

1 **S. BRETT SUTTON 143107**
2 **JARED HAGUE 251517**
3 **ANTHONY E. GUZMAN II 311580**
4 **SUTTON HAGUE LAW CORPORATION, P.C.**
5 5200 N. Palm Avenue, Suite 203
6 Fresno, California 93704
7 Telephone: (559) 325-0500
8 Facsimile: (559) 981-1217

6 **ZACHARY CROSNER 272295**
7 **MICHAEL CROSNER 41299**
8 **CROSNER LEGAL, P.C.**
9 433 N. Camden Drive, Suite 400
10 Beverly Hills, California 90210
11 Telephone: (310) 496-5818
12 Facsimile: (310) 510-6429

11 Attorneys for Plaintiff: Joseph Payne, on behalf of
12 himself and others similarly situated

13 **SUPERIOR COURT OF CALIFORNIA**

14 **COUNTY OF KERN**

15 JOSEPH PAYNE, an individual,
16
17 Plaintiff,

18 vs.

19 PROS, INCORPORATED, a California
20 Corporation; JAMES LEAL, an individual;
21 TERESA LEAL, an individual; and Does 1
22 through 50, inclusive,

23 Defendants.

* * *

Case No. BCV-16-100356DRL

CLASS ACTION

[Honorable David R. Lampe – Dept. 11]

**DECLARATION OF S. BRETT SUTTON
IN SUPPORT OF PLAINTIFF'S
UNOPPOSED MOTION FOR
ATTORNEYS' FEES, COSTS AND
ENHANCEMENT AWARD**

PRELIMINARY APPROVAL HEARING

Date: August 29, 2018

Time: 8:30 a.m.

Dept.: 11

Complaint Filed: February 22, 2016

25 SUTTON HAGUE LAW
26 CORPORATION
27 5200 NORTH PALM AVE
28 SUITE 203
FRESNO, CA 93704

1 I, S. BRETT SUTTON, declare:

2 1. I am an attorney licensed to practice law in the States of California and Nevada,
3 and before this Court. I am an attorney for the law firm of Sutton Hague Law Corporation,
4 attorneys for Plaintiff Bryan Blithe (“Plaintiff”). The facts set forth herein are personally known
5 to me and, unless otherwise noted, are based on my firsthand knowledge and/or observation. If
6 called as a witness, I could and would competently testify thereto under oath.

7 2. This declaration is submitted in support of Plaintiff’s Motion for Attorneys’ Fees,
8 Costs and Enhancement Award.

9 3. With respect to my qualifications to be appointed by the Court as class counsel in
10 this matter, I have over twenty-seven years of experience as a practicing attorney, most of which
11 has focused on issues of employment and labor law. I graduated summa cum laude and
12 Valedictorian from Pepperdine University in 1986, and graduated cum laude from Pepperdine
13 University School of Law in 1989. While in law school, I was on the Pepperdine Law Review
14 and Moot Court Honors Board, and was a Roger J. Traynor California Moot Court Champion
15 (1989) and Pepperdine Trial Advocacy Tournament Champion (1988). I have authored a number
16 of articles on various legal topics for law reviews and journals.

17 4. I am currently a member of the Fresno County, Los Angeles County, Clark
18 County (NV) and Washoe County (NV) Bar Associations.

19 5. I began my career as a litigation attorney at Mitchell, Silberberg & Knupp LLP in
20 Los Angeles. While working in the litigation department, I worked on complex litigation matters.
21 I then became associated with and later a partner of the Fresno law firm of Kimble, MacMichael
22 & Upton, where I successfully tried cases to verdict in both state and federal court, including
23 employment law matters. I then was a partner at the Fresno firm of Sagaser, Franson & Jones,
24 where I continued my practice, focused primarily on employment law, including the litigation of
25 a number of wage and hour class action defense cases. I thereafter founded the Fresno firm of
26 Sutton Hatmaker Law Corporation, again focusing on employment law, and a continuing focus
27 on wage and hour class action cases for both plaintiffs and defendants.

28 ///

1 6. I founded Sutton Hague Law Corporation, P.C. in 2014. Our firm specializes in
2 employment and labor law, and represents both plaintiffs and defendants in such matters. Mr.
3 Hague and I worked closely together on a number of wage and hour class action cases at Sutton
4 Hatmaker Law Corporation, where we successfully recovered millions of dollars on behalf of
5 plaintiffs. I have served as lead counsel on both the plaintiff and defense side of a number of
6 wage and hour class action cases in both federal and state court, including: *Hufferd, et al. v.*
7 *SolutionOne, et al.*, Case No. 06CECG03644 (Fresno Sup. Ct.); *Packard, et al. v. SolutionOne,*
8 *et al.*, Case No. 07CECG00071 (Fresno Sup. Ct.); *Gesberg, et al. v. LinkUs Enterprises, Inc.*,
9 Case No. 163180 (Shasta Sup. Ct., removed to Eastern District of California, Case No. 08-cv-
10 02428-MCE-CMK); *Bermejo, et al. v. Ro's Precise Painting, et al.*, Case No. 10CECG01318
11 (Fresno Sup. Ct.); *Gonzalez, et al. v. California Dairies, Inc.*, Case No. 08-226450 (Tulare Sup.
12 Ct.); *Valdez, et al. v. Dish Network Corporation et al.*, Case No. A-09-604830-C (Nevada, Clark
13 Sup. Ct., removed to Nevada District, Case No. 2:10-cv-00023-RLH-PAL); *Wood, et al. v. Vie-*
14 *Del Company*, Case No. 08CECG01289; *Hernandez, et al. v. Target Corp., et al.*, Case No.
15 1089837 (Santa Barbara Sup. Ct.); *Wright, et al. v. LinkUs Enterprises, Inc.*, Case No. 2:07-cv-
16 01347-MCE-CMK (California Eastern District); *Heinz v. Pacific Gas & Electric Company., et*
17 *al.*, Case No. CGC-10-503452 (San Francisco Sup. Ct.); *Meza v. LinkUs Enterprises, Inc.*, Case
18 No. S-1500-CV-274733 LHB (Kern County Sup. Ct.); *Gutierrez v. LinkUs Enterprises, Inc.*,
19 Case No. MCV065774 (Madera County Sup. Ct.); *Buck v. Saputo Cheese USA, Inc.*, Case No.
20 256347 (Tulare County Sup. Ct.); *Torchia v. W.W. Grainger, Inc.*, Case No. 1:13-CV-01427-
21 LJO-JLT (California Eastern District); *Farnsworth v. California Transplant Donor Network,*
22 Case No. RG13669714 (Alameda County Sup. Ct.); *Hildebrand v. LinkUs Enterprises, Inc.*,
23 Case No. Dr150155 (Humboldt County Sup. Ct.); *Garcia v. Gordon Trucking, Inc.*, Case No.
24 1:10-cv-00324-OWW-SKO (California Eastern District); *Van Kempen v. Matheson Tri-Gas,*
25 *Inc.*, Case No. 15-cv-00660-HSG (California Northern District); *Gonzalez-Garcia et al. v.*
26 *Firefly Westside, LLC*, Case No. A-15-717966-C (Eighth Judicial District Court of Nevada);
27 *Nickeson v. Pacific Distributing, Inc. et al*, Case No 15CECG00314 (Fresno County Sup. Ct.);
28 *Aguirre v. Mariani Nut Company, Inc.*, Case No. 34-2016-00190252-CU-OE-GDS (Sacramento

1 County Sup. Ct.); *Brewer v. Saputo Dairy Foods USA, LLC*, Case No. VCU266443 (Tulare
2 County Sup. Ct.); *Turk v. Gale/Triangle, Inc. et al.*, Case No. 2:16-cv-00783-MCE-DB
3 (California Eastern District); *Snipes v. Dollar Tree Distribution, Inc.*, Case No. 2:15-cv-00878-
4 MCE-DAD (California Eastern District); *Slattery et al. v. Boot Barn, Inc.*, Case No. 30-2016-
5 00877430-CU-OE-CXC (Orange County Sup. Ct.); and *Blithe v. A&A Concrete Supply, Inc. et*
6 *al.*, Case No. 34-2016-00190795 (Sacramento County Sup. Ct.). I have also handled numerous
7 cases on behalf of plaintiffs and defendants involving wage and hour-related claims brought on a
8 representative basis under the Private Attorneys' General Act of 2004 ("PAGA"). I have also
9 served in a consultation capacity for other attorneys handling wage and hour class action case.

10 7. To my knowledge, I was the first attorney in Central California invited to serve as
11 a Contributing Editor to the Rutter Group Employment Litigation treatise at the invitation of
12 Justice Rebecca A. Wiseman of the California Fifth District Court of Appeal. I have served in
13 this capacity for approximately the past eight years.

14 8. I have also been retained and formally designated as an expert witness in
15 employment law by the McCormick Barstow firm in *Stovall v. Veroff, et al.*, Fresno County
16 Superior Court Case No. 07CECG03270 and by the Wilkins, Drolshagen & Czeshinski firm in
17 *Hun & Lau, Inc. et al. v. Travelers Casualty and Surety Company of America, et al.*, Case No.
18 13CECG03502 (Fresno County Superior Court).

19 9. I have been asked to serve as an Early Neutral Evaluator in employment law cases
20 by the United States District Court Eastern District of California (Fresno Division), and agreed to
21 do so.

22 10. I am regularly asked to speak on employment law and wage and hour matters and
23 have done so for many years, to groups such as: The Society for Human Resource Management,
24 the Employer Advisory Council, the Employment Development Department, California State
25 University – Fresno, the Tulare County Bar Association, California Association of Workplace
26 Investigators, and various industry groups, such as the California CPA Society, California
27 Dietetic Association, the Northern Nevada Human Resource Association, California Council of
28 School Attorneys, American Association of School Personnel Administrators, Agricultural

1 Personnel Management Association and others. I have been joined in some of these presentations
2 by prominent members of the bench, from both state and federal courts. Through these
3 presentations as well as monthly webinars on Employment Law I have conducted for many years
4 in both California and Nevada, I have trained thousands of people including on wage and hour
5 law.

6 11. I have been selected for inclusion on the list of Northern California Super
7 Lawyers from 2011 to present.

8 12. I am peer review rated as an AV-rating, Martindale-Hubbell's highest possible
9 rating through its peer review rating system.

10 13. In June 2016 I was elected by the Governors of the College of Labor and
11 Employment Lawyers as a Fellow. An attorney may only be considered for election as a Fellow
12 by invitation of existing members, followed by a rigorous review process before a vote of the
13 board. My formal induction took place on November 12, 2016 in Chicago, Illinois.

14 14. My office is fully committed to dedicating the time and resources to see this case
15 through to its conclusion.

16 15. I have no knowledge of the existence of a conflict between any of the putative
17 members and the Plaintiff, or of any conflict between any of the putative class members and
18 Sutton Hague Law Corporation.

19 16. My base hourly billing rate for this type of case is \$800.00. Based on my years of
20 experience in litigating complex wage and hour class actions, this rate is reasonable for this type
21 of case and well within the market rates for lawyers of similar practices and experience. I
22 calculated this rate by reference to the Laffey Matrix, available at <http://laffeymatrix.com>, which
23 several courts have recognized as one measurement of attorneys' fees in the context of wage and
24 hour class actions and lodestar cross-checks. Under the Laffey Matrix, an attorney with more
25 than twenty years of practice could have charged an hourly rate of between \$826 and \$864
26 during the pendency of this litigation.

27 17. I have spent a total of 19.7 hours on this case amounting to attorneys' fees in the
28 amount of fifteen thousand seven hundred and sixty dollars (\$15,760) using the \$800 per hour

1 rate. I have reviewed my time expended in this matter as well as all attorneys' time and staff
2 time, and all such fees billed in this case were reasonably necessary to conduct his litigation. The
3 amount of attorneys' fees incurred is reasonable because the rates are reasonable given the years
4 of experience of the attorneys and the fact that this firm has offices throughout California and
5 Nevada.

6 18. The total attorneys' fees incurred in this matter by Sutton Hague Law Corporation
7 are as follows:

Attorney	Hours Worked	Rate	Total Fees
S. Brett Sutton	19.7	\$800.00	\$15,760
Jared Hague	144.30	\$580.00	\$83,694
Rebecca Carlson	23.95	\$300.00	\$7,185
Anthony E. Guzman	174.30	\$300.00	\$52,290
Amy McGeever	31.8	\$300.00	\$7,155
Justin Vecchiarelli	5.8	\$300.00	\$1,740
Totals	399.85		\$167,824

16
17
18 19. With the exception of Jared Hague, who is a Partner, none of the other attorneys
19 and staff who billed for this matter billed their work at a rate greater than \$300.00 per hour. Mr.
20 Hague's qualifications and rate are set forth in his declaration filed under separate cover.

21 20. Anthony E. Guzman is an attorney who has been practicing law since 2016. Mr.
22 Guzman graduated summa cum laude from California State University, Fresno, with a degree in
23 philosophy in 2013. Mr. Guzman received his Juris Doctor from University of California,
24 Berkeley, School of Law in May 2016. Mr. Guzman was a participant of the National Moot
25 Court Championship, Western Regional Moot Court Tournament, Regional Labor and
26 Employment Trial Tournament, and the Regional Intellectual Property Negotiations Tournament.
27 He is a member of the California Bar Association and the State Bar of Nevada. Under the Laffey
28

1 Matrix, an attorney with one to three years of practice could have charged an hourly rate of
2 between \$343 and \$359 during the pendency of this litigation.

3 21. Justin Vecchiarelli is an attorney who has been practicing law since 2014. Mr.
4 Vecchiarelli graduated from California State University, Fresno, with a degree in criminology
5 cum laude in 2010. Mr. Vecchiarelli received his Juris Doctor from San Joaquin College of Law
6 in 2014. Mr. Vecchiarelli was recipient of the George A. Hopper Moot Court Competition Best
7 Brief Finalist award in 2013, recipient of the American Board of Trial Advocates Scholarship,
8 and recipient of the Leon S. Peter Leadership Scholarship. Under the Laffey Matrix, an attorney
9 with one to three years of practice could have charged an hourly rate of between \$343 and \$359
10 during the pendency of this litigation.

11 22. Amy McGeever, an attorney formerly employed by this firm, has been practicing
12 law in California since 2014. Ms. McGeever completed both her undergraduate and legal
13 education at University of San Diego. While in law school, she served as a judicial extern for the
14 Hon. Judge Mitchell D. Dembin in the United States District Court for the Southern District of
15 California and as a law clerk for the California Office of the Attorney General. She was also a
16 recipient of the Order of Barristers award in 2013. Under the Laffey Matrix, an attorney with one
17 to three years of practice could have charged an hourly rate of between \$343 and \$359 during the
18 pendency of this litigation.

19 23. Rebecca Carlson, an attorney formerly employed by this firm, has been practicing
20 law in California since 2017. Ms. Carlson completed her undergraduate education at University
21 of Nevada, Reno, with a dual degree in Communications and Political Science. She completed
22 her legal education at the Chapman University, Dale E. Fowler School of Law, also receiving a
23 certificate in mediation. Under the Laffey Matrix, an attorney with one to three years of practice
24 could have charged an hourly rate of between \$343 and \$359 during the pendency of this
25 litigation.

26 24. The invoices for the attorneys' fees are kept in the regular course of Sutton Hague
27 Law Corporation, P.C.'s business. It is customary in the business of Sutton Hague Law
28 Corporation, P.C. to retain invoices issued to its contingency clients, including the Plaintiffs in

1 this case. I would be happy to provide the Court with the actual billings in this case upon request.
2 All the hourly rates requested in thus case have been previously approved as reasonable in the
3 wage and hour class action context. For example, these rates were approved by the Sacramento
4 Superior Court in the aforementioned case entitled *Aguirre et al. v. Mariani Nut Company*, Case
5 No. 34-2016-00190252-CU-OE-GDS (Sacramento County Sup.Ct.), as well as in the Eastern
6 District of California in the aforementioned case entitled *Turk v. Gale/Triangle, Inc. et al.*, Case
7 No. 2:16-cv-00783-MCE-DB (California Eastern District).

8 25. In addition to their requests for fees, Class Counsel further request reimbursement
9 of the reasonable out-of-pocket expenses advanced and/or incurred by them in connection with
10 this litigation, in the amount of \$14,842. The costs are all litigation-related costs including filing
11 and Motion fees, mediation fees and travel costs associated with mediation and deposition, copy
12 charges, postage charged, and delivery fees. The authority for the court to award the costs set
13 forth below is the parties' Stipulation and Agreement for Class Action Settlement. Class counsel
14 requests that the court approve the request for reimbursement of costs. Attached hereto as
15 Exhibit "1" is an itemized detail of such costs.

16 26. During the time this case was pending, I turned down dozens of potential cases
17 due to, among other reasons, the fact that it was unclear how this case was going to be resolved
18 and the amount of time and expense that might be involved to prosecute this case. I know from
19 my experience that class action cases can be very expensive to prosecute and take a long time to
20 resolve. This case was formally filed on February 22, 2016. However, investigation of this
21 matter, commenced approximately two months prior to that date, during which time our office
22 informally investigated Plaintiff's claims and began the process of drafting Plaintiff's initial
23 Complaint. This means my firm has gone without any compensation for our work on this case
24 for over two years. In short, this case has required me to forego significant other work, required
25 the advancement of costs, and required the advancement of costs, and required a significant
26 investment in time and resources, including the advancement of \$14,842 in costs at a time when
27 routine business expenses still had to be met.

28 ///

1 27. In light of the inherent expense, delay, uncertainty of trial, and potential issues
2 raised by this case, I believe the Settlement Agreement is fair and equitable for all concerned. I
3 believe this settlement Agreement is in the best interest of all involved.

4 28. In my experience, fees equaling one-third of the common fund are reasonable in
5 similarly litigated wage and hour class actions, taken on a contingency fee basis. In this case,
6 one-third of the common fund would amount to \$233,310.

7 29. The aggregate lodestar of all the attorneys of this firm for Plaintiff in this matter is
8 \$167,824. In addition, as set forth in the declarations of Zachary Crosner and Michael Crosner,
9 our co-counsel's aggregate lodestar is \$53,280. The combined lodestar of 221,104 would result
10 in a multiplier of only 1.0099 to reach the requested one third threshold of \$233,310. Based on
11 all of the facts set forth herein, and as articulated by the Motion for Attorneys' Fees, Costs and
12 Enhancement Award, the multiplier is justified and is well within the range of multipliers that are
13 routinely awarded by California courts in cases of this type.

14 30. In summary, Plaintiff's attorney fees and costs request is reasonable in light of the
15 highly favorable settlement that was obtained on behalf of the Class Members in this case. The
16 Settlement provides a very favorable gross recovery of \$700,000 to those Class Members who
17 worked under the Defendants. None of the Class Members have objected to the Settlement or
18 opted-out of the Settlement on that basis of the attorneys' fees Class Counsel may request. The
19 award request is fair and should be approved.

20 I declare under penalty of perjury under the laws of California that the foregoing is true
21 and correct and that this declaration was executed on this 21st day of June, 2018, at Fresno,
22 California.

23
24 

25 _____
26 BRETTON SUTTON
27
28

EXHIBIT 1

Matter Billing Detail

Sutton Hague Law Corporation

Date Range: 01/01/2014 to 06/20/2018
Client: 4182.01 - Joseph Payne
Matter: 4182.01 - Joseph Payne

Report Date: 6/20/2018
Report Time: 8:30AM
Page: 1 of 6
User ID: Gentry

Date	Expense Code	Description	Debit	Credit	Billing Status	On Hold	Invoice Number	Check Number	Payee
Balance Forward:									
02/26/2016	SOP	Service of Process-Service Fee	\$0.00						
02/29/2016	CF	Court Filing Fees-Remote Court Filing/Fee Advance	\$119.50		Unbilled			3154	Eddings Attorney Services
03/01/2016	POS	Postage	\$1,663.50		Unbilled			3154	Eddings Attorney Services
03/01/2016	POS	Postage	\$0.48		Unbilled				
03/01/2016	POS	Postage	\$2.52		Unbilled				
03/07/2016	POS	Postage	\$0.48		Unbilled				
03/15/2016	CF	Court Filing Fees-matter 4182.01	\$85.00		Unbilled			4342	Eddings Attorney Services
03/24/2016	CF	Court Filing Fees-Remote court filing	\$85.00		Unbilled			3195	Eddings Attorney Services
03/28/2016	CF	Court Filing Fees-Court filing matter 4182.01	\$85.00		Unbilled			3195	Eddings Attorney Services
03/29/2016	CPC	Color Photocopies	\$2.66		Unbilled				
03/29/2016	PHO	Photocopies	\$7.38		Unbilled				
04/04/2016	CF	Court Filing Fees-Remote court filing matter 4182.01	\$85.00		Unbilled			3195	Eddings Attorney Services
05/04/2016	PHO	Photocopies	\$3.42		Unbilled				
05/04/2016	CPC	Color Photocopies	\$1.90		Unbilled				
05/31/2016	CPC	Color Photocopies	\$0.76		Unbilled				
05/31/2016	CPC	Color Photocopies	\$0.76		Unbilled				
05/31/2016	PHO	Photocopies	\$2.16		Unbilled				
06/23/2016	FD	Fedex	\$18.47		Unbilled				
06/30/2016	PHO	Photocopies	\$2.16		Unbilled				
06/30/2016	CPC	Color Photocopies	\$0.76		Unbilled				
07/13/2016	POS	Postage	\$1.99		Unbilled				
07/19/2016	CCC	Contingency Case Costs--Teresa Leal	\$718.75		Unbilled				
07/19/2016	CCC	Contingency Case Costs--Lori Buller	\$682.25		Unbilled				
07/31/2016	CPC	Color Photocopies	\$0.38		Unbilled				
08/05/2016	POS	Postage	\$1.34		Unbilled				
08/08/2016	FF	Filing Fee-E-filing matter 4182.01	\$14.95		Unbilled			4288	Eddings Attorney Services

Matter Billing Detail

Sutton Hague Law Corporation

Report Date: 6/20/2018
Report Time: 8:30AM
Page: 2 of 6
User ID: Gentry

Date	Expense Code	Description	Debit	Credit	Billing Status	On Hold	Invoice Number	Check Number	Payee
08/11/2016	POS	Postage	\$0.92		Unbilled				
08/16/2016	CC	Certified Copies-Certified Copy of Transcripts	\$359.00		Unbilled		5170		U.S. Legal Support, Inc.
08/16/2016	CC	Certified Copies- Lori Buller	\$315.00		Unbilled		5170		U.S. Legal Support, Inc.
08/22/2016	CCL	Court Call	\$86.00		Unbilled				
08/23/2016	SOP	Service of Process-E-Filing for matter 4182.01	\$173.95		Unbilled		4343		Eddings Attorney Services
08/31/2016	PHO	Photocopies	\$4.14		Unbilled				
08/31/2016	CPC	Color Photocopies	\$5.32		Unbilled				
11/21/2016	FF	Filing Fee-e-filing matter 4182.01	\$14.95		Unbilled		4476		Eddings Attorney Services
11/28/2016	CCL	Court Call	\$86.00		Unbilled				
11/30/2016	PHO	Photocopies	\$1.80		Unbilled				
11/30/2016	CPC	Color Photocopies	\$1.52		Unbilled				
02/28/2017	POS	Postage	\$0.92		Unbilled				
02/28/2017	PHO	Photocopies	\$9.36		Unbilled				
02/28/2017	CPC	Color Photocopies	\$5.32		Unbilled				
03/29/2017	PHO	Photocopies	\$9.36		Unbilled				
03/29/2017	CPC	Color Photocopies	\$5.32		Unbilled				
04/05/2017	FF	Filing Fee-filing matter 4182.01	\$14.95		Unbilled		4761		Eddings Attorney Services
04/30/2017	PHO	Photocopies	\$14.04		Unbilled				
05/02/2017	FF	Filing Fee-filing matter 4182.01	\$36.15		Unbilled		5045		Eddings Attorney Services
05/03/2017	POS	Postage	\$0.92		Unbilled				
05/04/2017	FF	Filing Fee-filing matter 4182.01	\$14.95		Unbilled		5045		Eddings Attorney Services
05/08/2017	SOP	Service of Process-Service Fee matter 4182.01	\$119.50		Unbilled		5045		Eddings Attorney Services
05/10/2017	POS	Postage	\$1.82		Unbilled				
05/30/2017	PHO	Photocopies	\$81.72		Unbilled				
06/12/2017	CCL	Court Call	\$86.00		Unbilled				
06/12/2017	FF	Filing Fee-filing matter 4182.01	\$14.95		Unbilled		5122		Eddings Attorney Services
06/12/2017	POS	Postage	\$2.38		Unbilled				
06/30/2017	PHO	Photocopies	\$82.44		Unbilled				

Matter Billing Detail

Sutton Hague Law Corporation

Report Date: 6/20/2018
Report Time: 8:30AM
Page: 3 of 6
User ID: Gentry

Date	Expense Code	Description	Debit	Credit	Billing Status	On Hold	Invoice Number	Check Number	Payee
07/07/2017	POS	Postage	\$1.34		Unbilled				
07/12/2017	FF	Filing Fee-matter 4182.01	\$14.95		Unbilled			5203	Eddings Attorney Services
07/18/2017	MED	Mediation Services- matter 4182.01	\$4,500.00		Unbilled			5227	Winikow Mediation
07/20/2017	CCL	Court Call	\$86.00		Unbilled				
07/20/2017	POS	Postage	\$0.92		Unbilled				
07/24/2017	FF	Filing Fee-matter 4182.01	\$14.95		Unbilled				
07/31/2017	PHO	Photocopies	\$1.80		Unbilled				
08/16/2017	SOP	Service of Process- matter 4182.01	\$677.10		Unbilled			5256	Simpluris, Inc.
09/05/2017	FF	Filing Fee-matter 4182.01	\$14.95		Unbilled			5378	Eddings Attorney Services
09/13/2017	FF	Filing Fee-matter 4182.01	\$78.55		Unbilled			5378	Eddings Attorney Services
09/22/2017	TE	Travel Expenses for Jared to attend the mediation.	\$524.05		Unbilled				
09/26/2017	FF	Filing Fee-matter 4182.01	\$14.95		Unbilled			5378	Eddings Attorney Services
09/29/2017	POS	Postage	\$1.34		Unbilled				
09/30/2017	PHO	Photocopies	\$27.00		Unbilled				
09/30/2017	CPC	Color Photocopies	\$1.52		Unbilled				
09/30/2017	POS	Postage	\$7.60		Unbilled				
09/30/2017	POS	Postage	\$1.34		Unbilled				
10/04/2017	CCL	Court Call	\$86.00		Unbilled				
10/18/2017	FF	VENDOR:Eddings Attorney Services; INVOICE#:E198644; DATE:10/18/2017 - Filing Fee-matter 4182.01	\$78.55		Unbilled			5533	Eddings Attorney Services
10/31/2017	CPC	Color Photocopies	\$117.04		Unbilled				
10/31/2017	POS	Postage	\$0.92		Unbilled				
10/31/2017	POS	Postage	\$2.18		Unbilled				
10/31/2017	POS	Postage	\$69.00		Unbilled				
11/06/2017	FD	Fedex	\$19.56		Unbilled				
11/06/2017	CCL	Court Call	\$86.00		Unbilled				
11/06/2017	FF	VENDOR:Eddings Attorney Services; INVOICE#:E200485; DATE:11/6/2017 - Filing Fee-4182.01	\$14.95		Unbilled			5535	Eddings Attorney Services

Matter Billing Detail

Sutton Hague Law Corporation

Report Date: 6/20/2018
Report Time: 8:30AM
Page: 4 of 6
User ID: Gentry

Date	Expense Code	Description	Debit	Credit	Billing Status	On Hold	Invoice Number	Check Number	Payee
11/21/2017	RES	VENDOR:Berkeley Research Group; INVOICE#:58620; DATE:11/21/2017 - Research/Investigation- matter 4182.01	\$2,528.40		Unbilled			5531	Berkeley Research Group
11/21/2017	FF	VENDOR:Eddings Attorney Services; INVOICE#:E201763; DATE:11/21/2017 - Filing Fee-4182.01	\$14.95		Unbilled			5536	Eddings Attorney Services
11/30/2017	CPC	Color Photocopies	\$1.90		Unbilled				
11/30/2017	PHO	Photocopies	\$19.98		Unbilled				
12/06/2017	FD	Fedex Matthew McDaniels	\$20.16		Unbilled				
12/06/2017	FD	Fedex Alejandra Barajas	\$23.90		Unbilled				
12/06/2017	FD	Fedex Claud Jones	\$20.16		Unbilled				
12/06/2017	FD	Fedex Emmanuel Luna	\$20.16		Unbilled				
12/12/2017	FF	VENDOR:Eddings Attorney Services; INVOICE#:E203742; DATE:12/12/2017 - Filing Fee- Matter 4182.01	\$14.95		Unbilled			5558	Eddings Attorney Services
12/18/2017	FD	Fedex	\$19.66		Unbilled				
12/27/2017	POS	Postage	\$0.92		Unbilled				
12/27/2017	POS	Postage	\$4.90		Unbilled				
12/29/2017	CPC	Color Photocopies	\$1.52		Unbilled				
12/29/2017	PHO	Photocopies	\$47.34		Unbilled				
01/02/2018	FF	VENDOR:Eddings Attorney Services; INVOICE#:E205857; DATE:1/2/2018 - Filing Fee- matter 4182.01	\$14.95		Unbilled			5613	Eddings Attorney Services
01/16/2018	CCL	Court Call	\$86.00		Unbilled				
01/16/2018	MIL	VENDOR:Justin Vecchiarelli; INVOICE#:01162018; DATE:1/16/2018 - Courier Mileage-Mileage Reimbursement (230 x .545 = \$125.35)	\$125.35		Unbilled			5621	Justin Vecchiarelli
01/17/2018	FF	VENDOR:Eddings Attorney Services; INVOICE#:E207462; DATE:1/17/2018 - Filing Fee- matter 4182.01	\$14.95		Unbilled			5613	Eddings Attorney Services
01/17/2018	FF	VENDOR:Eddings Attorney Services; INVOICE#:E207085; DATE:1/17/2018 - Filing Fee-Matter 4182.01	\$14.95		Unbilled			5646	Eddings Attorney Services
01/18/2018	SOP	VENDOR:Eddings Attorney Services; INVOICE#:E207623; DATE:1/18/2018 - Service of Process- matter 4182.01	\$119.50		Unbilled			5614	Eddings Attorney Services

Matter Billing Detail

Sutton Hague Law Corporation

Report Date: 6/20/2018
Report Time: 8:30AM
Page: 5 of 6
User ID: Gentry

Date	Expense Code	Description	Debit	Credit	Billing Status	On Hold	Invoice Number	Check Number	Payee
01/31/2018	CPC	Color Photocopies	\$1.52		Unbilled				
02/05/2018	POS	Postage	\$1.36		Unbilled				
02/28/2018	PHO	Photocopies	\$2.16		Unbilled				
02/28/2018	CPC	Color Photocopies	\$1.52		Unbilled				
03/02/2018	POS	Postage	\$0.94		Unbilled				
03/06/2018	FF	VENDOR:Eddings Attorney Services; INVOICE#:E212845; DATE:3/6/2018 - Filing Fee- Matter 4182.01	\$14.95		Unbilled		5708		Eddings Attorney Services
03/12/2018	CCL	Court Call	(\$86.00)		Unbilled				
03/31/2018	PHO	Photocopies	\$3.60		Unbilled				
04/18/2018	POS	Postage	\$18.00		Unbilled				
04/23/2018	FF	VENDOR:Eddings Attorney Services; INVOICE#:E217951; DATE:4/23/2018 - Filing Fee- Matter 4182.01	\$78.55		Unbilled		5835		Eddings Attorney Services
04/25/2018	POS	Postage	\$1.36		Unbilled				
04/26/2018	FF	VENDOR:Eddings Attorney Services; INVOICE#:E218749; DATE:4/26/2018 - Filing Fee- Matter 4182.01	\$14.95		Unbilled		5835		Eddings Attorney Services
04/30/2018	PHO	Photocopies	\$18.60		Unbilled				
04/30/2018	FF	VENDOR:Eddings Attorney Services; INVOICE#:E218996; DATE:4/30/2018 - Filing Fee- Matter 4182.01	\$14.95		Unbilled		5835		Eddings Attorney Services
05/22/2018	POS	Postage	\$5.36		Unbilled				
05/23/2018	FF	VENDOR:Eddings Attorney Services; INVOICE#:E221655; DATE:5/23/2018 - Filing Fee- Matter 4182.01	\$14.95		Unbilled		5903		Eddings Attorney Services
05/31/2018	PHO	Photocopies	\$34.20		Unbilled				
05/31/2018	POS	Postage	\$1.36		Unbilled				
05/31/2018	CF	Court Filing Fees ti file Notice of Entry of Order.	\$8.19		Unbilled				
Total:			\$14,842.95	\$0.00					
Balance:			\$14,842.95						

PROOF OF SERVICE

1
2 My business address is **5200 N. Palm Ave., Suite 203, Fresno, California**
3 **93704**. I am employed in Fresno, California. I am over the age of 18 years and am not a party
4 to this case.

5 On the date indicated below, I served the foregoing document(s) described as:

6 **NOTICE OF MOTION AND MOTION IN SUPPORT OF PLAINTIFF’S MOTION**
7 **FOR ATTORNEYS’ FEES, COSTS AND ENHANCEMENT AWARD;**
8 **MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF**
9 **PLAINTIFF’S UNOPPOSED MOTION FOR ATTORNEYS’ FEES, COSTS AND**
10 **ENHANCEMENT AWARD; DECLARATION OF JARED HAGUE IN SUPPORT OF**
11 **UNOPPOSED MOTION FOR ATTORNEYS’ FEES, COSTS AND ENHANCEMENT**
12 **AWARD; DECLARATION OF S. BRETT SUTTON IN SUPPORT OF PLAINTIFF’S**
13 **UNOPPOSED MOTION FOR ATTORNEYS’ FEES, COSTS AND ENHANCEMENT**
14 **AWARD; AND DECLARATION OF ZACHARY CROSNER IN SUPPORT OF**
15 **MOTION FOR ATTORNEYS’ FEES, COSTS AND ENHANCEMENT AWARD**

16 on all interested parties in this action by placing a true copy thereof enclosed in sealed envelopes
17 addressed as follows:

18 Jerry Wayne Pearson Jr., Esq. 19 Young Wooldridge LLP 20 1800 30th Street, Fourth Floor 21 Bakersfield, CA 93301-1919	22 Zachary Crosner, Esq. 23 Michael Crosner, Esq. 24 Crosner Legal, PC 25 345 Reeves Dr., Suite 2 26 Beverly Hills, CA 90212
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27 X (BY FIRST CLASS MAIL) I am readily familiar with the business' practice for
28 collection and processing of correspondence for mailing, and that correspondence,
with postage thereon fully prepaid, will be deposited with the United States Postal
Service on the date noted below in the ordinary course of business, at Fresno,
California.

_____ (BY PERSONAL SERVICE) I caused such envelopes to be delivered by hand to
the office(s) of the addressee(s).

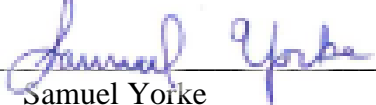
_____ (BY FACSIMILE) I caused the above-referenced document to be delivered by
facsimile to the facsimile number(s) of the addressee(s).

_____ (BY OVERNIGHT MAIL) I am readily familiar with the business' practice for
collection and processing of correspondence for mailing and that correspondence
will be deposited with an overnight carrier on the date noted below in the ordinary
course of business, in accordance with the overnight carrier’s method for billing
for same, and before the last scheduled pick-up time, at Fresno, California.

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EXECUTED on June 22, 2018, at Fresno, California.

 X (STATE) I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.



Samuel Yorke