

1 Andranik Tsarukyan (SBN 258241)
andy@remedylawgroup.com
2 Armen Zenjiryan (SBN 261073)
armen@remedylawgroup.com
3 REMEDY LAW GROUP LLP
610 E. Providencia Ave., Unit B
4 Burbank, CA 91501
Tel: (818) 422-5941

5 Attorneys for Plaintiff
6 SILVIA VALDIVIA DE CABRERA

7
8 UNITED STATES DISTRICT COURT
9 CENTRAL DISTRICT OF CALIFORNIA

10
11 SILVIA VALDIVIA DE CABRERA, an
individual, on behalf of herself and all
12 others similarly situated,

13 Plaintiffs,

14 vs.

15 SWIFT BEEF COMPANY, a Delaware
corporation; JBS USA, LLC, an unknown
limited liability company; JBS USA
16 HOLDINGS, INC., an unknown
corporation; JBS USA, an unknown
17 entity; JBS USA INC., an unknown
corporation; SWIFT & COMPANY INC.,
18 an unknown corporation; PILGRIM'S
PRIDE CORPORATION, an unknown
19 corporation; JBS USA FOOD
COMPANY, an unknown entity; JBS
20 USA FOOD COMPANY HOLDINGS,
an unknown entity; and DOES 1 through
21 100, inclusive

22 Defendants.
23
24
25
26
27
28

Case No. 5:18-cv-02551-PSG-E

CLASS ACTION

**DECLARATION OF ANDRANIK
TSARUKYAN IN SUPPORT OF
PLAINTIFF'S UNOPPOSED
MOTION FOR ATTORNEYS' FEES
AND COSTS AND CLASS
REPRESENTATIVES' INCENTIVE
AWARD**

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

1 I, Andranik Tsarukyan, declare:

2 1. I am admitted, in good standing, to practice as an attorney in the State of
3 California and the United States District Court for the Central District of California. I
4 submit this declaration in support of Plaintiff’s Unopposed Motion for Attorneys’ Fees
5 and Costs and Class Representatives’ Incentive Award. I make this declaration on my
6 personal knowledge, and if called upon to do so, I could and would competently testify
7 to the contents of this declaration.

8 2. I am the co-founding partner of Remedy Law Group LLP. I am counsel for
9 Plaintiff Silvia Valdivia De Cabrera (“Plaintiff”).

10 3. As lead counsel in this case, I fully support the resulting settlement as fair,
11 adequate, and reasonable.

12 BACKGROUND

13 4. On November 2, 2018, Plaintiff filed a lawsuit in California state court on
14 behalf of all non-exempt, hourly paid employees of Defendants in California. On
15 February 5, 2019, Plaintiff filed a First Amended Complaint asserting claims for: (i)
16 unpaid minimum wages; (ii) unpaid overtime wages; (iii) meal and rest break violations;
17 (iv) failure to timely pay wages upon termination; (v) wage statement violations; (vi)
18 derivative claims under Business & Professions Code §§ 17200, *et seq.*; and (vii) penalties
19 under the Private Attorneys General Act. Defendants removed the case to this Court on
20 December 5, 2018.

21 5. On March 13, 2019, plaintiff Eddie Duron also filed a lawsuit in California state
22 court on behalf of all non-exempt, hourly paid employees of Defendants in California.
23 Defendants removed the *Duron* case, entitled *Eddie Duron v. JBS USA Food Company*
24 *Holdings, et al.*, 5:19- cv-00702 PSG(Ex) (C. D. Cal. 2019), to this Court and, on April
25 23, 2019, filed a notice of related cases relating the instant case with the *Duron* case. The
26 instant case and the *Duron* case have six causes of action in common with each other and
27 involve substantially similar purported putative classes of individuals. Therefore,
28

1 approval of the Settlement in the instant case will also resolve the wage and hour claims
2 in the related *Duron* case.

3 6. Counsel for Plaintiff have entered into a written fee sharing agreement with
4 counsel for Eddie Duron in which Setareh Law Group will receive 32.5% of the total fee
5 awarded and Remedy Law Group LLP will receive 67.5% of the fee awarded. Both
6 Plaintiff and Eddie Duron have approved the agreement in writing.

7 7. One June 25, 2020, this Court preliminarily approved the Settlement, appointed
8 Remedy Law Group LLP and Setareh Law Group as Class Counsel, appointed Plaintiff
9 and Eddie Duron as Class Representatives, and appointed Phoenix Class Action
10 Administration Solutions as the Settlement Administrator.

11 8. The deadline for opting out of or objecting to the settlement is October 5, 2020.
12 The Settlement Administrator and my firm will file declarations summarizing the final
13 details concerning the administration of the settlement before the final approval hearing,
14 after the deadline to object to or opt out of the settlement has passed.

15 9. As of this date, no Class Member has objected to or opted out the settlement.
16 Based on this lack of opt-out, each Class Member will receive an average settlement of
17 \$413 after all deductions, but before tax withholdings. The settlement fund is non-
18 reversionary and payment will be sent to all Class Members who have not opted out. This
19 represents a good outcome which provides substantial relief, in a case where, *inter alia*,
20 victory was uncertain due to the various defenses raised by Defendants. Defendants also
21 will pay the employer's share of payroll taxes separately and in addition to the Gross
22 Settlement Amount of \$750,000.

23 10. As summarized in **Exhibit 1**, attached hereto, my firm has documented a
24 lodestar of approximately \$153,900 as of September 24, 2020, representing
25 approximately 228 hours of time spent by my firm since the inception of this case. Even
26 if we only include the time spent by Remedy Law Group LLP on this case, and not the
27 time spent by Class Counsel Setareh Law Group, the benchmark fee award of \$187,500
28

1 would only provide a 1.2 multiplier. (\$187,500 fee request) / (\$153,900 lodestar of
2 Remedy Law Group LLP) = (1.2 multiplier). I expect this multiplier will decrease as my
3 firm spends additional time on the case, including finalizing the motion for final approval
4 of the settlement, preparation for and appearance at the final approval hearing, promptly
5 responding to Class Members' inquiries about the settlement, and ensuring payments are
6 properly distributed to all Class Members, among other work. In addition, my firm seeks
7 \$3,652.10 in actual costs incurred to date, including costs it has incurred for filing and
8 service of documents and retaining an expert statistician. My firm does not anticipate
9 incurring any further litigation costs, assuming the settlement is granted final approval on
10 or about November 16, 2020. **Exhibit 2**, attached hereto, are copies of invoices for actual
11 costs incurred in this case.

12 11. The amount of work my firm has invested in this case was reasonably necessary
13 to ensure that the Class Members covered by this settlement will be compensated
14 appropriately. My firm exercised appropriate billing discretion as we would for a fee-
15 paying hourly client.

16 THE EXPERIENCE OF CLASS COUNSEL

17 12. I am a co-founding partner of Remedy Law Group LLP, which is engaged in
18 the practice of employment law and focuses exclusively on representing plaintiffs. The
19 firm's wage and hour practice consists of class action litigation, single plaintiff litigation,
20 and prosecution of PAGA claims in both federal and state courts in California. Prior to
21 founding Remedy Law Group LLP, I was a senior associate with the Los Angeles office
22 of Jackson Lewis, P.C., working exclusively on defense of employment law cases,
23 including single plaintiff, PAGA, and class action wage and hour claims.

24 13. I received a B.A. in International Studies in 2002 from Virginia Military
25 Institute. I received my J.D. from Southwestern Law School in 2008. I have been an
26 Active Member of the State Bar of California since December 2008 and in good standing
27 continuously since then.
28

1 14. My partner, Armen Zenjiryan, is a co-founding partner of Remedy Law Group
2 LLP. Prior to founding Remedy Law Group LLP, Mr. Zenjiryan was a partner at the Los
3 Angeles office of Jackson Lewis, P.C., working exclusively on defense of employment
4 law cases, including single plaintiff, PAGA, and class action wage and hour claims.¹

5 15. Mr. Zenjiryan received a B.A. in Political Science in 2005 from University of
6 Southern California. He received his J.D. from Pepperdine University in 2008. He has
7 been an Active Member of the State Bar of California since December 2008 and in good
8 standing continuously since then.

9 16. Mr. Zenjiryan and I have been lead class counsel in multiple wage and hour
10 class action cases. The following are class action cases which Mr. Zenjiryan and I have
11 prosecuted:

- 12 (a) *Guzman v. Team-One Employment Specialists, LLC*, Los Angeles
13 County Superior Court, Case No. 19STCV11006;
- 14 (b) *Rodriguez v. Hort Tech LLC*, Riverside County Superior Court, Case
15 No. RIC1816212;
- 16 (c) *Ramirez v. Sukar and Sons of California*, Los Angeles County
17 Superior Court, Case No. BC715061;
- 18 (d) *Callahan v. Brookdale Senior Living Communities, Inc.*, United
19 States District Court for the Central District of California, Case No.
20 2:18-cv-10726-VAP-SS;
- 21 (e) *Garcia v. Swissport SA, LLC*, Los Angeles County Superior Court,
22 Case No. BC716020;
- 23 (f) *Zermeno v. Rapid Manufacturing, LCR*, Los Angeles County
24 Superior Court, Case No. 19STCV42207;

25 _____
26 ¹ In 2018, the Court in *Nunnari v. Merchant Factors Corp.*, United States District
27 Court for the Central District of California, Case No. 2:17-cv-09058-PSG-JEM granted
28 my partner Mr. Zenjiryan's request for an hourly rate of \$700.00. Mr. Zenjiryan and I
were both admitted to the California State Bar in 2008 and worked together for over 6
years at the Los Angeles office of Jackson Lewis P.C.

1 (g) *Duran v. Sectran Security, Incorporated*, Los Angeles County
2 Superior Court, Case No. 20STCV00515;

3 (h) *Mydland v. Alamon Telco, Inc.*, Los Angeles County Superior Court,
4 Case No. BC715173; and

5 (i) *Castellanos v. Audio Visual Services Group, LLC*, Los Angeles
6 County Superior Court, Case No. 19STCV04620.

7 17. My usual and customary rate is billed at \$675.00 per hour, which is the
8 amount charged to the firm's hourly-fee paying clients. Multiple courts have recently
9 approved my usual and customary billing rates and/or fee awards with multipliers of that
10 rate based upon a lodestar cross-check:

- 11 • On February 6, 2020, the court in the class action case of *Mydland v. Alamon*
12 *Telco, Inc.*, Los Angeles County Superior Court, Case No. BC715173 approved
13 my requested fees based upon my submission of \$675.00 per hour for the lodestar
14 cross-check;
- 15 • On June 23, 2020, the court in the class action case of *Rodriguez v. Hort Tech LLC*,
16 Riverside County Superior Court, Case No. RIC1816212 approved my requested
17 fees based upon my submission of \$675.00 per hour for the lodestar cross-check;
18 and
- 19 • On July 8, 2020, the court in the class action case of *Ramirez v. Sukar and Sons of*
20 *California*, Los Angeles County Superior Court, Case No. BC715061 approved
21 my requested fees based upon my submission of \$675.00 per hour for the lodestar
22 cross-check.

23 18. I was selected for the Rising Stars edition of Super Lawyers in 2018 and I was
24 selected to Super Lawyers for 2020 and 2021. Based upon my experience, including all
25 the above information, and previously approved hourly rates, my regular hourly billing
26 rate is \$675.00.

27 19. At all times during this litigation, my law firm has had only two attorneys.
28

1 During the pendency of this matter, my firm was obligated to assure that sufficient
2 attorney resources were dedicated to the prosecution of this litigation, at the expense of
3 prosecuting other matters – including matters in which we might have represented hourly-
4 paying clients. My firm’s dedication of resources reduced counsel’s ability to work on
5 cases the outcome of which was more certain. In the time that this case has been pending,
6 my firm has not received any compensation or reimbursement for its efforts in
7 prosecuting this case on behalf of Plaintiff and the Class, and has advanced all expenses
8 to date.

9 REASONABLENESS OF THE REQUESTED FEE AWARD

10 20. When this case was taken on a contingent fee basis, with the firm agreeing to
11 assume responsibility for litigation costs, the ultimate result was far from certain. During
12 this litigation, Remedy Law Group LLP paid all filing and service costs and the costs to
13 retain an expert statistician, among others. There was never a guarantee that Remedy
14 Law Group LLP would recoup those expenditures. The firm took on this case, which
15 necessarily required the firm to forego other opportunities, given finite resources to
16 devote to cases.

17 21. Because of the uncertainty of the outcome in this and other wage and hour
18 litigation undertaken by Remedy Law Group LLP, we took this case with the expectation
19 that a risk enhancement, either in the form of a lodestar multiplier or a percentage of the
20 fund award equivalent thereto, would be available if we prevailed. This expectation stems
21 from the fact that some cases we undertake as putative class actions do not resolve
22 successfully.

23 22. Class Counsel’s experience in employment class actions was integral in
24 evaluating the strengths and weaknesses of the case against Defendants and the
25 reasonableness of the settlement. Practice in the narrow fields of wage and hour litigation
26 requires skill and knowledge concerning the rapidly evolving substantive law (state and
27 federal) of class action and PAGA litigation.
28

1 23. Here, Class Counsel seeks the “benchmark” 25% of the common fund for
2 attorneys’ fees in this case. This is consistent with common practice, consistent with
3 Ninth Circuit practice, consistent with California law approving the percentage of the
4 fund method to award fees from a common fund, *Laffitte v. Robert Half Intern. Inc.*, 1
5 Cal. 5th 480, 503 (2016), and not inappropriate considering the many hours expended by
6 attorneys performing work on behalf of the class before and after the filing of this matter.

7 That work includes:

- 8 (a) Investigating the facts of this case before the filing of and during the
9 pendency of this action;
- 10 (b) Numerous interviews with the Plaintiff;
- 11 (c) Drafting pleadings;
- 12 (d) Review of documents provided by Plaintiff;
- 13 (e) Numerous communications with Defendants’ counsel;
- 14 (f) Legal research and investigation regarding Defendants’ practices at
15 numerous points in the litigation;
- 16 (g) Preparation of the original and amended class action complaints;
- 17 (h) Preparation of the notice to the Labor and Workforce Development
18 Agency.
- 19 (i) Meet and confer efforts with Defendants’ counsel to obtain relevant
20 documents and information through informal discovery;
- 21 (j) Contacting witnesses;
- 22 (k) Preparing written discovery;
- 23 (l) Reviewing extensive statistical data provided by Defendants’ counsel;
- 24 (m) Numerous communications with a statistics expert regarding data
25 and potential damages;
- 26 (n) Analysis of the audit results and preparation of a damages model with
27 the aid of a statistics expert;
- 28

- (o) Drafting, negotiating, and reviewing multiple drafts of the Settlement Agreement and attachments;
- (p) Preparation of the class notice and related documents; and
- (q) Preparation of the motion for preliminary approval of the settlement, including related documents;
- (r) Engaging in communications with Class Members, Defendants' counsel, and the Settlement Administrator regarding the settlement;
- (s) Preparation of the instant motion for attorneys' fees and costs; and
- (t) Preparation of the motion for final approval of the settlement, including related documents.

24. I anticipate I will spend approximately an additional 20 hours on this matter finalizing the motion for final approval, preparing for and appearing at the hearing for final approval, answering Class Members' calls and email inquiries about the settlement, working with the Settlement Administrator to facilitate payment to the Class, conferring with Defendants' counsel, and resolving any post-approval issues that may arise.

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

Executed this September 24, 2020, at Burbank, California.

/s/ Andranik Tsarukyan
Andranik Tsarukyan

EXHIBIT 1

Hours	Attorney Biller	Description	Hourly Rate (\$)
1.9	Andranik Tsarukyan ("AT")	Initial meeting with client re potential claims	\$675.00
.8	AT	Confer with Armen Zenjiryan re potential claims	\$675.00
2.3	AT	Research regarding nine potential defendants to be included in lawsuit	\$675.00
.7	AT	Meeting with potential client re proceeding with case on a class-wide basis	\$675.00
.2	AT	Review correspondence from potential client regarding company handbook	\$675.00
.5	AT	Prepare engagement letter	\$675.00
1.4	AT	Meeting with client to discuss various aspects of case	\$675.00
1.5	AT	Meeting with additional potential clients re class-wide lawsuit	\$675.00
.4	AT	Communication with client re engagement letter	\$675.00
.6	AT	Address issues regarding identities of client's employer(s)	\$675.00
1.2	AT	Review company information regarding nine potential defendants and staffing agency	\$675.00
3.9	AT	Review employee handbook, paystubs, W-2s and various policies and procedures	\$675.00
.9	AT	Confer with Armen Zenjiryan re potential causes of action	\$675.00
3.4	AT	Contact various witnesses re plaintiff's claims	\$675.00
.5	AT	Address issues re viability of PAGA penalties	\$675.00
.9	AT	Review plaintiff's personnel file	\$675.00
.8	AT	Confer with statistician re wage and hour issues	\$675.00
.7	AT	Review wage orders applicable to class claims	\$675.00
4.3	AT	Prepare initial draft of class action complaint	\$675.00
.6	AT	Confer with Armen Zenjiryan regarding venue and other procedural issues	\$675.00

.3	AT	Call with client re status of case	\$675.00
2.1	AT	Revise draft of class action complaint	\$675.00
.3	AT	Prepare summons	\$675.00
.2	AT	Prepare certificate of counsel	\$675.00
.4	AT	Call with client regarding breaks	\$675.00
1.0	AT	Finalize class action complaint	\$675.00
.6	AT	Review Secretary of State's website regarding agent for service of process for nine defendants	\$675.00
2.4	AT	Conduct site visit	\$675.00
.6	AT	File class action complaint and related documents in Riverside	\$675.00
.3	AT	Call with client re status of case	\$675.00
.8	AT	Prepare service of complaint on all defendants	\$675.00
1.1	AT	Detailed review of twenty page case management order	\$675.00
2.0	AT	Prepare letter to LWDA regarding alleged PAGA violations	\$675.00
.2	AT	Review notice of assignment	\$675.00
.3	AT	Review pro hac vice application of Kelly Robinson and proposed order thereon	\$675.00
.5	AT	Revise and finalize letter to LWDA	\$675.00
.4	AT	Prepare letter to LWDA enclosing fee to file PAGA action	\$675.00
.3	AT	Review proofs of service regarding all defendants	\$675.00
.4	AT	Confer with Armen Zenjiryan about service of process issues	\$675.00
2.0	AT	Review plaintiff's payroll records	\$675.00
.6	AT	Call with client about breaks and timekeeping practices and policies	\$675.00
2.1	AT	Review motion to intervene and related documents and address issue re same	\$675.00
3.8	AT	Review package of removal to federal court documents	\$675.00
.3	AT	Review corporate disclosure forms	\$675.00
.7	AT	Address issues re counter arguments to removal of case to federal court	\$675.00

.4	AT	Prepare stipulation regarding extension of deadline to file responsive pleading	\$675.00
.2	AT	Exchange correspondence with opposing counsel re extension of deadline to file answer	\$675.00
2.1	AT	Prepare interrogatories	\$675.00
1.8	AT	Prepare document requests	\$675.00
.3	AT	Review defendants' response to OSC re lack of case prosecution	\$675.00
.2	AT	Review revised pro hac vice applications	\$675.00
.9	AT	Prepare stipulation re dismissal of various defendants and proposed order thereon	\$675.00
2.6	AT	Review defendant Swift Beef Company's answer to complaint	\$675.00
.6	AT	Review court's standing order	\$675.00
.2	AT	Review order dismissing various defendants	\$675.00
.1	AT	Review order setting scheduling conference	\$675.00
1.4	AT	Prepare stipulation and proposed order re relief from L.R. 23-3	\$675.00
1.8	AT	Prepare categories of demands related to class data	\$675.00
1.6	AT	Prepare first amended class action complaint	\$675.00
2.2	AT	Review defendant's answer to first amended complaint	\$675.00
.8	AT	Review notice of related cases filed by defendant	\$675.00
1.2	AT	Confer with client re information needed to prepare initial disclosures	\$675.00
1.4	AT	Prepare plaintiff's initial disclosures	\$675.00
1.2	AT	Review defendant's initial disclosures	\$675.00
1.7	AT	Prepare discovery plan	\$675.00
.8	AT	Prepare stipulation and proposed order to continue scheduling conference	\$675.00
1.5	AT	Prepare stipulation and proposed order to consolidate cases	\$675.00
1.6	AT	Prepare Rule 26(f) report	\$675.00

1.7	AT	Interviews regarding working conditions	\$675.00
.6	AT	Review declaration regarding non-employer defendants	\$675.00
.4	AT	Confer with Armen Zenjiryan re stipulation and protective order re confidential docs	\$675.00
4.3	AT	Review class list and class data	\$675.00
3.3	AT	Review sixty seven page employee handbook sent by opposing counsel	\$675.00
2.0	AT	Prepare selection criteria for sample class size	\$675.00
1.6	AT	Confer with Armen Zenjiryan re class data	\$675.00
6.9	AT	Review approximately four hundred pages of time records of class members	\$675.00
6.4	AT	Analyze nearly three hundred seventy five pages of time records for class members	\$675.00
6.2	AT	Review approximately four hundred pages of time records for class members	\$675.00
7.0	AT	Review approximately five hundred pages of time records	\$675.00
4.5	AT	Review approximately three hundred pages of time records	\$675.00
5.9	AT	Analyze approximately six hundred pages of raw punch data	\$675.00
6.5	AT	Review approximately six hundred fifty pages of raw punch data	\$675.00
7.2	AT	Analyze approximately seven hundred pages of raw punch data	\$675.00
5.6	AT	Review approximately four hundred pages of raw punch data in preparation in preparing damages analysis	\$675.00
1.0	AT	Call with expert re class data analysis	\$675.00
1.6	AT	Review damages analysis for all claims	\$675.00
.8	AT	Further call with statistician regarding damages	\$675.00
.5	AT	Solicit bids from various settlement administrators for settlement administration	\$675.00

.2	AT	Email with opposing counsel re motion for preliminary approval	\$675.00
6.8	AT	Prepare initial draft of long form settlement agreement	\$675.00
1.0	AT	Prepare joint stipulation and proposed order to reopen case	\$675.00
2.9	AT	Review long form settlement agreement	\$675.00
2.7	AT	Revise settlement agreement	\$675.00
.1	AT	Email to opposing counsel re settlement agreement	\$675.00
1.9	AT	Review opposing counsel's proposed changes to settlement agreement	\$675.00
.6	AT	Confer with Armen Zenjiryan re revisions to settlement agreement	\$675.00
1.0	AT	Analyze defense counsel's redlined changes to settlement agreement	\$675.00
.5	AT	Call with client re terms of settlement agreement	\$675.00
1.4	AT	Prepare joint motion and proposed order to reopen case	\$675.00
.2	AT	Review court order reopening case	\$675.00
8.7	AT	Prepare motion for preliminary approval	\$675.00
2.6	AT	Review motion for preliminary approval	\$675.00
2.4	AT	Revise and finalize motion for preliminary approval	\$675.00
.1	AT	Send correspondence to defense counsel re motion for preliminary approval	\$675.00
.4	AT	Call with defense counsel re settlement agreement	\$675.00
.4	AT	Call with co-counsel re changes to settlement agreement	\$675.00
1.9	AT	Prepare proposed order granting preliminary approval	\$675.00
3.7	AT	Prepare class notice	\$675.00
.1	AT	Review email from opposing counsel re class notice	\$675.00
.1	AT	Send correspondence to opposing counsel re proposed order	\$675.00
.1	AT	Review email from opposing counsel re changes to motion for	\$675.00

		preliminary approval and proposed order.	
3.9	AT	Review and revise motion for preliminary approval and proposed order thereon based on comments from opposing counsel	\$675.00
1.8	AT	Prepare objection and exclusion forms to settlement	\$675.00
5.6	AT	Prepare initial draft of declaration in support of motion for preliminary approval	\$675.00
3.4	AT	Further drafting of declaration supporting preliminary approval	\$675.00
.5	AT	Review detailed settlement administration bid	\$675.00
.2	AT	Call with client re status of case	\$675.00
1.0	AT	Finalize for filing all documents re motion for preliminary approval	\$675.00
.2	AT	Call with client regarding case status update	\$675.00
1.4	AT	Review opposing counsel's proposed changes to class notice, settlement agreement and proposed order	\$675.00
.2	AT	Exchange correspondence with defense counsel re preliminary approval docs	\$675.00
1.1	AT	Review order granting preliminary approval of class action settlement	\$675.00
3.9	AT	Prepare initial draft of motion for approval of attorneys fees and incentive awards	\$675.00
3.0	AT	Prepare declaration in support of motion for attorneys fees and service awards	\$675.00
.6	AT	Prepare proposed order re request for attorney's fees and incentive awards	\$675.00
4.9	AT	Prepare initial draft of motion for final approval	\$675.00
3.2	AT	Prepare declaration in support of motion for final approval	\$675.00
1.5	AT	Prepare proposed order in support of final approval motion	\$675.00

EXHIBIT 2



Sean Berger
2131 Century Park Lane #113
Los Angeles, CA 90067
Phone 818.635.5563

DATE: 8/26/2019
INVOICE # 2569
FOR: Valdivia v JBS

Bill To:

Remedy Law Group
c/o Andy Tsarukyan
610 E Providencia Ave Unit B
Burbank, California 91501
(818) 422-5941

DESCRIPTION	AMOUNT
Valdivia v JBS Analysis (10.00 hours @ \$125/hr Rate)	\$1,250.00
TOTAL	\$1,250.00

Please make all checks payable to Berger Consulting Group, LLC
2131 Century Park Lane #113
Los Angeles, CA 90067

Thank you for your business.

INVOICE



1400 North McDowell Blvd. Suite 300
 Petaluma, CA 94954
 1-800-938-8815 ext. 1
 TIN: 26-0259046

We've moved! Please update your records with our new mailing address.

Bill To
Remedy Law Group LLP 610 E. Providencia Ave #B Burbank CA 91501

Credit Card Sale

Date	11/2/2018
Customer	0117000
Credit Sale	01606300
Amount Due	\$0

Order Number	12457378
Contact	Andranik Tsarukyan
Attorney	Andranik Tsarukyan
Billing Code	
Case Title	Silvia Valdivia De Cabrera v SWIFT BEEF COMPANY
Court	Superior Court of California, Riverside County
Court Transaction Number	
Case Number	RIC1823002
Documents	Complaint, Summons, Civil Case Cover Sheet, General/Other

STATUTORY DISBURSEMENTS*	AMOUNT
Court Filing Fee	\$450.00
Court Filing Fee	\$1,000.00
SUBTOTAL	\$1,450.00

ONE LEGAL FEES	AMOUNT
Convenience Fee‡	\$47.85
Court Filing Service Charge, 16 - 25 Pages	\$70.00
SUBTOTAL	\$117.85

FEES SUMMARY	AMOUNT
Disbursements	\$1,450.00
One Legal Fees	\$117.85
TOTAL CHARGED	\$1,567.85

* These mandatory fees are charged by the court or required by statute and are not One Legal service fees. One Legal disburses these fees on your behalf.

‡ Statutory fees disbursed on your behalf are assessed a convenience fee for processing and collecting these disbursements. The convenience fee is waived if you elect the One Legal ACH payment service. One Legal does not assess a convenience fee on its products and services. Learn more at www.onelegal.com/ACH



1400 North McDowell Blvd. Suite 300
 Petaluma, CA 94954
 1-800-938-8815 ext. 1
 TIN: 26-0259046

We've moved! Please update your records with our new mailing address.

Credit Card Sale

Date	11/7/2018
Customer	0117000
Credit Sale	01611830
Amount Due	\$0

Bill To
Remedy Law Group LLP 610 E. Providencia Ave #B Burbank CA 91501

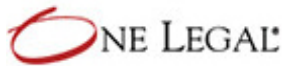
Order Number	12469395
Contact	Andranik Tsarukyan
Attorney	Andranik Tsarukyan
Billing Code	
Case Title	Silvia Valdivia De Cabrera v SWIFT BEEF COMPANY
Court	Superior Court of California, Riverside County
Court Transaction Number	
Case Number	RIC1823002
Documents	POS

ONE LEGAL FEES	AMOUNT
----------------	--------

File Proof of Service	\$20.00
SUBTOTAL	\$20.00

FEES SUMMARY	AMOUNT
--------------	--------

One Legal Fees	\$20.00
TOTAL CHARGED	\$20.00



1400 North McDowell Blvd. Suite 300
 Petaluma, CA 94954
 1-800-938-8815 ext. 1
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Credit Card Sale

Date	11/7/2018
Customer	0117000
Credit Sale	01611838
Amount Due	\$0

Order Number	12469394
Contact	Andranik Tsarukyan
Attorney	Andranik Tsarukyan
Billing Code	
Case Title	Silvia Valdivia De Cabrera v SWIFT BEEF COMPANY
Court	Superior Court of California, Riverside County
Court Transaction Number	
Case Number	RIC1823002
Documents	POS

ONE LEGAL FEES	AMOUNT
----------------	--------

File Proof of Service	\$20.00
SUBTOTAL	\$20.00

FEES SUMMARY	AMOUNT
--------------	--------

One Legal Fees	\$20.00
TOTAL CHARGED	\$20.00



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Credit Card Sale

Date	11/7/2018
Customer	0117000
Credit Sale	01611837
Amount Due	\$0

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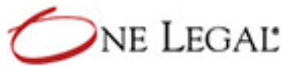
Order Number	12469393
Contact	Andranik Tsarukyan
Attorney	Andranik Tsarukyan
Billing Code	
Case Title	Silvia Valdivia De Cabrera v SWIFT BEEF COMPANY
Court	Superior Court of California, Riverside County
Court Transaction Number	
Case Number	RIC1823002
Documents	POS

ONE LEGAL FEES	AMOUNT
----------------	--------

File Proof of Service	\$20.00
SUBTOTAL	\$20.00

FEES SUMMARY	AMOUNT
--------------	--------

One Legal Fees	\$20.00
TOTAL CHARGED	\$20.00



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Credit Card Sale

Date	11/13/2018
Customer	0117000
Credit Sale	01617187
Amount Due	\$0

Order Number	12479169
Contact	Andranik Tsarukyan
Attorney	Andranik Tsarukyan
Billing Code	
Case Title	Silvia Valdivia De Cabrera v SWIFT BEEF COMPANY
Court	Superior Court of California, Riverside County
Court Transaction Number	
Case Number	RIC1823002
Documents	

ONE LEGAL FEES	AMOUNT
----------------	--------

File Proof of Service	\$20.00
SUBTOTAL	\$20.00

FEES SUMMARY	AMOUNT
--------------	--------

One Legal Fees	\$20.00
TOTAL CHARGED	\$20.00



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Credit Card Sale

Date	11/27/2018
Customer	0117000
Credit Sale	01632347
Amount Due	\$0

Order Number	12516945
Contact	Andranik Tsarukyan
Attorney	Andranik Tsarukyan
Billing Code	
Case Title	Silvia Valdivia De Cabrera v SWIFT BEEF COMPANY
Court	Superior Court of California, Riverside County
Court Transaction Number	
Case Number	RIC1823002
Documents	POS

ONE LEGAL FEES	AMOUNT
----------------	--------

File Proof of Service	\$20.00
SUBTOTAL	\$20.00

FEES SUMMARY	AMOUNT
--------------	--------

One Legal Fees	\$20.00
TOTAL CHARGED	\$20.00



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Credit Card Sale

Date	11/27/2018
Customer	0117000
Credit Sale	01632348
Amount Due	\$0

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Order Number	12516946
Contact	Andranik Tsarukyan
Attorney	Andranik Tsarukyan
Billing Code	
Case Title	Silvia Valdivia De Cabrera v SWIFT BEEF COMPANY
Court	Superior Court of California, Riverside County
Court Transaction Number	
Case Number	RIC1823002
Documents	POS

ONE LEGAL FEES	AMOUNT
----------------	--------

File Proof of Service	\$20.00
SUBTOTAL	\$20.00

FEES SUMMARY	AMOUNT
--------------	--------

One Legal Fees	\$20.00
TOTAL CHARGED	\$20.00



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Credit Card Sale

Date	11/27/2018
Customer	0117000
Credit Sale	01632400
Amount Due	\$0

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Order Number	12516947
Contact	Andranik Tsarukyan
Attorney	Andranik Tsarukyan
Billing Code	
Case Title	Silvia Valdivia De Cabrera v SWIFT BEEF COMPANY
Court	Superior Court of California, Riverside County
Court Transaction Number	
Case Number	RIC1823002
Documents	POS

ONE LEGAL FEES	AMOUNT
-----------------------	---------------

File Proof of Service	\$20.00
SUBTOTAL	\$20.00

FEES SUMMARY	AMOUNT
---------------------	---------------

One Legal Fees	\$20.00
TOTAL CHARGED	\$20.00



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Credit Card Sale

Date	11/27/2018
Customer	0117000
Credit Sale	01632435
Amount Due	\$0

Order Number	12517523
Contact	Andranik Tsarukyan
Attorney	Andranik Tsarukyan
Billing Code	
Case Title	Silvia Valdivia De Cabrera v SWIFT BEEF COMPANY
Court	Superior Court of California, Riverside County
Court Transaction Number	
Case Number	RIC1823002
Documents	

ONE LEGAL FEES	AMOUNT
----------------	--------

File Proof of Service	\$20.00
SUBTOTAL	\$20.00

FEES SUMMARY	AMOUNT
--------------	--------

One Legal Fees	\$20.00
TOTAL CHARGED	\$20.00



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Credit Card Sale

Date	1/22/2019
Customer	0117000
Credit Sale	01716300
Amount Due	\$0

Order Number	12698066
Contact	Andranik Tsarukyan
Attorney	Andranik Tsarukyan
Billing Code	
Case Title	Silvia Valdivia De Cabrera v SWIFT BEEF COMPANY
Court	United States District Court, Central District of California
Court Transaction Number	
Case Number	5:18-cv-02551-PSG-E
Documents	Stipulation, Proposed Order, General/Other

ONE LEGAL FEES	AMOUNT
----------------	--------

Court Filing Copy Charge	\$2.00
Courtesy Copy	\$30.00
SUBTOTAL	\$32.00

FEES SUMMARY	AMOUNT
--------------	--------

One Legal Fees	\$32.00
TOTAL CHARGED	\$32.00



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Credit Card Sale

Date	11/7/2018
Customer	0117000
Credit Sale	01611343
Amount Due	\$0

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Order Number	12457380
Contact	Andranik Tsarukyan
Attorney	Andranik Tsarukyan
Billing Code	
Case Title	Silvia Valdivia De Cabrera v SWIFT BEEF COMPANY
Court	Superior Court of California, Riverside County
Court Transaction Number	
Case Number	RIC1823002
Documents	Summons, Additional Parties, Complaint, Civil Case Cover Sheet, Certificate of Counsel, ADR Information
Assignment Details	Company Serve - JBS USA, LLC, An Unknown Limited Liability Company

ONE LEGAL FEES	AMOUNT
----------------	--------

Service on a Registered Agent (CT or CSC)	\$40.00
SUBTOTAL	\$40.00

FEES SUMMARY	AMOUNT
--------------	--------

One Legal Fees	\$40.00
TOTAL CHARGED	\$40.00



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Credit Card Sale

Date	11/7/2018
Customer	0117000
Credit Sale	01611342
Amount Due	\$0

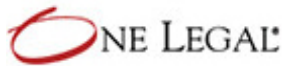
Order Number	12457379
Contact	Andranik Tsarukyan
Attorney	Andranik Tsarukyan
Billing Code	
Case Title	Silvia Valdivia De Cabrera v SWIFT BEEF COMPANY
Court	Superior Court of California, Riverside County
Court Transaction Number	
Case Number	RIC1823002
Documents	Summons, Additional Parties, Complaint, Civil Case Cover Sheet, Certificate of Counsel, ADR Information
Assignment Details	Company Serve - SWIFT BEEF COMPANY, A Delaware Corporation

ONE LEGAL FEES	AMOUNT
----------------	--------

Service on a Registered Agent (CT or CSC)	\$40.00
SUBTOTAL	\$40.00

FEES SUMMARY	AMOUNT
--------------	--------

One Legal Fees	\$40.00
TOTAL CHARGED	\$40.00



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Credit Card Sale

Date	11/7/2018
Customer	0117000
Credit Sale	01611359
Amount Due	\$0

Order Number	12457381
Contact	Andranik Tsarukyan
Attorney	Andranik Tsarukyan
Billing Code	
Case Title	Silvia Valdivia De Cabrera v SWIFT BEEF COMPANY, et al.
Court	Superior Court of California, Riverside County
Court Transaction Number	
Case Number	RIC1823002
Documents	Summons, Additional Parties, Complaint, Civil Case Cover Sheet, Certificate of Counsel, ADR Information
Assignment Details	Company Serve - JBS USA HOLDINGS, INC., An Unknown Corporation

ONE LEGAL FEES	AMOUNT
----------------	--------

Service on a Registered Agent (CT or CSC)	\$40.00
SUBTOTAL	\$40.00

FEES SUMMARY	AMOUNT
--------------	--------

One Legal Fees	\$40.00
TOTAL CHARGED	\$40.00



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Credit Card Sale

Date	11/9/2018
Customer	0117000
Credit Sale	01614893
Amount Due	\$0

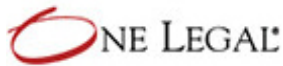
Order Number	12476932
Contact	Andranik Tsarukyan
Attorney	Andranik Tsarukyan
Billing Code	
Case Title	Silvia Valdivia De Cabrera v SWIFT BEEF COMPANY
Court	Superior Court of California, Riverside County
Court Transaction Number	
Case Number	RIC1823002
Documents	Summons; Additional Parties, Complaint; Civil Case Cover Sheet; Certificate of Counsel; ADR Information
Assignment Details	Company Serve - PILGRIM'S PRIDE CORPORATION, an Unknown Corporation

ONE LEGAL FEES	AMOUNT
----------------	--------

Service on a Registered Agent (CT or CSC)	\$40.00
SUBTOTAL	\$40.00

FEES SUMMARY	AMOUNT
--------------	--------

One Legal Fees	\$40.00
TOTAL CHARGED	\$40.00



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Credit Card Sale

Date	11/27/2018
Customer	0117000
Credit Sale	01631899
Amount Due	\$0

Order Number	12494439
Contact	Andranik Tsarukyan
Attorney	Andranik Tsarukyan
Billing Code	
Case Title	Silvia Valdivia De Cabrera v SWIFT BEEF COMPANY
Court	Superior Court of California, Riverside County
Court Transaction Number	
Case Number	RIC1823002
Documents	Summons, Complaint, Civil Case Cover Sheet, Certificate of Counsel, ADR Package
Assignment Details	Company Serve - SWIFT & COMPANY INC., an unknown corporation

ONE LEGAL FEES	AMOUNT
----------------	--------

Service on a Registered Agent (CT or CSC)	\$40.00
SUBTOTAL	\$40.00

FEES SUMMARY	AMOUNT
--------------	--------

One Legal Fees	\$40.00
TOTAL CHARGED	\$40.00



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Credit Card Sale

Date	11/27/2018
Customer	0117000
Credit Sale	01631919
Amount Due	\$0

Order Number	12494438
Contact	Andranik Tsarukyan
Attorney	Andranik Tsarukyan
Billing Code	
Case Title	Silvia Valdivia De Cabrera v SWIFT BEEF COMPANY
Court	Superior Court of California, Riverside County
Court Transaction Number	
Case Number	RIC1823002
Documents	Summons, Complaint, Civil Case Cover Sheet, Certificate of Counsel, ADR Package
Assignment Details	Company Serve - JBS USA INC., an unknown corporation

ONE LEGAL FEES	AMOUNT
Service on a Registered Agent (CT or CSC)	\$40.00
SUBTOTAL	\$40.00

FEES SUMMARY	AMOUNT
One Legal Fees	\$40.00
TOTAL CHARGED	\$40.00



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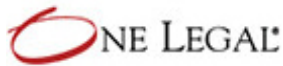
Credit Card Sale

Date	11/27/2018
Customer	0117000
Credit Sale	01631900
Amount Due	\$0

Order Number	12494441
Contact	Andranik Tsarukyan
Attorney	Andranik Tsarukyan
Billing Code	
Case Title	Silvia Valdivia De Cabrera v SWIFT BEEF COMPANY
Court	Superior Court of California, Riverside County
Court Transaction Number	
Case Number	RIC1823002
Documents	Summons, Complaint, Civil Case Cover Sheet, Certificate of Counsel, ADR Package
Assignment Details	Company Serve - JBS USA FOOD COMPANY HOLDINGS, an unknown entity

ONE LEGAL FEES	AMOUNT
Process Serving Copy Charge	\$4.75
Service on a Registered Agent (CT or CSC)	\$40.00
Mailing Declaration	\$15.00
SUBTOTAL	\$59.75

FEES SUMMARY	AMOUNT
One Legal Fees	\$59.75
TOTAL CHARGED	\$59.75



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Credit Card Sale

Date	11/27/2018
Customer	0117000
Credit Sale	01631918
Amount Due	\$0

Order Number	12494437
Contact	Andranik Tsarukyan
Attorney	Andranik Tsarukyan
Billing Code	
Case Title	Silvia Valdivia De Cabrera v SWIFT BEEF COMPANY
Court	Superior Court of California, Riverside County
Court Transaction Number	
Case Number	RIC1823002
Documents	Summons, Complaint, Civil Case Cover Sheet, Certificate of Counsel, ADR Package
Assignment Details	Company Serve - JBS USA, an unknown entity

ONE LEGAL FEES	AMOUNT
Process Serving Copy Charge	\$4.75
Mailing Declaration	\$15.00
Service on a Registered Agent (CT or CSC)	\$40.00
SUBTOTAL	\$59.75

FEES SUMMARY	AMOUNT
One Legal Fees	\$59.75
TOTAL CHARGED	\$59.75



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Credit Card Sale

Date	2/26/2020
Customer	0117000
Credit Sale	02529180
Amount Due	\$0

Bill To
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Order Number	14472962
Contact	Andranik Tsarukyan
Attorney	Andranik Tsarukyan
Billing Code	
Case Title	Silvia Valdivia De Cabrera v SWIFT BEEF COMPANY
Court	United States District Court, Central District of California
Court Transaction Number	
Case Number	5:18-cv-02551-PSG-E
Documents	Motion, Order

ONE LEGAL FEES	AMOUNT
Photocopy Charges	\$12.75
Urgent Service - Courtesy Copy	\$60.00
Courtesy Copy	\$35.00
SUBTOTAL	\$107.75

FEES SUMMARY	AMOUNT
One Legal Fees	\$107.75
TOTAL CHARGED	\$107.75



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Credit Card Sale

Date	11/14/2018
Customer	0117000
Credit Sale	01618857
Amount Due	\$0

Order Number	12457382
Contact	Andranik Tsarukyan
Attorney	Andranik Tsarukyan
Billing Code	
Case Title	Silvia Valdivia De Cabrera v SWIFT BEEF COMPANY
Court	Superior Court of California, Riverside County
Court Transaction Number	
Case Number	RIC1823002
Documents	Summons; Complaint; Civil Case Cover Sheet; Certificate of Counsel; ADR Information;
Assignment Details	Non-Service - PILGRIM'S PRIDE CORPORATION, an unknown corporation

ONE LEGAL FEES	AMOUNT
Additional Service Attempts - Three Day	\$75.00
Process Serving Area Surcharge	\$100.00
SUBTOTAL	\$175.00

FEES SUMMARY	AMOUNT
One Legal Fees	\$175.00
TOTAL CHARGED	\$175.00