

1 HAMMONDLAW, P.C.  
2 Julian Hammond (SBN 268489)  
3 jhammond@hammondlawpc.com  
4 Polina Brandler (SBN 269086)  
5 pbrandler@hammondlawpc.com  
6 Ari Cherniak (SBN 290071)  
7 acherniak@hammondlawpc.com  
8 1201 Pacific Ave., Suite 600  
9 Tacoma, WA 98402  
10 Tel.: (310) 601-6766  
11 Fax: (310) 295-2385  
12 *Attorneys for Plaintiffs and the Putative Classes*

10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
11 **COUNTY OF SAN BERNARDINO**

13 **MONICA JACKSON**, individually and on  
14 behalf of all others similarly situated,

15 Plaintiff,

16 vs.

17 **UNIVERSITY OF REDLANDS**, a California  
18 Non-Profit Corporation,

19 Defendant.

CASE NO. CIVSB2133143

**DECLARATION OF JULIAN HAMMOND  
IN SUPPORT OF PLAINTIFF'S MOTION  
FOR FINAL APPROVAL OF CLASS  
ACTION SETTLEMENT AND MOTION  
FOR APPROVAL OF ATTORNEYS' FEES  
AND COSTS, AND SERVICE AWARD FOR  
CLASS REPRESENTATIVE**

Date: September 18, 2023

Time: 9:00 a.m.

Dept. S26

Hon. David Cohn

1 I, Julian Hammond, declare as follows:

2 1. I am over the age of 18 and have personal knowledge of the facts set forth in this  
3 declaration and could and would testify competently to them.

4 2. I am a member in good standing of the Bar of the State of California. I am licensed to  
5 practice before all courts in the State of California.

6 3. I am the principal of my own law firm HammondLaw, P.C. (“HammondLaw” or “Class  
7 Counsel”) and counsel for the named Plaintiff Monica Jackson (“Plaintiffs”) and the Settlement Class  
8 Members.

9 4. My firm’s resume is attached as **Exhibit 1**.

10 5. I have no knowledge of the existence of any conflicting interests between my firm and  
11 any of its attorneys, on the one hand, and Plaintiffs or any Class Member, on the other.

12 **PERCENTAGE OF THE FUND ANALYSIS**

13 6. Class Counsel seek an attorneys’ fee award that is one third of the Gross Settlement (*i.e.*,  
14 \$233,333.33), which is the amount allowed under the Settlement. This amount is reasonable considering  
15 Class Counsel’s extensive experience in wage and hour class actions, the risk of non-recovery after  
16 substantial investment of time and resources undertaken by Class Counsel, the work done by Class  
17 Counsel on this case, the manner in which Counsel effectuated this result to ensure prompt payment to  
18 the Class by negotiating a Settlement within less than a year of filing this lawsuit, and the continued time  
19 and expense that Class Counsel will incur by administering the settlement fund should this Court grant  
20 approval.

21 7. California courts, routinely award fees in the amount of one third or more of the common  
22 fund in similar wage and hour cases brought by class counsel, including *Angelina Harrold v California*  
23 *Family Health LLC*, Case No. 34-2022-00323409 (Sacramento County Superior Court) (August 17,  
24 2023) (approving fees of 35% of \$223,000 representative action settlement); *Carr et al v Konica Minolta*  
25 *Business Solutions U.S.A., Inc.*, Case No. 21CV001245 (Alameda County Superior Court) (June 27,  
26 2023)( approving fees of 1/3 of \$1,247,907.53 class settlement); *Castillo v. Holy Names University*, Case  
27 No. HG21097245 (Alameda County Superior Court, May 2, 2023) (approving fees of 1/3 of \$907,701  
28 wage and hour class settlement); *Glor, et al v. iHeartMedia+ Entm’t, Inc.*, Case No. 22CV005286 (Cal.  
Sup. Ct. Alameda Cnty. February 14, 2023) (approving fees of 1/3 of \$1,220,000 in a wage and hour  
class settlement); *Cassidy v. Keyence Corporation of America*, Case No. 21CV382350 (Santa Clara  
County Superior Court, February 8, 2023) (approving fees of a 1/3 of \$300,000 PAGA settlement);  
*Burleigh v. National University*, Case No. MSC21-00939 (Contra Costa Cty. Sup. Ct.) (Aug. 26, 2022)

1 (approving fees of 40% of \$925,000 class settlement); *Costa v. University of Antelope Valley*, Case No.  
2 21STCV18531 (Los Angeles County Superior Court) (August 23, 2022) (approving fees of a 1/3 of  
3 \$150,000 PAGA settlement); *Parsons v. La Sierra University*, Case No. CVRI2000104 (Riverside  
4 County Superior Court, May 19, 2022)(approving fees of a 1/3 of \$578,220 wage and hour class  
5 settlement); *Chindamo v. Chapman University*, Case No. 30-2020-01147814-CU-OE-CXC (Orange  
6 County Superior Court) (April 15, 2022) (approving fees of 1/3 of \$1,150,000 wage and hour class  
7 settlement); *Sweetland-Gil v. University of the Pacific*, Case No. STK-CV-UOE-2019-0014682 (San  
8 Joaquin County Superior Court) (March 4, 2022) (approving fees of 1/3 of \$1,800,000 class settlement);  
9 *Senese v. University of San Diego*, Case No. 37-2019-00047124-CU-OE-CTL (San Diego County  
10 Superior Court) (February 8, 2022) (approving fees of 1/3 of \$3,892,750 class settlement); and many  
11 other cases.

12 8. In my professional experience, percentage-of-the-fund awards are frequently used as the  
13 basis for awarding successful plaintiff's attorneys their fees in common fund settlements. My  
14 understanding is that the courts' bases for favoring percentage-of-the-fund awards in common fund  
15 settlements include (1) fairly compensating the attorneys based on the benefits brought to the class; (2)  
16 providing an incentive for counsel to efficiently litigate cases, rather than spend excessive hours to  
17 prolong litigation and justify a higher lodestar; (3) providing incentive for settlement, which is  
18 particularly preferred in class actions; (4) equitably spreading the attorneys' fees among class members  
19 who benefit from their work at a rate that closely mirrors percentages paid on individual contingency fees  
20 cases; and (5) relieving some of the workload on an overtaxed judicial system while still providing  
21 fairness to the class through judicial oversight of class settlements.

22 9. Class Counsel's fee request is justified under these factors. Class Counsel agreed to  
23 represent Plaintiff and the putative Classes on a contingency basis, and further agreed to advance all  
24 litigation costs. Class Counsel also took on this case despite the known risks associated with Plaintiff's  
25 claims and the Class allegations, as described in detail in my Declaration in Support of Preliminary  
26 Approval filed December 27, 2022, and the unpredictable risks that are common to most complex  
27 employment class actions that develop only over the course of the litigation. Such unpredictable factors  
28 include, of course, the possibilities of changes or developments in the law and actions by defendants or  
defense counsel. Despite all of this, Class Counsel were able to obtain a very favorable settlement in a  
relatively short time after filing this lawsuit.

10 10. The requested percentage of the distribution is in line with (or lower than) the fee that my  
11 firm would have expected if we had negotiated individual retainer agreements with each Class Member.

1 Such an award ensures that we can receive an appropriate fee for the risks undertaken by our firm and  
2 the benefit conferred to the Class, particularly when it would be impossible *ex ante* to enter a fair fee  
3 arrangement with all the members of the Class.

4 **LODESTAR-MULTIPLIER ANALYSIS**

5 11. Plaintiff’s Counsel has calculated its combined lodestar amount (reasonable hours times  
6 reasonable hourly rates) to be \$132,267 through August 23, 2023. Plaintiff’s Counsel billing records are  
7 attached hereto as **Exhibit 2**. To the extent the records contain privileged/confidential information, the  
8 submission of Plaintiff’s Counsel billing records are not intended to, and do not waive, attorney-client  
9 privilege, attorney work product, or any other applicable privilege or immunity.

10 12. In this section of the declaration, I provide a summary of the general tasks performed by  
11 HammondLaw at each stage of the litigation in order to assist the Court in evaluating the reasonableness  
12 of the hours submitted by Plaintiffs. I have divided the time spent litigating this case into four separate  
13 phases. Phase I consists of pre-filing work including fact investigation, case analysis, and drafting of  
14 pleadings. Phase II consists of discovery and preparation for mediation. Phase III consists of attendance  
15 at mediation and negotiations of the settlement agreement. Phase IV consists of post settlement motions  
16 (preliminary and final approval), notice administration, and correspondence with Class Members.

17 **PHASE I WORK**

18 13. Phase I consisted of pre-filing fact investigation and drafting pleadings. The total time  
19 expended by HammondLaw on these tasks was 41.9 hours for a lodestar of \$32,237.50, as follows:

	Hammond	Cherniak	Brandler	Barnes	Total
Fact Investigation	10.10	1.50	5.20	0	<b>16.80</b>
Pleadings	1.60	6.60	6.50	0	<b>14.70</b>
Hearings	1.10	6.60	1.00	1.70	<b>10.40</b>
<b>Total</b>	<b>12.80</b>	<b>14.70</b>	<b>12.70</b>	<b>1.70</b>	<b>41.90</b>

20 14. The “Fact Investigation” work included researching and analyzing Defendant’s policies  
21 and relevant law to determine the validity of Plaintiff’s claims prior to sending the PAGA Notice;  
22 reviewing documents provided by Plaintiff Jackson; researching publicly available information about  
23 Defendant; corresponding with Plaintiff Jackson to obtain information necessary for the PAGA Notice  
24 and Complaints; obtaining Plaintiff Jackson’s personnel file; and reviewing and analyzing the settlement  
25 documents in *Moreira v. University of Redlands*, No. Case No. CIVDS1913813 (San Bernardino Cnty.  
26 Super. Ct.), a class and PAGA settlement which included claims similar to those alleged here on behalf  
27 of Adjunct Professors.

1 15. The “Pleadings” work included drafting, reviewing and discussing the PAGA Notice;  
2 drafting a Complaint, and First Amended Complaint; discussing the PAGA Notice and Complaints with  
3 Plaintiff Jackson; and reviewing Defendant’s Answers\.

4 16. The “Hearings” work included drafting case management conference statements and/or  
5 stipulations; appearing at the initial case management conference; reviewing and serving case  
6 management conference orders; and arranging for Court appearances.

7 **PHASE II WORK**

8 17. Phase II consisted of discovery and mediation preparation. The total time expended by  
9 Plaintiff’s Counsel on these tasks was 57.7 hours for a lodestar of \$41,185, as follows:

	Hammond	Cherniak	Brandler	Total
Discovery / Data Analysis	2.10	10.60	6.80	<b>19.50</b>
Mediation Prep	4.30	21.50	12.40	<b>38.20</b>
<b>Total</b>	<b>6.40</b>	<b>32.10</b>	<b>19.20</b>	<b>57.70</b>

11 18. The “Discovery and Data Analysis” work included drafting informal discovery prior to  
12 mediation; meeting and conferring with Defendant, via email and phone, regarding informal discovery;  
13 and reviewing and analyzing data and documents provided by Defendant including (1) the size of the  
14 Adjunct Professor Class, (2) the number of workweeks, pay periods, and online credits taught, (3) a  
15 sample of wage statements and Course Assignment letters issued to Adjunct Professors, (4) Plaintiff’s  
16 Personnel File, (4) the Faculty Handbook, (5) Academic Calendars, (6) Payroll Schedules, and (7) a  
17 spreadsheet of trainings completed by Adjunct Professors. Defendant also produced (8) the  
18 Reimbursement Class size, (9) the number of workweeks, pay periods, and months worked by the  
19 Reimbursement Class, (10) a list of online courses taught during the relevant period, and (11) Expense  
20 Reimbursement Policies and Procedures.

21 19. The “Mediation Preparation” work included meeting and conferring with Defendant  
22 regarding mediators and mediation dates; drafting a mediation brief with a detailed legal and factual  
23 analysis of Plaintiff’s claims, discussion of Defendant’s actual and anticipated contentions, and a detailed  
24 damages model based on Plaintiff’s analysis of the class data, including class sizes, pay period worked  
25 by each class, average hourly rates, and remote work expensed incurred by Class Members; conducting  
26 an online survey of Adjunct Class Members regarding their claims and interviewing Adjunct CMs;  
27 selecting and assembling supporting exhibits for these briefs; and discussing the scope of the case and  
28 mediation strategy among Plaintiff’s Counsel.

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**PHASE III WORK**

20. Phase III consisted of the mediation and settlement negotiations. The total time expended by Plaintiff’s Counsel on these tasks was 20.6 hours for a lodestar of \$15,870, as follows:

	Hammond	Cherniak	Brandler	Total
Mediation Attendance	3.00	-	3.50	<b>6.50</b>
Post Mediation Settlement	1.80	4.20	8.10	<b>14.10</b>
<b>Total</b>	<b>4.80</b>	<b>4.20</b>	<b>11.60</b>	<b>20.60</b>

21. The “Mediation Attendance” work included attending the mediation via Zoom with Lou Marlin.

22. The “Post Mediation Settlement” work included continued negotiations to reach settlement, followed by negotiating the settlement structure, class definitions, escalator clause, allocation of the Gross Settlement between the classes; the Release language, and other key terms; and reviewing, and drafting the Settlement Agreement and Class Notice

**PHASE IV WORK**

23. Phase IV consisted of obtaining approval of the Settlement and overseeing the administration of Notice to the Class. This work included drafting a detailed preliminary approval motion and supporting declaration with an in-depth analysis of each of Plaintiff’s claims, the underlying allegations, Defendant’s defenses, the strength of each defense, and maximum and realistic liability on each claim; reviewing the class data, settlement calculations, and the Notice prior to mailing; reviewing the weekly reports circulated by the Settlement Administrator; reviewing and editing the Settlement Administrator’s Declaration; drafting the final approval motion; and time spent drafting the fees motion, final approval motion, the instant declaration and declarations of Plaintiffs, and compiling time and costs for submitting to the Court. The total time expended by Plaintiff’s Counsel on these tasks was 69.8 hours for a lodestar of \$42,975, as follows:

Hammond	Cherniak	Brandler	Greenfield	Total
2.9	15.30	25.90	25.7	<b>69.8</b>

**PLAINTIFF’S COUNSEL’S QUALIFICATIONS**

24. The following paragraphs summarize each attorney’s qualifications:

**a. Julian Hammond**

25. *Qualifications and Experience.* I have been practicing law since 2000. I was admitted as a Solicitor in New South Wales in 2000. In 2002, I was admitted to the New York State Bar, and in 2002 I was admitted as a Barrister in New South Wales. As a Barrister, from approximately 2002 to 2008, I

1 first-chaired four cases and second-chaired at least 10 cases. I also advised high profile institutional  
2 clients and advised and represented individuals and groups of individuals in a wide variety of matters,  
3 including pharmaceutical product liability, oil-spill, eminent domain and other real estate matters, and  
4 breach of contract. Thereafter and for the majority of my career I have represented plaintiffs in  
5 employment and consumer cases. From 2008 until 2010, I worked with Ackermann & Tilajef, P.C. in  
6 Los Angeles, California where I worked with employees in a number of wage and hour class actions, as  
7 well as small groups of clients in sexual discrimination, FMLA discrimination, retaliation and similar  
8 cases.

9 26. In 2010 I founded my firm HammondLaw, P.C. Since the founding of my firm, I have been  
10 lead or co-lead counsel in over 50 employment and consumer class actions in state and federal courts in  
11 California and Washington state. I represented employees across a variety of industries, including outside  
12 salespersons in the liquor distribution industry and in the photocopier distribution industry securing  
13 settlements against major players in both industries for violations of Labor Code § 2802 and securing  
14 significant increases in the amount of money they received for expense reimbursement. I also represented  
15 thousands of truck drivers in California, securing settlements and compensation changes going forward  
16 against the largest trucking companies in the United States for unpaid wages and premium pay. I have  
17 also represented employees who have worked as pet groomers, fitness instructors, adjunct instructors,  
18 and account executives and sales employees.

19 27. My firm was also the first firm in the country to bring cases and secure settlements  
20 pursuant to the Automatic Renewal Law §§ 17600, *et seq.* (“ARL”) and the UCL. As lead or co-lead  
21 counsel we secured the largest settlement thus far under the ARL and UCL in *Siciliano, et al. v. Apple,*  
22 *Inc.*, Case No. 1:13-CV-257676 (Santa Clara County Superior Court, November 5, 2018) (\$16,500,000  
23 settlement on behalf of approximately 4,000,000 consumers). We also secured settlements under the  
24 ARL and the UCL in *Goldman v. Lifelock*, Case No. 1-15-cv-276235 (Santa Clara County Superior Court  
25 Feb. 5, 2016) (\$2,500,000 settlement on behalf of approximately 320,000 consumers); *Davis v. Birchbox*  
26 *Inc.*, Case No. 3:15-cv-498-BEN-BSG (S.D. Cal. Oct 17, 2016) (settlement in form of Birchbox credits  
27 for approximately 150,000 consumers); *Kruger v. Kiwi Crate*, Case No. 1-13-CV-254550 (Santa Clara  
28 County Superior Court July 2, 2015)) (claims made settlements on behalf of consumers); and *Gargir v.*  
*SeaWorld Inc.*, Case No. 37-2015-00008175-CU-MC-CTL (San Diego County Superior Court October  
21, 2016) (\$500,000 settlement on behalf of 88,000 subscribers).

29 28. Since 2016, my firm has been the leader in prosecuting wage and hour adjunct instructor  
30 cases in the state. My firm has successfully recovered at least \$42 million dollars in damages and statutory

1 and civil penalties in twenty-nine class actions. My firm also recently litigated one adjunct class action  
2 all the way through to trial in which the Class prevailed on a wage statement claim, and the judgment  
3 was recently affirmed on appeal. *See Gola v. University of San Francisco*, 90 Cal. App. 5th 548 (2023).  
4 My firm also recently secured victory on an arbitration issue in a consumer case, which was also affirmed  
5 on appeal. *See Fisher v. MoneyGram International*, 66 Cal. App. 5th (2023).

6 29. My firm was also on the Executive Committee in the MDL case titled *In re Ashley*  
7 *Madison Customer Data Security Breach Litigation*, Case No. MDL 2669 (E.D. Mis. Dec. 9, 2015)  
8 (\$11.2 million claims-made settlement on behalf of approximately 39 million Ashley Madison users  
9 alleging privacy violations); and is currently co-lead counsel in *In Re Betterhelp, Inc. Data Disclosure*  
10 *Cases*, Case No. 23-cv-01033-RS (N.D. Cal. July 24, 2023).

11 **b. Adrian Barnes**

12 30. *Qualifications and Experience.* Mr. Barnes is a recognized employment law and  
13 consumer protection attorney, with over 12 years of experience. Since graduating from law school, Mr.  
14 Barnes has spent the majority of his career representing the interests of employees and union members  
15 in labor and employment cases. Mr. Barnes has represented clients in more than 20 arbitrations, before  
16 the PERB, and before the NLRB. Mr. Barnes has also been appointed class counsel in more than 40 class  
17 actions brought on behalf of employees and consumers, and has secured settlements totaling at least \$10  
18 million. Mr. Barnes graduated from the University of California, Berkeley, in 2001, and from Columbia  
19 Law School, in 2007, where he was a member of the *Columbia Law Review* and received the Emil  
20 Schlesinger Labor Law Prize.

21 **c. Polina Brandler**

22 31. *Qualifications and Experience.* Ms. Brandler's practice has focused on wage and hour  
23 and consumer class actions for over a decade. Ms. Brandler has been responsible for all facets of wage  
24 and hour actions, from pre-filing investigation, discovery, and motion practice, settlement negotiations,  
25 trial, appeal and/or settlement approval. She has been certified as class counsel in more than 45 class  
26 actions, including numerous wage and hour cases. She was one of the primary attorneys litigating the  
27 *Fisher v. MoneyGram* case, which, as discussed above, resulted in an important victory for consumers  
28 on an arbitration issue. Ms. Brandler also second chaired the trial in this case. Prior to joining  
HammondLaw, Ms. Brandler clerked for the Honorable Anita H. Dymant of the Appellate Division of  
the Los Angeles Superior Court from 2009 to 2012. Ms. Brandler received her B.A. in history cum laude  
from the Macaulay Honors College at the City University of New York in 2005, and her J.D. from the  
Benjamin N. Cardozo School of law in 2009. While in law school, Ms. Brandler was an intern for the



1 Honorable Sandra L. Townes of the Southern District of New York where she assisted in drafting two  
2 published decisions.

3 **c. Ari Cherniak**

4 32. *Qualifications and Experience.* Mr. Cherniak has extensive class action litigation  
5 experience. Mr. Cherniak’s practice has focused on wage and hour employment and consumer class  
6 action since 2010, during which time he has been appointed, along with other members of the  
7 HammondLaw Team, as class counsel in over 70 class actions. Mr. Cherniak handles all aspects of  
8 litigation, including drafting pleadings, motions/oppositions, briefs, and discovery, and brings to our team  
9 an extensive knowledge of procedural requirements. He received his B.S. in Philosophy cum laude from  
10 Towson University in 2007, and his J.D. from Tulane Law School in 2011.

11 **d. Steven Greenfield:**

12 33. *Qualifications and Experience.* Mr. Greenfield has over 7 years of legal experience. Mr.  
13 Greenfield graduated from Yeshiva University, New York, in 1996, where he was valedictorian from the  
14 Sy Syms School of Business, and from University of Pennsylvania Law School, in 1999, where he  
15 graduated in the top 25% of his class. Mr. Greenfield was admitted to the New York Bar in 2000. Since  
16 graduating from law school, Mr. Greenfield has focused his legal career on tax and corporate law.  
17 Starting in December 2022, Mr. Greenfield has focused on wage and hour and consumer class actions.  
18 Mr. Greenfield sat for the California Bar Exam on July 25, 2023.

19 **HOURS SPENT ON LITIGATION ARE REASONABLE**

20 34. I was responsible for managing Plaintiff’s Counsel’s work including the work of other  
21 attorneys employed to assist with litigation. In managing the case, I made every effort to litigate this  
22 matter efficiently by coordinating the work of HammondLaw attorneys, and others who worked on this  
23 case, minimizing duplication, and assigning tasks in a time and cost-efficient manner, based on the  
24 timekeepers’ experience levels and talents. In connection with the preparation of this declaration, Mr.  
25 Cherniak reviewed the time records of the attorneys who billed to this matter and exercised billing  
26 judgment to delete and/or reduce certain time entries based on his experience in similar lodestar  
27 calculation and billing judgment determinations in other complex cases.

28 35. In my professional judgment, there is no question that the involvement of each of the  
attorneys in the case was necessary to provide adequate and effective representation to Plaintiffs in this  
complex litigation. I was mainly involved in the case strategy and settlement negotiations, and Ms.  
Brandler and Mr. Cherniak were primarily responsible for the day-to-day litigation, with assistance from  
Mr. Barnes and Mr. Greenfield. This structure led to efficient and cost-effective representation. The

1 instances where multiple attorneys contributed to the same task (for example, the mediation brief) were,  
2 in my professional judgment, necessary to ensure coordination and accuracy, and to capture the particular  
3 expertise of each attorney.

4 36. It is my opinion and professional judgment that the hours spent by Plaintiff’s Counsel  
5 were both reasonable and necessary to the effective representation of our client and the Class. My  
6 opinion is informed by my involvement as lead counsel, and over a decade of experience in litigating  
7 many large class actions in which, similar to this case, it was necessary to field and manage a team of  
8 lawyers, with different levels of experience and types of expertise, to carry out the work required by the  
9 case

10 **REASONABLE HOURLY RATES**

11 37. California Courts recently approved HL’s hourly 2023 rates in *Harrold v California*  
12 *Family Health LLC*, Case No. 34-2022-00323409 (Sacramento County Superior Court) (August 11,  
13 2023); *Castillo, et al. v. Holy Names University, Inc.*, Case No. 22CV005286 (Alameda County Superior  
14 Court, May 2, 2023 ; *Harris v. Southern New Hampshire University*, Case No. RG21109745 (Alameda  
15 County Superior Court, May 17, 2023); and *Carr et al v Konica Minolta Business Solutions U.S.A., Inc.*,  
16 Case No. 21CV001245 (Alameda County Superior Court) (June 27, 2023) (awarding 2.1 multiplier  
17 calculated using my firm’s 2023 rates).

18 38. Indeed, based on my knowledge of billing rates and practices and surveys and court  
19 decisions I have reviewed, I believe that our hourly billing rates shown in the table immediately below  
20 are consistent with the rates charged by comparable attorneys for similar class action work and complex  
21 litigation, including particular firms that regularly prosecute or defend employment class actions and  
22 other complex litigation; and that the rates we charge are reasonable for attorneys of our experience,  
23 reputation, and expertise practicing complex and class action litigation.

2023 Rates		
Attorney/Timekeeper	Year Admitted	Rate
Julian Hammond, Principal	2000	\$925
Adrian Barnes, Sr. Counsel	2007	\$775
Polina Brandler, Counsel	2010	\$750
Ari Cherniak, Associate	2011	\$650
Steven Greenfield	2000	\$425

24 39. HammondLaw’s slightly lower 2022 hourly rates have been approved by a California  
25 Court in *Glor v. iHeart Media + Entm’t, Inc.*, Case No. 22CV005286 (Alameda County Superior Court,  
26

February 14, 2023)(approving Class Counsel’s hourly rates as reasonable, and within the range of market rates that attorneys with similar levels of skill, experience and reputation for handling matters of similar complexity); *Cassidy v. Keyence Corporation of America*, Case No. 21CV382350 (Santa Clara County Superior Court, February 8, 2023); *Rodriguez v. River City Bank*, Case No. 1-13-cv-257676 (Sacramento County Superior Court, October 26, 2022); *Burleigh v. National University*, Case No. MSC21-00939 (Contra Costa County Superior Court, Aug. 26, 2022); *Costa v. University of Antelope Valley*, Case No. 21STCV18531 (Los Angeles County Superior Court, August 23, 2022); *Parsons v. La Sierra University*, Case No. CVRI2000104 (Riverside County Superior Court, May 19, 2022); *Chindamo v. Chapman University*, Case No. 30-2020-01147814-CU-OE-CXC (Orange County Superior Court, April 15, 2022); *Sweetland-Gil v. University of the Pacific*, Case No. STK-CV-UOE-2019-0014682 (San Joaquin County Superior Court, March 4, 2022); and *Senese v. University of San Diego*, Case No. 37-2019-00047124-CU-OE-CTL (San Diego County Superior Court, February 8, 2022).

**REQUESTED MULTIPLIER IS REASONABLE**

40. The requested attorneys’ fees represent a multiplier of 1.76 to Plaintiff’s Counsel’s current lodestar. HammondLaw, P.C. has calculated its combined lodestar amount as of August 23, 2023 (reasonable hours times reasonable hourly rates) to be \$132,267 as follows:

Attorney/Timekeeper	Rate	Hours	Lodestar
Julian Hammond, Principal	\$925	26.9	\$24,882.50
Adrian Barnes Attorney	\$775	1.7	\$1,317.50
Polina Brandler, Associate	\$750	69.4	\$52,050.00
Ari Cherniak, Associate	\$650	66.3	\$43,095.00
Steven Greenfield, Attorney	\$425	25.7	\$10,922.50
		<b>190.0</b>	<b>\$132,267.50</b>

41. I estimate that Class Counsel will spend an additional 20 hours finalizing the final approval papers, appearing at the final approval hearing, and seeing the Settlement through to its conclusion, which is not included in Class Counsel’s lodestar. Thus, the requested fees will represent an even smaller percentage of Class Counsel’s lodestar by the time this case is concluded.

42. My firm has been awarded multipliers in many similar wage and hour cases that settled in less than a year after the case was filed, with essentially no motion practice, and courts awarded my firm a similar or higher multiplier in many of these cases including *Carr et al v Konica Minolta Business Solutions U.S.A., Inc.*, Case No. 21CV001245 (Alameda County Superior Court) (June 27, 2023) (awarding 2.1 multiplier) *Glor v. iHeart Media + Entm’t, Inc.*, Case No. 22CV005286 (Alameda County Superior Court, February 14, 2023)(finding the fees request justified under the lodestar/multiplier

1 analysis and awarding 2.12 multiplier); *Burleigh v. Brandman University*, Case No. 30-2020-01172801-  
2 CU-OE-CXC (Orange County Superior Court, January 27, 2023) (awarding 2.1 multiplier); *Chindamo*  
3 *v. Chapman University*, Case No. 30-2020-01147814-CU-OE-CXC (Orange County Superior Court)  
4 (April 15, 2022)(awarding 1.92 multiplier); *Sweetland-Gil v. University of the Pacific*, Case No., STK-  
5 CV-UOE-2019-0014682 (San Joaquin County Superior Court, March 4, 2022) (awarding 2.52  
6 multiplier); *Senese v. University of San Diego*, Case No. 37-2019-00047124-CU-OE-CTL (San Diego  
7 County Superior Court, February 8, 2022) (awarding 2.98 multiplier); *Stupar et al. v. University of La*  
8 *Verne*, Case No. 19STCV333363 (Los Angeles County Superior Court, October 14, 2021) (awarding  
9 2.48 multiplier); *Normand v. Loyola Marymount University*, Case No. 19STCV17953 (Los Angeles  
10 County Superior Court, September 9, 2021) (awarding 3.53 multiplier because “counsel should not be  
11 disadvantaged for efficient litigation tactics and that lowering the percentage-of-gross fee award could  
12 encourage inefficient ligation”); *Mooiman et al. v. Saint Mary’s College of California*, Case No. C19-  
13 02092 (Contra Costa County Superior Court, June 10, 2021) (awarding 2.0 multiplier); *Peng v. The*  
14 *President and Board of Trustees of Santa Clara College*, Case No. 19CV348190 (Santa Clara County  
15 Superior Court, April 21, 2021) (awarding 2.75 multiplier); *Morse v Fresno Pacific University*, Case No.  
16 19-CV-04350 (Merced County Superior Court, April 6, 2021) (awarding a 3.13 multiplier); *Harris-*  
17 *Foster v. University of Phoenix*, Case No. RG19019028 (Alameda County Superior Court, March 17,  
18 2021) (awarding a 3.05 multiplier); *Granberry v. Azusa Pacific University*, Case No. 19STCV28949  
19 (Los Angeles County Superior Court) (March 5, 2021) (awarding 1.77 multiplier); and *Stempien v.*  
20 *DeVry University, Inc.*, No. RG19002623 (Alameda County Superior Court, June 30, 2020) (awarding a  
21 2.46 multiplier).

22 43. My understanding is that the basis for approving multipliers include (1) the significant  
23 contingency risk assumed by Counsel in accepting the representation; (2) the novel and complex nature  
24 of the case; (3) the exceptional results achieved and the importance of the rights at stake; and (4) the  
25 preclusion of other employment that resulted from the intensive work required by this case. All four of  
26 these factors support Class Counsel’s requested multiplier.

27 **A. Contingent Risk**

28 44. My firm undertook and litigated this case on a contingent fee basis, assuming a significant  
risk that the litigation would yield no recovery and leave us uncompensated for 190 attorney hours (as  
of August 23, 2023), as well as nearly \$15,000 in out-of-pocket and anticipated costs. The risk of  
nonpayment was very real as Defendant raised several potentially meritorious defenses.

1           45.     At preliminary approval, I calculated Defendant's maximum exposure for all of the Class  
2 Members' claims as \$2,111,830. The \$700,000 settlement represented 33% of the maximum damages.  
3 After applying discounts for the risks discussed below, I calculated Defendant's realistic exposure  
4 as \$1,195,870. The \$700,000 settlement represents 59% of the realistic damages.

5           46.     As discussed in the preliminary approval papers, there was a significant risk that Plaintiff  
6 would recover nothing for the Adjunct Professor Class in light of Defendant's arguments that Defendant  
7 maintained a written policy and practice requiring Adjunct Professors to record all time worked and  
8 prohibited any off-the-clock work, and thus the APs were paid for training time because they submitted  
9 their training time on their timesheets.

10           47.     Defendant also contended that it paid out \$744,659 in expense reimbursements to its  
11 employees during the Reimbursement Claim Period, and all remote expenses that were submitted were  
12 reimbursed. Moreover, most of the Reimbursement Claim CMs returned to work to the office by summer  
13 2021 so Defendant had no liability after that. In addition, Defendant contended that any actual remote  
14 work expenses incurred by the Reimbursement Claim Class were much lower than Plaintiff estimated.

15           48.     Defendant also contended that Plaintiff would not be able to certify the Adjunct or  
16 Reimbursement Claim Class. With respect to Adjunct Professors, whether they attended training,  
17 whether the training was mandatory, whether they submitted their hours and were paid, and whether  
18 Defendant knew or should have known about each individual Adjunct's training, would lead to multiple  
19 individualized inquires. With respect to Reimbursement CMs, which departments and schools they  
20 worked in, and when they started and ended to work-from-home, would lead to multiple individualized  
21 inquires as well.

22           49.     After a decade of practice as the principal of my own law firm, I am familiar with the  
23 significant financial risks associated with litigating contingency cases. In any contingency case, there is  
24 a possibility that the attorneys will never recover their fees, even after spending years on a matter, and  
25 investing substantial resources. Attorneys agree to undertake this risk only if they believe they will be  
26 able to receive a premium for doing so if they succeed, such as that reflected by an enhancement to the  
27 lodestar. At my firm, and to my personal knowledge, other firms like ours, we are able to undertake  
28 risky and expensive wage and hour cases only because of the availability of an enhanced fee award in  
cases where we prevail, and the case-specific factors warrant one. Indeed, there have been cases in which  
our firm recovered either no fees and was forced to absorb our out-of-pocket costs, or a small fraction of  
our fees because Defendant prevailed on a defense, or Defendant went bankrupt.

1                   **B. Skill Displayed in Presenting Novel and Complex Case**

2           50. As an experienced wage and hour litigator, I am familiar with the inherent complexities  
3 in class and representative wage and hour cases including issues of class certification and litigating legal  
4 questions that fall within the many unsettled areas of wage and hour law. Plaintiffs and my firm took on  
5 the responsibility of representing the interests of over 1,100 employees as well as the interests of the  
6 State of California.

7           51. Even if Plaintiff certified all or some of her claims, whichever claims cleared that hurdle  
8 would face trial. Regardless of the outcome at trial, the losing party would likely appeal, which would  
9 take years to resolve. Plaintiff's Counsel has been litigating a case on behalf of University of San  
10 Francisco's adjunct instructors for over five years, with a petition for review just recently denied by the  
11 with the Supreme Court. The uncertainties of continued litigation presented a very real risk that Plaintiff  
12 would be unable to litigate their class claims at all and put Class Members at a risk of recovering nothing.  
13 Instead, this settlement provides an early resolution of a dispute, and CMs will recover in the relatively  
14 near future if the settlement receives final approval. Therefore, I believe the settlement is in the best  
15 interests of the Classes.

16                   **C. Significance of the Results Obtained**

17           52. Plaintiff obtained excellent results in this case under the circumstances, with average and  
18 high payments to Adjunct Professor Class Members of \$132 and \$512.64; and average and high  
19 payments to Reimbursement Claim Class Members of \$334.80 and \$877.53.

20                   **D. Preclusion of Other Employment**

21           53. To meet the needs of the case, my firm had to divert attorney time that would otherwise  
22 have been spent on the firm's other wage and hour class actions.

23                                   **REQUESTED COSTS ARE REASONABLE**

24           54. HammondLaw has incurred (or will incur) \$14,964.50 in out-of-pocket litigation  
25 expenses summarized as follows:

26 ///  
27  
28

Mediation	\$7,000.00
San Bernardino Docket Retrieval	\$100.00
Rezac Meyer	\$2,539.00
Witness Location/ Survey	\$5,000.00
Technology hosting	\$110.00
LWDA	\$75.00
Final Approval Filing (anticipated)	\$250.00
<b>TOTAL</b>	<b>\$14,964.50</b>

55. Mediation costs represent half of the mediator fee of the private mediator who assisted the parties during the all-day mediation which was fundamental to reaching settlement.

56. Rezac / San Bernardino Superior Court Docket Retrieval costs were reasonably necessary for filing and serving pleadings in this case and for research.


57. Survey / witness locator costs were reasonably necessary for Plaintiff's investigation and factual development of their claims.

58. PAGA Notice cost was the payment to the LWDA for Plaintiff's initial PAGA Notice.

59. Final Approval Filing/ Service costs are anticipated costs of filing and serving the Motion for Final Approval and Motion for Fees and Costs.

60. Plaintiff's Counsel has (or will) incur \$10,035.50 less than the \$25,000.00 provided for in the Settlement which will increase the share of each Settlement Class Members.

I declare under penalty of perjury under the laws of the United States and the State of California that the foregoing is true and correct. Executed on August 24, 2023.

  
 \_\_\_\_\_  
 Julian Hammond

# **EXHIBIT 1**



**Approved California Wage and Hour Cases**

- ***Angelina Harrold v California Family Health LLC dba California Family Fitness***, Case No. 34-2022-00323409 (Sacramento County Superior Court) (August 17, 2023) (Labor Code § 2699 et seq. representative action settlement for \$223,000 for violation of Labor Code §§ Labor Code §§ 1194, 510, 226.7, 512, 226(a), 201-203, and 2802 on behalf of 374 fitness instructors);
- ***Carr et al v Konica Minolta Business Solutions U.S.A., Inc.***, Case No. 21CV001245 (Alameda County Superior Court) (June 27, 2023) (certifying HammondLaw as class counsel for \$1,247,907.53 settlement of Labor Code §§ 1194, 226(a), 226.7, 510, and 201-203 claims on behalf of 269 sales representatives and Labor Code § 2802 claims on behalf of 890 other employees);
- ***Harris v Southern New Hampshire University***, Case No. RG21109745 (Alameda County Superior Court) (May 12, 2023) (certifying HammondLaw as co-class counsel for \$1,475,000 settlement of Labor Code §§ 1194, 226(a), 226.2, 226.7, 510 512, 201-203, and 2802 claims on behalf of 480 adjunct instructors);
- ***Castillo v Holy Names University***, Case No. HG21097245 (Alameda County Superior Court) (May 2, 2023) (certifying HammondLaw as class counsel for \$970,701.38 settlement of Labor Code §§ 226(a), 226.2, 226.7, 512, 1194, 201-203, and 2802 claims on behalf of 454 part-time instructors; Labor Code § 2802 claims on behalf of 563 other employees who worked remotely; and Labor Code § 226(a) claims on behalf of 682 employees who received inaccurate wage statements);
- ***Marantz v Laguna College of Art and Design***, Case No. 30-2021-01194814-CU-OE-CXC (Orange County Superior Court) (April 21, 2023) (certifying HammondLaw as class counsel for \$825,000 settlement of Labor Code §§ 1194, 226(a), 226.2, 226.7, 512, 201-203, and 2802 claims on behalf of 295 adjunct instructors; and Labor Code § 2802 claims on behalf of 191 other employees);
- ***Glor v iHeart Media + Entertainment***, Case No. 22CV005286 (Alameda County Superior Court) (February 14, 2023) (certifying HammondLaw as class counsel for \$1,220,000 settlement of Labor Code §§ 226(a), 510, 1194, and 201-203 claims on behalf of 206 account executives and Labor Code § 2802 claims on behalf of 1,154 other employees);
- ***Cassidy v Keyence Corporation of America***, Case No. 21CV382350 (Santa Clara County Superior Court) (February 8, 2023) (Labor Code § 2699 et seq. representative action settlement for \$300,000 for violation of Labor Code §§ 226(a), 512, 203, and 2802 on behalf of 151 sales representatives and Labor Code § 2802 claims on behalf of 18 other employees);
- ***Burleigh v. Brandman University***, Case No. 30-2020-01172801-CU-OE-CXC (Orange County Superior Court) (January 27, 2023) (certifying HammondLaw as class counsel for \$1,550,000 settlement of Labor Code §§ 1194, 226(a), 226.2, 226.7, 512, 201-203, claims on behalf of 1,757 adjunct instructors and Labor Code § 2802 claims on behalf of 555 other employees);
- ***Burleigh v. Walden University LLC and Laureate Education, Inc.***, Case No. RG21106062 (Alameda County Superior Court) (December 9, 2022)

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(certifying HammondLaw as co-class counsel for \$815,000 settlement of Labor Code §§ 1194, 226(a), 226.2, 226.7, 203, 2802, and 2699, claims on behalf of 244 adjunct instructors);

- ***Burleigh v. National University***, Case No. MSC21-00939 (Contra Costa County Superior Court) (August 26, 2022) (certifying HammondLaw as co-class counsel for \$925,000 settlement of Labor Code § 2802 claim on behalf of 1,802 instructors);
- ***Costa v. University of Antelope Valley***, Case No. 21STCV18531 (Los Angeles County Superior Court) (August 23, 2022) (Labor Code § 2699 et seq. representative action settlement for \$150,000 for violation of Labor Code §§ 1194, 226(a), 226.2, 226.7, 510, 512, 203, and 2802 on behalf of 55 instructors and Labor Code § 2802 claims on behalf of 54 other employees);
- ***Parson v. La Sierra University***, Case No. CVRI2000104 (Riverside County Superior Court) (May 19, 2022) (certifying HammondLaw as class counsel for \$578,220 settlement of Labor Code §§ 1194, 226(a), 226.2, 226.7, 203, claims on behalf of 381 adjunct instructors and Labor Code § 2802 claims on behalf of 739 other employees);
- ***Chindamo v. Chapman University***, Case No. 30-2020-01147814-CU-OE-CXC (Orange County Superior Court) (April 15, 2022) (certifying HammondLaw as co-class counsel for \$1,150,00 settlement of Labor Code §§ 1194, 226(a), 226.2, 226.7, 203, claims on behalf of 1,374 adjunct instructors and Labor Code § 2802 claims on behalf of 4,120 other employees);
- ***Sweetland-Gil v. University of the Pacific***, Case No. STK-CV-UOE-2019-0014682 (San Joaquin County Superior Court) (March 4, 2022) (certifying HammondLaw as class counsel for \$1,800,000 settlement of Labor Code §§ 1194, 226(a), 226.2, 226.7, and 203 claims on behalf of 1,100 adjunct instructors);
- ***Senese v. University of San Diego***, Case No. 37-2019-00047124-CU-OE-CTL (San Diego County Superior Court) (February 8, 2022) (certifying HammondLaw as co-class counsel for \$3,892,750 settlement of Labor Code §§ 1194, 226(a), 226.2, 226.7, and 203 claims on behalf of 2,071 adjunct instructors);
- ***Solis et al. v Concordia University Irvine***, Case No. 30-2019-01114998-CU-OE-CXC (Orange County Superior Court) (February 3, 2022) (certifying HammondLaw as class counsel for \$890,000 settlement of Labor Code §§ 1194, 226(a), 226.2, 226.7, 203, and 2802 claims on behalf of 778 adjunct instructors);
- ***McCoy et v Legacy Education LLC***, Case No. 19STCV2792 (Los Angeles County Superior Court) (November 15, 2021) (Labor Code § 2698 et seq. representative action settlement for \$76,000 for violation of Labor Code §§ 1194, 226(a), 226.7, 512, 203, and 2802 on behalf of 31 instructors);
- ***Merlan v Alliant International University***, Case No. 37-2019-00064053-CU- OE-CTL (San Diego County Superior Court) (November 2, 2021) (certifying HammondLaw as co-class counsel for \$711,500 settlement of Labor Code §§ 1194, 226(a), 226.2, 226.7, and 203 claims on behalf of 803 adjunct instructors);
- ***Stupar et al. v University of La Verne***, Case No. 19STCV33363 (Los Angeles County Superior Court) (October 14, 2021) (certifying HammondLaw as class counsel for \$2,450,000 settlement of Labor Code §§ 1194, 226(a), 226.2, 226.7, 512, and 203 claims on behalf of 1,364 adjunct instructors);

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- ***Normand et al. v Loyola Marymount University***, Case No. 19STCV17953 (Los Angeles County Superior Court) (September 9, 2021) (certifying HammondLaw as class counsel for \$3,400,000 settlement of Labor Code §§ 1194, 226(a), 226.2, 226.7, and 203 claims on behalf of 1,655 adjunct instructors);
- ***Veal v Point Loma Nazarene University***, Case No. 37-2019-00064165-CU-OE-CTL (San Diego County Superior Court) (August 27, 2021) (certifying HammondLaw as class counsel for \$711,500 settlement of Labor Code §§ 1194, 226(a), 226.2, 226.7, and 203 claims on behalf of 670 adjunct instructors);
- ***Pillow et al. v Pepperdine University***, Case No. 19STCV33162 (Los Angeles County Superior Court) (July 28, 2021) (certifying HammondLaw as class counsel for \$940,000 settlement of Labor Code §§ 1194, 226(a), 226.2, 226.7, and 203 claims on behalf of 1,547 adjunct instructors);
- ***Moore et al v Notre Dame De Namur University***, Case No. 19-CIV-04765 (San Mateo County Superior Court) (July 1, 2021) (certifying HammondLaw as class counsel for \$882,880 settlement of Labor Code §§ 1194, 226(a), 226.2, 226.7, and 203 claims on behalf of 397 adjunct instructors);
- ***Mooiman et al. v Saint Mary's College of California***, Case No. C19-02092 (Contra Costa County Superior Court) (June 10, 2021) (certifying HammondLaw as class counsel for \$1,700,000 settlement of Labor Code §§ 1194, 226(a), 226.2, 226.7, and 203 claims on behalf of 760 adjunct instructors and Labor Code Code § 226(a) claim on behalf of 2,212 other employees);
- ***Peng v The President and Board of Trustees of Santa Clara College***, Case No. 19CV348190 (Santa Clara County Superior Court) (April 21, 2021) (certifying HammondLaw as class counsel for \$1,900,000 settlement of Labor Code §§ 1194, 226(a), 226.2, 226.7, and 203 claims on behalf of 1,017 adjunct instructors and Labor Code Code § 226(a) claim on behalf of 5,102 other employees);
- ***Morse v Fresno Pacific University***, Case No. 19-CV-04350 (Merced County Superior Court) (April 6, 2021) (certifying HammondLaw as class counsel for \$1,534,725 settlement of Labor Code §§ 1194, 226(a), 226.2, 226.7, 512 and 203 claims on behalf of 861 adjunct instructors);
- ***Miner, et al. v ITT Educational Services, Inc.***, Case No. 3:16-cv-04827-VC (N.D. Cal.) (March 19, 2021) (certifying HammondLaw as class counsel for \$5.2 million settlement of Labor Code §§ 1194, 226(a), 226.2, 226.7, 512 and 2802 claims on behalf of 1,154 adjunct instructors);
- ***Harris-Foster v. University of Phoenix***, Case No. RG19019028 (Alameda County Superior Court, March 17, 2021) (certifying HammondLaw as class counsel for \$2,863,106 settlement of Labor Code §§ 1194, 226(a), 226.2, 226.7 and 2802 putative class action on behalf of 3,447 adjunct instructors);
- ***Granberry v. Azusa Pacific University***, Case No. 19STCV28949 (Los Angeles County Superior Court, March 5, 2021) (certifying HammondLaw as class counsel for \$1,112,100 settlement of Labor Code §§ 1194, 226(a), 226.2, 226.7 and 2802 claims on behalf of 1,962 adjunct instructors);
- ***Ott v. California Baptist University***, Case No. RIC1904830 (Riverside County Superior Court, January 26, 2021) (certifying HammondLaw as co-class

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counsel for \$700,000 settlement of Labor Code §§ 1194, 226(a), 226.2, 226.7 and 512 claims on behalf of 958 adjunct instructors);

- ***Pereltsvaig v. Cartus Corporation***, Case No. 19CV348335 (Santa Clara County Superior Court, January 13, 2021) (certifying HammondLaw as class counsel in \$300,000 settlement of Labor Code §§ 226.8(a), 1194, 226(a), 226.7, 510, 512, and 2802 claims on behalf of 126 instructors);
- ***Morrison v. American National Red Cross***, Case No. 19-cv-02855-HSG (N.D. Cal., January 8, 2021) (certifying HammondLaw as class counsel in a \$377,000 Settlement of Labor Code §§ 1194, 226(a), 226.7, 510, 512 and 2802 claims on behalf of 377 instructors who taught training courses);
- ***Brown v. Cernx***, Case No. JCCP004971 (Cal. Sup. Ct. Alameda Cty. July 14, 2020) (certifying HammondLaw as co-class counsel in \$350,000 settlement of Labor Code §§ 1194, 226, 226.7, 510, 512, and 2802 claims on behalf of 309 amazon couriers);
- ***Stempien v. DeVry University***, Case No. RG19002623 (Cal. Sup. Ct. Alameda Cty. June 30, 2020) (certifying HammondLaw as class counsel for \$1,364,880 settlement Labor Code §§ 1194, 226, 226.2, 226.7, and 2802 claims on behalf of 498 adjunct instructors);
- ***McCoy v. Concorde.***, Case No. 30-2017-00936359-CU-OE-CXC (Cal. Sup. Ct. Orange Cty. July 2, 2019) (certifying HammondLaw as class counsel for \$2,500,000 settlement of Labor Code §§ 1194, 226, 226.7, and 512 putative claims on behalf of 636 adjunct instructors);
- ***Hogue v. YRC***, Case No. 5:16-cv-01338 (C.D. Cal. June 24, 2019) (certifying HammondLaw and A&T as co-class counsel for \$700,000 settlement of Labor Code §§ 1194, 226.2, 226.7, and 2802 claims on behalf of 225 truck drivers);
- ***Sands v. Gold's Gym***, Case No. BC660124 (Cal. Sup. Ct. Los Angeles Cty. March 20, 2019) (Labor Code § 2698 *et seq.* representative action settlement for \$125,000 for violation of Labor Code § 1194, 2802 and 246 *et seq.* claims on behalf of 106 fitness instructors);
- ***Garcia v. CSU Fullerton.***, Case No. 30-2017-00912195-CU-OE-CXC (Cal. Sup. Ct. Orange Cty. February 15, 2019) (certifying HammondLaw as class counsel for \$330,000 settlement of Labor Code §§ 1194, 226, 226.7, and 512 claims on behalf of 127 adjunct instructors);
- ***Pereltsvaig v. Stanford***, Case No. 17-CV-311521 (Cal. Sup. Ct. Santa Clara Cty. January 4, 2019) (certifying HammondLaw as class counsel for \$886,890 settlement of Labor Code §§ 1194, 226, 226.7, 512, 2802 and 2699 claims on behalf of 398 adjunct instructors);
- ***Moss et al. v. USF Reddaway, Inc.***, Case No. 5:15-cv-01541 (C.D. Cal. July 25, 2018) (certifying HammondLaw and A&T as co-class counsel for \$2,950,000 settlement of Labor Code §§ 1194, 226, 226.7, and 201-203 claims on behalf of 538 truck drivers);
- ***Beckman v. YMCA of Greater Long***, Case No. BC655840 (Cal. Sup. Ct. Los Angeles Cty. June 26, 2018) (Labor Code § 2698 *et seq.* representative

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action settlement for \$92,500 for violation of Labor Code § 1194 and 226(a) claims on behalf of 101 fitness instructors);

- ***Maldonado v. Heavy Weight Transport, Inc.***, Case No. 2:16-cv-08838 (C.D. Cal. December 11, 2017) (certifying HammondLaw and A&T as co-class counsel for \$340,000 settlement of Labor Code §§ 1194, 226, 226.2, 226.7, 226, 201-203, and 2699 claims on behalf of 160 truck drivers);
- ***Hillman v. Kaplan***, Case No. 34-2017-00208078 (Cal. Sup. Ct. Sacramento Cty. December 7, 2017) (certifying HammondLaw as class counsel for \$1,500,000 settlement of Labor Code §§ 1194, 226, 226.7, 201-203 and 2802 claims on behalf of 506 instructors);
- ***Bender et al. v. Mr. Copy, Inc.***, Case No. 30-2015-00824068-CU-OE-CXC (Cal. Sup. Ct. Orange Cty. October 13, 2017) (certifying HammondLaw and A&T as co-class counsel for \$695,000 settlement of Labor Code §2802 claims on behalf of approximately 250 outside sales representatives);
- ***Rios v. SoCal Office Technologies***, Case No. CIVDS1703071 (Cal. Sup. Ct. San Bernardino Cty. September 6, 2017) (certifying HammondLaw and A&T as co-class counsel for \$495,000 settlement of Labor Code §2802 claims on behalf of approximately 180 outside sales representatives);
- ***Russell v. Young's Commercial Transfer, Inc.***, Case No. PCU265656 (Cal. Sup. Ct. Tulare Cty. June 19, 2017) (certifying HammondLaw and A&T as co-class counsel for \$561,304 settlement of Labor Code §§ 1194, 226, 226.2, and 201-203 claims on behalf of 962 truck drivers);
- ***Keyes v. Valley Farm Transport, Inc.***, Case No. FCS046361 (Cal. Sup. Ct. Solano Cty. May 23, 2017) (certifying HammondLaw and A&T as co-class counsel for \$497,000 settlement of Labor Code § 226, 1194, 512 and 2698 *et seq.* claims on behalf of 316 truck drivers);
- ***Numi v. Interstate Distributor Co.***, Case No. RG15778541 (Cal. Sup. Ct. Alameda Cty. March 6, 2017) (certifying HammondLaw and A&T as co-class counsel for \$1,300,000 settlement of Labor Code §§ 1194, 226.2 and 2802 claims on behalf of approximately 1,000 truck drivers);
- ***Keyes v. Vitek, Inc.***, Case No. 2016-00189609 (Cal. Sup. Ct. Sacramento Cty. February 17, 2017) (\$102,000 settlement of PAGA representative action for violation of Labor Code § 226.8 on behalf of 90 truck drivers);
- ***Martinez v. Estes West dba G.I. Trucking, Inc.***, Case. BC587052 (Cal. Sup. Ct. L.A. Cty., April 4, 2017) (certifying HammondLaw and A&T as co-class counsel for \$425,000 settlement of Labor Code §§ 1194, 226, and 201-203 claims on behalf of approximately 156 truck drivers);
- ***Sansinena v. Gazelle Transport Inc.***, Case No. S1500-CV- No 283400 (Cal. Sup. Ct. Kern Cty. December 8, 2016) (certifying HammondLaw and A&T as co-class counsel for \$264,966 settlement of Labor Code §§ 1194, 226, and 201-203 claims on behalf of approximately 314 truck drivers);
- ***Cruz v. Blackbelt Enterprises, Inc.***, Case No. 39-2015-00327914-CU-OE-STK (Cal. Sup. Ct. San Joaquin Cty. September 22, 2016) (certifying HammondLaw and A&T as co-class counsel for \$250,000 settlement of Labor

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Code §§ 1194, 226, and 201-203 claims on behalf of approximately 79 truck drivers);

- ***Araiza et al. v. The Scotts Company, L.L.C.***, Case No. BC570350 (Cal. Sup. Ct. L.A. Cty. September 19, 2016) (certifying HammondLaw and A&T as co-class counsel for \$925,000 settlement of Labor Code §226, 510, 512 and 2802 claims on behalf of approximately 570 merchandisers; and Labor Code 226(a) claims on behalf of approximately 120 other employees);
- ***Dixon v. Hearst Television, Inc.***, Case No. 15CV000127 (Cal. Sup. Ct. Monterey Cty. September 15, 2016) (certifying HammondLaw as class counsel for a \$432,000 settlement of Labor Code § 2802 claims on behalf of approximately 55 outside sales representatives);
- ***Garcia et al. v. Zoom Imaging Solutions, Inc.*** SCV0035770 (Cal. Sup. Ct. Placer Cty. September 8, 2016) (certifying HammondLaw and A&T as co-class counsel for \$750,000 settlement of Labor Code § 510, 512, 1194 and 2802 claims on behalf of approximately 160 sales representatives and service technicians);
- ***O'Beirne et al. v. Copier Source, Inc. dba Image Source***, Case No. 30-2015-00801066-CU-OE-CXC (Cal. Sup. Ct. Orange Cty. September 8, 2016) (certifying HammondLaw and A&T as co-class counsel for \$393,300 settlement of Labor Code §2802 claims on behalf of approximately 132 outside sales representatives);
- ***Mead v. Pan-Pacific Petroleum Company, Inc.***, Case No. BC555887 (Cal. Sup. Ct. L.A. Cty. August 30, 2016) (certifying HammondLaw and A&T as co-class counsel for \$450,000 settlement of Labor Code §§ 1194, 226, and 201-203 claims on behalf of approximately 172 truck drivers);
- ***Lange v. Ricoh Americas Corporation***, Case No. RG136812710 (Cal. Sup. Ct. Alameda Cty. August 5, 2016) (certifying HammondLaw as co-class counsel for \$1,887,060 settlement of Labor Code § 2802 claims on behalf of approximately 550 sales representatives);
- ***Alcazar v. US Foods, Inc. dba US Foodservice***, Case No. BC567664 (Cal. Sup. Ct. L.A. Cty. March 18, 2016) (certifying HammondLaw and A&T as co-class counsel for a \$475,000 settlement on behalf of approximately 634 truck drivers);
- ***Harris v. Toyota Logistics***, Case No. C 15-00217 (Cal. Sup. Ct. Contra Costa Cty. February 9, 2016) (certifying HammondLaw and A&T as co-class counsel for \$550,000 settlement reached on behalf of approximately truck 125 drivers);
- ***Albanes v. Premium Retail Services Inc.***, Case No. RG1577982 (Cal. Sup. Ct. Alameda Cty. January 29, 2016) (Private Attorney General Act Settlement for \$275,000 on behalf of approximately 38 employees);
- ***Garcia et al v. Sysco Los Angeles, et al.***, Case No. BC560274 (Cal. Sup. Ct. L.A. Cty. November 12, 2015) (certifying HammondLaw and A&T as co-class counsel for a \$325,000 settlement on behalf of approximately 500 truck drivers);

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- ***Cooper et al. v. Savage Services Corporation, Inc.***, Case No. BC578990 (Cal. Sup. Ct. L.A. Cty. October 19, 2015) (certifying HammondLaw and A&T as co-class counsel for \$295,000 settlement on behalf of approximately 115 truck drivers);
- ***Gallardo et al. v. Canon Solutions America, Inc.***, Case No. CIVDSS1500375 (Cal. Sup. Ct. San Bernardino Cty. August 5, 2015) (certifying HammondLaw and A&T as co-class counsel for \$750,000 settlement on behalf for approximately 320 outside sales representatives);
- ***Glover v. 20/20 Companies, Inc.***, Case No. RG14748879 (Cal. Sup. Ct. Alameda Cty. August 3, 2015) (Private Attorney General Act Settlement for \$475,000 on behalf of approximately 273 independent contractors);
- ***Mayton et al v. Konica Minolta Business Solutions USA, Inc.***, Case No. RG12657116 (Cal. Sup. Ct. Alameda Cty. June 22, 2015) (certifying HammondLaw as co-class counsel for \$1,225,000 settlement on behalf for approximately 620 outside sales representatives);
- ***Garza, et al. v. Regal Wine Company, Inc. & Regal III, LLC***, Case No. RG12657199 (Cal. Sup. Ct. Alameda Cty. February 21, 2014) (certifying HammondLaw as class counsel for \$1.7 million settlement on behalf of approximately 317 employees);
- ***Moy, et al. v. Young's Market Co., Inc.***, Case No. 30-2011-00467109-CU-OE-CXC (Cal. Sup. Ct. Orange Cty. November 8, 2013) (certifying HammondLaw as co-class counsel for \$2.3 million settlement on behalf of approximately 575 sales representatives);
- ***Gagner v. Southern Wine & Spirits of America, Inc.***, Case No. 3:10-cv-10-04405 JSW (N.D. Cal. December 11, 2012) (certifying HammondLaw as co-class counsel for \$3.5 million settlement reached on behalf of approximately 870 sales representatives);
- ***Downs, et al. v. US Foods, Inc. dba US Foodservice***, Case No. 3:10-cv-02163 EMC (N.D. Cal. September 12, 2012) (certifying HammondLaw as co-class counsel for \$3 million settlement reached on behalf of approximately 950 truck drivers)

**Approved California Consumer Cases**

- ***Rodriguez v River City Bank***, Case No. 1-13-cv-257676 (Cal. Sup. Ct. Sacramento Cty., October 26, 2022) (approving \$140,000 settlement of Cal. Bus. Prof. Code §§ 17200, Civil Code § 1798.80 and 1798.100 claims on behalf of 16,417 River City Bank customers);
- ***Siciliano et al. v. Apple***, Case No. 1-13-cv-257676 (Cal. Sup. Ct. Santa Clara Cty. November 2, 2018) (approving \$16,500,000 settlement of Cal. Bus. Prof. Code §§ 17603, 17200, and 17535 claims on behalf of 3.9 million California subscribers to Apple InApp subscriptions);
- ***In re Ashley Madison Customer Data Security Breach Litigation***, Case No. 4:15-cv- 02669 JAR (E.D. Mis. November 20, 2017) (HammondLaw appointed to the executive committee in \$11.2 million settlement on behalf of 39

**HAMMONDLAW. P.C.**

1201 Pacific Ave, Suite 600, Tacoma, WA, 98402

million subscribers to ashleymadison.com whose information was compromised in the Ashley Madison data breach);

- ***Gargir v. SeaWorld Inc.***, Case No. 37-2015-00008175-CU-MC-CTL (Cal. Sup. Ct. San Diego Cty. October 21, 2016) (certifying HammondLaw and Berman DeValerio as co-class counsel in \$500,000 settlement of Cal. Bus. Prof. Code §§ 17603, 17200, and 17535 claims class action on behalf of 88,000 subscribers to SeaWorld’s annual park passes);
- ***Davis v. Birchbox, Inc.***, Case No. 3:15-cv-00498-BEN-BGS (S.D. Cal. October 14, 2016) (certifying HammondLaw and Berman DeValerio as co-class counsel in \$1,572,000 settlement of Cal. Bus. Prof. Code §§ 17603, 17200, and 17535 claims on behalf of 149,000 subscribers to Birchbox’s memberships);
- ***Goldman v. LifeLock, Inc.*** Case No. 1-15-cv-276235 (Cal. Sup. Ct. Santa Clara Cty. February 5, 2016) (certifying HammondLaw and Berman DeValerio as co-class counsel in \$2,500,000 settlement of Cal. Bus. Prof. Code §§ 17603, 17200, and 17535 claims on behalf of 300,000 California subscribers to Lifelock’s identity protection programs); and
- ***Kruger v. Kiwi Crate, Inc.*** Case No. 1-13-cv-254550 (Cal. Sup. Ct. Santa Clara Cty. July 2, 2015) (certifying HammondLaw as class counsel in \$108,000 settlement of Cal. Bus. Prof. Code §§ 17603, 17200, and 17535 claims on behalf of 5,400 California subscribers to Kiwi Crate’s subscriptions).



## **EXHIBIT 2**

JULIAN HAMMOND, ESQ. BILLING RECORDS

Date	Hours	Description	User
11/12/2021	0.1	JH read Plaintiff email re: resending updated retainer;	Julian Hammond
11/12/2021	0.1	JH send Plaintiff email re: resending updated retainer;	Julian Hammond
11/12/2021	0.1	JH send AC email re: drafting PAGA letter;	Julian Hammond
11/15/2021	0.1	JH send Plaintiff email re: request for contract docs;	Julian Hammond
11/15/2021	0.1	JH read Plaintiff email re: attached contract docs;	Julian Hammond
11/15/2021	0.1	JH read Plaintiff email re: attached paystub;	Julian Hammond
11/15/2021	0.1	JH send PB email re: link re HEERF reporting;	Julian Hammond
11/16/2021	0.1	JH read Plaintiff email re: attached payroll schedule;	Julian Hammond
11/16/2021	0.1	JH send PB email re: drafting complaint and revising PAGA letter;	Julian Hammond
11/16/2021	0.1	JH read PB email re: attached PAGA and complaint;	Julian Hammond
11/17/2021	2.3	research and investigation, reviewing docs online, and sent by client	Julian Hammond
11/17/2021	0.1	JH read Plaintiff email re: workplace training;	Julian Hammond
11/17/2021	0.1	JH read Plaintiff email re entering hours;	Julian Hammond
11/17/2021	0.1	JH read Plaintiff email re: contract and comms.;	Julian Hammond
11/17/2021	0.1	JH send Plaintiff email re: paystub with reimbursement;	Julian Hammond
11/17/2021	0.1	JH read Plaintiff email re: attached paystub with reimbursement;	Julian Hammond
11/17/2021	0.1	JH send Plaintiff email re: earlier wage statement;	Julian Hammond
11/17/2021	0.1	JH read Plaintiff email re: attached wage statement;	Julian Hammond
11/17/2021	0.1	JH send Plaintiff email re: wage statement hours;	Julian Hammond
11/17/2021	0.1	JH read Plaintiff email re: attached training paystub;	Julian Hammond
11/17/2021	0.1	JH send Plaintiff email re: pay explanation;	Julian Hammond
11/17/2021	0.1	JH read Plaintiff email re: training pay explanation;	Julian Hammond
11/17/2021	0.1	JH send Plaintiff email re: training hours and time cards;	Julian Hammond
11/17/2021	0.1	JH read Plaintiff email re: training hours and attached time cards;	Julian Hammond
11/17/2021	0.1	JH send Plaintiff email re: explanation of time cards;	Julian Hammond
11/17/2021	0.1	JH read Plaintiff email re: explanation of time cards;	Julian Hammond
11/17/2021	0.1	JH send AC email re: complaint from Moreira case	Julian Hammond
11/17/2021	0.1	JH read AC email re: attached complaint from Moreira case	Julian Hammond
11/17/2021	0.1	JH send AC email re: sending PAGA letter from Moreira case	Julian Hammond
11/17/2021	0.1	JH read AC email re: sending PAGA letter from Moreira case	Julian Hammond
11/17/2021	0.1	JH send PB email re: faculty resources and IT moodle;	Julian Hammond
11/18/2021	0.1	JH send Plaintiff email re: training videos;	Julian Hammond
11/18/2021	0.9	case discussion with PB - case theory, claims, reviewing and discussion documents	Julian Hammond
11/18/2021	0.1	JH read Plaintiff email re: moodle training videos;	Julian Hammond
11/18/2021	0.1	JH send Plaintiff email re: moodle training videos and paystubs;	Julian Hammond
11/18/2021	0.1	JH read Plaintiff email re: moodle training demo;	Julian Hammond
11/18/2021	0.1	JH read Plaintiff email re: security awareness training;	Julian Hammond
11/18/2021	0.1	JH send Plaintiff email re: emails received from Redlands;	Julian Hammond
11/18/2021	0.1	JH read Plaintiff email re: emails received from Redlands;	Julian Hammond
11/19/2021	0.1	JH read PB email re: client's contract date and training;	Julian Hammond
11/19/2021	0.1	JH read Plaintiff email re: contract date and trainings;	Julian Hammond
11/21/2021	0.1	JH read Plaintiff email re mandatory training;	Julian Hammond
11/21/2021	0.1	JH send Plaintiff email re: course information and pay history;	Julian Hammond
11/21/2021	0.1	JH read Plaintiff email re: course information and pay history clarification;	Julian Hammond
11/21/2021	0.1	JH read Plaintiff email re prep hours breakdown;	Julian Hammond
11/21/2021	0.1	JH send PB email re: moodle training demo video	Julian Hammond
11/21/2021	0.1	JH send PB email re: reimbursement info;	Julian Hammond
11/21/2021	0.1	JH send PB email re: link re adjunct faculty resources;	Julian Hammond
11/21/2021	1.2	investigation and research; review docs;	Julian Hammond
11/23/2021	0.1	JH read DLSE email re: attached requested PAGA notices;	Julian Hammond
11/23/2021	0.1	JH send AC email re: sending complaint in Moreira case	Julian Hammond
11/24/2021	0.1	JH send Plaintiff email re: request for pay stubs;	Julian Hammond
11/24/2021	0.1	JH read Plaintiff email re: request for pay stubs;	Julian Hammond
11/24/2021	0.1	JH read PB email re: moodle hours pay;	Julian Hammond
11/24/2021	0.1	JH send PB email re: sending case docs;	Julian Hammond
11/24/2021	0.1	JH read PB email re: pulling amended complaint Moreira case	Julian Hammond
11/24/2021	0.1	JH read PB email re: attached amended complaint from Moreira case	Julian Hammond
11/25/2021	0.1	JH send PB email re: discussing Moodle hours pay;	Julian Hammond
11/25/2021	0.1	JH read PB email re: discussing Moodle hours pay;	Julian Hammond

11/26/2021	0.1	JH read AC email re: attached Redlands answer from Moreira case	Julian Hammond
11/26/2021	0.1	JH read Plaintiff email re: downloading emails;	Julian Hammond
11/29/2021	0.1	JH read PB email re: attached PAGA notice;	Julian Hammond
11/29/2021	0.1	JH read PB email re: attached revised PAGA letter;	Julian Hammond
11/29/2021	0.1	JH read Plaintiff email re: relevant emails and attached paystubs;	Julian Hammond
11/29/2021	0.1	JH read Plaintiff email re: training email	Julian Hammond
11/30/2021	0.1	JH read PB email re: attached PAGA letter and complaint;	Julian Hammond
11/30/2021	0.1	JH read AC email re: attached revised complaint;	Julian Hammond
12/03/2021	0.1	JH read PB email re: sending out personnel file request.	Julian Hammond
12/03/2021	0.1	JH send PB email re: sending out personnel file request.	Julian Hammond
12/03/2021	0.1	JH read Plaintiff email re: request form;	Julian Hammond
12/08/2021	0.1	JH send OPC email re: update re accepting service;	Julian Hammond
12/08/2021	0.1	JH read OPC email re: update re accepting service;	Julian Hammond
12/10/2021	0.1	JH read Plaintiff email re contract hours	Julian Hammond
12/13/2021	0.1	JH read PL email re: attached personnel file records;	Julian Hammond
12/13/2021	0.1	JH read PB email re: personnel file records;	Julian Hammond
01/06/2022	0.1	JH send OPC email re: availability to discuss case;	Julian Hammond
01/06/2022	0.1	JH read OPC email re: availability to discuss case; update on accepting service	Julian Hammond
01/06/2022	0.1	JH read AC email re: update on service and conformed copies;	Julian Hammond
01/19/2022	0.1	JH read OPC email re: update on potential early mediation;	Julian Hammond
01/28/2022	0.1	JH read AC email re: attached amended complaint for review;	Julian Hammond
02/01/2022	0.1	JH read AC email re: attached FAC; discussion re edits;	Julian Hammond
02/08/2022	0.1	JH send OPC email re: follow up on mediation;	Julian Hammond
02/09/2022	0.1	JH send PB, AC email re: update on filing FAC;	Julian Hammond
02/25/2022	0.1	JH read Rezac Meyer email re: attached conformed copy of complaint;	Julian Hammond
03/03/2022	0.1	JH send AB, PB, AC email re: drafting discovery;	Julian Hammond
03/03/2022	0.1	JH read AC email re: attached CM order; discovery stayed;	Julian Hammond
03/14/2022	0.2	discuss case status and review contracts;	Julian Hammond
04/06/2022	0.1	JH read OPC email re: mediation agreement and proposed mediators;	Julian Hammond
04/07/2022	0.1	JH send AC email re: proposed mediator;	Julian Hammond
04/07/2022	0.1	JH send OPC email re: mediation availability;	Julian Hammond
04/08/2022	0.1	JH read AC email re: attached draft report and order; due date;	Julian Hammond
04/13/2022	0.1	JH read OPC email re: reserving mediation date;	Julian Hammond
04/13/2022	0.1	JH read Mediator email re: reserving mediation date;	Julian Hammond
04/13/2022	0.1	JH read OPC email re: mediation reservation;	Julian Hammond
04/13/2022	0.1	JH read Mediator email re: mediation reservation;	Julian Hammond
04/13/2022	0.1	JH read OPC email re: sending caption page re mediation reservation;	Julian Hammond
04/15/2022	0.1	JH read OPC email re: attached signed stip to continue CMC;	Julian Hammond
05/04/2022	0.1	JH read Plaintiff email re: follow up re case status;	Julian Hammond
05/04/2022	0.1	JH read AC email re: list of informal discovery;	Julian Hammond
05/10/2022	0.1	JH read Rezac Meyer email re: attached joint stip to continue CMC;	Julian Hammond
06/06/2022	0.1	JH read Plaintiff email re: arbitration clause	Julian Hammond
07/26/2022	0.1	JH read AC email re: initial CMC date; pushing off;	Julian Hammond
08/02/2022	0.1	JH read OPC email re: update re informal discovery;	Julian Hammond
08/08/2022	0.1	JH read AC email re: survey link for review;	Julian Hammond
08/08/2022	0.1	JH read OPC email re: finalizing document production;	Julian Hammond
08/15/2022	0.1	JH read AC email re: draft informal discovery requests;	Julian Hammond
08/17/2022	0.1	JH read OPC email re: comments re request for class data;	Julian Hammond
08/18/2022	0.1	JH send AC email re: edits to survey;	Julian Hammond
08/18/2022	0.1	JH read AC email re: plaintiff arbitration agreement;	Julian Hammond
08/18/2022	0.1	JH read OPC re: rescheduling mediation;	Julian Hammond
08/22/2022	0.5	JH email x14 w/ AC, OPC and mediator re: rescheduling mediation date;	Julian Hammond
08/23/2022	0.1	JH read mediator email re: mediation start time;	Julian Hammond
08/26/2022	0.1	JH read opc email re: Follow up re Plaintiff's Questions on Production;	Julian Hammond
09/13/2022	0.1	JH read OPC email re: Follow up re Plaintiff's Questions on Production;	Julian Hammond
09/13/2022	0.1	JH read OPC email re: employee data;	Julian Hammond
09/22/2022	0.1	JH read PB email re: plaintiff training/class info;	Julian Hammond
09/22/2022	0.1	JH read PB email re: attached draft mediation brief for review;	Julian Hammond
09/22/2022	1.4	review brief; discuss with PB	Julian Hammond
09/22/2022	0.1	JH send PB email re: finalizing mediation brief for review;	Julian Hammond

09/23/2022	0.1	JH read OPC email re: attached defendant's mediation brief;	Julian Hammond
09/23/2022	0.1	JH read OPC email re: additional reimbursement data;	Julian Hammond
09/28/2022	0.1	JH read OPC email re: attached documents produced;	Julian Hammond
09/28/2022	0.1	JH read plaintiff email re: attending mediation;	Julian Hammond
09/29/2022	3	attending mediation	Julian Hammond
09/29/2022	0.1	JH read PB email re: attached class date;	Julian Hammond
09/29/2022	0.1	JH read plaintiff email re: attending mediation; training info;	Julian Hammond
09/29/2022	0.2	JH email x7 with AC re: rescheduling CMC; staying discovery;	Julian Hammond
09/29/2022	0.1	JH read mediator email re: mediator's proposal;	Julian Hammond
10/06/2022	0.1	JH read OPC email re: update re defendant's position on statements;	Julian Hammond
10/12/2022	0.1	JH send mediator email re: mediator's proposal;	Julian Hammond
10/12/2022	0.1	JH read mediator email re: mediator's proposal;	Julian Hammond
10/13/2022	0.1	JH read AC email re: mediators proposal;	Julian Hammond
10/14/2022	0.1	JH read AC email re: attached court call notice and status report for CMC;	Julian Hammond
10/14/2022	0.1	JH read PB email re: Mediator's proposal	Julian Hammond
10/17/2022	0.2	JH read AB email re: CMC date to discuss settlement;	Julian Hammond
10/21/2022	0.1	JH read PB email re: Annual Training for Redlands;	Julian Hammond
10/27/2022	0.1	JH read PB email re: discussion with plaintiff re settlement;	Julian Hammond
10/27/2022	0.3	JH read PB, OPC, mediator email re: mediators proposal;	Julian Hammond
10/27/2022	0.1	JH read PB email re: discussion with OPC re PAGA letter, draft settlement;	Julian Hammond
11/03/2022	0.1	JH read PB email re: request draft settlement;	Julian Hammond
11/04/2022	0.1	JH read OPC email re: send draft settlement early/mid next week	Julian Hammond
11/17/2022	0.1	JH read PB email re: hearing date for Plaintiff's Motion for Preliminary Approval	Julian Hammond
11/17/2022	0.1	JH read PB email re: response re hearing date;	Julian Hammond
11/17/2022	0.2	JH read PB email re: attached draft Settlement Agreement with edits in redlines	Julian Hammond
11/29/2022	0.1	JH read PB email re: Request Settlement Agreement;	Julian Hammond
11/30/2022	0.1	JH read OPC email re: attached revised Settlement Agreement;	Julian Hammond
12/01/2022	0.1	JH read PB email re: edit re Settlement Agreement;	Julian Hammond
12/01/2022	0.1	JH read MK email re: Update on draft of MPA and Dec.	Julian Hammond
12/02/2022	0.1	JH read MK email re: Attached MPA and Dec along with and excel with settlement	Julian Hammond
12/27/2022	0.1	JH read PB email re: Attached filed copies of Notice of PI's Motion,	Julian Hammond
02/20/2023	0.1	JH read AC email re: hearing continued until 5/5/23;	Julian Hammond
05/02/2023	0.1	JH read AC email re: hearing info;	Julian Hammond
05/04/2023	0.1	JH read AC email re: granted preliminary approval, attached tentative rulings;	Julian Hammond
05/04/2023	0.1	JH send PB email re: Hearing Appearance	Julian Hammond
05/10/2023	0.1	JH read Phoenix email re: administration timeline after reviewing the case documents	Julian Hammond
05/15/2023	0.2	reviewing case files/docket and emails to see that all is taken care of post prelim app	Julian Hammond
06/14/2023	0.3	JH email x3 with PB re: discussion with class member re Settlement Notification	Julian Hammond
06/16/2023	0.1	JH read Phoenix email re: attached weekly report;	Julian Hammond
06/23/2023	0.1	JH read Phoenix email re: attached weekly report;	Julian Hammond
06/30/2023	0.1	JH read Phoenix email re: attached weekly report;	Julian Hammond
07/07/2023	0.1	JH read Phoenix email re: attached weekly report	Julian Hammond
07/14/2023	0.1	JH read Phoenix email re: attached weekly report	Julian Hammond
07/24/2023	0.1	JH read Phoenix email re: names of opt-outs	Julian Hammond
08/07/2023	0.2	JH email x2 with SG re: Final Approval and fees brief draft	Julian Hammond
08/14/2023	0.6	disc with PB and SG re questions re final approval and fees brief	Julian Hammond

ADRIAN BARNES, ESQ. BILLING RECORDS

Date	Hours	Description	User
07/26/2022	0.1	AB read AC email re: initial CMC date; pushing off;	Adrian Barnes
10/14/2022	0.4	Conference with AC regarding CMC; review CMC statement and prep for CMC	Adrian Barnes
10/14/2022	0.1	AB read AC email re: attached court call notice and status report for CMC;	Adrian Barnes
10/17/2022	0.9	Attend initial case management conference (court call); draft email to JH, PB, AC reporting same	Adrian Barnes
10/17/2022	0.2	AB send JH, PB,AC email re: CMC date to discuss settlement;	Adrian Barnes

POLINA BRANDLER, ESQ. BILLING RECORDS



Date	Hours	Description	User
11/15/2021	0.1	PB read Plaintiff email re: attached contract docs;	Polina Brandler
11/15/2021	0.1	PB read Plaintiff email re: attached paystub;	Polina Brandler
11/15/2021	0.1	PB read JH email re: link re HEERF reporting;	Polina Brandler
11/16/2021	0.1	PB read Plaintiff email re: attached payroll schedule;	Polina Brandler
11/16/2021	0.1	PB read JH email re: drafting complaint and revising PAGA letter;	Polina Brandler
11/16/2021	0.1	PB send JH, AC email re: attached PAGA and complaint;	Polina Brandler
11/17/2021	0.2	discussion with JH re complaint/paga and claims	Polina Brandler
11/17/2021	0.1	PB read Plaintiff email re entering hours;	Polina Brandler
11/17/2021	0.1	PB read Plaintiff email re: attached training paystub;	Polina Brandler
11/17/2021	0.1	PB read Plaintiff email re: explanation of time cards;	Polina Brandler
11/17/2021	0.1	PB read JH email re faculty resources and IT moodle;	Polina Brandler
11/18/2021	0.9	case discussion with JH - case theory, claims, reviewing and discussion documents	Polina Brandler
11/18/2021	0.1	PB read Plaintiff email re: moodle training demo;	Polina Brandler
11/18/2021	0.1	PB read Plaintiff email re: security awareness training;	Polina Brandler
11/19/2021	0.1	discussion with JH re claims	Polina Brandler
11/19/2021	0.1	PB read JH email re: client's contract date and training;	Polina Brandler
11/19/2021	0.1	PB send Plaintiff email re: contract date and training;	Polina Brandler
11/19/2021	0.1	PB read Plaintiff email re: contract date and trainings;	Polina Brandler
11/21/2021	0.1	PB read Plaintiff email re: email and docs re mandatory training;	Polina Brandler
11/21/2021	0.1	PB read Plaintiff email re prep hours breakdown;	Polina Brandler
11/21/2021	0.1	PB read JH email re: moodle training demo video	Polina Brandler
11/21/2021	0.1	PB read JH email re: reimbursement info;	Polina Brandler
11/21/2021	0.1	PB read JH email re: link re adjunct faculty resources;	Polina Brandler
11/23/2021	0.2	discussion with JH re claims	Polina Brandler
11/23/2021	0.1	PB read DLSE email re: attached requested PAGA notices;	Polina Brandler
11/24/2021	0.1	PB send JH email re: moodle hours pay;	Polina Brandler
11/24/2021	0.1	PB send AB email re: attached case docs; availability to discuss case;	Polina Brandler
11/24/2021	0.1	PB read JH email re: sending case docs;	Polina Brandler
11/24/2021	0.1	PB read AB email re: availability to discuss;	Polina Brandler
11/24/2021	0.1	PB send JH email re: pulling amended complaint ç	Polina Brandler
11/24/2021	0.1	PB send JH email re: attached amended complaint from Moreira case	Polina Brandler
11/25/2021	0.1	PB send JH email re: discussing Moodle hours pay;	Polina Brandler
11/25/2021	0.1	PB read JH email re: discussing Moodle hours pay;	Polina Brandler
11/25/2021	0.1	PB read JH email re: attached contract and stipend emails;	Polina Brandler
11/25/2021	0.6	discussing case facts/claims with JH	Polina Brandler
11/25/2021	0.2	discussing case facts/claims with JH	Polina Brandler
11/26/2021	0.1	PB send Plaintiff email re: downloading emails;	Polina Brandler
11/26/2021	0.1	PB read Plaintiff email re: downloading emails;	Polina Brandler
11/29/2021	0.3	edit/add to paga ltr	Polina Brandler
11/29/2021	0.5	review docs and add unpaid wages claim to paga ltr	Polina Brandler
11/29/2021	0.1	discussion with JH re editing paga ltr	Polina Brandler
11/29/2021	0.4	review Moreira settlement, add to paga letter	Polina Brandler
11/29/2021	0.2	edit paga letter based on Plaintiff's comments	Polina Brandler
11/29/2021	0.1	PB send JH email re: attached PAGA notice;	Polina Brandler
11/29/2021	0.1	PB send JH email re: attached revised PAGA letter;	Polina Brandler
11/29/2021	0.1	PB read Plaintiff email re: relevant emails and attached paystubs;	Polina Brandler
11/29/2021	0.1	PB read Plaintiff email re: training email	Polina Brandler
11/29/2021	0.1	PB send Plaintiff email re: attached draft PAGA for review;	Polina Brandler
11/29/2021	0.1	PB read Plaintiff email re: comments re PAGA letter;	Polina Brandler
11/29/2021	0.1	PB send Plaintiff email re: comments re PAGA letter;	Polina Brandler
11/30/2021	1.2	drafting complaint	Polina Brandler
11/30/2021	0.1	discussion with JH	Polina Brandler
11/30/2021	0.1	PB send JH email re: attached PAGA letter and complaint;	Polina Brandler
11/30/2021	0.1	PB read JH email re: sending and filing PAGA letter and complaint;	Polina Brandler
11/30/2021	0.1	PB send AC email re: sending and filing PAGA letter and complaint;	Polina Brandler
11/30/2021	0.1	PB read AC email re: attached revised complaint;	Polina Brandler
11/30/2021	0.1	PB send Plaintiff email re: comments re complaint;	Polina Brandler
11/30/2021	0.1	PB send Rezac Meyer email re: filing complaint;	Polina Brandler
11/30/2021	0.1	PB read Rezac Meyer email re: filing complaint;	Polina Brandler
11/30/2021	0.1	PB send Rezac Meyer email re: attached case initiation docs for filing;	Polina Brandler
11/30/2021	0.1	PB send PL email re: attached complaint for drafting cover sheet and summons;	Polina Brandler
11/30/2021	0.1	PB read PL email re: attached draft cover sheet and summons;	Polina Brandler
11/30/2021	0.1	PB send PL email re: edits to draft cover sheet and summons;	Polina Brandler
11/30/2021	0.1	PB read PL email re: attached revised draft cover sheet;	Polina Brandler
11/30/2021	0.1	PB send PL email re: filing complaint and cover sheet;	Polina Brandler
11/30/2021	0.1	PB read PL email re: filing complaint and cover sheet;	Polina Brandler
12/01/2021	0.1	PB send OPC email re: attached PAGA and complaint; service of process;	Polina Brandler
12/01/2021	0.1	PB send Rezac email re: advancing complex fee;	Polina Brandler
12/01/2021	0.1	PB read Rezac Meyer email re: advancing complex fee;	Polina Brandler
12/02/2021	0.1	PB read OPC email re: representing defendant;	Polina Brandler
12/03/2021	0.1	PB send JH email re: sending out personnel file request.	Polina Brandler
12/03/2021	0.1	PB read JH email re: sending out personnel file request.	Polina Brandler

12/03/2021	0.1	PB read Plaintiff email re: request form;	Polina Brandler
12/03/2021	0.1	PB send PL email re: sending personnel file request;	Polina Brandler
12/03/2021	0.1	PB read PL email re: sending personnel file request;	Polina Brandler
12/08/2021	0.1	PB read OPC email re: update re accepting service;	Polina Brandler
12/10/2021	0.1	PB read Plaintiff email re contract hours	Polina Brandler
12/10/2021	0.1	PB send Plaintiff email re: clarification re contract hours; attached PAGA letter and filed complaint;	Polina Brandler
12/10/2021	0.1	PB send AC email re: update re conformed complaint;	Polina Brandler
12/10/2021	0.1	PB read AC email re: update re conformed complaint;	Polina Brandler
12/13/2021	0.1	PB read PL email re: attached personnel file records;	Polina Brandler
12/13/2021	0.1	PB send JH, AB, AC email re: personnel file records;	Polina Brandler
01/06/2022	0.1	PB read AC email re: update on service and conformed copies;	Polina Brandler
01/28/2022	0.1	PB read AC email re: attached amended complaint for review;	Polina Brandler
02/01/2022	0.1	PB read AC email re: attached FAC; discussion re edits;	Polina Brandler
02/04/2022	0.1	PB send AC email re: attached redlined FAC;	Polina Brandler
04/06/2022	0.1	PB read OPC email re: mediation agreement and proposed mediators;	Polina Brandler
04/08/2022	0.1	PB read AC email re: attached draft report and order; due date;	Polina Brandler
04/12/2022	0.1	PB send OPC email re: proposed mediator and mediator availability;	Polina Brandler
04/13/2022	0.1	PB send OPC email re: mediation availability; attached stip to continue CMC;	Polina Brandler
04/14/2022	0.1	PB send Mediator email re: attached case page; mediation reservation info;	Polina Brandler
04/15/2022	0.1	PB read OPC email re: attached signed stip to continue CMC;	Polina Brandler
05/04/2022	0.1	PB read AC email re: list of informal discovery;	Polina Brandler
05/10/2022	0.1	PB read Rezac Meyer email re: attached joint stip to continue CMC;	Polina Brandler
05/24/2022	0.4	review pleadings and informal discovery requests/suggested edits	Polina Brandler
06/06/2022	0.1	PB read Plaintiff email re: arbitration clause	Polina Brandler
07/26/2022	0.1	PB read AC email re: initial CMC date; pushing off;	Polina Brandler
08/08/2022	0.1	PB read AC email re: survey link for review;	Polina Brandler
08/09/2022	0.1	PB send JH, AB, AC email re: attached downloaded mediation production;	Polina Brandler
08/15/2022	0.1	PB read AC email re: draft informal discovery requests;	Polina Brandler
08/18/2022	0.1	PB send AC email re: edits to survey;	Polina Brandler
08/18/2022	0.1	PB read AC email re: plaintiff arbitration agreement;	Polina Brandler
08/18/2022	0.1	PB read AC email re: plaintiff arbitration agreement;	Polina Brandler
08/18/2022	0.1	PB read OPC re: rescheduling mediation;	Polina Brandler
08/26/2022	0.1	PB read opc email re: Follow up re Plaintiff's Questions on Production;	Polina Brandler
09/19/2022	0.1	PB read OPC email re: response re class data;	Polina Brandler
09/19/2022	0.1	PB read AC email re: attached class data and mediation brief;	Polina Brandler
09/20/2022	0.6	disc with AC re informal discovery produced	Polina Brandler
09/20/2022	0.1	PB send AC email re: plaintiff's documents and emails;	Polina Brandler
09/21/2022	0.5	reviewing/editing mediation brief	Polina Brandler
09/21/2022	0.5	reviewing/editing mediation brief	Polina Brandler
09/21/2022	2.6	reviewing survey resp, docs provided by P and docs produced	Polina Brandler
09/21/2022	0.1	call vm and text to respondent/CM	Polina Brandler
09/21/2022	0.4	call vm, and call with survey respondent	Polina Brandler
09/21/2022	0.7	further editing mediation brief, including damages	Polina Brandler
09/22/2022	0.2	disc with PI re trainings	Polina Brandler
09/22/2022	0.1	call and vm to survey respondent	Polina Brandler
09/22/2022	0.1	call and vm to survey respondent	Polina Brandler
09/22/2022	0.1	call with survey respondent	Polina Brandler
09/22/2022	0.1	PB send JH email re: plaintiff training/class info;	Polina Brandler
09/22/2022	0.1	PB send JH, AC email re: attached draft mediation brief for review;	Polina Brandler
09/22/2022	0.1	PB read JH email re: finalizing mediation brief for review;	Polina Brandler
09/22/2022	0.8	reviewing further docs/ online sources	Polina Brandler
09/22/2022	3.8	further editing/finalizing mediation brief	Polina Brandler
09/22/2022	0.2	disc with JH re damages	Polina Brandler
09/22/2022	0.4	recal damages/fix up mediation brief	Polina Brandler
09/23/2022	0.1	call with Adjunct CM	Polina Brandler
09/23/2022	0.1	PB read OPC email re: attached defendant's mediation brief;	Polina Brandler
09/23/2022	0.1	PB read OPC email re: additional reimbursement data;	Polina Brandler
09/23/2022	0.1	PB send mediator email re: attached mediation brief and exhibits;	Polina Brandler
09/23/2022	0.1	PB read mediator email re: mediation participants;	Polina Brandler
09/23/2022	0.2	disc with AC (0.1), disc with JH (0.1)	Polina Brandler
09/23/2022	2.7	finalizing mediation brief	Polina Brandler
09/24/2022	0.1	PB send plaintiff email re: attached mediation brief and exhibits; mediation info;	Polina Brandler
09/25/2022	0.1	PB send mediator email re: mediation participants;	Polina Brandler
09/28/2022	0.1	PB read OPC email re: attached documents produced;	Polina Brandler
09/28/2022	0.1	PB read plaintiff email re: attending mediation;	Polina Brandler
09/28/2022	0.4	read Def's mediation brief	Polina Brandler
09/28/2022	0.4	review new data and docs sent by Def	Polina Brandler
09/28/2022	0.1	PB send plaintiff email re: zoom details for mediation;	Polina Brandler
09/29/2022	3	attending mediation	Polina Brandler
09/29/2022	0.5	mediation prep	Polina Brandler
09/29/2022	0.1	PB send JH email re: attached class date;	Polina Brandler
09/29/2022	0.1	PB read plaintiff email re: attending mediation; training info;	Polina Brandler

09/29/2022	0.1	PB send plaintiff email re: mediation update;	Polina Brandler
09/29/2022	0.1	PB read mediator email re: mediator's proposal;	Polina Brandler
09/29/2022	0.3	texts and call with Plaintiff re mediator/mediator's proposal	Polina Brandler
10/12/2022	0.1	PB read mediator email re: mediator's proposal;	Polina Brandler
10/13/2022	0.1	PB read MK email re: follow up re MOU;	Polina Brandler
10/13/2022	0.1	PB send MK email re: update re MOU;	Polina Brandler
10/14/2022	0.1	PB read AC email re: attached court call notice and status report for CMC;	Polina Brandler
10/14/2022	0.1	PB send plaintiff email re: Mediator's proposal	Polina Brandler
10/14/2022	0.1	PB send JH, AC email re: Mediator's proposal	Polina Brandler
10/17/2022	0.2	PB read AB email re: CMC date to discuss settlement;	Polina Brandler
10/21/2022	0.1	PB send JH email re: Annual Training for Redlands;	Polina Brandler
10/27/2022	0.3	disc with PI/Plaintiff re settlement	Polina Brandler
10/27/2022	0.4	disc with OPC (OPC M) re settlement/release	Polina Brandler
10/27/2022	0.1	PB send JH email re: discussion with plaintiff re settlement;	Polina Brandler
10/27/2022	0.3	PB email x7 with mediator, OPC re: mediators proposal;	Polina Brandler
10/27/2022	0.1	PB send JH,AB,AC email re: discussion with OPC re PAGA letter, draft settlement;	Polina Brandler
10/31/2022	0.1	search / submit lwd public records request for McCoy v. University of Redlands 2802 paga ltr	Polina Brandler
11/03/2022	0.1	PB send OPC email re: request draft settlement;	Polina Brandler
11/04/2022	0.1	PB read OPC email re: send draft settlement early/mid next week	Polina Brandler
11/16/2022	0.2	research re how to reserve a hearing date	Polina Brandler
11/16/2022	2.1	review/edit draft settlement agreement	Polina Brandler
11/17/2022	0.3	review/edit draft settlement agreement	Polina Brandler
11/17/2022	0.5	draft class notice	Polina Brandler
11/17/2022	0.1	disc with AC re review SA and class notice	Polina Brandler
11/17/2022	0.4	disc with AC (0.1), and (0.3) re settlement agreement/ structure	Polina Brandler
11/17/2022	0.1	PB send OPC email re: response re hearing date;	Polina Brandler
11/17/2022	0.2	PB email x3 with OPC re: reserving hearing date for the preliminary approval motion;	Polina Brandler
11/17/2022	0.2	PB send OPC email re: attached draft Settlement Agreement with edits in redlines;	Polina Brandler
11/29/2022	0.1	PB send OPC email re: Request Settlement Agreement;	Polina Brandler
11/30/2022	0.1	PB read OPC email re: attached revised Settlement Agreement;	Polina Brandler
12/01/2022	0.1	PB send OPC email re: edit re Settlement Agreement;	Polina Brandler
12/01/2022	0.1	PB read MK email re: Update on draft of MPA and Dec.	Polina Brandler
12/02/2022	0.1	PB read MK email re: Attached MPA and Dec along with and excel with settlement calculations.	Polina Brandler
12/06/2022	0.4	final review/clean up of SA, adding back release lang for two classes	Polina Brandler
12/08/2022	0.9	drafting class notice	Polina Brandler
12/08/2022	0.4	going over Settlement Agr with Plaintiff	Polina Brandler
12/09/2022	0.1	disc with Plaintiff re her decl	Polina Brandler
12/12/2022	2.4	editing prelim app mpa	Polina Brandler
12/12/2022	0.7	reviewing prelim app guidelines/reading other prelim and final app orders by the Court	Polina Brandler
12/14/2022	2.9	editing/drafting preliminary approval papers	Polina Brandler
12/14/2022	2.7	working out fees/costs and editing MPA based on decl	Polina Brandler
12/16/2022	1.9	finalize mpa/decl; draft PO and notice of mot.	Polina Brandler
12/16/2022	0.2	research e-filing prelim app	Polina Brandler
12/19/2022	0.1	PB read OPC email re: edits re Notice of Class Action Settlement;	Polina Brandler
12/19/2022	0.1	PB send OPC email re: Agree to edits re Notice of Class Action Settlement + request dates that works for OPC re prelim approval hearing;	Polina Brandler
12/20/2022	0.1	PB read OPC email re: availability for earliest prelim approval hearing;	Polina Brandler
12/21/2022	0.1	PB send Clerk email re:available hearing date for Plaintiff's Motion for Preliminary Approval of Class Action Settlement;	Polina Brandler
12/21/2022	0.1	PB read OPC email re: Pick earliest date that works for HL;	Polina Brandler
12/21/2022	0.1	PB send clerk email re: earliest date that works for HL;	Polina Brandler
12/21/2022	0.1	PB read OPC email re: file and request earliest hearing date;	Polina Brandler
12/22/2022	0.2	review/edit Pl's decl and send via docusign	Polina Brandler
12/22/2022	0.1	disc with AC re decl iso prelim app	Polina Brandler
12/22/2022	0.1	follow up with PI re decl	Polina Brandler
12/22/2022	0.1	PB send Plaintiff email re: preliminary approval motion + sending declaration for PI signature;	Polina Brandler
12/23/2022	0.4	finalize for filing/resending docs to client for PI decl/and text follow up	Polina Brandler
12/27/2022	0.7	filing prelim approval papers (finalizing/convert to pdf/signing/reviewing fax filing guidelines/filing out fax filing coversheet)	Polina Brandler
12/27/2022	0.2	2x calls with AC re fax filing/hard copies	Polina Brandler
12/27/2022	0.1	PB send OPC email re: Attached filed copies of Notice of Pl's Motion	Polina Brandler
12/27/2022	0.1	PB send AC email re: Review attached Coversheet;	Polina Brandler
12/27/2022	0.1	PB send AC email re: attached docs re Preliminary Approval of Class Action Settlement;	Polina Brandler
12/28/2022	0.5	zoom with Lola and a couple of calls re mailing hard copies	Polina Brandler
01/04/2023	0.1	PB read AC email re: Stipulation due date;	Polina Brandler
01/05/2023	0.1	checking case docket re Jan 11 CMC	Polina Brandler
01/05/2023	0.1	PB send AC email re: CMC vacated;	Polina Brandler
01/17/2023	0.1	call with Plaintiff re training time question	Polina Brandler
02/20/2023	0.1	PB read AC email re: hearing continued until 5/5/23;	Polina Brandler
04/21/2023	0.1	PB read Plaintiff email re: follow up re case;	Polina Brandler
04/21/2023	0.1	PB send Plaintiff email re: Update re case;	Polina Brandler
05/02/2023	0.1	PB read AC email re: hearing info;	Polina Brandler
05/04/2023	0.1	PB read AC email re: granted preliminary approval, attached tentative rulings;	Polina Brandler

05/04/2023	0.1	PB send OPC email re: attached Tentative Ruling granting preliminary, PI submit on the tentative	Polina Brandler
05/04/2023	0.1	PB read OPC email re: Def submit on the tentative; update re McCoy case;	Polina Brandler
05/04/2023	0.1	PB read JH email re: Hearing Appearance	Polina Brandler
05/04/2023	0.1	checking for tentative	Polina Brandler
05/05/2023	0.2	PB email x3 with OPC re: final approval hearing date;	Polina Brandler
05/05/2023	0.1	PB send Clerk email re: Plaintiff reviewed the tentative ruling posted on May 4, 2023 and submit on the tentative;	Polina Brandler
05/05/2023	0.1	PB send Plaintiff email re: Update re case;	Polina Brandler
05/05/2023	0.4	research re how to submit/email of jud assistant; disc with AC, and call re submitting with clerk;	Polina Brandler
05/09/2023	0.2	PB email x2 with AC re: Preliminary Order and Final Notice;	Polina Brandler
05/09/2023	0.1	PB send AC email re: Final Notice;	Polina Brandler
05/10/2023	0.1	PB read Phoenix email re: circulating an administration timeline after reviewing the documents	Polina Brandler
05/12/2023	0.1	call with clerk re final app hearing date	Polina Brandler
05/25/2023	0.3	PB email x3 with Phoenix re: preliminary calculations and formatted mailing documents;	Polina Brandler
05/30/2023	0.5	PB email x5 with OPC, Phoenix re: pay periods in PAGA;	Polina Brandler
05/30/2023	0.2	review settlement admin's spreadsheet with pay periods/cms, including going over docs	Polina Brandler
05/31/2023	0.1	call and vm for Settlement admin	Polina Brandler
06/01/2023	0.1	call with Jodey re pp numbers	Polina Brandler
06/02/2023	0.1	read email from OPC re pay periods, consider and respond	Polina Brandler
06/06/2023	0.2	PB email x2 with Phoenix re: confirmation to proceed with schedule to complete mailing;	Polina Brandler
06/13/2023	0.1	PB read Class member email re: Settlement Notification	Polina Brandler
06/14/2023	0.3	PB email x3 with JH re: discussion with class member re Settlement Notification;	Polina Brandler
06/14/2023	0.2	PB email x2 with Class member re: teaching status;	Polina Brandler
06/14/2023	0.1	disc w/ AC re notice to adjuncts	Polina Brandler
06/16/2023	0.1	PB read Phoenix email re: attached weekly report;	Polina Brandler
06/23/2023	0.1	PB read Phoenix email re: attached weekly report;	Polina Brandler
06/23/2023	0.2	PB email x2 with Plaintiff re: standard language for settlements	Polina Brandler
06/30/2023	0.1	PB read Phoenix email re: attached weekly report	Polina Brandler
07/07/2023	0.1	PB read Phoenix email re: attached weekly report	Polina Brandler
07/14/2023	0.1	PB read Phoenix email re: attached weekly report	Polina Brandler
07/24/2023	0.1	PB read Phoenix email re: names of opt-outs	Polina Brandler
07/26/2023	0.1	disc with AC re checklist for final approval	Polina Brandler
07/27/2023	0.5	review case file/prep docs to send to SG	Polina Brandler
07/27/2023	0.2	disc with AC re other cases and final approval checklist reqs	Polina Brandler
07/27/2023	0.1	disc with Lola re prep costs	Polina Brandler
07/27/2023	0.1	PB send SG email re: attached docs needed to draft the Motion for Final Approval, Motion for Attorneys' Fees, Hammond Declaration, Proposed Order	Polina Brandler
07/27/2023	0.2	PB email x2 with LA re: compiling costs;	Polina Brandler
07/27/2023	0.1	PB send SG email re: attached docs to draft the Motion for Final Approval and Fees,	Polina Brandler
07/27/2023	0.1	PB send Phoenix email re: requesting a draft declaration re notice results	Polina Brandler
07/27/2023	0.1	PB read Phoenix email re: request for caption page and final costs	Polina Brandler
07/28/2023	0.1	PB read LA email re: attached compiled costs and receipt/invoices	Polina Brandler
07/28/2023	0.2	PB email x2 with AC re: compiled costs and receipt/invoices	Polina Brandler
07/28/2023	0.1	PB send Phoenix email re: attached caption page	Polina Brandler
07/31/2023	0.1	review costs /add costs	Polina Brandler
07/31/2023	0.1	PB send Phoenix email re: final costs	Polina Brandler
08/04/2023	0.5	disc with SG re final approval, and looking up cost/billables for SG	Polina Brandler
08/04/2023	0.1	PB send Phoenix email re: follow up re phoenix declaration	Polina Brandler
08/04/2023	0.1	PB read Phoenix email re: attached Kevin Declaration re Settlement Notice Administration;	Polina Brandler
08/04/2023	0.1	PB send SG email re: compiled cost	Polina Brandler
08/04/2023	0.1	PB send SG email re: attached MPA iso Final Approval, JH Declaration, MPA iso Fees; Redland Administration costs;	Polina Brandler
08/04/2023	0.1	PB send SG email re: Total hours and lodestar	Polina Brandler
08/04/2023	0.1	PB send CT email re: attached MPA iso Motion for Preliminary Approval and JH Declaration;	Polina Brandler
08/07/2023	0.3	review Settlement Admin's decl and redline	Polina Brandler
08/07/2023	0.1	PB send SG email re: attached Kevin Declaration re Settlement Notice Administration;	Polina Brandler
08/07/2023	0.1	PB send Phoenix email re: attached comments/edits to Kevin Declaration re Settlement Notice Administration;	Polina Brandler
08/07/2023	0.1	disc with SG re final approval mtn	Polina Brandler
08/07/2023	0.1	PB send AC email re: attached edits re Kevin Lee Declaration re Settlement Notice Administration for review	Polina Brandler
08/07/2023	0.1	PB read AC email re: attached comments re Kevin Lee Declaration re Settlement Notice Administration for review	Polina Brandler
08/07/2023	0.1	PB send Phoenix email re: attached comments/edits to Admin Declaration re Settlement Notice Administration;	Polina Brandler
08/08/2023	0.2	PB email x2 with Phoenix re: updates to Admin Declaration re Settlement Notice Administration;	Polina Brandler
08/08/2023	0.1	PB read Phoenix email re: adding the names of opt outs to the Admin Declaration re ; attached updates	Polina Brandler
08/08/2023	0.1	PB send SG email re: attached lodestar activities;	Polina Brandler
08/14/2023	0.1	disc with JH re final app motions/ SG drafts/disc re process of drafting motion	Polina Brandler
08/14/2023	0.6	disc with JH and SG re questions re final approval and fees brief	Polina Brandler
08/14/2023	0.1	PB send Phoenix email re: request for final draft of Phoenix declaration and exhibits	Polina Brandler

08/14/2023	0.1	PB read Phoenix email re: attached executed declaration re settlement notice administration with exhibits	Polina Brandler
08/14/2023	0.1	PB send SG email re: attached Proof of Service on the LWDA for filing	Polina Brandler
08/14/2023	0.1	PB send SG email re: attached Proposed Order and Judgement Granting Final Approval;	Polina Brandler
08/14/2023	0.1	PB send SG email re: Exhibit 1	Polina Brandler

ARI CHERNIAK, ESQ. BILLING RECORDS

Date	Hours	Description	User
11/12/2021	0.1	AC read Plaintiff email re: resending updated retainer;	Ari Cherniak
11/12/2021	0.1	AC send PL email re: correct client email;	Ari Cherniak
11/12/2021	0.1	AC read JH email re: drafting PAGA letter;	Ari Cherniak
11/15/2021	0.3	draft PAGA Notice;	Ari Cherniak
11/16/2021	0.1	AC read PB email re: attached PAGA and complaint;	Ari Cherniak
11/16/2021	0.2	call with PB re: filing complaint;	Ari Cherniak
11/17/2021	0.1	AC send JH email re: attached complaint from Moreira case	Ari Cherniak
11/17/2021	0.1	AC read JH email re: attached complaint from Moreira case	Ari Cherniak
11/17/2021	0.1	AC read JH email re: sending PAGA letter from Moreira case	Ari Cherniak
11/17/2021	0.1	AC send JH email re: sending PAGA letter from Moreira case	Ari Cherniak
11/17/2021	0.1	AC send LWDA email re: PAGA request;	Ari Cherniak
11/17/2021	0.1	AC send PAGA admin email re: PAGA request;	Ari Cherniak
11/17/2021	0.2	search for PAGA Notice;	Ari Cherniak
11/23/2021	0.1	AC read DLSE email re: attached requested PAGA notices;	Ari Cherniak
11/23/2021	0.1	AC read JH email re: sending complaint in Moreira case	Ari Cherniak
11/26/2021	0.1	AC send JH email re: attached Redlands answer from Moreira case	Ari Cherniak
11/26/2021	0.2	pull answer from Moreira case;	Ari Cherniak
11/30/2021	0.1	AC read PB email re: sending and filing PAGA letter and complaint;	Ari Cherniak
11/30/2021	0.1	AC send PAGA admin email re: submitting initial PAGA notice;	Ari Cherniak
11/30/2021	0.1	AC read PAGA admin email re: submitting initial PAGA notice;	Ari Cherniak
11/30/2021	0.1	AC send JH email re: payment for PAGA notice;	Ari Cherniak
11/30/2021	0.1	AC read PB email re: payment for PAGA notice;	Ari Cherniak
11/30/2021	0.1	AC send Plaintiff email re: attached complaint for review;	Ari Cherniak
11/30/2021	0.1	AC read Plaintiff email re: comments re complaint;	Ari Cherniak
11/30/2021	0.1	AC send JH, PB email re: attached revised complaint;	Ari Cherniak
11/30/2021	0.1	AC send JH, PB email re: PAGA payment;	Ari Cherniak
11/30/2021	0.7	finalize/ file PAGA; edit complaint; call with LWDA re: notice;	Ari Cherniak
12/08/2021	0.1	AC read OPC email re: update re accepting service;	Ari Cherniak
12/10/2021	0.1	AC read PB email re: update re conformed complaint;	Ari Cherniak
12/10/2021	0.1	AC send PB email re: update re conformed complaint;	Ari Cherniak
12/13/2021	0.1	AC read PL email re: attached personnel file records;	Ari Cherniak
12/13/2021	0.1	AC read PB email re: personnel file records;	Ari Cherniak
01/06/2022	0.1	AC send JH, PB email re: update on service and conformed copies;	Ari Cherniak
01/18/2022	0.1	AC send OPC email re: update on early mediation;	Ari Cherniak
01/19/2022	0.1	AC read OPC email re: update on potential early mediation;	Ari Cherniak
01/24/2022	0.1	AC send OPC email re: e-mail service of process and sending notice of acknowledgement;	Ari Cherniak
01/24/2022	0.1	AC read OPC email re: e-mail service of process and sending notice of acknowledgement;	Ari Cherniak
01/24/2022	0.1	AC send PL email re: drafting notice of acknowledgement;	Ari Cherniak
01/24/2022	0.1	AC read PL email re: attached draft notice of acknowledgement;	Ari Cherniak
01/24/2022	0.1	AC send PL email re: edit to draft notice of acknowledgement;	Ari Cherniak
01/24/2022	0.1	AC read PL email re: attached revised draft notice of acknowledgement;	Ari Cherniak
01/24/2022	0.1	AC send OPC email re: attached notice of acknowledgement for signature;	Ari Cherniak
01/24/2022	0.6	download/ review Complaint; draft/file notice of case assignment;	Ari Cherniak
01/24/2022	0.1	AC send Rezac Meyer email re: attached certificate of assignment for filing;	Ari Cherniak
01/24/2022	0.1	AC read Rezac Meyer email re: filing certificate of assignment;	Ari Cherniak
01/28/2022	0.1	AC send JH, PB email re: attached amended complaint for review;	Ari Cherniak
01/31/2022	0.1	AC send Rezac Meyer email re: update on filing of certificate of assignment;	Ari Cherniak
01/31/2022	0.1	AC read Rezac Meyer email re: update on filing of certificate of assignment; attached conformed copy;	Ari Cherniak
02/01/2022	0.1	AC read Rezac Meyer email re: attached conformed copies of summons and certificate of assignment;	Ari Cherniak
02/01/2022	0.1	AC send JH, PB email re: attached FAC; discussion re edits;	Ari Cherniak
02/01/2022	0.4	draft FAC; review PAGA;	Ari Cherniak
02/02/2022	0.1	AC send OPC email re: follow-up on mediation;	Ari Cherniak
02/04/2022	0.1	AC read PB email re: attached redlined FAC;	Ari Cherniak
02/04/2022	0.1	AC send Rezac Meyer email re: court for filing;	Ari Cherniak
02/04/2022	0.1	AC read Rezac Meyer email re: court for filing;	Ari Cherniak

02/04/2022	0.1	AC send Rezac Meyer email re: attached complaint for filing;	Ari Cherniak
02/04/2022	0.1	AC read Rezac Meyer email re: confirmation of complaint for filing;	Ari Cherniak
02/04/2022	0.1	AC send OPC email re: e-mail service of attached complaint;	Ari Cherniak
02/04/2022	0.4	file/ serve FAC;	Ari Cherniak
02/08/2022	0.1	AC send OPC email re: accepting e-mail service of FAC;	Ari Cherniak
02/08/2022	0.1	AC read OPC email re: accepting e-mail service of FAC; update on NAR;	Ari Cherniak
02/09/2022	0.1	AC send Rezac Meyer email re: confirmation of complaint filing;	Ari Cherniak
02/10/2022	0.1	AC send OPC email re: attached service copy of CMC order;	Ari Cherniak
02/10/2022	0.1	AC send Rezac Meyer email re: attached POS of CMC order and summons for filing;	Ari Cherniak
02/10/2022	0.3	review/ Serve CM order; review AOS of summons;	Ari Cherniak
02/11/2022	0.1	AC send Rezac Meyer email re: attached revised POS for filing;	Ari Cherniak
02/11/2022	0.2	revise/ submit proofs of service;	Ari Cherniak
02/11/2022	0.2	fix/ resubmit POS;	Ari Cherniak
02/25/2022	0.1	AC read Rezac Meyer email re: attached conformed copy of complaint;	Ari Cherniak
03/03/2022	0.1	AC send JH, AB email re: attached CM order; discovery stayed;	Ari Cherniak
04/04/2022	0.5	review CM order; draft status conference statement;	Ari Cherniak
04/06/2022	0.1	AC read OPC email re: mediation agreement and proposed mediators;	Ari Cherniak
04/07/2022	0.1	AC read JH email re: proposed mediator;	Ari Cherniak
04/07/2022	0.1	AC send Mediator email re: request for mediation availability;	Ari Cherniak
04/07/2022	0.1	AC read Mediator email re: mediation availability;	Ari Cherniak
04/07/2022	0.1	AC send OPC email re: request for mediation availability;	Ari Cherniak
04/07/2022	0.1	AC read OPC email re: mediation availability;	Ari Cherniak
04/08/2022	0.1	AC send JH, PB email re: attached draft report and order; due date;	Ari Cherniak
04/15/2022	0.1	AC read OPC email re: attached signed stip to continue CMC;	Ari Cherniak
04/18/2022	0.1	AC send Rezac Meyer email re: attached joint stip and order for filing;	Ari Cherniak
04/18/2022	0.2	review/ file stip on CMC;	Ari Cherniak
04/25/2022	0.1	AC send OPC email re: attached signed order continuing CMC;	Ari Cherniak
04/25/2022	0.2	review/ save signed stip;	Ari Cherniak
04/28/2022	0.1	AC read Rezac Meyer email re: attached conformed copy of notice of receipt;	Ari Cherniak
05/04/2022	0.1	AC read Plaintiff email re: follow up re case status;	Ari Cherniak
05/04/2022	0.1	AC send Plaintiff email re: update re case status;	Ari Cherniak
05/04/2022	0.1	AC send JH, PB email re: list of informal discovery;	Ari Cherniak
05/04/2022	0.4	draft informal discovery; call Plaintiff for update;	Ari Cherniak
05/10/2022	0.1	AC read Rezac Meyer email re: attached joint stip to continue CMC;	Ari Cherniak
05/24/2022	0.1	AC send OPC, OPC email re: informal discovery requests;	Ari Cherniak
05/24/2022	0.4	revise informal discovery list	Ari Cherniak
06/06/2022	0.1	AC read Plaintiff email re: arbitration clause	Ari Cherniak
06/07/2022	0.2	call with plaintiff re: case status; call plaintiff leave VM;	Ari Cherniak
07/25/2022	0.1	AC send OPC email re: follow up re informal discovery request;	Ari Cherniak
07/26/2022	0.1	AC send JH, PB, AB email re: initial CMC date; pushing off;	Ari Cherniak
08/02/2022	0.1	AC send AB, JH, PB email re: pushing off initial CMC;	Ari Cherniak
08/02/2022	0.1	AC send OPC email re: request for update re informal discovery;	Ari Cherniak
08/02/2022	0.1	AC read OPC email re: update re informal discovery;	Ari Cherniak
08/03/2022	0.2	review complaint; draft survey;	Ari Cherniak
08/04/2022	0.9	draft survey; review case file; review Moreria settlement;	Ari Cherniak
08/08/2022	0.1	AC send JH, PB, AB email re: survey link for review;	Ari Cherniak
08/08/2022	0.1	AC read OPC email re: finalizing document production;	Ari Cherniak
08/15/2022	0.1	AC send OPC email re: request for expense reimbursement data;	Ari Cherniak
08/15/2022	0.1	AC send JH, PB email re: draft informal discovery requests;	Ari Cherniak
08/15/2022	5.7	review discovery production; draft follow-up email re: documents still needed	Ari Cherniak
08/16/2022	0.1	AC send OPC email re: follow up re data and documents request;	Ari Cherniak
08/16/2022	0.1	AC read OPC email re: response re data and documents request;	Ari Cherniak
08/16/2022	0.1	AC send OPC email re: expense reimbursement class;	Ari Cherniak
08/16/2022	3.2	draft meet and confer email; start drafting brief;	Ari Cherniak
08/17/2022	0.1	AC read OPC email re: comments re request for class data;	Ari Cherniak
08/17/2022	0.1	AC send OPC email re: scheduling call re request for class data;	Ari Cherniak
08/17/2022	0.1	AC read OPC email re: scheduling call re request for class data;	Ari Cherniak
08/17/2022	6.9	continue drafting mediation brief;	Ari Cherniak
08/18/2022	0.1	AC read PB email re: edits to survey;	Ari Cherniak



08/18/2022	0.1	AC read JH email re: edits to survey;	Ari Cherniak
08/18/2022	0.1	AC send JH, AB, PB email re: arbitration agreement;	Ari Cherniak
08/18/2022	0.1	AC read OPC re: rescheduling mediation;	Ari Cherniak
08/18/2022	0.5	call with opposing counsel re: data and claims;	Ari Cherniak
08/22/2022	0.5	AC email x14 w/ JH, OPC and mediator re: rescheduling mediation date;	Ari Cherniak
08/23/2022	0.1	AC read mediator email re: mediation start time;	Ari Cherniak
08/23/2022	0.1	AC read OPC email re: mediation start time;	Ari Cherniak
08/26/2022	0.1	AC read opc email re: Follow up re Plaintiff's Questions on Production;	Ari Cherniak
08/26/2022	0.1	AC send opc email re: attached paystub and email	Ari Cherniak
09/12/2022	0.1	AC send OPC email re: follow up re data and documents production;	Ari Cherniak
09/12/2022	0.1	AC read plaintiff email re: mediation update;	Ari Cherniak
09/12/2022	0.1	AC send plaintiff email re: mediation update;	Ari Cherniak
09/12/2022	0.1	AC send mediator email re: mediation start time;	Ari Cherniak
09/12/2022	0.1	AC read mediator email re: mediation start time;	Ari Cherniak
09/13/2022	0.1	AC read OPC email re: Follow up re Plaintiff's Questions on Production;	Ari Cherniak
09/13/2022	0.1	AC send OPC email re: request for employee data;	Ari Cherniak
09/13/2022	0.1	AC read OPC email re: employee data;	Ari Cherniak
09/13/2022	2.2	continue drafting brief	Ari Cherniak
09/16/2022	2.7	continue drafting brief;	Ari Cherniak
09/19/2022	0.1	AC send OPC email re: request for class data;	Ari Cherniak
09/19/2022	0.1	AC read OPC email re: response re class data;	Ari Cherniak
09/19/2022	0.1	AC send PB email re: attached class data and mediation brief;	Ari Cherniak
09/20/2022	0.1	AC read PB email re: plaintiff's documents and emails;	Ari Cherniak
09/20/2022	0.3	Zoom with PB re: data and discovery;	Ari Cherniak
09/22/2022	0.1	AC read PB email re: attached draft mediation brief for review;	Ari Cherniak
09/23/2022	0.1	AC read OPC email re: additional reimbursement data;	Ari Cherniak
09/23/2022	1.4	review mediation brief; calls with PB re: brief;	Ari Cherniak
09/23/2022	0.4	review Def brief;	Ari Cherniak
09/28/2022	0.1	AC read OPC email re: attached documents produced;	Ari Cherniak
09/28/2022	0.3	review production; discuss with PB;	Ari Cherniak
09/29/2022	0.2	AC email x7 with JH re: rescheduling CMC; staying discovery;	Ari Cherniak
09/29/2022	0.1	AC send OPC email re: attached draft joint statement for review; statement due date;	Ari Cherniak
09/29/2022	0.5	draft CM statement; review complex guidelines;	Ari Cherniak
10/03/2022	0.1	AC send OPC email re: request for defendant's position statements;	Ari Cherniak
10/04/2022	0.1	AC send OPC email re: update re finalizing draft joint statement;	Ari Cherniak
10/04/2022	0.1	AC send MK email re: attached docs re drafting prelim approval motion;	Ari Cherniak
10/06/2022	0.1	AC read OPC email re: update re defendant's position on statements;	Ari Cherniak
10/07/2022	0.1	AC send Rezac email re: attached joint status conference report for court filing;	Ari Cherniak
10/07/2022	0.3	AC email x5 with OPC re: attached joint status conference report for review; edits;	Ari Cherniak
10/07/2022	0.7	review Def. statements; call OPC re: deadlines; file statement;	Ari Cherniak
10/13/2022	0.1	AC send JH email re: mediators proposal;	Ari Cherniak
10/13/2022	0.1	AC send AB email re: mediator's proposal response	Ari Cherniak
10/14/2022	0.1	AC sends OPC email re: attached service of Notice	Ari Cherniak
10/14/2022	0.1	AC sends JH, PB, AB email re: attached service of Notice;	Ari Cherniak
10/14/2022	0.1	AC send AB, JH, PB email re: attached court call notice and status report for CMC;	Ari Cherniak
10/14/2022	0.1	AC read PB email re: Mediator's proposal	Ari Cherniak
10/14/2022	0.4	call with AB re: initial CMC; draft + file jury fees notice	Ari Cherniak
10/17/2022	0.2	AC read AB email re: CMC date to discuss settlement;	Ari Cherniak
10/27/2022	0.2	review, save answer to FAC	Ari Cherniak
10/27/2022	0.3	AC read PB, OPC, mediator email re: mediators proposal;	Ari Cherniak
10/27/2022	0.1	AC read PB email re: discussion with OPC re PAGA letter, draft settlement;	Ari Cherniak
11/01/2022	0.2	call with MK re: prelim approval papers	Ari Cherniak
11/03/2022	0.1	AC read PB email re: request draft settlement;	Ari Cherniak
11/04/2022	0.1	AC read OPC email re: send draft settlement early/mid next week	Ari Cherniak
11/16/2022	0.1	review/ save minute order	Ari Cherniak
11/17/2022	2.8	review/ revise Settlement Agreement	Ari Cherniak
11/17/2022	0.1	AC read PB email re: reserve hearing date for Plaintiff's Motion for Preliminary Approval of Class Action Settlement;	Ari Cherniak
11/17/2022	0.1	AC read PB email re: response re hearing date;	Ari Cherniak

11/17/2022	0.2	AC read PB email re: attached draft Settlement Agreement with edits in redlines;	Ari Cherniak
11/29/2022	0.1	AC read PB email re: Request Settlement Agreement;	Ari Cherniak
11/30/2022	0.1	AC read OPC email re: attached revised Settlement Agreement;	Ari Cherniak
12/01/2022	0.1	AC read PB email re: edit re Settlement Agreement;	Ari Cherniak
12/01/2022	0.1	AC read MK email re: Update on draft of MPA and Dec.	Ari Cherniak
12/02/2022	0.1	AC read MK email re: Attached MPA and Dec along with and excel with settlement calculations.	Ari Cherniak
12/21/2022	0.1	AC read PB email re: available hearing date for Plaintiff's Motion for Preliminary Approval of Class Action Settlement;	Ari Cherniak
12/21/2022	0.1	AC read OPC email re: Pick earliest date that works for HL;	Ari Cherniak
12/21/2022	0.1	AC read PB email re: earliest date that works for HL;	Ari Cherniak
12/22/2022	0.1	AC read PB email re: preliminary approval motion + sending declaration for PI signature;	Ari Cherniak
12/22/2022	1.6	review prelim approval motion; discuss with PB;	Ari Cherniak
12/27/2022	0.1	AC read PB email re: Attached filed copies of Notice of PI's Motion	Ari Cherniak
12/27/2022	0.1	AC read PB email re: Review attached Coversheet;	Ari Cherniak
12/27/2022	0.1	AC read PB email re: attached docs re Preliminary Approval of Class Action Settlement;	Ari Cherniak
12/27/2022	0.3	call with PB re: fax filing; review prelim approval papers ;	Ari Cherniak
01/04/2023	0.1	AC send PB email re: Stipulation due date;	Ari Cherniak
01/05/2023	0.1	AC read PB email re: CMC vacated;	Ari Cherniak
02/20/2023	0.1	AC send JH, PB email re: hearing continued until 5/5/23;	Ari Cherniak
02/20/2023	0.1	review notice of continuance of hearing;	Ari Cherniak
02/28/2023	0.1	AC send OPC email re: attached service copy of Notice Change of Address;	Ari Cherniak
02/28/2023	0.1	AC send Rezac email re: filing POS, Notice of change of address;	Ari Cherniak
02/28/2023	0.3	review change of address; draft POS;	Ari Cherniak
05/02/2023	0.1	AC send JH, PB email re: hearing info;	Ari Cherniak
05/04/2023	0.1	AC send JH, AB, PB email re: granted preliminary approval, attached tentative rulings;	Ari Cherniak
05/04/2023	0.3	review tentative on prelim approval; call with PB re: appearing or submitting	Ari Cherniak
05/09/2023	0.3	review order; submit to LWDA; retrieve notice, admin bid	Ari Cherniak
05/09/2023	0.2	AC email x2 with PB re: Preliminary Order and Final Notice;	Ari Cherniak
05/09/2023	0.1	AC read PB email re: Final Notice;	Ari Cherniak
05/10/2023	0.1	AC read Phoenix email re: circulating an administration timeline after reviewing the case documents;	Ari Cherniak
05/10/2023	0.1	AC read OPC email re: availability for final approval hearing date;	Ari Cherniak
05/16/2023	0.1	AC send Phoenix email re: circulating list of deadlines;	Ari Cherniak
05/22/2023	0.1	AC send Phoenix email re: Providing an administration timeline;	Ari Cherniak
05/22/2023	0.1	AC read Phoenix email re: circulating an administration timeline shortly;	Ari Cherniak
05/24/2023	0.1	AC send Phoenix email re: follow up on the status of the Notice mailing;	Ari Cherniak
05/24/2023	0.1	AC read Phoenix email re: attached administration timeline;	Ari Cherniak
06/16/2023	0.1	AC read Phoenix email re: attached weekly report;	Ari Cherniak
06/23/2023	0.1	AC read Phoenix email re: attached weekly report;	Ari Cherniak
06/30/2023	0.1	AC read Phoenix email re: attached weekly report	Ari Cherniak
07/07/2023	0.1	AC read Phoenix email re: attached weekly report	Ari Cherniak
07/14/2023	0.1	AC read Phoenix email re: attached weekly report	Ari Cherniak
07/24/2023	0.1	AC read Phoenix email re: names of opt-outs	Ari Cherniak
07/28/2023	0.1	review costs compiled by LA	Ari Cherniak
07/28/2023	0.2	AC email x2 with PB re: compiled costs and receipt/invoices	Ari Cherniak
08/07/2023	0.2	review Admin decl	Ari Cherniak
08/07/2023	0.1	AC read PB email re: attached edits re Kevin Lee Declaration re Settlement Notice Administration for review	Ari Cherniak
08/07/2023	0.1	AC send PB email re: attached comments re Kevin Lee Declaration re Settlement Notice Administration for review	Ari Cherniak
08/10/2023	0.1	call with SG re: final approval papers	Ari Cherniak
08/10/2023	0.8	review/ edit Hammond Decl ISO final approval	Ari Cherniak
08/10/2023	0.1	AC email with SG re: word version re Preliminary Approval paper	Ari Cherniak
08/10/2023	0.4	AC email x4 with SG re: Drafts of the Motion for Approval of Attorney's Fees and Costs, JH Declaration and MPA; time/ costs breakdown; edits/comments;	Ari Cherniak

08/10/2023	0.1	AC send SG email re: declarations of motions for approval of attorneys' fees and costs and service award	Ari Cherniak
08/11/2023	0.2	call with SG re: comments and redlines to the prelim approval papers	Ari Cherniak
08/14/2023	0.1	call with SG re: final approval and fees motion drafts	Ari Cherniak
08/14/2023	0.1	AC read SG email re: attached drafts of JH Declaration iso Fees, MPA iso Final Approval, Plaintiff's Motion for Approval of Attorneys' Fees, etc	Ari Cherniak
08/14/2023	0.1	AC send SG email re: attached template for Notice of Motion and Motion for Attorneys' Fees, Notice of Motion and Motion for Final Approval; etc	Ari Cherniak
08/14/2023	0.1	AC read SG email re: attached drafts of Notice of Motion and Motion for Attorneys' Fees, Notice of Motion and Motion for Final Approval; etc	Ari Cherniak
08/14/2023	3.3	review/ redline final approval papers	Ari Cherniak
08/15/2023	2.5	review final approval, proposed order, notices of motion, Proof of service	Ari Cherniak
08/15/2023	0.1	AC send SG email re: attached redlined copies of Plaintiff's Motion for Attorneys' Fees and Costs, MPA iso Final Approval, etc	Ari Cherniak
08/16/2023	0.2	review fees papers before sending to opposing counsel	Ari Cherniak
08/16/2023	0.1	AC send SG email re: Follow up on edits re drafts of Plaintiff's Motion for Attorneys' Fees and Costs	Ari Cherniak
08/16/2023	0.1	AC send OPC email re: attached draft of MPA iso Final Approval, Plaintiff's Motion for Approval of Attorneys' Fees and Costs	Ari Cherniak
08/23/2023	0.8	review final approval papers; prep for filing	Ari Cherniak

**STEVEN GREENFIELD, ESQ. BILLING RECORDS**

Date	Hours	Description	User
07/26/2023	1	prep Final Approval brief	Steven Greenfield
07/27/2023	0.1	SG read PB email re: attached docs needed to draft the Motion for Final Approval, Motion for Attorneys' Fees, Hammond Declaration, Proposed Order	Steven Greenfield
07/27/2023	0.4	Review Case Materials	Steven Greenfield
07/27/2023	0.1	SG read PB email re: attached docs needed to draft the Motion for Final Approval and Fees,	Steven Greenfield
08/03/2023	2.5	drafting Decl + Motion for Final Approval	Steven Greenfield
08/04/2023	0.1	SG read PB email re: compiled cost	Steven Greenfield
08/04/2023	0.1	SG read PB email re: attached MPA iso Final Approval, JH Declaration, MPA iso Fees; Redland Administration costs;	Steven Greenfield
08/04/2023	0.1	SG read PB email re: Total hours and lodestar	Steven Greenfield
08/04/2023	0.1	SG read PB email re: attached MPA iso Motion for Preliminary Approval and JH Declaration;	Steven Greenfield
08/04/2023	4	drafting Final Approval and Motion of Fees	Steven Greenfield
08/04/2023	0.9	Reviewed Motion for fees for Redlands	Steven Greenfield
08/07/2023	5	continue drafting Final Approval Documents; Hammond Dec. and Final Approval Motion	Steven Greenfield
08/07/2023	0.2	SG email x2 with JH re: Final Approval and fees brief draft	Steven Greenfield
08/08/2023	0.1	SG read PB email re: attached lodestar activities;	Steven Greenfield
08/08/2023	5.7	continue drafting Memo inn Support of Plaintiff's Motion for Final Approval of Class Action Settlement, Decl	Steven Greenfield
08/10/2023	0.1	SG email with AC re: word version re Preliminary Approval paper	Steven Greenfield
08/10/2023	0.4	SG email x4 with AC re: Drafts of the Motion for Approval of Attorney's Fees and Costs, JH Declaration and MPA; time/ costs breakdown; edits/comments;	Steven Greenfield
08/10/2023	0.1	SG read AC email re: declarations of motions for approval of attorneys' fees and costs and service award	Steven Greenfield
08/14/2023	0.1	SG read AC email re: attached template for Notice of Motion and Motion for Attorneys' Fees, Notice of Motion and Motion for Final Approval; etc	Steven Greenfield
08/14/2023	0.1	SG send AC email re: attached drafts of Notice of Motion and Motion for Attorneys' Fees, Notice of Motion and Motion for Final Approval; etc	Steven Greenfield
08/14/2023	0.1	SG read PB email re: attached Proof of Service on the LWDA for filing	Steven Greenfield
08/14/2023	0.1	SG read PB email re: attached Proposed Order and Judgement Granting Final Approval;	Steven Greenfield
08/14/2023	0.1	SG read PB email re: Exhibit 1	Steven Greenfield
08/14/2023	4	Revised, Finish the Final Approval Packet with Exhibits	Steven Greenfield
08/15/2023	0.1	SG read AC email re: attached redlined copies of Plaintiff's Motion for Attorneys' Fees and Costs, MPA iso Final Approval, etc	Steven Greenfield
08/16/2023	0.1	SG read AC email re: Follow up on edits re drafts of Plaintiff's Motion for Attorneys' Fees and Costs	Steven Greenfield