

1 JULIAN HAMMOND (SBN 268489)
jhammond@hammondlawpc.com
2 POLINA BRANDLER (SBN 269086)
pbrandler@hammondlawpc.com
3 ARI CHERNIAK (SBN 290071)
acherniak@hammondlawpc.com
4 HAMMONDLAW, P.C.
1201 Pacific Ave., Suite 600
5 Tacoma, WA 98402
(310) 601-6766
6 (310) 295-2385 (Fax)

7 *Attorneys for Plaintiff and the Classes*

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SUPERIOR COURT FOR THE STATE OF CALIFORNIA

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COUNTY OF SAN BERNARDINO

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

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Plaintiff,

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vs.

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UNIVERSITY OF REDLANDS, a California
Non-Profit Corporation,

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Defendant.

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CASE NO. CIVSB2133143

**DECLARATION OF KEVIN LEE
REGARDING SETTLEMENT
NOTICE ADMINISTRATION**

Date: September 18, 2023

Time: 9:00 a.m.

Dept. S26, Hon. David Cohn

DECLARATION OF KEVIN LEE

I, Kevin Lee, declare as follows:

1. I am a Case Manager at Phoenix Settlement Administrators (“Phoenix”), the Court-appointed Class Action Settlement Administrator for *Jackson v. University of Redlands* (the “Action”). I have personal knowledge of the facts stated herein and, if called upon to testify, I could and would testify competently to such facts.

2. Phoenix was selected by the Parties to provide notice of the Settlement and perform class administration duties in this Action. Pursuant to the Stipulation of Class Action and PAGA Settlement (“Settlement Agreement” or “Settlement”) for this matter, Phoenix was responsible for: (i) preparing, printing, and mailing the *Notice of Class Action Settlement* (“Notice”); (ii) responding to inquiries from Class Members; (iii) confirming the number of weeks each Class Member worked during the period from January 22, 2021 to January 24, 2023 (“Adjunct Professor Unpaid Wages Class Period”) and from March 20, 2020 to March 1, 2022 (“Reimbursement Claim Period”), calculating the number of pay periods that each Adjunct Aggrieved Employee worked during the time period from January 22, 2021 to January 24, 2023 (“Adjunct PAGA Period”), and calculating the number of pay periods that each Aggrieved Employees worked during the time period from August 4, 2020 to January 24, 2023 (“PAGA Period”); (iv) determining the validity of letters indicating a request to be excluded from the Class Settlement (“Requests for Exclusion”), written objections to the Class Settlement (“Objections”), and/or dispute regarding the number of Workweeks submitted by Class Members; (v) calculating the Net Settlement Amount; (vi) calculating and distributing the Individual Settlement Payments to Settlement Class Members, and calculating and distributing PAGA Payments to Aggrieved Employees; (vii) issuing the payment to Class Counsel for attorneys’ fees and costs, the Class Representative Service Award payment Plaintiff, and the employer/employee payroll taxes to the appropriate taxing authorities; and (viii) such other tasks as set forth in the Settlement Agreement or as the Parties mutually agree or as the Court orders.

3. On May 18, 2023, Phoenix received a data file from Defense Counsel that contained names, last known mailing addresses, Social Security numbers, dates of employment, and

1 workweeks for each Class Member (“Class List”) during the Class Period. The final mailing list
2 contained one thousand one hundred thirteen (1,113) individuals identified as Class Members, of
3 which one thousand one hundred (1,100) were in the Reimbursement Class, and three hundred
4 fourteen (314) were in the Adjunct Professor Class.

5 4. On June 7, 2023, Phoenix conducted a National Change of Address (“NCOA”)
6 search in an attempt to update the class list of addresses as accurately as possible. A search of this
7 database provides updated addresses for any individual who has moved in the previous four (4)
8 years and notified the U.S. Postal Service of their change of address.

9 5. On June 7, 2023, Phoenix mailed the Notice via U.S. first class mail, in English, to
10 all one thousand one hundred thirteen (1,113) Class Members on the Class List. A true and correct
11 copy of the mailed Notice is attached hereto as **Exhibit A**.

12 6. As of the date of this declaration, twenty-two (22) Notices have been returned to
13 Phoenix. None were returned with a forwarding address. For the twenty-two (22) Notices returned
14 from the Post Office without a forwarding address, Phoenix attempted to locate a current mailing
15 address using TransUnion TLOxp, one of the most comprehensive address databases available for
16 skip tracing. Of the twenty-two (22) Notices that were skip traced, twenty-one (21) updated
17 addresses were obtained and the Notice was promptly re-mailed to those Class Members via first
18 class mail.

19 7. As of the date of this declaration, one (1) Notice remains undeliverable since an
20 updated address could not be obtained via skip trace.

21 8. As of the date of this declaration, Phoenix has received five (5) Requests for
22 Exclusion from the following Class Members: Ryan Cook, James Patricola, Sakura Tsai, John
23 Walsh, Mara Winick. Of the five (5) Requests for Exclusion, four (4) were both Adjunct Professor
24 Settlement Class Members and Reimbursement Claim Settlement Class Members, and one (1) was
25 a Reimbursement Claim Settlement Class Member only. The deadline to request exclusion from
26 the Class Settlement was July 22, 2023.

27 9. As of the date of this declaration, Phoenix has received zero (0) Notices of Objection
28 from Class Members. The deadline for objecting to the Class Settlement was July 22, 2023.

1 10. As of the date of this declaration, Phoenix has received zero (0) Workweek disputes
2 from Class Members. The deadline for submitting a dispute was July 22, 2023.

3 11. There are one thousand one hundred eight (1,108) Class Members who did not
4 submit timely and valid Requests for Exclusion and are therefore deemed Settlement Class
5 Members, representing 99.55% of the Class. Reimbursement Claim Settlement Class Members have
6 worked a collective fifty-thousand six hundred sixty (50,660) Workweeks during the Class Period,
7 while Adjunct Professor Settlement Class Members have worked eight thousand three hundred
8 thirty-six (8,336) Workweeks. Reimbursement Claim Workweeks are valued at approximately
9 \$7.27 each, while Adjunct Professor Workweeks are valued at approximately \$4.91 each.

10 12. The Escalator Clause stipulates that, should the total number of Settlement Class
11 Members increase by more than 10% over one thousand one hundred nine (1,109) (i.e., if there are
12 more than one thousand two hundred twenty (1,220) Settlement Class Members, then the Gross
13 Settlement Amount shall be increased proportionately to the increase in Settlement Class Members.
14 Because the total number of Settlement Class Members did not exceed this cap, the Escalator Clause
15 was not triggered.

16 13. The Net Settlement Amount of \$409,202.17 available to pay Settlement Class
17 Members was determined by subtracting the requested Class Counsel attorneys' fees (\$233,333.33),
18 and Class Counsel costs (\$14,964.50), requested Enhancement Payment to Plaintiff Jackson
19 (\$7,500.00), the PAGA Amount (\$25,000.00), and the requested Settlement Administration Costs
20 (\$10,000.00) from the Gross Settlement Amount (\$700,000.00).

21 14. Based upon the calculations stipulated in the Settlement, 90%, or \$368,281.95 of the
22 Net Settlement Amount was allocated to Reimbursement Claim Settlement Class Members, while
23 10%, or \$40,920.22, was allocated to the Adjunct Professor Settlement Class.

24 15. There are one thousand one hundred (1,100) Settlement Reimbursement Class
25 Members. The highest Individual Settlement Payment to be paid to a Reimbursement Claim
26 Settlement Class Member is approximately \$877.53, the lowest Individual Settlement Payment to
27 be paid is approximately \$1.02, while the average Individual Settlement Payment to be paid is
28 approximately \$334.80. Reimbursement Claim Settlement Class Member will be issued payment

1 of their Individual Settlement Payments as 100% Reimbursement, from which no taxes will be
2 withheld or reported.

3 16. There are three hundred ten (310) Settlement Adjunct Class Members. The highest
4 Individual Settlement Payment to be paid to an Adjunct Professor Settlement Class Member is
5 approximately \$512.64, the lowest Individual Settlement Payment to be paid is approximately
6 \$4.91, while the average Individual Settlement Payment to be paid is approximately \$132.00.
7 Settlement Class Members will be issued payment of their Individual Settlement Payments subject
8 to reduction for the employee's share of taxes and withholdings with respect to the 50% wages
9 portion of the Individual Settlement Payment.

10 17. Additionally, \$25,000.00 of the Gross Settlement Amount has been allocated toward
11 penalties under the Private Attorneys General Act ("PAGA Amount"), of which 75%, or
12 \$18,750.00, shall be paid to the Labor and Workforce Development Agency ("LWDA"), and 25%,
13 or \$6,250.00, of which shall be paid to all current and former hourly non-exempt individuals who
14 are or were employed by Defendant during the PAGA Periods. There are one thousand forty-one
15 (1,041) Aggrieved Employees who worked a total of twenty-seven thousand nine hundred eighty-
16 one (27,981) pay periods during the PAGA Period. The highest Individual PAGA Payment to be
17 paid is approximately \$9.16, and the average Individual PAGA Payment to be paid is approximately
18 \$6.00.

19 18. Plaintiff Jackson's Individual Class Payment is \$61.45.

20 19. Pursuant to the Settlement, Defendant has agreed to fund the employer-side taxes
21 due separately and apart from the Gross Settlement Amount. As of this date, and utilizing the
22 maximum tax rates, the employer-side taxes are estimated not to exceed \$2,956.49.

23 20. Phoenix's costs associated with the administration of this matter are \$10,000.00.
24 This includes all costs incurred to date, as well as estimated costs involved in completing the
25 settlement distribution. A true and correct copy of the invoice from Phoenix is attached hereto as

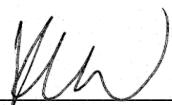
26 **Exhibit B.**

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

Executed this 14th day of August 2023, at Orange, California.



KEVIN LEE

Exhibit A

NOTICE OF CLASS ACTION SETTLEMENT

Jackson v. University of Redlands

(San Bernardino County Superior Court, Case No. CIV SB2133143)

«psa_id»
«presorttrayid»
«pre_sort_order»

TO: (1) All individuals employed by Defendant at any time from March 20, 2020 through March 1, 2022 (“Reimbursement Class Members”), and (2) All Adjunct Professors employed by the University of Redlands (“Defendant”) at any time from January 22, 2021 through January 24, 2023 (“Adjunct Professor Class Members”).

THIS NOTICE MAY AFFECT YOUR RIGHTS.

PLEASE READ THIS NOTICE CAREFULLY.

You have received this Notice of Class Action Settlement because Defendant’s records show you are or were employed as a Reimbursement Class Member or Adjunct Professor Class Member and are therefore entitled to a payment from this Class Action Settlement. Reimbursement Class Members and Adjunct Professor Class Members are referred to collectively as “Class Members.”

This settlement resolves a class-action lawsuit, Jackson v. University of Redlands (the “Lawsuit”), which alleges that Defendant (1) failed to reimburse necessary business expenses incurred by Reimbursement Class Members, which includes Adjunct Professor Class Members, as a result of working remotely or otherwise, (2) failed to pay Adjunct Professor Class Members for all hours worked, and (3) failed to issue to Adjunct Professor Class Members accurate, itemized wage statements.

Class Counsel in this matter are Julian Hammond, Polina Brandler and Ari Cherniak of HammondLaw, P.C.

On May 5, 2023, the San Bernardino County Superior Court granted preliminary approval of this Class Action Settlement and ordered that all Class Members be notified of the Settlement.

The Court has not made any determination of the validity of the claims in the Lawsuit. In other words, the Court has not determined whether any laws have been violated, nor has it decided in favor of Plaintiff or Defendant. Defendant expressly denies that it did anything wrong or that it has violated the law, and Defendant further denies any liability whatsoever to Plaintiff or to the Class Members.

Table with 2 columns: Option and Description. Options include: DO NOTHING AND RECEIVE PAYMENT, OPT OUT OF THE SETTLEMENT, and OBJECT TO THE SETTLEMENT.

Why Am I Receiving This Notice?

You were sent this Notice because you have a right to know about the proposed settlement of the Lawsuit, and about all of your options before the Court decides whether to finally approve the Settlement. If the Court approves the Settlement and then any objections and appeals are resolved, a “Settlement Administrator” appointed by the Court will make the payments described in this Notice. This Notice explains the Lawsuit, the Settlement, your legal rights, what benefits are available, who is eligible for them, and how to get them.

Questions? Contact the Settlement Claims Administrator toll free at (800) 523-5773

What Is This Case About?

Monica Jackson worked as an Adjunct Professor at the University of Redlands. She is the “Plaintiff” in this case and is suing University of Redlands on behalf of herself and the Reimbursement Class and Adjunct Professor Class for alleged violations of California’s wage and hour and reimbursement laws. As stated above, as it pertains to the **Reimbursement Class**, which includes the Adjunct Professor Class, the claims are failure to reimburse business expenses. As it pertains to the **Adjunct Professor Class** the claims are failure to pay for mandatory training time, and failure to issue accurate, itemized wage statements. In the Lawsuit, the Plaintiff also seeks penalties under the California Private Attorneys General Act of 2004 (“PAGA”) for members of both classes employed between August 4, 2020 and January 24, 2023, as well as fees and costs. Defendant denies all of the allegations made by Plaintiff.

Plaintiff and Defendant have tentatively settled this Lawsuit. The Settlement has received preliminary approval of the Court, subject to notice being provided to Class Members and final approval by the Court after a public hearing. The proposed Settlement is described in the next section.

As one of the Class Members, you will receive money from the proposed Settlement if the Court grants final approval. If the proposed Settlement is not approved, then the offer of settlement will be deemed withdrawn, and the case will proceed in Court as if no settlement had ever been made.

Summary of the Settlement Terms

Plaintiff and Defendant have agreed to settle this case on behalf of the Reimbursement Class and Adjunct Professor Class for the Gross Settlement Amount of \$700,000 (“Gross Settlement Amount”). The Gross Settlement Amount includes: (1) Administration Costs up to \$13,000; (2) a service payment to Plaintiff Jackson of \$7,500 for her time and efforts in pursuing this case and in exchange for a general release of claims she will enter into as part of the settlement with Defendant; (3) attorneys’ fees of up to one-third of the Gross Settlement Amount (\$233,333.33) and up to \$25,000 in litigation costs to Class Counsel; and (4) payment allocated to the PAGA penalties in the amount of \$25,000 (with \$18,750 to be paid to the Labor and Workforce Development Agency (“LWDA”)) and \$6,250 paid to the Expense Reimbursement Class Members who worked during the PAGA Period (defined as April 30, 2020 to January 24, 2023) and Adjunct Professor Class Members who worked during the Adjunct PAGA Period (defined as January 22, 2021 to January 24, 2023). After deducting these sums, a total of approximately \$391,166.67 will be available for distribution to Class Members (“Net Settlement Amount” or “NSA”).

Distribution to Class Members

The Net Settlement Amount will be distributed as follows: \$356,550.00 (approximately 90% of the NSA) shall be allocated to the Reimbursement Class Members and shall be paid *pro-rata* based on the number of eligible workweeks worked by a Reimbursement Class Member during the Reimbursement Claim Period (March 20, 2020 through March 1, 2022) in proportion to the eligible workweeks worked by all Reimbursement Class Members. \$39,616.67 (approximately 10% of the NSA) shall be allocated to the Adjunct Professor Class Members and shall be paid *pro-rata* based on the number of workweeks worked by an Adjunct Professor Class Member during the Adjunct Professor Unpaid Wages Class Period (January 22, 2021 to January 24, 2023) in proportion to the workweeks worked by all Adjunct Professor Class Members. In addition, as stated above, the \$6,250 of the PAGA penalties shall be paid *pro-rata* based on the number of pay periods worked by the Class Member during the PAGA Period and Adjunct PAGA Period in proportion to the pay periods worked by all Class Members who worked during the PAGA Period and Adjunct PAGA Period.

Your Estimated Settlement Award

Defendant’s records show that you are a member of the Expense Reimbursement Class and worked a total of: «Reimbursement_Weeks» eligible workweeks during the Settlement Class Period. *Please note if you are an Adjunct Professor Class Member:* due to a prior settlement in *Moreira v. University of Redlands*, San Bernardino County Superior Court, Case No. CIV DS 1913813, which resolved reimbursement claims of Adjunct Professors, Adjunct Professor Class Members in this case have no eligible workweeks for purposes of the reimbursement claim between March 20, 2020 and January 21, 2021. Your share of the Settlement allocated to the Reimbursement Class is «REIMB_AMOUNT».

Defendant’s records also show that you «Adjunct_AreNot» a member of the Adjunct Professor Class and worked a total of: «Adjunct_Weeks» eligible workweeks during the Adjunct Professor Unpaid Wages Class Period. Your share of the Settlement allocated to the Adjunct Professor Unpaid Wages Class Period Class is «ADJUNCT__AMOUNT».

Defendant's records show that you «PAGA_AreNot» a member of the PAGA Class and worked a total of «TOTAL_PAGA_PAY_PERIODS» pay periods during the PAGA Period or Adjunct PAGA Period. Your share of the PAGA Payment is «PAGA_AMOUNT».

If you believe that the number of eligible workweeks or pay periods listed above is incorrect and wish to dispute it, you must mail a dispute to the Settlement Administrator no later than July 7, 2023. Please include any documentation you have that you contend supports your dispute.

Tax Reporting

For tax reporting purposes, the monies paid to the Reimbursement Class will be allotted 100% to non-wages and interest. Payments to the Adjunct Professor Class will be allocated as 50% wages, and 50% as penalties and interest. PAGA payments will be allocated 100% as penalties.

Please consult a tax advisor regarding the tax consequences of your Settlement Award. This notice is not intended to provide legal or tax advice on your Settlement Share.

Claims That You Are Releasing Under the Settlement

Reimbursement Class Released Claims: If finally approved by the Court, each Reimbursement Class Member who does not request exclusion from the Settlement will be bound by all of the terms of the Settlement, and will release the University of Redlands from any and all claims that are alleged, or could reasonably have been alleged based on the facts and claims asserted in the First Amended Complaint on their behalf and arising during the Settlement Class Period (March 20, 2020 through January 24, 2023), including alleged failure to reimburse business expenses (including but not limited to the cost of Internet service, cellular phone charges, software, ink/toner cartridges, and paper and other expenses) incurred as a result of remote work or otherwise, and the claims for PAGA civil penalties based on the Reimbursement Class Released Claims.

Adjunct Professor Class Released Claims: If finally approved by the Court, each Adjunct Professor Class Member who does not request exclusion from the Settlement will also release all claims that are alleged, or reasonably could have been alleged based on the facts and claims asserted in the First Amended Complaint on their behalf and arising during the Settlement Class Period (March 20, 2020 through January 24, 2023), including claims for the alleged failure to pay all wages due (including minimum wage and overtime wages), failure to pay for all hours worked (including off-the clock and on-call work and including on an exempt misclassification theory), failure to timely pay wages and final wages, failure to pay wages and final wages, failure to furnish accurate wage statements including claims derivative and/or related to these claims, liquidated damages and conversation of wages; and the claims for PAGA civil penalties based on the Adjunct Professor Class Released Claims.

Your Options Under the Settlement

Option 1 – Do Nothing and Receive Your Payment

If you do not opt out, you are automatically entitled to your payment because you are a Class Member. If you do not dispute your weeks worked or pay periods calculation and do not opt out of the Settlement, you will be bound by the Settlement and receive a settlement payment. **In other words, if you are a Class Member, you do not need to take any action to receive the Settlement payment set forth above.**

Option 2 – Opt Out of the Settlement

If you do not wish to participate in the Settlement, you may exclude yourself by submitting a written request to be excluded from the Class. Your written request must expressly and clearly indicate that you do not want to participate in the Settlement, and you desire to be excluded from the Settlement. The written request for exclusion must include your name, address, telephone number, the case name and number, and the last four digits of your Social Security Number. Sign, date, and mail your written request for exclusion by U.S. First-Class Mail to:

Phoenix Settlement Administrators

P.O. Box 7208
Orange, CA 92863

The written request to be excluded from the Settlement must be postmarked or received by the Administrator not later than July 22, 2023. If you exclude yourself from the Settlement then you will get no payment, other than your share of PAGA penalties, and retain your legal rights to pursue claims that would otherwise be released by the settlement of the Lawsuit, other than your claim for PAGA civil penalties.

Questions? Contact the Settlement Claims Administrator toll free at (800) 523-5773

Option 3 – *File an Objection to the Settlement*

If you wish to object to the Settlement you may file an objection in writing stating why you object to the Settlement. Your objection must provide your full name, address and telephone number, the case name and number, the last four digits of your Social Security Number, and your reasons why you think the Court should not approve the Settlement. Your objection must be mailed the Administrator no later than July 22, 2023. Please note that you cannot both object to the Settlement and exclude yourself. If the Court overrules your objection, you will be bound by the Settlement and will receive your share of the Settlement.

Final Fairness Hearing

You may, if you wish, also appear at the Final Fairness and Approval Hearing set for September 18, 2023 at 9:00 a.m. in Dept S26, San Bernardino Justice Center, located at 247 West Third Street San Bernardino, CA 92415, and discuss your objections with the Court and the Parties at your own expense. You may also retain an attorney to represent you at the Hearing at your own expense.

Additional Information

This Notice of Class Action Settlement is only a summary of this case and the Settlement. For a more detailed statement of the matters involved in this case and the Settlement, you may visit <https://www.phoenixclassaction.com/university-of-redlands/> or call the Settlement Administrator at (800) 523-5773.

The pleadings and other records in this Lawsuit may be examined online on the San Bernardino County Superior Court's Website, known as 'Court Access Portal,' at <https://www.sb-court.org/divisions/civil-general-information/court-case-information-and-document-sales>. After arriving at the website, click the 'Accept' tab at the top of the page, then select "Case Search" and Register in order to search by case number (CIV SB2133143). Images of documents filed in the case may be viewed at a minimal charge. You may also view images of documents filed in the case free of charge by using one of the computer terminal kiosks available at each court location that has a facility for civil filings.

All inquiries by Class Members regarding this Notice of Class Action Settlement and/or the Settlement should be directed to the Settlement Administrator or Class Counsel.

PLEASE DO NOT CONTACT THE COURT OR CLERK OF THE COURT FOR INFORMATION ABOUT THIS SETTLEMENT.

Exhibit B



PHOENIX

CLASS ACTION ADMINISTRATION SOLUTIONS

CASE ASSUMPTIONS

Class Members	1113
Opt Out Rate	0%
Opt Outs Received	5
Total Class Claimants	1108
Subtotal Admin Only	\$10,726.31

TOTAL COSTS \$10,000.00

Fixed Fee

August 14, 2023

Case: Jackson v. University of Redlands

Case & Database Setup / Toll Free Setup & Call Center / NCOA (USPS)

Administrative Tasks:	Rate	Hours/Units	Line Item Estimate
Programming Manager	\$100.00	3	\$300.00
Programming Database & Setup	\$100.00	3	\$300.00
Toll Free Setup*	\$140.00	1	\$140.00
Call Center & Long Distance	\$2.00	111	\$222.60
NCOA (USPS)	\$0.15	1113	\$166.95
Total			\$1,129.55

Data Merger & Scrub / Notice Packet, Opt-Out Form & Postage /Translation

Project Action	Rate	Hours/Units	Line Item Estimate
Notice Packet Formatting	\$105.00	3	\$315.00
Data Merge & Duplication Scrub	\$0.15	1,113	\$166.95
Notice Packet & Opt-Out Form	\$0.95	1,113	\$1,057.35
Postage (up to 1 oz.)	\$0.84	1,113	\$934.92
Total			\$2,474.22

Skip Tracing & Remailing Notice Packets / Tracking & Programming Undeliverables

Project Action:	Rate	Hours/Units	Line Item Estimate
Case Associate	\$55.00	3	\$165.00
Skip Tracing Undeliverables	\$1.00	22	\$22.00
Remail Notice Packets	\$0.95	22	\$20.90
Postage	\$0.84	21	\$17.64
Programing Undeliverables	\$50.00	1	\$50.00
Total			\$275.54

Database Programming / Processing Opt-Outs, Deficiencies or Disputes

Project Action:	Rate	Hours/Units	Line Item Estimate
Programming Claims Database	\$100.00	3	\$300.00
Non Opt-Out Processing	\$200.00	1	\$200.00
Case Associate	\$55.00	3	\$165.00
Opt-Outs/Deficiency/Dispute Letters	\$5.00	0	\$0.00
Case Manager	\$85.00	3	\$255.00
Total			\$920.00

Calculation & Disbursement Programming/ Create & Manage QSF/ Mail Checks

Project Action:	Rate	Hours/Units	Line Item Estimate
Programming Calculations	\$100.00	3	\$300.00
Disbursement Review	\$100.00	3	\$300.00
Programming Manager	\$95.00	2	\$190.00
QSF Fees, Bank Account & EIN	\$75.00	3	\$225.00
Check Run Setup & Printing	\$100.00	3	\$300.00
Mail Class Checks, W2 and 1099 *	\$1.00	1,108	\$1,108.00
Estimated Postage Checks, W2 and 1099	\$0.50	1,108	\$554.00
Total			\$2,977.00

* Checks are printed on 8.5 x 11 in. sheets with W2/1099 Tax Filing

Tax Reporting & Reconciliation / Re-Issuance of Checks / Conclusion Reports and Declarations

Project Action:	Rate	Hours/Units	Line Item Estimate
Case Supervisor	\$100.00	3	\$300.00
Remail Undeliverable Checks (Postage Included)	\$1.50	40	\$60.00
Case Associate	\$55.00	2	\$110.00
Reconcile Uncashed Checks	\$85.00	3	\$255.00
Conclusion Reports	\$115.00	2	\$230.00
Case Manager Conclusion	\$85.00	2	\$170.00
Final Reporting & Declarations	\$115.00	1	\$115.00
Uncashed Check Notice Postcard (Postage Included)	\$1.50	40	\$60.00
Uncashed Check QSF Tax Filing	\$150.00	3	\$450.00
IRS & QSF Annual Tax Reporting * (State Tax Reporting Included)	\$1,200.00	1	\$1,200.00
Total			\$2,950.00

* All applicable California State & Federal taxes, which include SUI, ETT, and SDI, and FUTA filings. Additional taxes are Defendant's responsibility.

Total: \$10,726.31