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7 *[Additional Counsel Listed on the Following Page.]*

8 *Attorneys for Plaintiff KURT CASADINE and ALFRED GUERRERO*  
9 *on behalf of themselves and all others similarly situated*

10 **IN THE UNITED STATES DISTRICT COURT**  
11 **CENTRAL DISTRICT OF CALIFORNIA**

13 KURT CASADINE on behalf of  
14 himself and all others similarly situated,

15 Plaintiff,

17 vs.

19 MAXIM HEALTHCARE SERVICES,  
20 INC., a Maryland Corporation and  
21 DOES 1 through 100, inclusive,

23 Defendants.

Case No.: CV 12-10078-DMG (CWx)

Honorable Dolly M. Gee

**DECLARATION OF KEVIN  
MAHONEY IN SUPPORT OF  
PLAINTIFF'S UNOPPOSED  
MOTION FOR CLASS  
REPRESENTATIVE SERVICE  
ENHANCEMENTS,  
ATTORNEYS' FEES AND  
LITIGATION COSTS**

Hearing Date: September 18, 2015

Hearing Time: 11:00 a.m.

Courtroom: 7

Complaint Filed: October 24, 2012

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**ADDITIONAL COUNSEL:**

Jose R. Garay, Esq., SBN 200494  
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**DECLARATION OF KEVIN MAHONEY**

I, KEVIN MAHONEY, declare the following:

1. I am an attorney and principal of the law firm Mahoney Law Group, APC, counsel of record for Plaintiff KURT CASADINE and ALFRED GUERRERO in the above referenced matter *Kurt Casadine v. Maxim Healthcare Services, Inc.*, Case No. CV 12-10078-DMG (CWx), and am admitted to practice before the United States District Court, Central District of California. All of the facts stated herein are true and to the best of my knowledge, and if called as a witness, I am competent to testify thereto.

2. This declaration is made in support of Plaintiffs’ Unopposed Motion for Unopposed Class Representative Service Enhancements, Attorneys’ Fees and Litigation Costs.

3. This Settlement, which was negotiated between Plaintiff Kurt Casadine (“Plaintiff”) and Defendant Maxim Healthcare Services, Inc. (“Defendant”), is fair and reasonable because it provides substantial and immediate benefits to the class members. Plaintiffs’ counsel provided great benefit to the class, through actively litigating this class action lawsuit for nearly three years. Indeed, Plaintiffs’ counsel conducted substantial discovery in this matter, drafted extensive law and motion, including Plaintiff’s Motion for Class Certification and Supplemental Class Certification Briefing (Docket No. 55, 72) Plaintiffs’ counsel, Mahoney Law Group, APC, committed substantial costs and time in the successful prosecution of this case.

4. The total hours worked by Plaintiffs’ counsel, MAHONEY LAW GROUP, APC is not less than 855.22, for a total lodestar of \$403,428.50. Attached to this Declaration as Exhibit “A” is a detailed billing report for the hours worked by Kevin Mahoney in this matter.

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|                     | <u>Hours</u> | <u>Rate</u> | <u>Lodestar</u> |
|---------------------|--------------|-------------|-----------------|
| Kevin Mahoney, Esq. | 177.60       | \$ 650.00   | \$ 115,440.00   |
| Sean Blakely, Esq.  | 677.62       | \$ 425.00   | \$ 287,988.50   |
| Total               | 855.22       |             | \$ 403,428.50   |

### **FACTUAL AND PROCEDURAL HISTORY OF THE CASE**

5. Below is a brief recitation of the factual history of this matter and the substantial work performed by Class Counsel.

6. On or about October 24, 2012, Plaintiff Kurt Casadine and Ronald Kroenig filed a wage and hour class action lawsuit against Defendant Maxim Healthcare Services, Inc. (“Defendant”) in the Superior Court of California, Los Angeles, based upon violations of the California Labor Code and the California Business and Professions Code, alleging the following causes of action: (1) Failure to Pay Wages; (2) Failure to Provide Meal Periods; (3) Failure to Provide Rest Periods; (4) Failure to Pay Wages Due at Termination; (5) Knowing and Intentional Failure to Comply With Itemized Wage Statement Provisions; and (6) Unfair Competition (Business And Professions Code § 17200 *et seq.* Prior to the filing of this lawsuit, I had several in-person meetings with Plaintiffs Kurt Casadine and Ronald Korenig regarding their potential claims and Defendant’s employment practices and policies. The representation of Plaintiffs throughout this case has been strictly on a contingency fee.

7. On or about November 26, 2012, Defendant removed this action from the Los Angeles County Superior Court to the instant Court. Plaintiff’s counsel analyzed Defendant’s Notice of Removal and accompanying documents to ensure that subject matter jurisdiction was proper in this Court.

8. On or about January 25, 2013, the Parties filed a Joint Case Management Statement in anticipation for the Scheduling Conference in this

1 matter. On February 8, 2013, I and Sean M. Blakely appeared at the Scheduling  
2 Conference in this matter.

3 9. On or about February 13, 2013, Plaintiff Casadine served Request for  
4 Production, Set One; Special Interrogatories, Set One; and Request for Admission,  
5 Set One on Defendant. This written discovery sought information and documents  
6 pertaining to Defendant's policies and procedures for the payment of wages, and  
7 the identity of "Caregivers" during the liability period.

8 10. After significant meet and confer efforts, the Parties agreed to  
9 stipulate to the filing of Plaintiffs' First Amended Complaint. On or about April  
10 23, 2013, this Court granted the Parties Stipulation, and ordered that Plaintiffs may  
11 file an amended complaint. Plaintiffs' First Amended Complaint alleged causes of  
12 action for (1) Recovery of Unpaid Minimum Wages; (2) Failure to Pay Wages Due  
13 at Termination; (3) Knowing and Intentional Failure to Comply with Itemized  
14 Wage Statement Provisions; and (4) Violation of Unfair Competition law, and  
15 omitted causes of action for failure to pay overtime and failure to provide meal and  
16 rest periods.

17 11. On or about April 12, 2013, Defendant served responses to Plaintiff's  
18 Request for Production of Documents, Set One. On or about April 19, 2013,  
19 Defendant served responses to Plaintiff's Special Interrogatories, Set One and  
20 Plaintiff's Request for Admissions, Set One. Defendant additionally produced  
21 over three hundred (300) pages of responsive documents, including Plaintiff's  
22 personnel file, wage statements and time records, as well as various policies,  
23 procedures and Defendant's employee handbook. The Parties met and conferred  
24 regarding Defendant's responses to Plaintiff's initial set of written discovery for  
25 several weeks, and on or about July 10, 2013, Defendant served supplemental  
26 discovery responses and served further responsive documents including  
27 communications between Plaintiff and Defendant and various policies and  
28 procedures specific to Home Health Aides. The Parties could not come to an

1 agreement regarding Defendant's responses to Plaintiff's first set of written  
2 discovery, and Plaintiff initiated the meet and confer process pursuant to Local  
3 Rule 37-1 to move the Court for an order compelling Defendant to provide the  
4 requested information and documents.

5 12. On September 5, 2013, the Parties filed a Joint Motion to Compel  
6 Further Discovery Responses. (See Docket No. 23) On November 4, 2013, the  
7 Court granted Plaintiff Casadine's Motion in part, and ordered Defendant to  
8 supplement its previous response to Plaintiffs' Special Interrogatory No. 1 and  
9 provide the name, address and telephone number of putative class members,  
10 defined as Home Health Aides who worked 24-hour Live-In shifts and were paid a  
11 flat or per-shift rate, who were employed by Defendant in Southern California  
12 offices. The Court further ordered Defendant to supplement some of its response  
13 to Plaintiff's Request for Production of Documents. (See Docket No. 31)

14 13. Defendant noticed Plaintiff Casadine's deposition in this matter.  
15 Plaintiff Casadine was produced for two full days of deposition on August 28,  
16 2013 and September 30, 2013.

17 14. Defendant served Request for Production of Documents on Plaintiff  
18 Casadine. On or about August 8, 2013, Plaintiff Casadine served responses to  
19 Defendant's document requests and served responsive documents.

20 15. On or about September 13, 2013, Plaintiff Casadine served further  
21 written discovery, including Special Interrogatories, Set Two; Request for  
22 Production of Documents, Set Two; and Request for Admission, Set Two, seeking  
23 information and documents specific to Caregivers, Certified Home Health Aides,  
24 and Patient Care Assistants who worked twenty-four (24) hour Live-In shifts and  
25 were paid a flat or daily rate of pay.

26 16. On or about October 26, 2013, Plaintiff Casadine noticed the  
27 deposition of Defendant pursuant to Federal Rule of Civil Procedure 30(b)(6) and  
28 requested Defendant to produce various documents. Plaintiff Casadine sought

1 testimony on a wide variety of topics including Defendant's policies and practices  
2 as to timekeeping, payment of minimum wages, wage rates, payment of wages to  
3 employees who worked twenty-four (24) hour Live-In shifts, wage statements, and  
4 the scheduling of twenty-four (24) hour Live-In shifts.

5 17. On or about November 18, 2013, Defendant served further  
6 supplemental discovery responses as to Plaintiff's first set of written discovery,  
7 and provided class contact information for Home Health Aides who worked  
8 twenty-four (24) hour Live-In shifts and were paid a flat or per-shift rate as ordered  
9 by the Court. Plaintiff's counsel prepared and delivered a class contact letter, and  
10 began to speak directly with putative class members regarding the alleged wage  
11 and hour violations and Defendant's policies and practices. Beginning in  
12 November 2013, and for a period of time covering approximately one year,  
13 Plaintiff's counsel spent countless hours contacting and speaking to dozens of  
14 putative class members to investigate Plaintiff's allegations and obtained a  
15 significant amount of information pertaining to Defendant's policies and  
16 procedures. Based on the information provided by putative class members,  
17 Plaintiff's counsel drafted declarations which were reviewed, edited and executed  
18 by putative class members.

19 18. On November 22, 2013, the Parties attended a private mediation  
20 session with experienced class action wage and hour mediator Jeffrey Krivis.  
21 Ultimately, the Parties were unable to reach a resolution at this mediation.  
22 Plaintiff's counsel spent considerable time reviewing documents and evidence in  
23 drafting Plaintiff's confidential mediation brief.

24 19. On or about January 15, 2014, pursuant to Plaintiff's FRCP 30(b)(6)  
25 deposition notice, Plaintiff Casadine took the deposition of Defendant by and  
26 through Amy Gargiulo in Sacramento, California. Both myself and Sean M.  
27 Blakely attended this deposition in Sacramento, California. Prior to the Deposition  
28 on January 15, 2014, Defendant produced further responsive documents. Prior to

1 this deposition, Plaintiff's counsel reviewed hundreds of pages of documents to  
2 prepare and spent numerous hours in preparation of this FRCP 30(b)(6) deposition.

3 20. On January 17, 2014 and February 20, 2014, Plaintiff Casadine took  
4 the depositions of Bryan Chacon and Frederick Cichy respectively, and received  
5 further testimony on the scheduling of twenty-four (24) hour Live-In shifts among  
6 other topics. Prior to these depositions, Plaintiff's counsel reviewed hundreds of  
7 pages of documents and reviewed previous deposition testimony in preparation for  
8 these depositions.

9 21. Plaintiff Casadine noticed and took a further FRCP 30(b)(6)  
10 deposition on February 27, 2014 in Sacramento, California, regarding Defendant's  
11 corporate structure and its relationship with individual filed offices in California.

12 22. Additionally, on February 27, 2014, Plaintiff Casadine also obtained  
13 testimony from Michael Beams, in his individual capacity as Regional Accounts  
14 Manager for Defendant.

15 23. On or about March 4, 2014, Plaintiff Casadine filed a Second  
16 Amended Complaint, which amended the proposed class definition in this matter  
17 to include certified home health aide / home health aide, companion care  
18 homemaker / companion care provider, companion caregiver, and caregiver –  
19 personal care assistant. Plaintiff's Second Amended Complaint amended the  
20 proposed classes Plaintiff sought to certify. (See Docket No. 49) Following the  
21 filing of the Second Amended Complaint, Plaintiff Casadine sought further  
22 testimony on the newly added job positions. The Parties could not reach an  
23 agreement as to a further FRCP 30(b)(6) deposition, and Plaintiff Casadine filed a  
24 Motion to Compel the Further Deposition of Defendant. (See Docket No. 52)

25 24. On April 8, 2014, this Court granted Plaintiff Casadine a limited  
26 further FRCP 30(b)(6) deposition with respect to the additional job titles and  
27 descriptions included in the proposed class definition in the Second Amended  
28 Complaint. (See Docket No. 54) On April 17, 2014, Plaintiff Casadine took a



1 further FRCP 30(b)(6) deposition by and through Michael Beams in Mountain  
2 View, California, and obtained testimony with respect to the additional job titles  
3 included in the Second Amended Complaint. I attended this deposition in  
4 Mountain View, California.

5 25. On or about April 14, 2014, pursuant to Plaintiff Casadine's discovery  
6 requests, Defendant agreed to produce a sampling of time records and  
7 corresponding payroll records for putative class members who worked twenty-four  
8 (24) hour Live-In shifts and were paid a flat or daily rate of pay. Upon receipt of  
9 the pay and time records, Plaintiff's counsel spent considerable time analyzing  
10 Defendant's records in preparation for Plaintiff's Motion for Class Certification.  
11 Plaintiff's counsel additionally conducted a thorough damage analysis based on  
12 Defendant's sampling.

13 26. Throughout this litigation, and in response to Plaintiff's discovery  
14 requests, Defendant produced over three thousand (3,000) documents pertaining to  
15 Defendant's policies regarding minimum wage policies, timekeeping procedures,  
16 and a sampling of time and pay records. Defendant also produced various  
17 Employee Handbooks utilized throughout the liability period.

18 27. After significant formal and informal discovery, Plaintiff Casadine  
19 began preparing its Motion for Class Certification. Plaintiff's counsel obtained  
20 numerous declarations from putative class members in support of its anticipated  
21 Motion for Class Certification. Plaintiff's counsel then undertook significant  
22 efforts in drafting Plaintiff's Motion for Class Certification, which included  
23 extensive legal research and review of documents and testimony in this case.

24 28. On May 5, 2014, Plaintiff Casadine filed his Motion for Class  
25 Certification seeking certification on all causes of action pled in Plaintiff's Second  
26 Amended Complaint. (See Docket No. 55) Plaintiff's counsel spent many hours  
27 reviewing Defendant's Opposition (Docket No. 60, 61, 62), and prepared and filed  
28 a Reply Brief in support of its Motion for Certification. (Docket No. 63)

1           29. Plaintiff's Motion for Class Certification came up for a hearing on  
2 August 29, 2014. Prior to the hearing, Plaintiff's counsel reviewed all relevant  
3 filings, documents and evidence in support of Plaintiff's motion. At the hearing,  
4 the Court ordered the Parties to meet and confer regarding Plaintiff's supplemental  
5 class certification briefing. (See Docket No. 67)

6           30. On or about November 17, 2014, Plaintiff Casadine filed a  
7 Supplemental Brief Regarding Certification as to Plaintiff's Third Cause of Action  
8 for Knowing and Intentional Failure to Comply with Itemized Wage Statement  
9 Provision. (See Docket No. 72) Following Defendant's filing of its Opposition to  
10 Plaintiff's Supplemental Briefing, the Parties entered into settlement discussions  
11 and requested that the Court stay any ruling as to Plaintiff's Supplemental Class  
12 Certification Briefing. (See Docket No. 76, 77) During this time, Defendant  
13 provided Plaintiff with further information under the mediation privilege and  
14 Plaintiff's counsel thoroughly reviewed further information and documents.

15           31. The Parties engaged in settlement discussions for several weeks. The  
16 Parties reached a tentative settlement in this matter in or about April 2015. In the  
17 weeks that followed, Plaintiffs' counsel worked diligently with Defendant's  
18 counsel in drafting a long form settlement agreement. The Parties spent many  
19 hours negotiating the details of the settlement agreement, including the preparation  
20 of the proposed Class Notice and Claim Form. On or about May 7, 2015, Plaintiffs  
21 filed its Unopposed Motion for Preliminary Approval of Class Action Settlement.  
22 (Docket No. 90)

23           32. The Settlement creates a \$630,000.00 settlement fund to pay Class  
24 members' claims, attorneys' fees, costs, any service enhancement awards, and  
25 administration expenses. Assuming that the full amount of the requested attorneys  
26 fees and costs are ordered as set forth in the Settlement agreement, the total Net  
27 Settlement Amount is approximately \$373,500.00. As there are 371 class  
28 members, the approximate distribution to class members is \$1,006.74.



1 class size of these cases ranged anywhere between approximately 1,200 to over  
2 15,000 putative class members with approved settlements in the millions.

3 41. In August of 2009, I voluntarily resigned from Rose, Klein & Marias  
4 and co-cofounded Mahoney, Perry & Burrows, in Long Beach, California. The  
5 firm (now the Mahoney Law Group, APC) currently serves as lead counsel and/or  
6 co-counsel in numerous wage and hour class action litigation in the Los Angeles  
7 Superior Court, Orange County Superior Court, and United States District Court  
8 for the Central District of California. Some examples of cases where I served as  
9 lead and/or co-counsel include: *Albiar, et al. v. Spectrum Athletics-Canoga Park,*  
10 *et al.*, Case No. BC413860; *Berry v. Brierwood Terrace Convalescent Hospital, et*  
11 *al.*, Case No. BC437781; *Calvo v. Providence Health Systems-Southern*  
12 *California, et al.*, Case No. BC419843; *Davis v Pacific Hospital of Long Beach, et*  
13 *al.*, Case No. BC488542; *De Lar Torre v Cri-Help, Inc.* Case No. BC508430;  
14 *Daniel Branch v. Indiana Plumbing Supply, Co. Inc. et al.*, Case No. BC425627;  
15 *Doe v. C.B & D.M. Entertainment, Inc.*, Case No. 37-2009-00097992-CU-OE-  
16 CTL; *Gerardo Ortega, et al. v. CR & R Incorporated*, Case No. BC414434; ;  
17 *Holt, et al. v. Parsec, Inc.*, Case No. CV-9540-VBF; *Oliver, et al. v. College*  
18 *Health Enterprise, et al.*, Case No. BC406481; *Teyuca v Pacific Alliance Medical*  
19 *Center, Inc.* Case No. BC459422; *Velazquez v. New Vista Health Services, Inc.*,  
20 Case No. BC 424797; *Wilcox, et al. v. Presbyterian Intercommunity Hospital, et*  
21 *al.*, Case No. BC 424796; *Zavala v. Ware Disposal, Inc.*, Case No. 30-2010-  
22 00392816-CU-OE-CXC; *Zimmerman v Quality Children's Services*, Case No.  
23 BC472001; and *Arteaga v. Command Center Security, Inc.* Case No. BC480496.

24 42. My current hourly rate is \$650.00 per hour, which has been  
25 approved by courts in the State of California.

26 43. Attached to this declaration as Exhibit "B" is a true and correct  
27 copy of Mahoney Law Group's litigation costs in this matter. Mahoney Law  
28 Group, APC has incurred \$15,830.28 in costs. I have reviewed these records

1 and invoices and believe that all costs were appropriate and necessary for the  
2 prosecution of this action.

3 I declare under penalty of perjury under the laws of California and the  
4 United States of America that the foregoing is true and correct.

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6 Executed on August 6, 2015 at Long Beach, California.

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9 /s/ Kevin Mahoney

10 Kevin Mahoney  
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# EXHIBIT A

# CASADINE v. MAXIM HEALTHCARE SERVICES, INC.

## LODESTAR FOR ATTORNEY KEVIN MAHONEY

| TASK   | TASK DETAIL  | LABOR HOURS |
|--|--|-------------|
| <b>Initial Consultation</b>  |  |             |
| Apr. 18, 2012  | Initial Meeting with client  | 3.50        |
| <b>Complaint</b>   |  |             |
| Oct. 23, 2012  | Review and Edit Complaint  | 1.80        |
| <b>Scheduling Conference</b>                                       |  |             |
| Feb. 8, 2013   | Attend Scheduling Conference   | 4.00        |
| <b>First Amended Complaint</b>                                     |  |             |
| Apr. 24, 2013  | Review and Edit FAC  | 0.30        |
| <b>Plaintiff's Motion to Compel Further Responses</b>              |  |             |
| Aug. 21, 2013  | Review and Edit Motion to Compel Further Responses re First Set of Discovery | 3.50        |
| Sept. 3, 2013  | Review and Edit Joint Motion to Compel                                       | 2.00        |
| Sept. 5, 2013  | Draft Declaration in Support of Motion to Compel                             | 3.00        |
| Oct. 8, 2013   | Review and Edit Supplemental Brief in Support of Motion to Compel            | 2.80        |
| Oct. 9, 2013   | Review Defendant's Supplemental Brief in Opposition                          | 4.00        |
| Nov. 4, 2013   | Attend Hearing on Motion to Compel   | 4.00        |
| <b>Mediation</b>   |  |             |
| Nov. 7, 2013   | Review Documents / evidence in preparation for mediation                     | 2.50        |
| Nov. 8, 2013   | Draft / Edit Mediation Brief   | 5.50        |
| Nov. 11, 2013  | Review and Edit Mediation Brief  | 6.50        |
| Nov. 12, 2013  | Review Mediation Brief   | 5.00        |
| Nov. 22, 2013  | Attend Mediation   | 8.50        |
| <b>Motion for leave to file SAC and to Modify Scheduling Order</b> |  |             |
| Jan. 6, 2014   | Review and Edit Motion   | 2.50        |
| Jan. 7, 2014   | Review and Edit Motion   | 2.00        |
| Jan. 17, 2014  | Review Opposing Papers   | 1.50        |
| <b>Deposition of Maxim 30(b)(6) [Gargiulo]</b>                     |  |             |
| Jan. 14, 2014  | Review Documents and Prepare for Deposition                                  | 6.50        |
| Jan. 15, 2014  | Take Deposition - Sacramento, California                                     | 11.00       |
| <b>Deposition of Maxim 30(a)(1) [Chacon]</b>                       |  |             |
| Jan. 14, 2014  | Review Documents and Prepare for Deposition                                  | 4.20        |
| Jan. 16, 2014  | Review Documents and Prepare for Deposition                                  | 3.50        |
| Jan. 17, 2014  | Take Deposition - Long Beach, California                                     | 4.00        |
| <b>Second Amended Complaint</b>                                    |  |             |
| Jan. 29, 2014  | Review and Edit SAC  | 0.50        |
| <b>Ex Parte Application to Continue Class Cert Deadline</b>        |  |             |
| Feb. 19, 2014  | Review and Edit Ex Parte   | 2.50        |
| <b>Plaintiff's Motion to Compel Appearance at Deposition</b>       |  |             |
| Mar. 27, 2014  | Review and Edit Motion   | 2.50        |
| April 1, 2014  | Review Joint Document  | 0.50        |
| April 8, 2014  | Attend Hearing on Motion to Compel   | 4.00        |
| <b>Deposition of Maxim 30(b)(6) [Beams]</b>                        |  |             |
| Apr. 15, 2014  | Review Documents and Prepare for Deposition                                  | 2.50        |
| Apr. 16, 2014  | Review Documents and Prepare for Deposition                                  | 3.80        |
| Apr. 17, 2014  | Take Deposition - Mountain View, California                                  | 10.00       |
| <b>Plaintiff's Motion for Class Certification</b>                  |  |             |
| April 28, 2014   | Draft Portions of Motion   | 3.50        |
| May 1, 2014  | Review Class Declarations  | 4.00        |
| May 3, 2014  | Review and Edit Motion   | 5.80        |
| May 4, 2014  | Further Review and Edit Motion   | 6.00        |
| May 4, 2014  | Review and Edit Declaration of KM  | 2.50        |
| May 5, 2014  | Review Final Draft of Motion   | 0.80        |

|  |   |               |
|--|---|---------------|
| <b>Notice of Errata re: Plaintiff's Motion for Class Cert</b>            |   |               |
| May 9, 2014  | Review Notice of Errata                                   | 0.40          |
| <b>Opposition to Defendant's Ex Parte Application</b>                    |   |               |
| May 20, 2014   | Review Defendant's Ex Parte                               | 2.00          |
| May 20, 2014   | Review and Edit Opposition                                | 2.50          |
| May 20, 2014   | Review Finalized Opposition                               | 0.20          |
| May 21, 2014   | Review Court's Order on Ex Parte                          | 0.20          |
| <b>Plaintiff's Reply to Opposition to Motion for Class Certification</b> |   |               |
| July 22, 2014  | Review Opposing Papers                                    | 3.80          |
| July 23, 2014  | Draft Portions of Reply to Opposition                     | 6.50          |
| July 27, 2014  | Review and Edit Reply                                     | 2.50          |
| July 28, 2014  | Further Review and Edit Reply                             | 0.50          |
| Aug. 28, 2014  | Prepare for Hearing on Motion for Certification           | 3.50          |
| Aug. 29, 2014  | Prepare for Hearing / Attend Hearing on Motion to Certify | 5.00          |
| <b>Stipulation to Extend Time to file Supplemental Briefing</b>          |   |               |
| Sept. 8, 2014  | Review and Edit Stipulation                               | 0.30          |
| <b>Plaintiff's Supplemental Class Certification Briefing</b>             |   |               |
| Nov. 16, 2014  | Review and Edit Supplemental Brief                        | 1.00          |
| Nov. 17, 2014  | Review and Edit Declaration of SMB                        | 1.50          |
| Nov. 17, 2014  | Review final Supplemental Brief in Support                | 0.30          |
| Dec. 10, 2014  | Review Opposing Papers                                    | 1.00          |
| <b>Third Amended Complaint</b>   |   |               |
| April 23, 2015   | Review and Edit 3AC                                       | 0.30          |
| May 5, 2015  | Review Defendant's Concerns re: 3AC                       | 0.80          |
| May 7, 2015  | Review Finalized 3AC                                      | 0.50          |
| <b>Plaintiff's Motion for Preliminary Approval</b>                       |   |               |
| April 29, 2015   | Review and Edit Motion                                    | 1.00          |
| May 6, 2015  | Review Defendant's Edits                                  | 0.50          |
| May 7, 2015  | Review Finalized Memorandum                               | 0.80          |
| May 7, 2015  | Review Finalized Declaration of SMB                       | 1.50          |
| <b>Subtotal</b>  |   | <b>177.60</b> |



# EXHIBIT B

# COST SUMMARY

Class Action

CASADINE v. MAXIM

FILE NO. 5138.001

|    | Name                                   | CHECK # | INVOICE #       | Date       | Amount     |
|----|--|---------|-----------------|------------|------------|
| 1  | Initial Case Cost                      |         |                 | 11/2/2012  | \$38.55    |
| 2  | Court hearing parking/mileage          |         |                 | 2/8/2013   | \$30.95    |
| 3  | Filing Fee                             |         |                 | 2/25/2013  | \$8.55     |
| 4  | Copies Form                            |         |                 | 7/3/2013   | \$19.22    |
| 5  | Copies Form                            |         |                 | 7/9/2013   | \$8.12     |
| 6  | Copies Form                            |         |                 | 7/15/2013  | \$87.39    |
| 7  | Copies Form                            |         |                 | 7/25/2013  | \$37.57    |
| 8  | Copies Form                            |         |                 | 8/8/2013   | \$67.14    |
| 9  | Copies Form                            |         |                 | 8/16/2013  | \$3.17     |
| 10 | Copies Form                            |         |                 | 8/19/2013  | \$2.71     |
| 11 | US Legal Support                       | 10415   | 394990/Ck#10415 | 10/4/2013  | \$1,442.61 |
| 12 | US Legal Support                       | 10413   | 396681/Ck#10413 | 10/15/2013 | \$993.00   |
| 13 | William Shane Invoice                  | 10428   | 126/Ck#10428    | 10/29/2013 | \$40.00    |
| 14 | William Shane Invoice                  | 10434   | 139/Ck#10434    | 11/3/2013  | \$25.00    |
| 15 | Expense Report (Sean - MTC Hearing)    |         |                 | 11/4/2013  | \$8.00     |
| 16 | Expense Report (Kevin - Mediation)     |         |                 | 11/22/2013 | \$110.51   |
| 17 | William Shane Invoice                  | 10474   | 142             | 11/26/2013 | \$80.00    |
| 18 | Flights to Sacramento for Depo         |         | ZXILRR          | 1/15/2014  | \$624.00   |
| 19 | LAX Fee for Sacramento Depo            |         | 3445            | 1/15/2014  | \$30.00    |
| 20 | Cab Fee for Sacramento Depo            |         | 374             | 1/15/2014  | \$45.90    |
| 21 | Lunch for Sacramento Depo              |         |                 | 1/15/2014  | \$14.17    |
| 22 | Dinner for Sacramento Depo             |         |                 | 1/15/2014  | \$31.00    |
| 23 | Cab Fee for Sacramento Depo            |         |                 | 1/15/2014  | \$39.60    |
| 24 | William Shane Invoice                  | 10582   | 164/Ck#10582    | 2/11/2014  | \$40.00    |
| 25 | Red Lion Hotel - Depo in Sacramento    |         | 26103172        | 2/26/2014  | \$79.01    |
| 26 | Southwest Flight - Depo in Sacramento  |         | ZNXOUA          | 2/27/2014  | \$220.00   |
| 27 | Jet Blue Flight - Depo in Sacramento   |         | RYZFLX          | 2/27/2014  | \$174.00   |
| 28 | Expense Report (Sean - Depo Maxim)     |         |                 | 2/27/2014  | \$86.00    |
| 29 | William Shane Invoice                  | 10659   | 169/ck#10659    | 2/19/2014  | \$40.00    |
| 30 | William Shane Invoice                  | 10683   | 171/ck#10683    | 4/13/2014  | \$80.00    |
| 31 | Flight for 30 b 6                      |         | conf#MQ9HS2     | 4/17/2014  | \$430.00   |
| 32 | Parking fee/Mileage/Fast Track         |         |                 | 4/8/2014   | \$47.95    |
| 33 | Depo re: Corp Struct/Cab Fee& Food/mi. | cc visa |                 | 4/17/2014  | \$91.00    |
| 34 | Copies From Docket                     |         |                 | 5/1/2014   | \$0.50     |
| 35 | Copies From Docket                     |         |                 | 5/1/2014   | \$2.60     |
| 36 | Copies From Docket                     |         |                 | 5/1/2014   | \$3.00     |
| 37 | Copies From Docket                     |         |                 | 5/1/2014   | \$2.70     |

|    |  |         |                    |            |            |
|----|--|---------|--------------------|------------|------------|
| 38 | Copies From Docket                       |         |                    | 5/1/2014   | \$0.50     |
| 39 | Copies From Docket                       |         |                    | 5/1/2014   | \$3.00     |
| 40 | Copies From Docket                       |         |                    | 5/1/2014   | \$3.00     |
| 41 | Copies Fom Docket                        |         |                    | 5/6/2014   | \$17.50    |
| 42 | Copies From Docket                       |         |                    | 5/9/2014   | \$3.30     |
| 43 | Copies From Docket                       |         |                    | 5/22/2014  | \$2.60     |
| 44 | William Shane Invoice                    | 10781   | 175                | 6/3/2014   | \$40.00    |
| 45 | Atkinson-Baker                           | 10764   | A80033A AA         | 6/1/2014   | \$463.00   |
| 46 | Atkinson-Baker                           | 10767   | A800DF7 AA         | 6/1/2014   | \$831.75   |
| 47 | Atkinson-Baker                           | 10765   | A80479B AA         | 6/1/2014   | \$923.56   |
| 48 | Atkinson-Baker                           | 10763   | A70D988 AA         | 6/1/2014   | \$967.95   |
| 49 | William Shane Invoice                    | 10852   | 181 (5/6,5/12,5/21 | 5/21/2014  | \$80.00    |
| 50 | Atkinson-Baker                           | cc visa | A801EC4AA          | 3/14/2014  | \$1,800.17 |
| 51 | Copies                                   |         |                    | 8/27/2014  | \$80.00    |
| 52 | Hearing Class Cert. Miles/Parking        |         |                    | 8/29/2014  | \$25.54    |
| 53 | William Shane Invoice                    | 11030   | 205                | 11/30/2014 | \$65.00    |
| 54 | Certified Paga LTL                       |         |                    | 4/10/2015  | \$12.96    |
| 55 | Expense Report (SB) Mtn for Prelim Apprl | cash    | 16434              | 5/22/2015  | \$50.86    |
| 56 | Merchant Atkinson                        | cc      | A801EC4 AA         | 9/9/2014   | \$1,800.17 |
| 57 | Trascript                                | 11297   |                    | 6/3/2015   | \$145.50   |
|    | Printing/Scanning Cost as of 8/6/15      |         |                    |            | \$3,430.00 |

**TOTAL**

**\$15,830.28**