

1 Shaun Setareh (SBN 204514)
shaun@setarehlaw.com
2 Thomas Segal (SBN 222791)
thomas@setarehlaw.com
3 Farrah Grant (SBN 293898)
farrah@setarehlaw.com
4 **SETAREH LAW GROUP**
315 South Beverly Drive, Suite 315
5 Beverly Hills, California 90212
Telephone (310) 888-7771
6 Facsimile (310) 888-0109

7 Attorneys for Plaintiff
EDDIE DURON
8

9 **UNITED STATES DISTRICT COURT**
10 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**
11

12 SILVIA VALDIVIA DE CABRERA,
an individual, on behalf of herself and
13 all others similarly situated,

14 *Plaintiff,*

15 vs.

16 SWIFT BEEF COMPANY, a Delaware
17 corporation,

18 *Defendant.*

Case No. 5:18-cv-02551-(PSG)-(Ex)

Honorable Philip S. Gutierrez

**DECLARATION OF SHAUN
SETAREH IN SUPPORT OF
MOTION FOR ATTORNEY FEES**

Hearing Information

Date: November 16, 2020
Time: 1:30 p.m.
Place: Courtroom 6A, 6th Floor
Judge: Hon. Philip S. Gutierrez

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DECLARATION OF SHAUN SETAREH

I, SHAUN SETAREH, declare as follows:

1. I am an attorney duly licensed to practice law in the State of California, and an attorney of record for Eddie Duron in this class action against Defendant Swift Beef Company (“Defendant”). I am a principal in Setareh Law Group. Except for those matters stated on information and belief, which I am informed and believe to be true and correct, I have personal knowledge of all matters set forth herein. If called as a witness, I could and would competently testify thereto under oath.

2. On November 2, 2018, Silvia Valdivia De Cabrera (“De Cabrera”) (collectively with Eddie Duron, “Plaintiffs”) filed a putative wage and hour class action complaint against Defendant in the Superior Court of the State of California for the County of Riverside. On December 5, 2018, this case was removed to this Court.

3. On March 13, 2019, Eddie Duron also filed a putative wage and hour class action complaint against Defendant in the Superior Court of the State of California for the County of Riverside, with additional allegations of violations of the Fair Credit Reporting Act and related state statutes (“Credit Reporting Claims”). On April 17, 2019, that case was removed to this Court.

4. Upon stipulation of the parties, Eddie Duron’s Credit Reporting Claims were severed and the case was administratively stayed pending settlement.

5. I entered into a written fee sharing agreement with Counsel for De Cabrera, Remedy Law Group LLP, wherein my firm will receive 32.5 percent of the total fee awarded and Remedy Law Group LLP will receive 67.5 percent of the fee awarded. The Plaintiffs approved this agreement in writing.

6. Defendants have and continue to deny Plaintiffs’ claims.

7. This case has been prosecuted diligently by my office for over a year and a half. Plaintiffs’ counsel’s investigation included meeting with Plaintiffs, conducting legal research and analysis of the applicable law as applied to the facts

1 discovered regarding Plaintiffs' claims and the defenses thereto and analyzing
2 Defendant's potential liability exposure.

3 8. As part of the investigation, Plaintiffs' counsel also has conducted a study
4 and investigation of the law and facts relating to the claims that were asserted and that
5 could have been asserted, as well as a study and investigation of the scope and identity
6 of the settlement class, and has concluded, taking into account the benefits of this
7 settlement, and the risks and delays of further litigation, as well as the strengths and
8 weakness of Plaintiffs' claims and Defendant's defenses, that this settlement is fair,
9 reasonable, and adequate, and in the best interests of the Plaintiffs and all members of
10 the classes affected by it.

11 **The Views of Experienced Counsel and Adequacy of Counsel**

12 9. My firm and I, as the Principal of Setareh Law Group, are well-
13 experienced class action attorneys. I, along with the senior attorney assigned to this
14 case, Thomas Segal, have considerable experience in class action litigation including
15 employment cases.

16 10. Setareh Law Group has successfully handled hundreds of class actions
17 and has over 80 Westlaw citable decisions.

18 11. I recently received the prestigious California Lawyer Attorney of the
19 Year Award from the Daily Journal.

20 12. Recently as lead counsel in *Troester v. Starbucks Corporation, et al.*, in
21 the Supreme Court of the State of California, Case No. S234969, the California
22 Supreme Court clarified and rejected the application of the widely adopted federal *de*
23 *minimis* doctrine to California's wage-hour laws.

24 13. I have been involved as lead or co-lead class counsel in numerous wage
25 and hour, consumer, FCRA, and antitrust class action cases. The following is a
26 sampling of class actions in which I have been appointed as class counsel both for a
27 settlement class and after a contested motion:

28 A. *Utne v. Home Depot U.S.A., Inc.*, U.S District Court, Northern District of

- 1 California, Case No. 16-cv-01854-RS (granting class certification against
2 Home Depot in connection with uncompensated off-the-clock work
3 occurring at the start of all employee shifts and at the end of closing shifts).
- 4 B. *Pitre v. Wal-Mart Stores, Inc.*, U.S. District Court, Central District of
5 California, Case No. 17-cv-01281-DOC (granting class certification against
6 Wal-Mart for a class of millions in FCRA action).
- 7 C. *Fronza v. Staffmark*, U.S. District Court, Northern District of California,
8 Case No. 15-CV-02315-MEJ (granted final approval in a case involving
9 alleged uncompensated security checks for warehouse workers).
- 10 D. *Valencia v. SCIS Air Security Corp.*, Los Angeles Superior Court, Case No.
11 BC421485 (granted class certification through contested motion in case on
12 behalf of former security workers based on late final wage payments in
13 violation of Labor Code §§ 201–203).
- 14 E. *Wilson v. TE Connectivity*, Northern District of California Case No. 3:14-cv-
15 04872-EDL (granted class certification through contested motion in case on
16 behalf of manufacturing facility employees subject to auto-deduction of meal
17 breaks).
- 18 F. *Padilla v. UPS*, U.S. District Court, Central District of California, Case No.
19 08-CV-1590 (granted final approval in a case involving claims for failure to
20 provide meal periods to part time employees engaged in sort operations and
21 failure to pay final wages in a timely manner to terminated employees).
- 22 G. *Vang v. Burlington Coat Factory Warehouse Corp.*, U.S. District Court,
23 Central District of California Case No. 09-CV-8061 (granted final approval
24 in a case involving, among other things, vacation pay forfeitures, failures to
25 provide meal and rest periods, and failures to pay overtime wages based on
26 employee misclassification).
- 27 H. *Garcia v. Am. Gen. Fin. Mgmt. Corp.*, U.S. District Court, Central District of
28 California, Case No. 09-CV-1916 (granted final approval in a case filed on

1 behalf of account managers in case involving, among other things, alleged
2 overtime miscalculations and meal and rest period violations).

3 I. *O’Neill v. Genesis Logistics, Inc.*, U.S. District Court, Northern District of
4 California, Case No. 08-CV-4707 (granted final approval in a case involving
5 claims for failure to provide meal periods to employees who worked as
6 drivers delivering goods to 7-11 stores throughout California and failure to
7 pay final wages in a timely manner to terminated employees).

8 J. *Spokes v. Lush Cosmetics, LLC*, Los Angeles Superior Court, Case No.
9 BC391397 (granted final approval in a case alleging failures to provide meal
10 and rest periods and failure to timely pay all final wages to California sales
11 associates and key holders).

12 K. *Green v. Staples Contract and Commercial, Inc.*, Los Angeles Superior
13 Court, Case No. BC389789 (granted final approval in a case involving claims
14 for unprovided meal and rest periods, inaccurate wage statements, waiting
15 time penalties, and unfair business practices on behalf of truck drivers
16 delivering Staples office supplies in California).

17 L. *Green v. Universal Music Group*, Los Angeles Superior Court, Case No.
18 BC374253 (granted final approval in a case involving misclassification
19 claims of current or former IT Support employees, including engineers,
20 server analysts, desktop support, and technical leads).

21 M. *Jones v. Shred-It USA, Inc.*, U.S. District Court, Central District of California,
22 Case No. 11-CV-00526 (granted final approval in a case brought on behalf
23 of customer service representatives and balers for alleged off-the-clock work
24 and meal and rest period violations).

25 N. *Alvarez v. Gary Grace Enterprises, LP*, Marin Superior Court, Case No. CIV
26 1002553 (granted final approval in a case on behalf of hair salon employees
27 for overtime miscalculation and related claims).

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1 O. *Calderon v. GreatCall, Inc.*, San Diego Superior Court, Case No. 37-2010-
2 00093743-CU-OE-CTL (granted final approval in a case on behalf of
3 customer service employees for, among other things, alleged meal and rest
4 period violations and overtime calculation errors).

5 P. *Douglas v. California Credit Union*, Los Angeles Superior Court, Case No.
6 BC445050 (granted final approval in a case on behalf of customer service
7 representatives alleging overtime miscalculation claims).

8 Q. *Cerdenia v. USA Truck, Inc.*, U.S. District Court, Central District of
9 California, Case No. 10-CV-1489-JVS (granted final approval in an action
10 on behalf of truck drivers for meal and rest period violations, off-the-clock
11 pre- and post-shift work, and unauthorized wage deductions).

12 R. *Butler v. Lexxiom, Inc.*, San Bernardino Superior Court, Case No. CIVRS
13 1001579 (granted final approval in an action on behalf of debt resolution
14 center employees alleging, among other things, meal and rest period
15 violations and overtime calculation errors).

16 S. *Valencia v. SCIS Air Security Corp.*, Los Angeles Superior Court, Case No.
17 BC421485 (granted class certification through contested motion in case on
18 behalf of former security workers based on late final wage payments in
19 violation of Labor Code §§ 201–203; subsequently granted preliminary
20 approval of proposed class action settlement).

21 T. *Sandoval v. Rite Aid Corp.*, Los Angeles County Superior Court, Case No.
22 BC431249 (granted class certification through contested motion in case on
23 behalf of former pharmacy employees based on late final wage payments in
24 violation of Labor Code §§ 201–203; subsequently granted final approval of
25 class action settlement).

26 14. The Setareh Law Group has no conflicts of interest with absent
27 Settlement Class Members.

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Attorney Fees

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2 15. Class Counsel have requested attorneys’ fees of up to \$187,500.00 (25%
3 of the Gross Settlement Amount). In view of Class Counsel’s efforts and risks in
4 pursuing this case, and the expenses incurred in vigorously litigating these claims, these
5 amounts are well within the range of reasonableness and thus warrant final approval.
6 Indeed, as Class Counsel in similar wage and hour class actions, I have routinely been
7 awarded fees amounting to approximately one-third of the settlement fund. These cases
8 include, but are not limited to: *O'Brien v. Optima Network Services, Inc.*, San
9 Bernardino County Superior Court, Case No. CIVRS1107056 (one-third of fund);
10 *Noyd v. The Cristcat Group, et al.*, Los Angeles County Superior Court, Case No.
11 BC439558 (one-third of fund); *Perez v. Southwest Dealer Services, Inc.*, Los Angeles
12 County Superior Court, Case No. BC439253 (one-third of fund); *Alvarez v. Gary*
13 *Grace Enterprises, LP*, Marin County Superior Court, Case No. CIV1002553 (one-
14 third of fund); *Calderon v. Greatcall, Inc.*, San Diego Superior Court, Case No. 37-
15 2010-00093743-CU-OE-CTL (one-third of fund); *Butler v. Lexxiom, Inc.*, San
16 Bernardino County Superior Court, Case No. CIVRS1001579 (one-third of fund);
17 *Huynh v. Carefusion Resources, LLC, et al*, San Diego County Superior Court, Case
18 No. 37-2009-00103277-CU-OE-CTL (one-third of fund); *Stucker v. L’Oreal USA S/D,*
19 *Inc.*, Los Angeles County Superior Court, Case No. BC456080 (one-third of fund);
20 *Sandoval v. Thrifty Payless, Inc.*, Los Angeles County Superior Court, Case No.
21 BC431249 (one-third of fund); *Tucker v. Maly’s West, Inc.*, Los Angeles County
22 Superior Court, Case No. BC483920 (one-third of fund); *Tiwari v. Merrill’s*
23 *Packaging*, San Mateo Superior Court, Case No. 519070 (one-third of fund);
24 *Montgomery v. Del Monte Corp., et al*, Kings County Case No. 13C0204 (one-third of
25 fund).

26 30. The work done by Setareh Law Group in this case includes drafting
27 pleadings, drafting discovery requests, reviewing documents produced by Defendant,
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1 participating in drafting the settlement agreement, and motion for preliminary approval
2 including related documents.

3 16. The Setareh Law Group prosecuted this matter on a contingent basis
4 meaning that if the case were unsuccessful the firm would have received no
5 compensation or reimbursement of costs. The time spent on the litigation took a
6 considerable amount of time and effort that could have been spent on other fee
7 generating work.

8 17. I have reviewed the work performed on the case and the billing entered by
9 the attorneys working on this case at my firm. The table below includes a summary of
10 all the hours worked. My firm's lodestar total is approximately \$47,746.25.

Attorney	Bar Date	Hourly Rate	Hours	Lodestar
Shaun Setareh	1999	\$850	19.25	\$16,362.50
Thomas Segal	2002	\$700	25.5	\$17,850
Farrah Grant	2013	\$475	26.95	\$12,127.50
Ashley Batiste	2017	\$375	3.75	\$1,406.25

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17 18. A true and correct copy of Setareh Law Group's billing records for this
18 matter is attached hereto as Exhibit A. The billing records also include law clerk
19 Valerie Savan and attorney William Pao but their time is not included in the above
20 lodestar. Ms. Savan's time is not included because she is a non-attorney. Mr. Pao's
21 time was excluded because it was de minimis.

22 **Reasonableness of Class Representative Enhancement Award**

23 19. Class representative Eddie Duron spent considerable time speaking with
24 counsel, gathering documents, and reviewing the Settlement, among other things, and
25 his assistance was instrumental in achieving a settlement amount that is significant to
26 the similarly situated individuals he sought to represent. Further, Duron took on the
27 personal risk of facing intrusive discovery demanded by his former employer, of
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1 making his future employment prospects uncertain, and exposed himself to a possible
2 cost award if the litigation were lost.

3 20. Like Class Members, Class representative Duron was employed by
4 Defendant as a non-exempt employee in California during the class period. Duron has
5 no conflict of interest with absent Class Members and have agreed to place the class’s
6 interests above his own.

7 21. Based on my extensive experience as plaintiffs’ counsel in similar wage-
8 and-hour class actions, the proposed enhancement award is reasonable.

9
10 I declare under the penalty of perjury of the laws of the State of California and
11 the United States of America that the foregoing is true and correct to the best of my
12 knowledge.

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14 Executed on September 24, 2020

_____/s/_____
SHAUN SETAREH

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EXHIBIT A

Date	User	Activity	Rate	Duration	Total	Description
4/18/2019	Ashley Batiste	Correspondence/E-mail	\$375.00	0.25	\$93.75	email ss re remand motion
5/1/2019	Ashley Batiste	Correspondence/E-mail	\$375.00	0.25	\$93.75	email ss re remand motion
5/8/2019	Ashley Batiste	Correspondence/E-mail	\$375.00	0.25	\$93.75	email KR re case file
5/17/2019	Ashley Batiste	Draft and Revise	\$375.00	2.5	\$937.50	draft PAGA only complaint etc.
5/17/2019	Ashley Batiste	Correspondence/E-mail	\$375.00	0.25	\$93.75	email JF re filing
5/17/2019	Ashley Batiste	Correspondence/E-mail	\$375.00	0.25	\$93.75	email JF re complaint

3.75 \$ 1,406.25

3/11/2019	Farrah Grant	Communicate (in firm)	\$450.00	0.5	\$225.00	Re finding client and causes of action
3/12/2019	Farrah Grant	Communicate (in firm)	\$450.00	0.5	\$225.00	Re complaint
3/12/2019	Farrah Grant	Communicate (other external)	\$450.00	0.5	\$225.00	Re finding client
3/13/2019	Farrah Grant	Communicate (in firm)	\$450.00	0.5	\$225.00	Re complaint
3/13/2019	Farrah Grant	Draft and Revise	\$450.00	1	\$450.00	Complaint
3/14/2019	Farrah Grant	Communicate (in firm)	\$450.00	0.25	\$112.50	re complaint
4/18/2019	Farrah Grant	Correspondence/E-mail	\$450.00	0.25	\$112.50	re remand mtn
6/6/2019	Farrah Grant	Correspondence/E-mail	\$450.00	0.25	\$112.50	re consolidation
6/6/2019	Farrah Grant	Correspondence/E-mail	\$450.00	0.25	\$112.50	re ntc of withdrawal
6/6/2019	Farrah Grant	Communicate (in firm)	\$450.00	0.25	\$112.50	re coordination
6/11/2019	Farrah Grant	Communicate (outside counsel)	\$450.00	0.25	\$112.50	Leave OC vm
6/12/2019	Farrah Grant	Correspondence/E-mail	\$450.00	0.25	\$112.50	Re demurrer
6/18/2019	Farrah Grant	Communicate (outside counsel)	\$450.00	0.25	\$112.50	Re combining cases
7/17/2019	Farrah Grant	Communicate (in firm)	\$450.00	0.25	\$112.50	re case status
7/17/2019	Farrah Grant	Communicate (other external)	\$450.00	0.25	\$112.50	other P firm re call via email and vm
7/18/2019	Farrah Grant	Communicate (in firm)	\$450.00	0.25	\$112.50	re case tasks
7/18/2019	Farrah Grant	Correspondence/E-mail	\$450.00	0.25	\$112.50	re rule 26(f)
7/19/2019	Farrah Grant	Communicate (outside counsel)	\$450.00	0.25	\$112.50	re meet and confer times
7/19/2019	Farrah Grant	Communicate (in firm)	\$450.00	0.25	\$112.50	re meet and confer times and tasks
7/30/2019	Farrah Grant	Communicate (in firm)	\$450.00	0.25	\$112.50	re meet and confer

7/30/2019	Farrah Grant	Communicate (outside counsel)	\$450.00	0.25	\$112.50	re meet and confer
7/31/2019	Farrah Grant	Communicate (outside counsel)	\$450.00	0.25	\$112.50	rule 26f call
7/31/2019	Farrah Grant	Communicate (in firm)	\$450.00	0.5	\$225.00	re case strategy
8/1/2019	Farrah Grant	Communicate (outside counsel)	\$450.00	0.25	\$112.50	re met and confer and mediation
8/1/2019	Farrah Grant	Communicate (in firm)	\$450.00	0.5	\$225.00	re met and confer, mediation and claims in the two cases
8/1/2019	Farrah Grant	Review and analyze	\$450.00	0.75	\$337.50	claims in the two cases
8/5/2019	Farrah Grant	Communicate (in firm)	\$450.00	0.25	\$112.50	re case strategy
8/7/2019	Farrah Grant	Communicate (in firm)	\$450.00	0.25	\$112.50	re call with Remedy Law
8/12/2019	Farrah Grant	Communicate (outside counsel)	\$450.00	0.25	\$112.50	Re mediation
8/12/2019	Farrah Grant	Communicate (in firm)	\$450.00	0.25	\$112.50	Re mediation
8/12/2019	Farrah Grant	Communicate (in firm)	\$450.00	0.25	\$112.50	Re cms
9/10/2019	Farrah Grant	Communicate (in firm)	\$450.00	0.25	\$112.50	Re mtn to intervene
9/17/2019	Farrah Grant	Draft and Revise	\$450.00	1	\$450.00	Initial disclosures
9/17/2019	Farrah Grant	Review and analyze	\$450.00	0.25	\$112.50	OC's initial disclosures
9/17/2019	Farrah Grant	Communicate (in firm)	\$450.00	0.25	\$112.50	Ntc of lead mtn
12/11/2019	Farrah Grant	Communicate (in firm)	\$450.00	0.5	\$225.00	re tasks
12/16/2019	Farrah Grant	Correspondence/E-mail	\$450.00	0.25	\$112.50	SA
12/17/2019	Farrah Grant	Correspondence/E-mail	\$450.00	0.25	\$112.50	re SA
12/23/2019	Farrah Grant	Communicate (in firm)	\$450.00	0.25	\$112.50	amending complaint
1/3/2020	Farrah Grant	Correspondence/E-mail	\$450.00	0.25	\$112.50	SA edits
1/7/2020	Farrah Grant	Communicate (in firm)	\$450.00	0.25	\$112.50	re status of tasks
1/7/2020	Farrah Grant	Communicate (outside counsel)	\$450.00	0.25	\$112.50	re amended complaint and phv
1/8/2020	Farrah Grant	Correspondence/E-mail	\$450.00	0.25	\$112.50	re meet and confer call
1/9/2020	Farrah Grant	Correspondence/E-mail	\$450.00	0.25	\$112.50	CMC and complaint
1/20/2020	Farrah Grant	Correspondence/E-mail	\$450.00	0.25	\$112.50	SA
1/24/2020	Farrah Grant	Correspondence/E-mail	\$450.00	0.25	\$112.50	ntc
1/24/2020	Farrah Grant	Correspondence/E-mail	\$450.00	0.25	\$112.50	amended complaint
1/30/2020	Farrah Grant	Correspondence/E-mail	\$450.00	0.25	\$112.50	class ntc
2/10/2020	Farrah Grant	Communicate (in firm)	\$450.00	0.25	\$112.50	hrg continuance
2/10/2020	Farrah Grant	Correspondence/E-mail	\$450.00	0.25	\$112.50	SA
2/11/2020	Farrah Grant	Correspondence/E-mail	\$450.00	0.25	\$112.50	signing SA
2/12/2020	Farrah Grant	Communicate (in firm)	\$450.00	0.25	\$112.50	re status of executing SA

2/13/2020	Farrah Grant	Correspondence/E-mail	\$450.00	0.25	\$112.50	re continuance
2/13/2020	Farrah Grant	Communicate (outside counsel)	\$450.00	1	\$450.00	meet and confer call
2/13/2020	Farrah Grant	Communicate (client)	\$450.00	0.25	\$112.50	re SA
2/17/2020	Farrah Grant	Communicate (client)	\$450.00	0.25	\$112.50	re SA
2/17/2020	Farrah Grant	Communicate (other external)	\$450.00	0.25	\$112.50	co-counsel
2/18/2020	Farrah Grant	Correspondence/E-mail	\$450.00	0.25	\$112.50	executing SA
2/19/2020	Farrah Grant	Communicate (outside counsel)	\$450.00	0.25	\$112.50	re executed SA
2/19/2020	Farrah Grant	Communicate (in firm)	\$450.00	0.25	\$112.50	executed SA
2/19/2020	Farrah Grant	Communicate (client)	\$450.00	0.25	\$112.50	re physical signature
2/21/2020	Farrah Grant	Communicate (outside counsel)	\$450.00	0.25	\$112.50	complaint revisions
2/24/2020	Farrah Grant	Correspondence/E-mail	\$450.00	0.25	\$112.50	handwritten SA
2/25/2020	Farrah Grant	Correspondence/E-mail	\$450.00	0.25	\$112.50	application to reopen
2/26/2020	Farrah Grant	Correspondence/E-mail	\$450.00	0.5	\$225.00	CMS
2/26/2020	Farrah Grant	Calendar	\$450.00	0.25	\$112.50	new CMC and tasks
3/3/2020	Farrah Grant	Draft and Revise	\$450.00	1	\$450.00	CMS
4/24/2020	Farrah Grant	Communicate (in firm)	\$450.00	0.1	\$45.00	mtn to reopen hrg
4/27/2020	Farrah Grant	Communicate (other external)	\$450.00	0.1	\$45.00	co-counsel
4/29/2020	Farrah Grant	Communicate (other external)	\$450.00	0.25	\$112.50	Co counsel re prelim approval mtn
5/26/2020	Farrah Grant	Communicate (outside counsel)	\$450.00	0.25	\$112.50	revised SA
5/27/2020	Farrah Grant	Communicate (in firm)	\$450.00	0.25	\$112.50	CMS
6/11/2020	Farrah Grant	Correspondence/E-mail	\$450.00	0.25	\$112.50	Status of cms and cmc
7/30/2020	Farrah Grant	Communicate (in firm)	\$450.00	0.2	\$90.00	calls re case status
8/5/2020	Farrah Grant	Communicate (in firm)	\$450.00	0.2	\$90.00	Disco requests
8/5/2020	Farrah Grant	Correspondence/E-mail	\$450.00	0.25	\$112.50	joint stip
8/5/2020	Farrah Grant	Review and analyze	\$450.00	0.2	\$90.00	disco to propound
8/6/2020	Farrah Grant	Correspondence/E-mail	\$450.00	0.25	\$112.50	discover we propounded
8/11/2020	Farrah Grant	Communicate (in firm)	\$450.00	0.25	\$112.50	Prelim approval order and tasks for final approval
8/13/2020	Farrah Grant	Correspondence/E-mail	\$450.00	0.25	\$112.50	Other case trying to be included
8/14/2020	Farrah Grant	Correspondence/E-mail	\$450.00	0.25	\$112.50	Class ntc
8/14/2020	Farrah Grant	Correspondence/E-mail	\$450.00	0.25	\$112.50	Amending complaint
8/18/2020	Farrah Grant	Correspondence/E-mail	\$450.00	0.2	\$90.00	Stip to extend time
9/1/2020	Farrah Grant	Correspondence/E-mail	\$450.00	0.25	\$112.50	Cms
9/4/2020	Farrah Grant	Correspondence/E-mail	\$450.00	0.25	\$112.50	CMS and complaint

9/8/2020	Farrah Grant	Review and analyze	\$450.00	0.25	\$112.50	admin report
9/9/2020	Farrah Grant	Correspondence/E-mail	\$450.00	0.25	\$112.50	Setting remote appearance
9/10/2020	Farrah Grant	Correspondence/E-mail	\$450.00	0.2	\$90.00	new complaint
				26.95	\$12,127.50	

4/23/2018 William M Pao Calendar \$450.00 0.25 \$112.50 calendar SOL

12/17/2019	Valerie Savran	Communicate (in firm)	\$350.00	0.3	\$105.00	discussion w/ Thomas re joint stip
12/23/2019	Valerie Savran	Draft and Revise	\$350.00	0.75	\$262.50	Draft amended complaint pursuant to stip.
1/17/2020	Valerie Savran	Communicate (in firm)	\$350.00	0.25	\$87.50	Discuss amended complaint with Thomas
1/17/2020	Valerie Savran	Draft and Revise	\$350.00	0.25	\$87.50	Revise JBS complaint
1/21/2020	Valerie Savran	Draft and Revise	\$325.00	0.25	\$81.25	Revise amended complaint; talk to Thomas about amended complaint; send amended complaint to Thomas to forward to opposing counsel.
1/24/2020	Valerie Savran	Draft and Revise	\$325.00	0.5	\$162.50	Revise FAC pursuant to OC suggestions
				2.3	\$ 786.25	

5/3/2019	Thomas Segal	Research	\$700.00	4.75	\$3,325.00	Grounds for remand of wage claims
5/6/2019	Thomas Segal	Draft and Revise	\$700.00	6	\$4,200.00	Remand motion
5/17/2019	Thomas Segal	Review and analyze	\$700.00	0.75	\$525.00	PAGA complaint
5/29/2019	Thomas Segal	Review and analyze	\$700.00	1.75	\$1,225.00	Pleadings in De Cabrera case
7/31/2019	Thomas Segal	Plan and prepare for	\$700.00	2.75	\$1,925.00	26(f) Conference
7/31/2019	Thomas Segal	Communicate (outside counsel)	\$700.00	0.5	\$350.00	26(f) Conference
8/23/2019	Thomas Segal	Review and analyze	\$700.00	0.5	\$350.00	Stip to consolidate
9/16/2019	Thomas Segal	Draft and Revise	\$700.00	4.5	\$3,150.00	Interim Lead Counsel motion

9/17/2019	Thomas Segal	File	\$700.00	1.25	\$875.00	Finalize and file lead counsel motion
9/27/2019	Thomas Segal	Review and analyze	\$700.00	0.75	\$525.00	Motion to stay
10/30/2019	Thomas Segal	Review and analyze	\$700.00	0.5	\$350.00	Fee sharing agreement
11/12/2019	Thomas Segal	Review and analyze	\$700.00	1.5	\$1,050.00	Settlement agreement

25.5 \$ 17,850.00

3/7/2019	Shaun Setareh	Review and analyze	\$850.00	3.25	\$2,762.50	Client docs and personnel file
4/18/2019	Shaun Setareh	Review and analyze	\$850.00	0.5	\$425.00	Notice of Removal
4/22/2019	Shaun Setareh	Research	\$850.00	2.5	\$2,125.00	Pleadings and docket in related case
9/5/2019	Shaun Setareh	Draft and Revise	\$850.00	0.75	\$637.50	Edit 26(f) report
9/16/2019	Shaun Setareh	Draft and Revise	\$850.00	3.5	\$2,975.00	Motion for interim counsel
9/27/2019	Shaun Setareh	Review and analyze	\$850.00	0.75	\$637.50	Motion to stay
11/14/2019	Shaun Setareh	Review and analyze	\$850.00	4.5	\$3,825.00	Review settlement agreement
4/29/2020	Shaun Setareh	Review and analyze	\$850.00	3.5	\$2,975.00	Draft prelim mtn

19.25 \$16,362.50