in Court of Appeals; forward memorandum to co-counsel; discuss strategy with co-counsel and appellate counsel. |
| 8/20/2018 | Adam Tamburelli | 1.6 | REview email from appellate counsel regarding facts stated in Rule 23(f) brief; research record for support; discuss with Stan Saltzman and prepare email with citations to record and explanation. |
| 8/20/2018 | Adam Tamburelli | 8.9 | Conduct legal research, including CACI and 9th Circuit form jury instructions and instructions proffered in similar cases; draft proposed jury instructions; circulate for review with co-counsel; review and respond to comments on same. |
| 8/20/2018 | Adam Tamburelli | 0.2 | Review proposed stipulated facts from Paul Cullen; revise and suggest revisions; review further comments from Stan Saltzman. |
| 8/20/2018 | Stanley D. Saltzman | 9.5 | Further work on jury instructions, as per Court's deadlines |
| 8/20/2018 | Stanley D. Saltzman | 1.5 | Respond to Deepak's inquiry on background facts (with AT) |
| 8/21/2018 | Stanley D. Saltzman | 9.5 | Extensive trial planning day, in conjunction with work on the pre-trial matters and work with experts |

Timekeeper Report From 3/11/08 to 12/28/18

| <u>Billing Date</u> | <u>Timekeeper</u> | <u>Hours</u> | <u>Description</u> |
|---------------------|---------------------|--------------|---|
| 8/22/2018 | Adam Tamburelli | 0.5 | Review and revise draft proposed pretrial order; send to co-counsel for review. |
| 8/22/2018 | Adam Tamburelli | 0.2 | Review email chain memorializing agreement between counsel regarding expert discovery schedule after new documents produced. |
| 8/22/2018 | Adam Tamburelli | 0.2 | Review numerous emails from Defendant's counsel regarding newly-produced documents; discuss with co-counsel. |
| 8/23/2018 | Adam Tamburelli | 12 | Discuss strategy with Stan Saltzman regarding possible motion to stay; conduct legal research and begin drafting motion to stay in 9th Circuit. |
| 8/23/2018 | Adam Tamburelli | 0.2 | Call 9th circuit clerk to inform them of forthcoming motion to stay underlying case. |
| 8/23/2018 | Stanley D. Saltzman | 7.3 | Confer with AT regarding motion to stay the case to be filed in the Ninth Circuit; further research re the same and assist in drafting on emergency basis |
| 8/23/2018 | Stanley D. Saltzman | 2.2 | Further telecons (several) with experts regarding yet further new data. |
| 8/24/2018 | Adam Tamburelli | 14 | Continue drafting motion to stay brief for 9th circuit; circulate draft and incorporate revisions; conduct additional legal research; finalize brief and file. |
| 8/24/2018 | Adam Tamburelli | 0.5 | Review new document production and emails from Defendant's counsel; conference call with experts and Stan Saltzman. |
| 8/24/2018 | Adam Tamburelli | 0.5 | Review and revise draft pretrial conference order. |
| 8/25/2018 | Adam Tamburelli | 0.1 | Review email from class member regarding contact info. |
| 8/27/2018 | Adam Tamburelli | 0.2 | Email Defendant's counsel regarding service via email; serve brief on Defendant's counsel. |
| 8/30/2018 | Adam Tamburelli | 0.3 | Review draft amended joint witness list reflecting new documents produced by Defendant. |
| 9/3/2018 | Adam Tamburelli | 4.5 | Review filings, pleadings, and trial documents in preparation for pretrial conference. |
| 9/3/2018 | Stanley D. Saltzman | 5.5 | Preparation for the pre-trial conference to be held tomorrow. |
| 9/4/2018 | Adam Tamburelli | 1.9 | Review and analyze Defendant's Opposition to Plaintiff's Rule 23(f) petition and opposition to Plaintiffs' motion to stay in the Ninth Circuit; take notes on briefs and check citations. |
| 9/4/2018 | Adam Tamburelli | 0.1 | Review and analyze amended deposition notice of Plaintiffs' expert |
| 9/4/2018 | Adam Tamburelli | 0.1 | Review and analyze Court order granting application to file under seal. |
| 9/4/2018 | Adam Tamburelli | 0.5 | Review and analyze our expert's analysis of Topel's expert report; discuss with Stan Saltzman. |
| 9/4/2018 | Stanley D. Saltzman | 6 | Drive downtown for pre-trial conference; attend the same and return to Agoura Hills after meeting of plaintiffs' counsel at court. |
| 9/4/2018 | Adam Tamburelli | 6 | Attend pretrial conference (including travel time); discuss strategy with Paul Cullen and Stan Saltzman afterward. |
| 9/5/2018 | Adam Tamburelli | 0.9 | Conduct legal research regarding judge's prior rulings on settlement and areas of focus in connection with settlement discussions. |
| 9/5/2018 | Adam Tamburelli | 0.3 | Review Defendant's counsel's email summarizing meet & confer on jury instructions; check notes re same. |

Timekeeper Report From 3/11/08 to 12/28/18

| <u>Billing Date</u> | <u>Timekeeper</u> | <u>Hours</u> | <u>Description</u> |
|---------------------|---------------------|--------------|--|
| 9/5/2018 | Adam Tamburelli | 0.2 | Discuss supplemental briefing with MIL No. 1 with Stan Saltzman; review emails among counsel regarding page limits on same. |
| 9/5/2018 | Adam Tamburelli | 0.1 | Review Court's minute order re pretrial conference. |
| 9/5/2018 | Stanley D. Saltzman | 7 | Work with expert re finalizing updated report; work on jury instructions to get to near final form; and continue to prepare for trial. |
| 9/5/2018 | Stanley D. Saltzman | 1.5 | Ongoing negotiations with Mr. Edelman regarding settlement of the case on a class-wide basis - numerous calls back and forth |
| 9/5/2018 | Adam Tamburelli | 2.5 | Meet with Stan Saltzman re Defendant's responses to proposed jury instructions; engage in meet and confer with Defendant's counsel re same. |
| 9/5/2018 | Adam Tamburelli | 0.2 | Telephone conference with Stan Saltzman and our expert witness re trial issues. |
| 9/5/2018 | Adam Tamburelli | 7.8 | Revise proposed jury instructions; insert citations to support proposed instructions; conduct legal research and draft responses to Defendant's proposed instructions; draft email explaining revisions to Defendant's counsel. |
| 9/6/2018 | Adam Tamburelli | 0.6 | Review and analyze Defendant's supplemental motion in limine; prepare notes thereof. |
| 9/6/2018 | Adam Tamburelli | 0.1 | Review court order granting application to seal. |
| 9/6/2018 | Adam Tamburelli | 0.3 | Review, analyze, and respond to email from Defendant's counsel regarding reorganization of jury instructions. |
| 9/6/2018 | Stanley D. Saltzman | 10 | Further work on expert issues to prepare for expert's deposition in L.A. tomorrow; and then meet with her upon her arrival in L.A. to get ready for her depo |
| 9/6/2018 | Stanley D. Saltzman | 2.5 | Further settlement talks; and internal meetings and discussions regarding settlement; plus reach out to appellate counsel re the same and to the mediator, Mr. Rudy |
| 9/6/2018 | Adam Tamburelli | 11.4 | Prepare for meeting and meet with expert to prepare for her deposition; review transcripts and declarations supporting the assumptions in her report; review Dr. Topel's rebuttal report and all 3 of our expert reports in preparation. |
| 9/7/2018 | Adam Tamburelli | 1 | Discuss settlement options with Stan Saltzman and Paul Cullen; review emails between counsel regarding settlement terms. |
| 9/7/2018 | Adam Tamburelli | 2.6 | Additional review of expert documentations; meet with expert for final preparation for her deposition. |
| 9/7/2018 | Adam Tamburelli | 0.2 | Review emails among counsel regarding settlement terms and next steps; discuss with Stan Saltzman. |
| 9/7/2018 | Stanley D. Saltzman | 2.5 | Morning of discussions regarding settlement both internally and with D counsel. Settlement finally reached and confirmed by emails. |
| 9/7/2018 | Stanley D. Saltzman | 0.4 | Telecon with the court clerk to advise of settlement, on a class basis, and to request vacating of individual case trial date. |
| 9/7/2018 | Stanley D. Saltzman | 0.7 | Follow up calls with D counsel re trial date, vacating the same, and how to handle issues going forward. |
| 9/9/2018 | Stanley D. Saltzman | 1.2 | Several calls with D counsel regarding terms of settlement, and notice of settlement to be drafted and filed. |
| 9/9/2018 | Stanley D. Saltzman | 2 | Numerous calls and emails regarding notice of settlement; multiple versions exchanged and edited back and forth. |

Timekeeper Report From 3/11/08 to 12/28/18

| <u>Billing Date</u> | <u>Timekeeper</u> | <u>Hours</u> | <u>Description</u> |
|---------------------|---------------------|--------------|---|
| 9/11/2018 | Adam Tamburelli | 0.2 | Review emails between counsel regarding Notice of Settlement and proposed dates; review revised Notice of Settlement from Defendant's counsel. |
| 9/11/2018 | Stanley D. Saltzman | 1.2 | Ongoing discussions regarding the language of the notice of settlement; dates to be inserted for further proposed actions; and work with co-counsel to agree on final terms. |
| 9/12/2018 | Adam Tamburelli | 0.1 | Review updated notice of settlement and filed version thereof. |
| 9/12/2018 | Stanley D. Saltzman | 1.4 | Reach final agreement on language and terms for the notice of settlement |
| 9/14/2018 | Adam Tamburelli | 0.7 | Review emails among counsel regarding Declaration notifying 9th Circuit of status of settlement; draft declaration and file. |
| 9/17/2018 | Adam Tamburelli | 0.1 | Review emails from co-counsel regarding client discussions. |
| 9/19/2018 | Adam Tamburelli | 0.5 | Review court order scheduling settlement approval dates; discuss strategy with Stan Saltzman. |
| 9/19/2018 | Stanley D. Saltzman | 0.3 | Review Court's order vacating trial date, resetting for February and setting very tight dates to conclude all the initial phases of the settlement |
| 9/19/2018 | Stanley D. Saltzman | 1.2 | Calls with D counsel re how to handle the details of the agreement and the prelim motion within ten days. Agree on a division of labor on the issues. |
| 9/24/2018 | Adam Tamburelli | 2 | Conduct legal research regarding standard for certification of settlement class; draft portion of motion for preliminary approval on that issue. |
| 9/24/2018 | Adam Tamburelli | 0.2 | Take call from driver regarding status of case. |
| 9/24/2018 | Stanley D. Saltzman | 8.5 | Begin work on the motion for preliminary approval, with Mr. Tamburelli |
| 9/24/2018 | Adam Tamburelli | 7.5 | Begin work on motion for preliminary approval; discuss with Stan Saltzman. |
| 9/26/2018 | Adam Tamburelli | 0.3 | Review draft motion to withdraw in 9th Circuit from co-counsel; exchange emails with Defendant's counsel regarding consent to file. |
| 9/26/2018 | Adam Tamburelli | 0.9 | Review and revise draft stipulation to modify settlement approval schedule; draft proposed order; exchange emails with Defendant's counsel regarding documents; prepare and file documents. |
| 9/26/2018 | Adam Tamburelli | 8.6 | Review and revise draft of motion for preliminary approval; discuss with Stan Saltzman; conduct legal research and draft section regarding appropriateness of certification following decertification; conduct legal research on PAGA issues. |
| 9/26/2018 | Stanley D. Saltzman | 6.3 | Work on motion for approval and SDS declaration in support thereof. |
| 9/26/2018 | Stanley D. Saltzman | 3.5 | Review initial draft of Settlement Agreement provided by D |
| 9/27/2018 | Stanley D. Saltzman | 4.5 | Detailed study of Settlement Agreement; provide input and edits to D, and lay out those terms that we simply cannot agree to |
| 9/27/2018 | Stanley D. Saltzman | 2.4 | Continue work on motion, while still working on Agreement terms |
| 9/27/2018 | Adam Tamburelli | 7.8 | Revise motion for preliminary approval; review email from Defendant's counsel and revisions to previously-circulated section and revise and include in motion; circulate draft to Defendant's counsel for review |

Timekeeper Report From 3/11/08 to 12/28/18

| <u>Billing Date</u> | <u>Timekeeper</u> | <u>Hours</u> | <u>Description</u> |
|---------------------|---------------------|--------------|--|
| 9/27/2018 | Adam Tamburelli | 1.5 | Review and analyze draft settlement agreement from Defendant's counsel; email Defendant's counsel regarding employer tax provision. |
| 9/28/2018 | Adam Tamburelli | 0.4 | Review and incorporate Defendant's edits into draft motion for preliminary approval. |
| 9/28/2018 | Adam Tamburelli | 0.1 | Review Ninth Circuit Order regarding withdraw of Rule 23(f) petition and motion. |
| 9/28/2018 | Adam Tamburelli | 1.5 | Continued review and revision of draft settlement agreement and release; circulate comments to Stan Saltzman. |
| 9/29/2018 | Adam Tamburelli | 2.9 | Review and revise motion for preliminary approval to get within 20-page limit; conduct legal research and replace "legal standards" section of brief to incorporate new case law and standards. |
| 9/29/2018 | Adam Tamburelli | 1.7 | Review and provide input on updated drafts of settlement agreement, class notice, and draft second amended complaint; review emails between counsel regarding terms thereof. |
| 9/29/2018 | Stanley D. Saltzman | 5.5 | Continue work and negotiations on the Settlement Agreement and the Class Notice; several calls and emails with S counsel, as time is running short. |
| 9/29/2018 | Stanley D. Saltzman | 3.3 | Further work on the motion for approval being primarily handled by AT |
| 9/30/2018 | Adam Tamburelli | 1.7 | Review updated version of Settlement Agreement and Class Notice, along with numerous emails between counsel regarding terms thereof; review Defendant's changes to Motion for Preliminary Approval. |
| 9/30/2018 | Stanley D. Saltzman | 6.3 | Work on near final version of the motion for preliminary approval |
| 9/30/2018 | Adam Tamburelli | 5 | Continue finalizing motion to be filed tomorrow; eliminate argument to get within page limits. |
| 10/1/2018 | Stanley D. Saltzman | 10 | Entire filing deadline day working on all aspects of the motion, and the settlement agreement, as well as all supporting documents. |
| 10/1/2018 | Adam Tamburelli | 11.5 | Review in final and approve for filing. Review and revise, and review Defendant's revisions, to settlement agreement, releases, declarations of Stan Saltzman and Paul Cullen, class notice, stipulation for leave to file Second Amended Complaint, proposed Second Amended Complaint, and proposed or |
| 10/1/2018 | Adam Tamburelli | 0.1 | Review court order regarding stipulation. |
| 10/11/2018 | Adam Tamburelli | 0.5 | Review email from attorney representing class in new lawsuit re carving out of our settlement; review complaint and settlement agreement; exchange numerous emails with co-counsel re strategy. |
| 10/22/2018 | Adam Tamburelli | 0.1 | Review court order taking motion for preliminary approval hearing off calendar. |
| 11/29/2018 | Adam Tamburelli | 0.5 | Review numerous emails between counsel and with administrator regarding forthcoming class notice and directions; review emails regarding supplemental notice to opt-outs. |
| 11/29/2018 | Adam Tamburelli | 0.5 | Review court order granting preliminary approval; discuss next steps with co-counsel. |

Timekeeper Report From 3/11/08 to 12/28/18

| <u>Billing Date</u> | <u>Timekeeper</u> | <u>Hours</u> | <u>Description</u> |
|----------------------------|--------------------------|---------------------|--|
| 11/30/2018 | Adam Tamburelli | 1.5 | Review draft ex parte application, declaration, letter re opt-outs, and proposed order; review emails regarding same; finalize documents and file. |
| 12/4/2018 | Adam Tamburelli | 0.2 | Review email from claims administrator and responsive emails from Defendant's counsel regarding notice and claims schedule. |
| 12/5/2018 | Stanley D. Saltzman | 2.5 | Review of payment calculations prepared by administrator for class member payouts |
| 12/9/2018 | Stanley D. Saltzman | 1.8 | Further review of Notice materials - mailing forthcoming |
| 12/11/2018 | Adam Tamburelli | 0.2 | Review court order granting ex parte application; review emails with class notice administrator regarding mailing directions. |
| 12/17/2018 | Adam Tamburelli | 0.2 | Review email and letter from class administrator re non-class members. |
| 12/19/2018 | Adam Tamburelli | 0.5 | Review LWDA rules and procedures and submit settlement documents for approval. |
| 12/22/2018 | Stanley D. Saltzman | 8.5 | Work on revisions to motion for fees, costs and incentives, and update for all facts relating to handling of the case over the last eleven years. |
| 12/24/2018 | Stanley D. Saltzman | 5.5 | Complete near final version of motion for fees, costs and incentives, and circulate to all plaintiffs' counsel for their review. |
| 12/26/2018 | Stanley D. Saltzman | 2.3 | Review drafts of client declarations prepared by Mr. Cullen, ISO of motion for incentives. |
| Total | | 6227.85 | |

EXHIBIT 3

**To the Declaration of Stanley D. Saltzman In Support of Plaintiffs'
Motion for Attorneys' Fees, Costs, and Incentive Awards**

LAFFEY MATRIX

| | | | | Years Out of Law School * | | | | |
|-----------------|------------------|-------------------|----------------------|---------------------------|-------|-------|-------|-------|
| | Year | Adjustmt Factor** | Paralegal/ Law Clerk | 1-3 | 4-7 | 8-10 | 11-19 | 20 + |
| History | 6/01/18- 5/31/19 | 1.0350 | \$202 | \$371 | \$455 | \$658 | \$742 | \$894 |
| Case Law | 6/01/17- 5/31/18 | 1.0463 | \$196 | \$359 | \$440 | \$636 | \$717 | \$864 |
| Expert Opinions | 6/01/16- 5/31/17 | 1.0369 | \$187 | \$343 | \$421 | \$608 | \$685 | \$826 |
| See the Matrix | 6/01/15- 5/31/16 | 1.0089 | \$180 | \$331 | \$406 | \$586 | \$661 | \$796 |
| Contact us | 6/01/14- 5/31/15 | 1.0235 | \$179 | \$328 | \$402 | \$581 | \$655 | \$789 |
| Home | 6/01/13- 5/31/14 | 1.0244 | \$175 | \$320 | \$393 | \$567 | \$640 | \$771 |
| Links | 6/01/12- 5/31/13 | 1.0258 | \$170 | \$312 | \$383 | \$554 | \$625 | \$753 |
| | 6/01/11- 5/31/12 | 1.0352 | \$166 | \$305 | \$374 | \$540 | \$609 | \$734 |
| | 6/01/10- 5/31/11 | 1.0337 | \$161 | \$294 | \$361 | \$522 | \$589 | \$709 |
| | 6/01/09- 5/31/10 | 1.0220 | \$155 | \$285 | \$349 | \$505 | \$569 | \$686 |
| | 6/01/08- 5/31/09 | 1.0399 | \$152 | \$279 | \$342 | \$494 | \$557 | \$671 |
| | 6/01/07-5/31/08 | 1.0516 | \$146 | \$268 | \$329 | \$475 | \$536 | \$645 |
| | 6/01/06-5/31/07 | 1.0256 | \$139 | \$255 | \$313 | \$452 | \$509 | \$614 |
| | 6/1/05-5/31/06 | 1.0427 | \$136 | \$249 | \$305 | \$441 | \$497 | \$598 |
| | 6/1/04-5/31/05 | 1.0455 | \$130 | \$239 | \$293 | \$423 | \$476 | \$574 |
| | 6/1/03-6/1/04 | 1.0507 | \$124 | \$228 | \$280 | \$405 | \$456 | \$549 |
| | 6/1/02-5/31/03 | 1.0727 | \$118 | \$217 | \$267 | \$385 | \$434 | \$522 |
| | 6/1/01-5/31/02 | 1.0407 | \$110 | \$203 | \$249 | \$359 | \$404 | \$487 |
| | 6/1/00-5/31/01 | 1.0529 | \$106 | \$195 | \$239 | \$345 | \$388 | \$468 |

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| | | | | | | | |
|----------------|--------|-------|-------|-------|-------|-------|-------|
| 6/1/99-5/31/00 | 1.0491 | \$101 | \$185 | \$227 | \$328 | \$369 | \$444 |
| 6/1/98-5/31/99 | 1.0439 | \$96 | \$176 | \$216 | \$312 | \$352 | \$424 |
| 6/1/97-5/31/98 | 1.0419 | \$92 | \$169 | \$207 | \$299 | \$337 | \$406 |
| 6/1/96-5/31/97 | 1.0396 | \$88 | \$162 | \$198 | \$287 | \$323 | \$389 |
| 6/1/95-5/31/96 | 1.032 | \$85 | \$155 | \$191 | \$276 | \$311 | \$375 |
| 6/1/94-5/31/95 | 1.0237 | \$82 | \$151 | \$185 | \$267 | \$301 | \$363 |

The methodology of calculation and benchmarking for this Updated Laffey Matrix has been approved in a number of cases. See, e.g., *McDowell v. District of Columbia*, Civ. A. No. 00-594 (RCL), LEXSEE 2001 U.S. Dist. LEXIS 8114 (D.D.C. June 4, 2001); *Salazar v. Dist. of Col.*, 123 F.Supp.2d 8 (D.D.C. 2000).

* “Years Out of Law School” is calculated from June 1 of each year, when most law students graduate. “1-3” includes an attorney in his 1st, 2nd and 3rd years of practice, measured from date of graduation (June 1). “4-7” applies to attorneys in their 4th, 5th, 6th and 7th years of practice. An attorney who graduated in May 1996 would be in tier “1-3” from June 1, 1996 until May 31, 1999, would move into tier “4-7” on June 1, 1999, and tier “8-10” on June 1, 2003.

** The Adjustment Factor refers to the nation-wide Legal Services Component of the Consumer Price Index produced by the Bureau of Labor Statistics of the United States Department of Labor.

EXHIBIT 4

**To the Declaration of Stanley D. Saltzman In Support of Plaintiffs'
Motion for Attorneys' Fees, Costs, and Incentive Awards**

12/27/2018
11:38 AMMarlin & Saltzman, LLP
Pre-bill Worksheet

Page 1

Selection Criteria

Clien.Selection Include: 22-0248
 Atto.Selection Include: Joy
 Slip.Transaction Date Earliest - 12/27/2018

Nickname 22-0248 | JB Hunt
 Full Name Ortega v JB Hunt Transport
 Address Client: Gerardo Ortega
 11816 Telechron Avenue
 Whittier, CA 90605
 Phone 1 562-944-5498 Phone 2
 Phone 3 Phone 4
 In Ref To Ortega v JB Hunt Transport

Fees Arrg. Our File # 22-0248
 Expense Arrg. By billing value on each slip
 Tax Profile Exempt

Total of billable time slips \$0.00

| Date ID | Attorney Expense | Price Markup % | Quantity | Amount | Total |
|------------------|---|----------------|----------|----------|----------|
| 6/29/2008 142035 | Joy \$Attorney Serv Attorney Service re DDS Legal Support; Invoice 1395656; obtain complaints | 75.25 | 1.000 | 75.25 | Billable |
| 7/29/2008 144553 | Joy \$Expenses Expense re Pacific Research, San Jose, Documents pulled from San Francisco case | 324.92 | 1.000 | 324.92 | Billable |
| 7/31/2008 143929 | Joy \$Photocopies July, 2008 copy charges; 2300 copies @ .10 per copy | 0.10 | 2300.000 | 230.00 | Billable |
| 8/25/2008 144319 | Joy \$Depositions Deposition costs re Veritext Court Reporting; Video Services; PMK of J.B. Hunt | 1250.00 | 1.000 | 1,250.00 | Billable |
| 8/31/2008 145002 | Joy \$Photocopies August, 2008 copy charges; 1640 copies @ .10 per copy | 0.10 | 1640.000 | 164.00 | Billable |
| 9/30/2008 144955 | Joy \$Photocopies September, 2008 copy charges; 74.0 copies @ .10 per copy | 0.10 | 74.000 | 7.40 | Billable |

EXHIBIT 4

To Declaration of Stanley D. Saltzman

12/27/2018
11:38 AMMarlin & Saltzman, LLP
Pre-bill Worksheet

Page 2

22-0248: Ortega v JB Hunt Transport (continued)

| Date ID | Attorney Expense | Price Markup % | Quantity | Amount | Total |
|------------|--|----------------|----------|----------|----------|
| 12/18/2008 | Joy 148108 \$Expenses Expense re Express Connection; Delivery of Paperwork | 85.25 | 1.000 | 85.25 | Billable |
| 1/8/2009 | Joy 149588 \$Attorney Serv Attorney Service re Batza & Associates; Invoice 6223; Investigation | 2490.85 | 1.000 | 2,490.85 | Billable |
| 1/8/2009 | Joy 149569 \$Attorney Serv Attorney Service re Batza & Associates; Invoice 6223; Investigation | 2500.90 | 1.000 | 2,500.90 | Billable |
| 1/9/2009 | Joy 148850 \$Depositions Deposition costs re Veritext Court Reporting; Invoice CA28651; Witness Leonard Garcia | 858.40 | 1.000 | 858.40 | Billable |
| 1/12/2009 | Joy 150745 \$Depositions Deposition costs re Veritext Court Reporting; Invoice CA28720; Robert Schoenberger | 725.98 | 1.000 | 725.98 | Billable |
| 1/12/2009 | Joy 150746 \$Depositions Deposition costs re Veritext Court Reporting; # CA28719; Video Services; Michael Graves | 735.88 | 1.000 | 735.88 | Billable |
| 1/20/2009 | Joy 150744 \$Depositions Deposition costs re Veritext Court Reporting; Invoice CA28984; Video Services; Leonard Garcia (vol.2) | 818.85 | 1.000 | 818.85 | Billable |
| 1/30/2009 | Joy 148949 \$Photocopies January, 2009 copy charges; 108 copies @ .10 per copy | 0.10 | 108.000 | 10.80 | Billable |
| 2/24/2009 | Joy 148851 \$Depositions Deposition costs re Veritext Court Reporting; Invoice CA29616; Original & One Transcript; Robert Schoenberger | 904.70 | 1.000 | 904.70 | Billable |
| 2/27/2009 | Joy 149810 \$Photocopies February, 2009 copy charges; 301 copies @ .10 per copy | 0.10 | 301.000 | 30.10 | Billable |
| 3/31/2009 | Joy 151842 \$Photocopies March, 2009 copy charges; 979 copies @ .10 per copy | 0.10 | 979.000 | 97.90 | Billable |

EXHIBIT 4

To Declaration of Stanley D. Saltzman

12/27/2018
11:38 AMMarlin & Saltzman, LLP
Pre-bill Worksheet

Page 3

22-0248: Ortega v JB Hunt Transport (continued)

| Date ID | Attorney Expense | Price Markup % | Quantity | Amount | Total |
|------------|---|-------------------|----------|-----------|----------|
| 3/31/2009 | Joy | 0.10 | 114.000 | 11.40 | Billable |
| 151951 | \$Photocopies March, 2009 copy charges 114 copies @ .10 per copy | | | | |
| 4/28/2009 | Joy | 85.50 | 1.000 | 85.50 | Billable |
| 153482 | \$Delivery Delivery Cost to US District Court; # 02650 | | | | |
| 4/30/2009 | Joy | 0.10 | 96.000 | 9.60 | Billable |
| 151896 | \$Photocopies April, 2009 copy charges; 96 copies @ .10 per copy | | | | |
| 5/28/2009 | Joy | 85.50 | 1.000 | 85.50 | Billable |
| 152813 | \$Expenses Expense re Express Connection; Delivery | | | | |
| 11/23/2010 | Joy | 16391.33 | 1.000 | 16,391.33 | Billable |
| 162487 | \$Expenses Expense re Epiq Systems; administrative services; class mailing | | | | |
| 10/4/2012 | Joy | 43.50 | 1.000 | 43.50 | Billable |
| 171639 | \$Expenses Expense re ABC Legal; Invoice 7827105; Courtesy copies to court | | | | |
| 10/25/2012 | Joy | 75.21 | 1.000 | 75.21 | Billable |
| 171333 | \$Expenses Expense re LA Court Online; Invoice 1121025J3039; copies | | | | |
| 10/25/2012 | Joy | 75.21 | 1.000 | 75.21 | Billable |
| 171334 | \$Expenses Expense re LA Court Online; Invoice 1121025J3010; copies | | | | |
| 10/25/2012 | Joy | 76.19 | 1.000 | 76.19 | Billable |
| 171335 | \$Expenses Expense re LA Court Online; Invoice 1121025J2983; copies | | | | |
| 10/25/2012 | Joy | 37.50 | 1.000 | 37.50 | Billable |
| 171336 | \$Expenses Expense re LA Court Online; Invoice 1121025J2961; copies | | | | |
| 10/30/2012 | Joy | 150.50 | 1.000 | 150.50 | Billable |
| 171649 | \$Expenses Expense re ABC Legal; Invoice 782252; courtesy copies to court | | | | |
| 5/31/2013 | Joy | 46.00 | 1.000 | 46.00 | Billable |
| 173788 | \$Postage May, 2013 Postage charges. | | | | |

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| Date ID | Attorney Expense | Price Markup % | Quantity | Amount | Total |
|------------|---|-------------------|----------|--------|----------|
| 7/12/2013 | Joy | 41.50 | 1.000 | 41.50 | Billable |
| 174735 | \$Expenses | | | | |
| | Expense re ABC Legal; Invoice 7958275; courtesy copy to court | | | | |
| 7/23/2013 | Joy | 9.50 | 1.000 | 9.50 | Billable |
| 174744 | \$Expenses | | | | |
| | Expense re ABC Legal; Invoice 7958357; deliver courtesy copies to court | | | | |
| 7/25/2013 | Joy | 29.70 | 1.000 | 29.70 | Billable |
| 174161 | \$Expenses | | | | |
| | Expense re Myra Ponce, Court Reporter, Invoice 13-1414; Transcript of Motion for Judgment, taken on 7/18/13 | | | | |
| 7/25/2013 | Joy | 78.91 | 1.000 | 78.91 | Billable |
| 174163 | \$Expenses | | | | |
| | Expense re Express Connection; Invoice 3023; Delivery of documents | | | | |
| 8/8/2013 | Joy | 73.50 | 1.000 | 73.50 | Billable |
| 175080 | \$Expenses | | | | |
| | Expense re ABC Legal; Invoice 7958491; courtesy copies to court | | | | |
| 8/10/2013 | Joy | 87.24 | 1.000 | 87.24 | Billable |
| 174715 | \$Expenses | | | | |
| | Expense re Express Connection; Invoice 3194; Delivery to Littler Mendelson, Los Angeles, CA | | | | |
| 8/14/2013 | Joy | 15.00 | 1.000 | 15.00 | Billable |
| 174403 | \$Expenses | | | | |
| | Expense re LA Court Online; Invoice 1130814J9700; copies | | | | |
| 8/20/2013 | Joy | 41.50 | 1.000 | 41.50 | Billable |
| 175084 | \$Expenses | | | | |
| | Expense re ABC Legal; Invoice 7958563; courtesy copies to court | | | | |
| 8/21/2013 | Joy | 83.50 | 1.000 | 83.50 | Billable |
| 175088 | \$Expenses | | | | |
| | Expense re ABC Legal; Invoice 7967182; courtesy copies to court | | | | |
| 8/26/2013 | Joy | 68.84 | 1.000 | 68.84 | Billable |
| 174727 | \$Delivery | | | | |
| | Delivery Cost to Express Connection; Invoice 3338; Delivery to Littler Mendelson, Los Angeles, CA | | | | |
| 8/31/2013 | Joy | 0.10 | 53.000 | 5.30 | Billable |
| 174494 | \$Photocopies | | | | |
| | August, 2013 copy charges; 53 copies @ .10 per copy | | | | |

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| Date ID | Attorney Expense | Price Markup % | Quantity | Amount | Total |
|----------------------|--|-------------------|----------|----------|----------|
| 10/7/2013 193214 | Joy \$Mileage Mileage re; travel to and from San Diego; 240.0 miles @ .55 per mile | 0.55 | 240.000 | 132.00 | Billable |
| 10/8/2013 175319 | Joy \$Parking Parking re deposition, San Diego; C. Humphrey | 26.00 | 1.000 | 26.00 | Billable |
| 10/31/2013 175259 | Joy \$Photocopies October, 2013 copy charges; 298 copies @ .10 per copy | 0.10 | 298.000 | 29.80 | Billable |
| 11/21/2013 175191 | Joy \$Depositions Deposition Costs re LegaLink; Invoice 17181978; Transcript of deposition of Michael Hein, Custodian of Records on 10/08/13 | 880.75 | 1.000 | 880.75 | Billable |
| 11/22/2013 175580 | Joy \$Depositions Deposition Costs re LegaLink; Invoice 17182987; Deposition transcript; Aaron Regalado on 11/13/13 | 2048.55 | 1.000 | 2,048.55 | Billable |
| 11/29/2013 177582 | Joy \$Depositions Deposition Costs re LegaLink; Invoice 17183167; Copy of transcript & word index of deposition; Darren Field on 11/21/13 | 1406.65 | 1.000 | 1,406.65 | Billable |
| 11/29/2013 177583 | Joy \$Depositions Deposition Costs re LegaLink; Invoice 17183165; Copy of transcript and word index of deposition; Frank Broadstreet on 11/20/13 | 2010.85 | 1.000 | 2,010.85 | Billable |
| 11/29/2013 177584 | Joy \$Depositions Deposition Costs re LegaLink; Invoice 17183160; Copy of transcript & word index of deposition; Benton Walker on 11/19/13 | 1736.95 | 1.000 | 1,736.95 | Billable |
| 11/29/2013 177585 | Joy \$Depositions Deposition Costs re LegaLink; Invoice 17182985; Videotaping services for the deposition of Benton Walker on 11/19/13 | 1449.50 | 1.000 | 1,449.50 | Billable |
| 11/29/2013 177586 | Joy \$Depositions Deposition Costs re LegaLink; Invoice 17182768; Videotaping services for the deposition of Aaron Regalado on 11/13/13 | 1178.25 | 1.000 | 1,178.25 | Billable |

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| Date ID | Attorney Expense | Price Markup % | Quantity | Amount | Total |
|------------|---|----------------|----------|----------|----------|
| 11/30/2013 | Joy | 0.10 | 1164.000 | 116.40 | Billable |
| 175751 | \$Photocopies November, 2013 copy charges; 1164 copies @ .10 per copy | | | | |
| 12/6/2013 | Joy | 407.62 | 1.000 | 407.62 | Billable |
| 175797 | \$Expenses Expense re Integrity Legal; Invoice 127661; Upload Images, convert to TIFF from PDF, master CD created | | | | |
| 12/9/2013 | Joy | 1435.00 | 1.000 | 1,435.00 | Billable |
| 193215 | \$Travel Travel expense re flight to and from Arkansas for depositions; C. Humphrey | | | | |
| 12/9/2013 | Joy | 1135.00 | 1.000 | 1,135.00 | Billable |
| 193216 | \$Hotel Hotel expenses re depositions in Arkansas (5 nights); C. Humphrey | | | | |
| 12/10/2013 | Joy | 1067.00 | 1.000 | 1,067.00 | Billable |
| 175676 | \$Depositions Deposition Costs re LegaLink; Invoice 17183662; Videotaping services for the deposition of Robert Topel | | | | |
| 12/10/2013 | Joy | 2135.37 | 1.000 | 2,135.37 | Billable |
| 175790 | \$Depositions Deposition Costs re LegaLink; Invoice 17183673; Copy of transcript; deposition of Robert Topel, Ph.D. | | | | |
| 12/10/2013 | Joy | 0.565 | 30.000 | 16.95 | Billable |
| 176497 | \$Mileage Mileage re; travel to Century City for deposition; C. Humphrey | | | | |
| 12/11/2013 | Joy | 1406.25 | 1.000 | 1,406.25 | Billable |
| 175677 | \$Depositions Deposition Costs re LegaLink; Invoice 17184141; Videotaping services for the deposition of Kris Ashmore | | | | |
| 12/12/2013 | Joy | 1154.25 | 1.000 | 1,154.25 | Billable |
| 175788 | \$Depositions Deposition Costs re LegaLink; Invoice 17183344; Videotaping services for the deposition of Darren Field | | | | |
| 12/12/2013 | Joy | 1807.50 | 1.000 | 1,807.50 | Billable |
| 175789 | \$Depositions Deposition Costs re LegaLink; Invoice 17183328; Videotaping services for the deposition of Frank Broadstreet | | | | |

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| Date ID | Attorney Expense | Price Markup % | Quantity | Amount | Total |
|------------|---|----------------|----------|----------|----------|
| 12/13/2013 | Joy 176661 \$Depositions Deposition Costs re LegaLink, Invoice 17183660; Copy of transcript and word index of deposition; Kris Ashmore | 3122.51 | 1.000 | 3,122.51 | Billable |
| 12/31/2013 | Joy 175715 \$Photocopies December, 2013 copy charges; 1433 copies @ .10 per copy | 0.10 | 1433.000 | 143.30 | Billable |
| 12/31/2013 | Joy 175947 \$Postage December, 2013 Postage charges. | 19.85 | 1.000 | 19.85 | Billable |
| 1/13/2014 | Joy 177666 \$Expenses Expense re ABC Legal; Invoice 30030390; copies to court | 39.50 | 1.000 | 39.50 | Billable |
| 1/17/2014 | Joy 176498 \$Mileage Mileage re; travel to Los Angeles for hearing; C. Humphrey | 0.565 | 35.000 | 19.78 | Billable |
| 1/17/2014 | Joy 176499 \$Parking Parking in Los Angeles; court appearance; C. Humphrey | 15.00 | 1.000 | 15.00 | Billable |
| 1/31/2014 | Joy 176333 \$Photocopies January, 2014 copy charges; 506 copies @ .10 per copy | 0.10 | 506.000 | 50.60 | Billable |
| 4/1/2014 | Joy 177689 \$Expenses Expense re ABC Legal; Invoice 30145648; copies to court | 39.50 | 1.000 | 39.50 | Billable |
| 4/7/2014 | Joy 177691 \$Expenses Expense re ABC Legal; Invoice 30145719; copy to court | 79.50 | 1.000 | 79.50 | Billable |
| 4/17/2014 | Joy 177092 \$Expenses Expense re Epiq Systems; Claims solutions | 4484.00 | 1.000 | 4,484.00 | Billable |
| 4/30/2014 | Joy 177338 \$Photocopies April, 2014 copy charges; 205 copies @ .10 per copy | 0.10 | 205.000 | 20.50 | Billable |
| 6/27/2014 | Joy 178283 \$Expenses Expense re court filing fee; Notice of Appeal | 505.00 | 1.000 | 505.00 | Billable |

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| Date ID | Attorney Expense | Price Markup % | Quantity | Amount | Total |
|----------------------|--|-------------------|----------|--------|----------|
| 8/5/2014 178812 | Joy \$Expenses Expense re Myra Ponce, Court Reporter; transcript of 07/18/14 hearing | 149.28 | 1.000 | 149.28 | Billable |
| 8/7/2014 181200 | Joy \$Expenses Expense re ABC Legal; Invoice 30052586; courtesy copies to court | 49.50 | 1.000 | 49.50 | Billable |
| 9/30/2014 179141 | Joy \$Postage September, 2014 postage charges | 16.06 | 1.000 | 16.06 | Billable |
| 11/30/2014 179786 | Joy \$Photocopies November, 2014 copy charges; 674 copies @ .10 per copy | 0.10 | 674.000 | 67.40 | Billable |
| 12/31/2014 180274 | Joy \$Photocopies December, 2014 postage charges; 257 copies @ .10 per copy | 0.10 | 257.000 | 25.70 | Billable |
| 1/31/2015 180304 | Joy \$Photocopies January, 2015 copy charges; 1938 copies @ .10 per copy | 0.10 | 1938.000 | 193.80 | Billable |
| 1/31/2015 180322 | Joy \$Photocopies January, 2015 copy charges; 1095 copies @ .10 per copy | 0.10 | 1095.000 | 109.50 | Billable |
| 3/31/2015 180950 | Joy \$Photocopies March, 2015 copy charges; 2318 copies @ .10 per copy | 0.10 | 2318.000 | 231.80 | Billable |
| 4/30/2015 181328 | Joy \$Photocopies April, 2015 copy charges; 1013 copies @ .10 per copy | 0.10 | 1013.000 | 101.30 | Billable |
| 5/31/2015 181668 | Joy \$Photocopies May, 2015 copy charges; 926 copies @ .10 per copy | 0.10 | 926.000 | 92.60 | Billable |
| 7/31/2015 182634 | Joy \$Photocopies July copy charges; copier #2; 4566 copies @ .10 per copy | 0.10 | 4566.000 | 456.60 | Billable |
| 8/31/2015 183084 | Joy \$Photocopies August copy charges; back copier; 1052 copies @ .10 per copy | 0.10 | 1052.000 | 105.20 | Billable |

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| Date ID | Attorney Expense | Price Markup % | Quantity | Amount | Total |
|------------|---|----------------|----------|----------|----------|
| 9/30/2015 | Joy 183179 \$Photocopies September copy charges; back copier; 2013 copies @ .10 per copy | 0.10 | 2013.000 | 201.30 | Billable |
| 10/30/2015 | Joy 184227 \$Photocopies October copy charges; back copier; 2255 copies @ .10 per copy | 0.10 | 2255.000 | 225.50 | Billable |
| 11/30/2015 | Joy 184167 \$Photocopies November copy charges; back copier; 1384 copies @ .10 per copy | 0.10 | 1384.000 | 138.40 | Billable |
| 11/30/2015 | Joy 184192 \$Photocopies November copy charges; 268 copies @ .10 per copy | 0.10 | 268.000 | 26.80 | Billable |
| 12/3/2015 | Joy 184345 \$Expenses Expense re Truth about Trucking; Media | 500.00 | 1.000 | 500.00 | Billable |
| 12/31/2015 | Joy 184260 \$Photocopies December copy charges; back copier; 465 copies @ .10 per copy | 0.10 | 465.000 | 46.50 | Billable |
| 1/31/2016 | Joy 184774 \$Photocopies January copy charges; back copier; 2250 copies @ .10 per copy | 0.10 | 2250.000 | 225.00 | Billable |
| 2/29/2016 | Joy 185125 \$Photocopies February copy charges; 265 copies @ .10 per copy; front copier | 0.10 | 265.000 | 26.50 | Billable |
| 2/29/2016 | Joy 185145 \$Photocopies February copy charges; 871 copies @ .10 per copy; back copier | 0.10 | 871.000 | 87.10 | Billable |
| 3/31/2016 | Joy 185342 \$Photocopies March copy charges; back copier; 1153 copies @ .10 per copy | 0.10 | 1153.000 | 115.30 | Billable |
| 4/30/2016 | Joy 186036 \$Photocopies April copy charges; 1320 copies @ .10 per copy | 0.10 | 1320.000 | 132.00 | Billable |
| 5/16/2016 | Joy 186117 \$Expenses Expense re Mark S. Rudy; Invoice 23804; Mediation fee on June 7, 2016 | 6250.00 | 1.000 | 6,250.00 | Billable |

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| Date ID | Attorney Expense | Price Markup % | Quantity | Amount | Total |
|-----------|--|----------------|----------|--------|----------|
| 5/31/2016 | Joy | 0.10 | 1253.000 | 125.30 | Billable |
| 186399 | \$Photocopies May copy charges; back copier; 1253 copies @ .10 per copy | | | | |
| 6/5/2016 | Joy | 503.96 | 1.000 | 503.96 | Billable |
| 186994 | \$Travel Travel expense re Southwest Airlines; travel to San Francisco for mediation; C. Humphrey | | | | |
| 6/6/2016 | Joy | 500.95 | 1.000 | 500.95 | Billable |
| 186332 | \$Expenses Expense re Southwest Airlines; travel to mediation in San Francisco; S. Saltzman | | | | |
| 6/7/2016 | Joy | 408.00 | 1.000 | 408.00 | Billable |
| 186987 | \$Travel Travel expense re Virgin America to San Francisco; mediation; M. Bradley | | | | |
| 6/7/2016 | Joy | 58.80 | 1.000 | 58.80 | Billable |
| 186988 | \$Travel Travel expense re taxi service in San Francisco for mediation; M. Bradley | | | | |
| 6/7/2016 | Joy | 617.43 | 1.000 | 617.43 | Billable |
| 186989 | \$Hotel Hotel expenses in San Francisco for mediation; M. Bradley | | | | |
| 6/7/2016 | Joy | 41.00 | 1.000 | 41.00 | Billable |
| 186990 | \$Parking Parking re Los Angeles Airport while in San Francisco for mediation; M. Bradley | | | | |
| 6/7/2016 | Joy | 575.60 | 1.000 | 575.60 | Billable |
| 193211 | \$Hotel Hotel expenses in San Francisco for mediation; S. Saltzman | | | | |
| 6/7/2016 | Joy | 551.50 | 1.000 | 551.50 | Billable |
| 193212 | \$Hotel Hotel expenses in San Francisco for mediation; C. Humphrey | | | | |
| 6/30/2016 | Joy | 0.10 | 1652.000 | 165.20 | Billable |
| 186904 | \$Photocopies June copy charges; back copier; 1652 copies @ .10 per copy | | | | |
| 7/31/2016 | Joy | 0.10 | 2727.000 | 272.70 | Billable |
| 187091 | \$Photocopies July copy charges; back copier; 2727 copies @ .10 per copy | | | | |

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| Date ID | Attorney Expense | Price Markup % | Quantity | Amount | Total |
|------------|---|----------------|----------|----------|----------|
| 8/31/2016 | Joy 187311 \$Photocopies August copy charges; back copier; 3262 copies @ .10 per copy | 0.10 | 3262.000 | 326.20 | Billable |
| 9/30/2016 | Joy 187787 \$Photocopies September copy charges; back copier; 1974 copies @ .10 per copy | 0.10 | 1974.000 | 197.40 | Billable |
| 10/26/2016 | Joy 187779 \$FedEx Federal Express charges to Office of the Clerk, Ninth Circuit Court of Appeal, San Francisco, CA | 209.39 | 1.000 | 209.39 | Billable |
| 10/26/2016 | Joy 187780 \$FedEx Federal Express charges to Office of the Clerk, Ninth Circuit Court of Appeal, San Francisco, CA | 179.93 | 1.000 | 179.93 | Billable |
| 10/31/2016 | Joy 187807 \$Photocopies October copy charges; back copier; 1675 copies @ .10 per copy | 0.10 | 1675.000 | 167.50 | Billable |
| 10/31/2016 | Joy 187938 \$Expenses Expense re Integrity Legal; Invoice 137171; 21,211 blowbacks from images w/o slipsheets, 55 blowbacks from images, color, 620 tabs, velo binds | 2412.86 | 1.000 | 2,412.86 | Billable |
| 11/30/2016 | Joy 188291 \$Photocopies November copy charges; back copier; 3824 copies @ .10 per copy | 0.10 | 3824.000 | 382.40 | Billable |
| 11/30/2016 | Joy 188304 \$Photocopies November copy charges; front copier; 380 copies @ .10 per copy | 0.10 | 380.000 | 38.00 | Billable |
| 12/20/2016 | Joy 188337 \$Expenses Expense re Integrity Legal; Invoice 137442; 238 blowbacks from images w/o slipsheets | 39.83 | 1.000 | 39.83 | Billable |
| 12/22/2016 | Joy 188350 \$FedEx Federal Express charges to Molly Dwyer, US Court of Appeal, San Francisco, CA | 21.78 | 1.000 | 21.78 | Billable |
| 12/31/2016 | Joy 188400 \$Photocopies December copy charges; 358 copies @ .10 per copy | 0.10 | 358.000 | 35.80 | Billable |

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| Date ID | Attorney Expense | Price Markup % | Quantity | Amount | Total |
|-----------|---|----------------|----------|--------|----------|
| 1/31/2017 | Joy 188598 \$Photocopies January copy charges; back copier; 535 copies @ .10 per copy | 0.10 | 535.000 | 53.50 | Billable |
| 2/28/2017 | Joy 188612 \$Photocopies February copy charges; front copier; 150 copies @ .10 per copy | 0.10 | 150.000 | 15.00 | Billable |
| 3/30/2017 | Joy 189035 \$FedEx Federal Express charges to S. Saltzman, Silver Spring MD | 105.28 | 1.000 | 105.28 | Billable |
| 3/30/2017 | Joy 189036 \$FedEx Federal Express charges to S. Saltzman, Silver Spring, MD | 97.38 | 1.000 | 97.38 | Billable |
| 4/30/2017 | Joy 189247 \$Photocopies April copy charges; 596 copies @ .10 per copy | 0.10 | 596.000 | 59.60 | Billable |
| 4/30/2017 | Joy 189292 \$Photocopies April copy charges; 204 copies @ .10 per copy | 0.10 | 204.000 | 20.40 | Billable |
| 5/31/2017 | Joy 189390 \$Photocopies May copy charges; 378 copies @ .10 per copy | 0.10 | 378.000 | 37.80 | Billable |
| 5/31/2017 | Joy 189400 \$Photocopies May copy charges; front copier; 114 copies @ .10 per copy | 0.10 | 114.000 | 11.40 | Billable |
| 6/30/2017 | Joy 189708 \$Photocopies June copy charges; 756 copies @ .10 per cop | 0.10 | 756.000 | 75.60 | Billable |
| 7/31/2017 | Joy 189973 \$Photocopies July copy charges; back copier; 582 copies @ .10 per copy | 0.10 | 582.000 | 58.20 | Billable |
| 8/31/2017 | Joy 189940 \$Photocopies August copy charges; back copier; 748 copies @ .10 per copy | 0.10 | 748.000 | 74.80 | Billable |
| 9/30/2017 | Joy 190372 \$Photocopies September copy charges; back copier; 342 copies @ .10 per copy | 0.10 | 342.000 | 34.20 | Billable |

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| Date ID | Attorney Expense | Price Markup % | Quantity | Amount | Total |
|------------|--|----------------|----------|-----------|----------|
| 10/31/2017 | Joy 190588 \$Photocopies October copy charges; back copier; 470 copies @ .10 per copy | 0.10 | 470.000 | 47.00 | Billable |
| 10/31/2017 | Joy 190598 \$Photocopies October copy charges; front copier; 210 copies @ .10 per copy | 0.10 | 210.000 | 21.00 | Billable |
| 11/30/2017 | Joy 190623 \$Photocopies November copy charges; front copier; 414 copies @ .10 per copy | 0.10 | 414.000 | 41.40 | Billable |
| 12/31/2017 | Joy 191035 \$Photocopies December copy charges; front copier; 228 copies @ .10 per copy | 0.10 | 228.000 | 22.80 | Billable |
| 1/31/2018 | Joy 191230 \$Photocopies January copy charges; front copier; 682 copies @ .10 per copy | 0.10 | 682.000 | 68.20 | Billable |
| 2/23/2018 | Joy 192067 \$Hotel Hotel expenses re client hotel for meeting | 423.22 | 1.000 | 423.22 | Billable |
| 3/7/2018 | Joy 191266 \$Expenses Expense re Mark S. Rudy, mediation fees; April 2, 2018 | 7500.00 | 1.000 | 7,500.00 | Billable |
| 3/8/2018 | Joy 191823 \$FedEx Federal Express charges to Gupta Wessler, Washington, DC | 67.57 | 1.000 | 67.57 | Billable |
| 3/23/2018 | Joy 193210 \$Expenses Expense re Gupta Wessler; Agreed fee for opposition to U.S. Supreme Court petition | 25000.00 | 1.000 | 25,000.00 | Billable |
| 3/30/2018 | Joy 192113 \$Expenses Expense re Southwest Airlines; travel to San Francisco for mediation; A. Tamburelli | 566.95 | 1.000 | 566.95 | Billable |
| 3/31/2018 | Joy 191781 \$Photocopies March copy charges; 837 copies @ .10 per copy | 0.10 | 837.000 | 83.70 | Billable |

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| Date ID | Attorney Expense | Price Markup % | Quantity | Amount | Total |
|-----------|--|----------------|----------|--------|----------|
| 4/1/2018 | Joy | 566.95 | 1.000 | 566.95 | Billable |
| 192090 | \$Expenses Expense re Southwest Airlines; travel to San Francisco for mediation; S. Saltzman | | | | |
| 4/2/2018 | Joy | 308.19 | 1.000 | 308.19 | Billable |
| 192102 | \$Expenses Expense re United Airlines; travel from mediation in San Francisco to Burbank; Paul Cullen | | | | |
| 4/2/2018 | Joy | 308.19 | 1.000 | 308.19 | Billable |
| 192103 | \$Expenses Expense re United Airlines; travel from mediation in San Francisco to Burbank; S. Saltzman | | | | |
| 4/2/2018 | Joy | 308.19 | 1.000 | 308.19 | Billable |
| 192104 | \$Expenses Expense re United Airlines; travel from mediation in San Francisco to Burbank; A. Tamburelli | | | | |
| 4/2/2018 | Joy | 395.57 | 1.000 | 395.57 | Billable |
| 192106 | \$Expenses Expense re taxi service in San Francisco for mediation; S. Saltzman | | | | |
| 4/2/2018 | Joy | 297.08 | 1.000 | 297.08 | Billable |
| 192107 | \$Hotel Expense re hotel in San Francisco for mediation; S. Saltzman | | | | |
| 4/2/2018 | Joy | 48.94 | 1.000 | 48.94 | Billable |
| 192111 | \$Expenses Expense re taxi service in San Francisco for mediation; A. Tamburelli | | | | |
| 4/2/2018 | Joy | 395.57 | 1.000 | 395.57 | Billable |
| 192114 | \$Expenses Expense re hotel in San Francisco for mediation; A. Tamburelli | | | | |
| 4/20/2018 | Joy | 67.50 | 1.000 | 67.50 | Billable |
| 192303 | \$Expenses Expense re ABC Legal; Invoice 3507786.100; file documents with court | | | | |
| 4/26/2018 | Joy | 67.50 | 1.000 | 67.50 | Billable |
| 192306 | \$Expenses Expense re ABC Legal; Invoice 3527058.100; file documents with court | | | | |
| 4/30/2018 | Joy | 0.10 | 1418.000 | 141.80 | Billable |
| 191849 | \$Photocopies April copy charges; front copier; 1418 copies @ .10 per copy | | | | |

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| Date ID | Attorney Expense | Price Markup % | Quantity | Amount | Total |
|---------------------|---|-------------------|----------|--------|----------|
| 5/4/2018 191830 | Joy \$Expenses Expense re Becker Gallagher Legal Publishing; print/bind brief, PDF A's (e-file)handling, postage | 675.08 | 1.000 | 675.08 | Billable |
| 5/23/2018 191971 | Joy \$FedEx Federal Express charges to Ms. Molly Dwyer, US Court of Appeal, San Francisco, CA | 73.14 | 1.000 | 73.14 | Billable |
| 5/31/2018 191985 | Joy \$Photocopies May copy charges; front copier; 994 copies @ .10 per copy | 0.10 | 994.000 | 99.40 | Billable |
| 5/31/2018 192248 | Joy \$Expenses Expense re Integrity Legal; Invoice 140945; 2 8GB USB, 2 2TB External hard drives, delivery | 379.80 | 1.000 | 379.80 | Billable |
| 5/31/2018 192249 | Joy \$Expenses Expense re Integrity Legal; Invoice 140939; 2 external hard drive, delivery charge | 326.24 | 1.000 | 326.24 | Billable |
| 6/6/2018 192290 | Joy \$Expenses Expense re ABC Legal; Invoice 3669983.100; file documents with court | 67.50 | 1.000 | 67.50 | Billable |
| 6/7/2018 192289 | Joy \$Expenses Expense re ABC Legal; Invoice 3675367.100; Court filing fee | 35.00 | 1.000 | 35.00 | Billable |
| 6/13/2018 192239 | Joy \$FedEx Federal Express charges to Candice Rosevear, Chicago, IL | 91.23 | 1.000 | 91.23 | Billable |
| 6/20/2018 192119 | Joy \$Expenses Expense re Ace Attorney Service; Invoice 229239; chamber's copy | 110.25 | 1.000 | 110.25 | Billable |
| 6/30/2018 192272 | Joy \$Expenses Expense re Integrity Legal; Invoice 141141; Fed Ex delivery charge to Candice Rosevear, Global Economics Group, Chicago, IL | 76.59 | 1.000 | 76.59 | Billable |
| 6/30/2018 192312 | Joy \$Photocopies June, 2018 copy charges; front copier; 6137 copies @ .10 per copy | 0.10 | 6137.000 | 613.70 | Billable |

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| Date ID | Attorney Expense | Price Markup % | Quantity | Amount | Total |
|---------------------|---|-------------------|----------|------------|----------|
| 7/10/2018 192218 | Joy \$Expenses Expense re Global Economics; Invoice 4782; Analyzed data, data work and research | 47262.50 | 1.000 | 47,262.50 | Billable |
| 7/11/2018 192429 | Joy \$Expenses Expense re Veritext; Invoice CA3404687; Certified transcript; deposition of Kristopher Ashmore, Vol 2 on July 5, 2018 | 3401.30 | 1.000 | 3,401.30 | Billable |
| 7/11/2018 192430 | Joy \$Expenses Expense re Veritext, Invoice CA3405991; Certified transcript; Deposition of Jacob Wofford 30(b)(6) on July 6, 2018 | 2815.45 | 1.000 | 2,815.45 | Billable |
| 7/12/2018 192271 | Joy \$Expenses Expense re ABC Legal; Invoice 3877094 100; file documents with court | 67.50 | 1.000 | 67.50 | Billable |
| 7/17/2018 192855 | Joy \$Expenses Expense re CPT Group; Invoice 14125; post certification mailing costs | 14789.25 | 1.000 | 14,789.25 | Billable |
| 7/31/2018 192717 | Joy \$Photocopies July copy charges; back copier; 3251 copies @ .10 per copy | 0.10 | 3251.000 | 325.10 | Billable |
| 7/31/2018 192729 | Joy \$Photocopies July copy charges; front copier; 8397 copies @ .10 per copy | 0.10 | 8397.000 | 839.70 | Billable |
| 7/31/2018 192754 | Joy \$Postage July postage charges | 1169.84 | 1.000 | 1,169.84 | Billable |
| 8/7/2018 193213 | Joy \$Expenses Expense re Veritext; Invoice CA3437657; Certified transcript; deposition of Gordon Kemp on August 6, 2018 | 1909.95 | 1.000 | 1,909.95 | Billable |
| 8/16/2018 192764 | Joy \$Expenses Expense re Global Economics; Invoice 4846; expert services | 208358.75 | 1.000 | 208,358.75 | Billable |
| 8/16/2018 192785 | Joy \$Expenses Expense re Gupta Wessler; Agreed fee for Petition for 23(f) Review | 25000.00 | 1.000 | 25,000.00 | Billable |

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| Date ID | Attorney Expense | Price Markup % | Quantity | Amount | Total |
|------------|---|----------------|----------|--------|----------|
| 8/20/2018 | Joy | 105.00 | 1.000 | 105.00 | Billable |
| 192847 | \$Expenses | | | | |
| | Expense re ABC Legal; Invoice 4014806.100; Court filing, copies | | | | |
| 8/20/2018 | Joy | 67.50 | 1.000 | 67.50 | Billable |
| 192848 | \$Expenses | | | | |
| | Expense re ABC Legal; Invoice 4015022.100; Court filing fee | | | | |
| 8/31/2018 | Joy | 0.10 | 295.000 | 29.50 | Billable |
| 192871 | \$Photocopies | | | | |
| | August copy charges; back copier; 295 copies @ .10 per copy | | | | |
| 8/31/2018 | Joy | 0.10 | 2988.000 | 298.80 | Billable |
| 192878 | \$Photocopies | | | | |
| | August copy charges; front copier; 2988 copies @ .10 per copy | | | | |
| 9/30/2018 | Joy | 65.50 | 1.000 | 65.50 | Billable |
| 193059 | \$Expenses | | | | |
| | Expense re Pacer; Invoice Q32016; copies | | | | |
| 9/30/2018 | Joy | 0.10 | 1648.000 | 164.80 | Billable |
| 193089 | \$Photocopies | | | | |
| | September copy charges; front copier; 1648 copies @ .10 per copy | | | | |
| 10/18/2018 | Joy | 82.82 | 1.000 | 82.82 | Billable |
| 193155 | \$FedEx | | | | |
| | Federal Express charges to US Court of Appeal, 9th Circuit, San Francisco, CA | | | | |
| 10/31/2018 | Joy | 0.10 | 459.000 | 45.90 | Billable |
| 193181 | \$Photocopies | | | | |
| | October copy charges; front copier; 459 copies @ .10 per copy | | | | |
| 11/19/2018 | Joy | 67.50 | 1.000 | 67.50 | Billable |
| 193150 | \$Expenses | | | | |
| | Expense re ABC Legal; Invoice 4001993.100; file documents with court | | | | |

| | | | |
|-------|----------------|--|---------------------|
| TOTAL | Billable Costs | | <u>\$423,262.33</u> |
|-------|----------------|--|---------------------|

| | | |
|------------------------------|--------|--------|
| | Amount | Total |
| Total of Fees (Time Charges) | | \$0.00 |

| | | |
|----------------------------------|--|--------------|
| Total of Costs (Expense Charges) | | \$423,262.33 |
|----------------------------------|--|--------------|

| | | |
|-------------------|--|--------------|
| Total new charges | | \$423,262.33 |
|-------------------|--|--------------|

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| | <u>Amount</u> | <u>Total</u> |
|-------------------|---------------|---------------------|
| New Balance | | |
| Current | \$423,262.33 | |
| Total New Balance | | <u>\$423,262.33</u> |