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11
12 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
13 **COUNTY OF SAN FRANCISCO**

14 TANIKA TURLEY and CHRISTOPHER
15 THOMPSON, individually and on behalf
of all others similarly situated,

16 Plaintiff,

17 v.

18 CHIPOTLE SERVICES, LLC, a
19 Colorado business entity, and DOES 1
through and including DOE 100,

20 Defendant.
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Case No. CGC-15-544936
*Assigned to the Hon. Anne-Christine Massullo,
Dept. 304*

**DECLARATION OF ALAN HARRIS IN
SUPPORT OF PLAINTIFF'S MOTION
FOR AWARD OF ATTORNEYS' FEES,
REIMBURSEMENT OF COSTS AND
ENHANCEMENT AWARD**

Date: February 19, 2021
Time: 9:15 a.m.
Judge: Hon. Anne-Christine Massullo
Dept.: 304
Civic Center Courthouse
400 McAllister Street
San Francisco, CA 94102

Complaint Filed: March 25, 2015
Class Cert. Granted: Nov. 2, 2018
Prelim. App. Granted: Oct. 2, 2020

1 ALAN HARRIS declares under penalty of perjury under the laws of the State of California and the
2 United States as follows:

3 1. I am a member in good standing of the State Bar of California and am one of the
4 attorneys for Plaintiff Tanika Turley (“Turley” or “Plaintiff”) in the within action. I make this
5 Declaration on behalf of Plaintiff and in support of Plaintiff’s Motion for and Request for Attorneys’
6 Fees, Reimbursement of Costs and Enhancement Award. I aver that all of the documents appended to
7 this Declaration have been maintained in my office in the ordinary course of business under my
8 direction and control, and, if sworn as a witness, I could competently testify to each and every fact set
9 forth herein from my own personal knowledge.

10 **THE EXPERIENCE AND VIEWS OF PAGA COUNSEL**

11 2. I was licensed as an attorney, first in Illinois (1974) and now in California (1989). I am a
12 *summa cum laude* graduate of the University of Illinois (A.B. 1970; J.D. 1974). After graduation from
13 law school in January 1974, I was hired as a litigation associate at a Plaintiff’s class action antitrust
14 boutique in Chicago, Illinois: Freeman, Freeman & Salzman.¹ I became a partner in that firm in 1980,
15 and I started my own practice in 1982. I speak before professional organizations on topics of interest to
16 the Bar. I have represented plaintiffs in complex business litigation for over forty-two years. E.g.,
17 Illinois v. Ill. Brick Co., Inc., 431 U.S. 720 (1977); In re My Left Hook, LLC, 129 Fed. Appx. 352 (9th
18 Cir. 2005); Gregory v. SCIE, LLC, 317 F.3d 1050 (9th Cir. 2003); In re Blue Coal Corp., 986 F.2d
19 687 (3d Cir. 1993); In re Blue Coal Corp., 206 B.R. 730 (M.D. Pa. 1997); U.S. v. Gleneagles Inv. Co.,
20 Inc., 584 F. Supp. 671, 689 (M.D. Pa. 1984), aff’d. in part and vacated in part, and remanded sub. nom.,
21 U.S. v. Tabor Ct. Realty Corp. 803 F.2d 1288 (3d Cir. 1986), cert. den. sub. nom., McClellan Realty Co.
22 v. U.S. 483 U.S. 1005 (1987); In re Uranium Antitrust Litig., 503 F. Supp. 33 (N.D. Ill. 1981); In re
23 Grand Jury, 469 F. Supp. 666 (M.D. Pa. 1980); In re Anthracite Coal Antitrust Litig., 82 F.R.D. 364
24 (M.D. Pa. 1979), In re Folding Carton Antitrust Litig., 83 F.R.D. 251 (N.D. Ill. 1978); In re Anthracite
25 Coal Antitrust Litig., 78 F.R.D. 709 (M.D. Pa. 1978); In re Masterkey Antitrust Litig., 1977 U.S. Dist.

26 _____
27 ¹ Of my still-living partners in Freeman, Freeman & Salzman, a firm that dissolved in 2007, each
28 became associated with a leading national law firm. Lee Freeman, Jr. became the Chair of the Antitrust
Litigation Practice at Jenner & Block. Jerrold Salzman is of counsel at Skadden, Arps, Slate, Meagher
& Flom. Tyrone Fahner is a partner at Mayer Brown, having served as its co-Chairman from 1998 to
2001 and its Chairman from 2001 to 2007.

1 LEXIS 12948 (D. Conn. 1977) (six week jury trial for plaintiffs); A. Cherney Disposal Co. v. Chicago &
2 Suburban Refuse Disposal Corp., 68 F.R.D. 383 (N.D. Ill. 1975); In re Cement-Concrete Block, Chicago
3 Area, Grand Jury Proceedings, 381 F. Supp. 1108 (N.D. Ill. 1974); Parment v. Lapin, 2004 Cal. App.
4 Unpub. LEXIS 5217 (June 1, 2004); Stetson v. West Publ'g Corp., 2011 U.S. App. LEXIS 22549 (9th
5 Cir. Nov. 7, 2011); Covillo v. Specialty's Café, 2012 WL 3537058 (N.D. Cal. Aug. 14, 2012). I have
6 gone to class action trials on behalf of plaintiffs and, once, a class action bench trial for a defendant,
7 Allstate Insurance Company. I have represented employees in numerous disputes concerning their
8 receipt of pay in connection with their employment, both before the State of California Division of
9 Labor Standards Enforcement and in state and federal courts in California. E.g., Jacobs v. CSAA Inter
10 Ins. Bureau, 2009 U.S. Dist. LEXIS 37153 (N.D. Cal. May 1, 2009); Escobar v. Whiteside Constr.
11 Corp., 2008 U.S. Dist. LEXIS 68439 (N.D. Cal. 2008) (certification of collective action); Tremblay v.
12 Chevron Stations, Inc., 2008 Westlaw 2020514 (N.D. Cal. 2008) (certification of collective action);
13 Perez v. Maid Brigade, Inc., 2007 U.S. Dist. LEXIS 78412 (N.D. Cal. 2007) (denial of employer's effort
14 to enforce arbitration clause in employment agreements); Hoffman v. Uncle P Prods., 2008 Cal. App.
15 Unpub. LEXIS 3609 (three-year statute of limitations applies to section 203 claims for continuing
16 wages); Bithell v. E.P. Mgmt. Servs., LP, 2007 Westlaw 4216854 (Cal. Ct. App. 2007) (sustaining class
17 settlement of entertainment-industry employees for section 203 and 226 claims against entertainment-
18 industry "payroll companies" and studios); DuPont v. Avalon Hollywood Servs., Inc., 2007 Westlaw
19 93386 (Cal. App. 2007); Gregory v. Superior Court, 2004 Westlaw 2786357 (Cal. Ct. App. 2004)
20 (employee of entertainment-industry "payroll company" not subject to arbitration of dispute under
21 collective-bargaining agreement), and; Zabounian v. Hack Partners, LLC, Los Angeles Superior Court
22 Case No. BC 343449 (bench trial resulting in \$600,000 judgment on behalf of 89 Aggrieved Employees
23 in certified California Labor Code and FLSA action). The undersigned has also been appointed lead
24 Plaintiffs' Counsel in many settled class actions. E.g., Kang v. Albertson's, Inc., C.D. Cal. Case No.
25 2:07-CV-00894-CAS-FFM (\$6,637,500 settlement of labor-law claims); Tremblay v. Chevron Stations,
26 Inc., N.D. Cal. Case No. CV 07-6009 EDL (\$4,500,000 settlement of labor-law claims); Doty v. Costco
27 Wholesale Corp., C.D. Cal. Case No. CV 05-3241 FMC (JWJx) (\$7,500,000 distributed to Aggrieved
28 Employees for FLSA and California Labor Code section 203 and 226 violations); Agatep v. Exxon

1 Mobil Corp., C.D. Cal. Case No. CV 05-2342 GAF (\$1,500,000 settlement on behalf of service-station
2 employees in California); Alfano v. Int'l Coffee & Tea, LLC, C.D. Cal. Case No. CV 04-8996 SVW
3 (CWx) (FLSA and California Labor Code section 226, 510, and 1194 case); Jenne v. On Stage Audio
4 Corp., C.D. Cal. Case No. CV 04-2045 CAS (PJWx) (FLSA and California Labor Code section 203
5 violations); Hansen v. Advanced Tech Security Servs., Inc., Los Angeles Superior Court Case No BC
6 367175 (\$1,050,000 settlement of labor-law claims); Ross v. Human Resources, Inc., Los Angeles
7 Superior Court Case No. BC 351506 (California Labor Code section 203 case); Harrington v. Manpay,
8 LLC, Los Angeles Superior Court Case No. BC 312171 (\$1,000,000 distributed to Aggrieved
9 Employees in a section 510 and section 1194 case); Brackett v. Saatchi & Saatchi, Los Angeles Superior
10 Court Case No. BC 298728 (over \$170,000 distributed to Aggrieved Employees in an FLSA and section
11 203 case); Readmond v. Straw Dogs, Inc., Los Angeles Superior Court Case No. BC257394 (over
12 \$100,000 distributed to Aggrieved Employees in a section 203 case); Greenberg v. EP Mgmt. Servs.,
13 LP, Los Angeles Superior Court Case No. BC 237787 (\$5,348,000 settlement of claims under sections
14 203 and 226 of California Labor Code); Angel Paws, Inc. v. Avalon Payroll Servs., Inc., Los Angeles
15 Superior Court Case No. BC 188982 (over \$450,000 distributed to Aggrieved Employees in a section
16 203 case); Saunders v. Metro Image Group, San Diego Superior Court Case No. GIC 809753 (California
17 Labor Code section 203 case); Stratford v. Citicorp West FSB, Monterey Superior Court Case No. M
18 81026 (\$950,000 settlement of labor-law claims); Deckard v. Banco Popular N. Am., related to Silva v.
19 Banco Popular N. Am., C.D. Cal. Case No. CV 08-6709 JFW (RZx) (\$1,050,000 settlement of
20 California Labor Code and FLSA claims); Wingate v. The Production Farm, LLC, C.D. Cal. No. CV
21 07-04294 (2009 settlement of FLSA and Cal Lab Code 203, 212, 226 and 1194 case); Dizon v. Ito, Inc.,
22 N.D. Cal. Case No. 3:10-CV-00239-JSW (\$2,451,000 settlement of California Labor Code and FLSA
23 claims); Jacobs v. Institute of Reading Dev., Inc., N.D. Cal. Case No. 10-CV-00574-JCS (\$275,000
24 settlement of California Labor Code and FLSA claims); Smith v. Lush Cosmetics, LLC, Los Angeles
25 Superior Court Case No. BC 443014 (\$145,000 settlement of labor-law claims); Randolph v. Chipotle,
26 Inc., STANISLAUS County Superior Court Case No. INC 90412 (\$545,000 settlement of labor-law
27 claims); Seielstad v. Aegis Senior Cmtys., LLC, Northern District of California Case No. 09-01797
28 MMC (\$1,000,000 settlement of labor claims); Rentoria v. Omnicare, Los Angeles Superior Court Case

1 No. BC405988 (\$755,000 settlement of labor-law claims); and Peralta v. Macerich Management
2 Company, Marin County Superior Court Case No. CIV 1004656 (\$2,200,000 settlement of California
3 Labor Code claims). The market rate for my services is at least \$895 per hour.

4 3. I began to apply the class action procedural mechanism to wage and hour matters in
5 California in the late 1990s. I also have significant experience with PAGA litigation. I am experienced
6 and qualified to evaluate the PAGA claims and viability of the defenses. I have extensive experience in
7 prosecuting and defending employment litigation, and have focused my practice primarily on cases
8 regarding wage and hour class actions and representative PAGA actions. My 40 plus years of litigation
9 experience includes litigating many PAGA lawsuits over the past 20 years, as well as class action cases.
10 I have been named Plaintiffs' Counsel in dozens of class action cases in state and federal courts in
11 California. While the vast majority of PAGA and class action lawsuits settle, I have served as lead
12 counsel in approximately seven trials involving California wage and hour issues; over a dozen contested
13 hearings before the California Division of Labor Standards Enforcement involving wage and hour
14 litigation; and four class action trials, two of which dealt with California wage and hour issues. Over the
15 past twenty years, I have researched and argued claims similar to those at issue in this case, i.e., non-
16 payment of overtime under California law, failure to provide rest and meal breaks, "continuing wages"
17 under section 203 of the California Labor Code, and liquidated damages under section 226 of the
18 California Labor Code. E.g. Greenberg v. EP Management Services, LP, Los Angeles Superior Court
19 Case No. BC 237787, filed October 2, 2000; Kang v. Albertson's, Inc., United States District Court for
20 the Central District of California Case No. 2:07-CV-00894-CAS-FFM, filed November 21, 2006;
21 Hansen v. Advanced Tech Security Services, Inc., Los Angeles Superior Court, Case No BC 367175,
22 filed March 1, 2007.

23 4. During the course of this case, the following employees of Harris & Ruble and my Co-
24 Counsel David Harris made substantial contributions:

25 a. David Harris is the founding attorney of the North Bay Law Group in Mill Valley, California.
26 Mr. Harris is a graduate of the University of Colorado, Boulder (BS 1994) and the University of San
27 Francisco School of Law (JD 2001), and a member of the California bar (December 3, 2001). Upon
28 graduating from the University of San Francisco, School of Law, Mr. Harris joined the litigation group

1 in the Palo Alto office of Brobeck, Phleger & Harrison LLP, where he worked from October 2001
2 through February 2003. Thereafter, Mr. Harris joined the litigation group in the San Francisco office of
3 Morgan Lewis & Bockius LLP, where he worked from February 2003 through July 2006. Thereafter,
4 Mr. Harris founded the North Bay Law Group, where he has worked for the past thirteen years. Mr.
5 Harris has extensive experience litigating class actions. Mr. Harris has represented employees in
6 numerous disputes concerning their receipt of pay in connection with their employment, both in state
7 and federal courts in California. E.g., Covillo v. Specialty's Café & Bakery, Inc., 2012 U.S. Dist.
8 LEXIS 114602 (N.D. Cal. 2012) (denial of employer's attempt to enforce arbitration clause in
9 employment agreements); Escobar v. Whiteside Constr. Corp., 2008 U.S. Dist. LEXIS 68439 (N.D. Cal.
10 2008) (certification of collective action); Tremblay v. Chevron Stations, Inc., 2008 Westlaw 2020514
11 (N.D. Cal. 2008) (certification of collective action); Perez v. Maid Brigade, Inc., 2007 U.S.
12 Dist. LEXIS 78412 (N.D. Cal. 2007) (denial of employer's effort to enforce arbitration clause in
13 employment agreements). Mr. Harris has also litigated and settled many class actions. E.g., Jacobs v.
14 CSAA Inter Insurance Bureau, N. D. Cal. Case No. 3:07-CV-00362-MHP (\$1,500,000 settlement of
15 labor-law claims); Tremblay v. Chevron Stations, Inc., N.D. Cal. Case No. CV 07-6009 EDL (settlement
16 of labor-law claims); Dizon v. Ito, Incorporated, N.D. Cal. Case No. 3:10-CV-00239-JSW (settlement of
17 California Labor Code and FLSA claims); In Re Paypal Litigation, N.D. Cal. Case No..5:02-CV-01227-
18 JF (defense and settlement of class action lawsuit alleging violations of the Electronic Funds Transfer
19 Act); Bernardino v. Macerich Management Co., Marin Superior Court Case No. CIV-1004645 (class
20 action settlement of labor law claims); Jacobs v. Institute of Reading Dev., Inc., N.D. Cal. Case No. 10-
21 CV-00574-JCS (settlement of California Labor Code and FLSA claims); Seielstad et al. v. Aegis Senior
22 Communities, LLC, N.D. Cal. Case No. CV-09-1797 MMC (settlement of labor-law wage and hour
23 class action); Escobar v. Whiteside Construction Corp., N.D. Cal. Case No.CV-08-1120-WHA (class
24 action settlement of labor-law claims); Wade v. Minatta Transportation Co., N.D. Cal. Case No. CV-10-
25 02796-BZ (settlement of class action wage and hour labor law claims); Perez v. Maid Brigade, Inc.,
26 N.D. Cal. Case No. 3:07-CV-03473-SI (class action settlement of labor-law claims); Blandino v. MCM
27 Construction, Inc., N.D. Cal. Case No. 12-01729-WHO (class action settlement of labor law claims);
28 Covillo et al. v. Specialty's Café and Bakery, Inc., N.D. Cal. Case No. 11-CV-00594-DMR (class action

1 settlement of wage and hour labor law claims); Douglas v. Arcadia Health Services, Inc., N.D. Cal. Case
2 No. CV-11-3552 (class action settlement of labor law claims); Thio et al. v. Genji LLC et al., N.D. Cal.
3 Case No.12-CV-05756 (class action settlement of labor law claims); O'Sullivan v. AMN Services, Inc.,
4 N.D. Cal. Case No. 3:12-cv-02125-JCS (class action settlement regarding denial of breaks and failure to
5 reimburse business expenses); Page v. Grand Home Holdings, Inc., N.D. Cal. Case No. 13-CV-02754-
6 NC (class action settlement of labor law claims); Veurink et al. v Beverly Health and Rehabilitation
7 Services Inc. et al., Sonoma County Superior Court No. SCV 255496 (class action settlement of wage
8 and hour claims); Lounibos v. Keypoint Government Solutions, Inc., N.D. Cal. Case No12-CV-0636
9 (JST) (class action settlement of wage and hour claims); McQueen et al. v Odd Fellows Home of
10 California, Napa County Superior Court Case No C-26-64176 (class action settlement of wage and hour
11 claims); Castillo v. ADT LLC, E.D. Cal. Case No. 2:15-cv-00383-WBS (class action settlement of wage
12 and hour claims); Osorio et al. v Ghiringhelli Specialty Foods, Inc., Solano County Superior Court Case
13 No. FCS040751 (class action settlement of wage and hour claims). The market rate for Harris' services
14 is at least \$805 per hour.

15 b. David Garrett is a senior associate at Harris & Ruble. Mr. Garrett is a cum laude graduate of
16 Southern Methodist University (B.A., Finance, 1990) and the UCLA School of Law (J.D., 1992). He
17 became a member of the California bar in 1992. Mr. Garrett has worked with me on numerous class-
18 action matters, e.g. Sherman v. CLP Resources, Inc., Central District of California Case No. Case No.
19 CV 12-8080 GW (PLAx) consolidated with Case No. CV 12-8080 GW (PLAx); Chookey v. Sears,
20 Central District of California Case No. CV 12-2491-GW (MRWx); Irrgang v. BHC Films, Inc., Los
21 Angeles Superior Court Case No. BC543984; Nall v. Diamond Supply, Los Angeles Superior Court
22 Case No. BC527457; Gonzalez v. Thyssenkrupp, Los Angeles Superior Court Case No. BC568761;
23 Alvarenga v. Insperity, Los Angeles Superior Court Case No. BC529803; Cociu v. David Yurman
24 Retail, LLC., Los Angeles Superior Court Case No. BC604385; Turley v. Chipotle, San Francisco
25 Superior Court Case No. CGC-15-544936; Petrosian v. Turn Around Communications, Inc., Los
26 Angeles Superior Court Case No. 18STCV09026; Ramos v. Steele Water Cable, Inc., Los Angeles
27 Superior Court Case No. BC694818; Altamirano v. Chipotle, Alameda County Superior Court, Case
28 No. RG17851392. He has represented employees in numerous labor-law disputes while at Harris &

1 Ruble. E.g., Sandling v. Seraphim Films, Inc., Los Angeles Superior Court Case No. BC 537787;
2 Graham v. Triumphant Films, Inc., Los Angeles Superior Court Case No. BC 539767; Wong v.
3 Weatherford, Alameda Superior Court Case No. RG 12626790; Perryment v. Sky Chefs, Northern
4 District of California Case No. 3:16-cv-04015-JD; Aravelo v. XPO Logistics, Inc., Los Angeles
5 Superior Court Case No. BC529813; Natale v. Topanga Productions, Inc., Los Angeles Superior Court
6 Case No. BC599970; Price v. Autozone, Inc., United States District Court Case No. 2:15-CV-076622
7 (C.D. Cal.); Osorio v. AWGE LLC, United States District Court Case No. 2:18-CV-01092 (C.D. Cal.).
8 David Garrett has been approved as Plaintiffs' Counsel in numerous state and federal class action
9 matters, e.g. Arrieta v. Superstation, Inc., Los Angeles Superior Court Case No. BC676302; Dye v.
10 Radford Studios, Inc., Los Angeles Superior Court Case No. BC663326; Luviano v. Multi Cable, Inc.,
11 United States District Court Case No. 2:15-CV-05592 (C.D. Cal.); Roach v. Red Bull Distribution, Inc.,
12 Los Angeles Superior Court Case No. BC663866; Crawford v. Sears Hometown and Outlet Store, Inc.,
13 Riverside Superior Court Case No. RIC1510091; Kleronomos v. E&S Ring Corp., Los Angeles
14 Superior Court Case No. BC625143; Dye v. Radford Studios, Inc., Los Angeles Superior Court Case
15 No. BC663326; Wigersma v. Motion Theory, Inc., Los Angeles Superior Court Case No. BC531180.
16 The market rate for Garrett's services is at least \$825 per hour.

17 c. Priya Mohan is an attorney at my firm who worked on the above-captioned matter. She is a
18 *magna cum laude* graduate of the University of Michigan (B.A., 2000) and the USC Gould School of
19 Law (J.D., 2003). She became a member of the California bar in 2003. Ms. Mohan has worked with me
20 in a number of labor-law disputes at Harris & Ruble. E.g. Clarke v. Indelible Media Corp., United
21 States District Court Case No. CV10-6230; Lobato v. Abbott Cardiovascular Systems, Inc., Santa Clara
22 Superior Court Case No. 110CV175637; Matheny v. CA Payroll, Inc., United States District Court Case
23 No. 2:11-CV-02522; Chorley v. Palm Productions, Los Angeles Superior Court Case No. BC465045;
24 Popko v. Van Acker Construction Associates, Inc., United States District Court Case No. CV114034;
25 Rentoria v. Omnicare, Los Angeles Superior Court Case No. BC405988; Pena v. Downey, Los Angeles
26 Superior Court Case No. BC447731; Seielstad v. Aegis Senior Communities, LLC, United States
27 District Court Case No. 09-01797; Covillo v. Specialty's Café and Bakery, Inc., 11-CV-00594-DMR;
28 Johnson v. Sky Chefs, Inc., 11-CV- 05619-LHK. Ms. Mohan has also worked with me on class-action

1 matters and has been appointed Plaintiffs' Counsel in connection therewith, e.g. Lobato v. Abbott
2 Cardiovascular Systems, Inc., Santa Clara Superior Court Case No. 110CV175637; Rentoria v.
3 Omnicare, Los Angeles Superior Court Case No. BC405988; Covillo v. Specialty's Café and Bakery,
4 Inc., United States District Court, Northern District Case No.11-CV-00594-DMR; Johnson v. Sky
5 Chefs, Inc., United States District Court, Northern District Case No. 11-CV- 05619-LHK; and Chookey
6 v. Sears Roebuck and Co., United States District Court, Central District Case No.12-CV-2491-GW.

7 The market rate for Mohan's services is at least \$795 per hour.

8 d. Min Ji Gal is a *magna cum laude* graduate of the University of Southern California (B.A., 2013),
9 and USC Gould School of Law (J.D., 2016). She became a member of the California bar in 2016. Her
10 practice is primarily focused on individual and class action cases involving wage-and-hour violations
11 under the California Labor Code and Fair Labor Standards Act. Ms. Gal has worked with me in a
12 number of labor-law disputes and class-action matters at Harris & Ruble. Eg., Schroeder v. Envoy Air,
13 Inc., C.D. Cal. Case No. 16-cv-04911; Fernandez v. Craft Beer Guild Distributing of California LLC,
14 Los Angeles Sup. Ct. Case No. 666562; Bowman v. Burnt Ends, LLC, C.D. Cal. Case No. 17-cv-05782;
15 Wise v. Nature's Best, LLC, Los Angeles Sup. Ct. Case No. 649808; Buckner v. Universal Television,
16 LLC, C.D. Cal. Case No. 17-cv-06489; Brashear v. Magnet Media, Inc., C.D. Cal. Case No. 17-cv-
17 06026; and Clarke v. Flower Ave, LLC, Los Angeles Sup. Ct. Case No. BC666525. The market rate for
18 Gal's services is at least \$425 per hour.

19 e. Lin Zhan is an associate at Harris & Ruble. His practice is primarily focused on individual and
20 class action cases involving wage-and-hour violations under the California Labor Code and the Fair
21 Labor Standards Act, as well as general business litigation. Mr. Zhan earned both of his LL.M. and J.D.
22 from the University of Southern California. While at USC, Mr. Zhan was a teaching assistant for Prof.
23 Heilman's Introduction to the U.S. Legal System and Topics in American Law. Mr. Zhan graduated
24 from Fujian Normal University with a degree in Law in 2013. During his third year at law school in Los
25 Angeles, Mr. Zhan worked as a law clerk at Harris & Ruble. Prior to joining Harris & Ruble, Mr. Zhan
26 passed the Chinese bar exam in 2013 and worked at a boutique law firm in China, where he handled a
27 range of civil litigation and transactional matters including contract and real estate matters. Mr. Zhan
28 also passed the National Level Three Psychologist exam in China in 2011. The market rate for Zhan's

1 services is at least \$375 per hour.

2 f. Christina Nordsten joined Harris and Ruble in 2014. Ms. Nordsten graduated from Stockholm
3 University Law School in 2013 with a Bachelor of Law (LL.B.). In 2014, Ms. Nordsten graduated from
4 USC Gould School of Law with a Masters of Law (LL.M.) and an Entertainment Law Certificate. At
5 USC, Ms. Nordsten was a Board Member of the Student Bar Association. Ms. Nordsten's practice is
6 primarily focused on class action cases involving wage-and-hour violations under California law, as well
7 as entertainment-related matters. The market rate for Nordsten's services is at least \$425 per hour.

8 g. Rebecca Lee, an attorney from Harris & Ruble who worked on the above-captioned case, has
9 worked with me on a number of wage and hour matters. Ms. Lee earned her J.D. from the USC Gould
10 School of Law in 2013. At USC, she was the President of the Public Interest Law Foundation, and was a
11 Production Editor for the Review of Law and Social Justice. Prior to joining Harris & Ruble, Ms. Lee
12 served as a Peace Corps volunteer in Cajabamba, Ecuador. During her service, she worked as a health
13 educator, and helped local groups found small businesses. She graduated from Columbia University in
14 2008 *cum laude*, with honors. She earned a B.A. in political science. Ms. Lee has worked with me on
15 numerous class-action matters, E.g. Sherman v. CLP Resources, Inc., Central District of California
16 Case No. Case No. CV 12-8080 GW (PLAx) *consolidated with* Case No. CV 12-8080 GW (PLAx).
17 The market rate for Lee's services is at least \$425 per hour.

18 5. Counsel for the Parties have investigated the applicable law as applied to the facts
19 discovered regarding the claims, the defenses and the associated damages, penalties and civil penalties.
20 Plaintiff has considered the expense and length of continued proceedings necessary to conclude the
21 Action against Chipotle through trial and any possible appeals. Plaintiff has also taken into account the
22 uncertainty and risk of the outcome of further litigation, and the difficulties and delays inherent in such
23 litigation, including the special issues involved in class actions.

24 6. Class Counsel represent that they have conducted a thorough investigation into the facts
25 of this case, and have diligently pursued an investigation of the Class Members' claims, including: (1)
26 interviewing Class Members and analyzing the results of Class Member interviews; (2) reviewing
27 relevant policy documents; (3) researching the applicable law and the potential defenses; and (4)
28 reviewing relevant data including time records and pay data. The Parties have conducted significant

1 investigation of the facts and law both before and after the Action was filed. The Parties have
2 extensively litigated the case over five years. Eight depositions have been completed.

3 6(b). Class Counsel facilitated the formal request for the records of Plaintiff Turley pursuant to
4 Cal. Labor Code §226 and §1198.5, and reviewed the results with her. Plaintiffs diligently pursued an
5 investigation of the claims, any and all applicable defenses, and the applicable law. The investigation
6 included formal written discovery, depositions, and exchange of payroll data pursuant to mediation.
7 When Plaintiffs believed that Defendant was not producing the required documents and deponents,
8 Plaintiffs filed Motion to Compel further discovery, which resulted in the production of additional
9 documents and witnesses. Plaintiffs' counsel reviewed thousands of pages of payroll records provided by
10 Chipotle in response to formal Requests for Production ("RFP's"). Both parties propounded Form
11 Interrogatories, RFP's, and Special Interrogatories. Chipotle provided over 25,000 pages in response to
12 Plaintiffs' RFP's, including wage statements and punch data for hundreds of class members.

13 6(d). Prior to class certification, Plaintiff's counsel interviewed over 50 class members, and
14 secured declarations from approximately 55 class members. Chipotle deposed five class members,
15 reviewing each individual's entire payroll and employment file prior to the depositions. Plaintiff took the
16 depositions of Chipotle PMK (Person Most Qualified), a Team Director with responsibility for some 54
17 California restaurants, as well a senior California store manager. Plaintiff's expert was also deposed.

18 6(e). Plaintiffs' counsel reviewed thousands of pages from nearly a dozen potentially-related
19 cases including but not limited to Segovia v. Chipotle, Case No. BC489851 (LA County Superior Court);
20 Turner v. Chipotle, Case No. 1:14-cv-02612-JLK-CBS; Porras v. Chipotle, No. CV-19-000937 (Stanislaus
21 County Superior Court); (2) Le Sure, et al. v. Chipotle, No. 19STCV05589 (Los Angeles County Superior Court);
22 (3) Sanchez v. Chipotle, No. CIVDS1910956 (San Bernardino) ("Sanchez"); and (4) Barber v. Chipotle, No. 20-
23 2016-864261 (Orange County Superior Court). (The Porras, Le Sure and Sanchez cases were also settled at the
24 Mediation with Jeff Krivis.)

25 6(f). Prior to Mediation, Plaintiffs' Counsel reviewed the time and wage records and prepared
26 a detailed damages model. Id. Plaintiffs' counsel has reviewed the payroll records with their expert
27 Stephen Moses, who is submitting a declaration herewith. Plaintiffs' counsel has also reviewed the
28

1 expert report of Berger Consulting Group, LLC (“BCG”), prepared in the Porras, Le Sure and Sanchez
2 actions, which analyzed timekeeping data for over 10,000 pay periods during the Class Period.

3 7. The parties participated in a full-day mediation on October 1, 2020, with Jeff Krivis of
4 First Mediation, an experienced mediator of wage and hour class actions. Krivis has resolved thousands
5 of disputes including wage and hour and consumer class actions, entertainment, mass tort, employment,
6 business, complex insurance, product liability and wrongful death matters.² Krivis is considered a
7 pioneer in the mediation field, named by The Los Angeles Daily Journal legal newspaper as one of the
8 “Top Neutrals in the State” every year. Co-founder and Past President of the International Academy of
9 Mediators, Past President Southern California Mediation Association, Past Council Member of the
10 American Bar Association’s Section of Dispute Resolution.

11 8. The mediation session was very constructive, and the parties were able to resolve all
12 outstanding issues and achieve a resolution of this case, which was later modified following two
13 unsuccessful motions for approval. Prior to Mediation, Plaintiffs’ Counsel reviewed the time and wage
14 records and prepared a detailed damages model. Plaintiffs’ counsel has reviewed the payroll records
15 with their expert Stephen Moses. Plaintiff’s counsel has also reviewed the expert report of Berger
16 Consulting Group, LLC (“BCG”), prepared in the Porras, Le Sure and Sanchez actions, which analyzed
17 timekeeping data for over 10,000 pay periods during the Class Period. As of the filing hereof, the
18 settlement has a 100% participation rate, indicating that is has been well-received by the class. Chipotle
19 has also advised of significant changes in their payroll practices. These employment practice changes
20 appear to have been, in part, the result of the efforts of Plaintiffs’ counsel in pursuing this case. For
21 example, Chipotle altered its wage statements to include the total hours worked by employees, a
22 deficiency alleged by Plaintiff in her Complaint. Chipotle has also enhanced its training and policies to
23 help ensure that employees receive proper meal breaks and rest periods and to expand payment of meal
24 period penalties. The Class Members have benefitted from the foregoing, even without formal injunctive
25 relief. These changes are a “factor weighs in favor of approving the settlement,” because they came as a
26 result of proposed Class Counsel’s efforts, and in a response to the lawsuit. *See* Moreno v. San Francisco

27
28 ² <https://www.jeffreykrivis.com/recognize/>

1 Bay Area Rapid Transit Dist., No. 17-CV-02911-JSC, 2019 WL 343472, at *4 (N.D. Cal. Jan. 28,
2 2019).

3 9. To the best of my knowledge, my firm has no conflict of interest with Plaintiff or any
4 Class Members, and I believe that my firm has, thus far, fairly and adequately represented the interests
5 of the Class. To date, Class Counsel have advanced all costs incurred in this case. Similarly, the
6 required legal services have been provided on a contingent-fee basis. I have considered the expense and
7 length of further proceedings necessary to continue this lawsuit against Defendant through trial and any
8 possible appeals. Defendant has vigorously opposed Plaintiff's lawsuit, so a payment to class members
9 now is a positive result, when the alternative might be years of protracted litigation and/or appeals. To
10 this point, this firm has been actively litigating against Chipotle for over five years. I have carefully
11 considered the risks and expenses involved in further litigation, the potential recovery to the class
12 members if the case were fully litigated through trial, and the probability of any recovery for class
13 members being delayed in the event of a successful trial outcome by the taking of an appeal. While
14 Defendant might be liable for substantial PAGA penalties, the Court may reduce the amount of PAGA
15 penalties awarded to an employee based upon discretionary factors other than the employer's ability to
16 pay. Thurman v. Bayshore Transit Management, Inc., 203 Cal. App. 4th 1112 (2012). In approving a
17 PAGA settlement, a court may substantially discount penalties. E.g., Rodriguez v. West Publ'g Corp.,
18 563 F.3d 948, 964 (9th Cir. 2009).

19 **ATTORNEYS' FEES AND COSTS**

20 10. The requested attorney fee percentage is comparable to that charged by Counsel for other
21 employment cases. The Court should also consider that the efforts of Counsel have resulted in
22 substantial benefits to the Class Members and Aggrieved Employees in the form of a significant
23 settlement fund established to compensate the Class Members and Aggrieved Employees for the alleged
24 wage-and-hour violations. Without the efforts of Plaintiffs' Counsel, the claims alleged in the complaint
25 would likely have gone without remedy. Additionally, Plaintiffs' Counsel has invested significant time
26 and resources in this case, with payment deferred to the end of the litigation and entirely contingent on
27 the outcome. I am familiar with the contingent fee market throughout California, particularly as it
28 pertains to complex employment, wage and hour, class action, and PAGA litigation. During this

1 litigation, my Co-Counsel and this firm have litigated this case without receiving any payment for their
2 services or reimbursement of their costs incurred for the benefit of the state of California and the
3 aggrieved employees.

4 11. On behalf of my firm, I have negotiated numerous contingency fee agreements with
5 plaintiffs, both as individuals and as representatives in class action and PAGA suits. Many of those
6 agreements provided that counsel will receive a fee that is between 33.33% and 40% of any recovery
7 that is obtained, and, in addition, that counsel be reimbursed for the costs they incurred out of the
8 recovery amount. There are always risks attendant to billing cases on a contingency basis. It is not a
9 foregone conclusion that every case taken on a contingency fee basis will result in a recovery or that the
10 attorneys' fees recovered will actually compensate my firm for the amount of time expended in an
11 action. Moreover, even when successful, a class action contingency law firm may only receive a small
12 percentage of the amount of attorneys' fees incurred during the prosecution of a case. Where plaintiffs'
13 counsel does succeed, therefore, it is appropriate to compensate the firm for the risks the firm regularly
14 undertakes. There is also always the possibility that the Plaintiff will not prevail and Class Counsel will
15 not receive any compensation for its services and/or that the Defendant will declare bankruptcy or lack
16 the assets necessary to satisfy any judgment obtained against it. Neither Harris & Ruble nor North Bay
17 Law Group has been paid any money for attorneys' fees in this case. My firm has also advanced of all
18 the costs associated with the case, currently estimated to be approximately \$38,427.47, which is higher
19 than the amount of reimbursement being requests (\$25,000).

20 12. An award of contingent attorney's fees to counsel is justified under the "common fund"
21 doctrine. Serrano v. Priest, 20 Cal. 3d 25, 34 (1977). An attorney who recovers a common fund for the
22 benefit of persons other than his or her clients is entitled to a fee from the common fund. Mills v.
23 Electric Auto-Lite Co., 396 U.S. 375, 392–96 (1970). It is well-established that the "experienced trial
24 judge is the best judge of the value of professional services rendered in [the] court" Serrano, 20
25 Cal. 3d at 49. Both state and federal courts in California have embraced this doctrine. Serrano, 20 Cal.
26 3d at 35; See Vasquez v. Coast Valley Roofing, 266 F.R.D. 482 (E.D. Cal.2010) (in wage-and-hour
27 action class-action an award of **33.3 percent** appropriate); See also In re Activision Sec. Litig., 723 F.
28 Supp. 1373, 1377–78 (N.D. Cal. 1989) ("*nearly all* common fund awards range around **30%**");

1 Betancourt v. Advantage Human Resourcing, Inc., No. 14-CV-01788-JST, 2016 WL 344532, at *9
2 (N.D. Cal. Jan. 28, 2016) (**34.3%** of common fund “fair and reasonable”); Deaver v. Compass Bank,
3 No. 13-CV-00222-JSC, 2015 WL 8526982, at *11 (N.D. Cal. Dec. 11, 2015) (**33%**); Boyd v. Bank of
4 Am. Corp., No. SACV 13-0561-DOC, 2014 WL 6473804, at *12 (C.D. Cal. Nov. 18, 2014) (**33.3%**);
5 Fernandez v. Victoria Secret Stores, LLC, No. CV 06-04149 MMM SHX, 2008 WL 8150856, at *16
6 (C.D. Cal. July 21, 2008) (**34%** award is “fair and reasonable”); Stuart v. Radioshack Corp., No. C-07-
7 4499 EMC, 2010 WL 3155645, at *6 (N.D. Cal. Aug. 9, 2010) (**33.3%**).³

8 13. In the present case, the facts supporting payment of fees by the beneficiaries of the
9 common fund are satisfied. Under the doctrine, courts have historically and consistently recognized that
10 class litigation is increasingly necessary to protect the rights of individuals whose injuries and/or
11 damages are too small to economically justify individual representation. In Paul, Johnson, Alston &
12 Hunt v. Grauly, 886 F. 2d 268, 271 (9th Cir. 1989), the Ninth Circuit stated that “it is well settled that
13 the lawyer who creates a common fund is allowed an extra reward, beyond that which he has arranged
14 with his client.” Paul, Johnson, Alston & Hunt v. Grauly, 886 F. 2d at 271. Class Counsel spent a
15 reasonable number of hours for the work required in this matter, and all of them should be considered in
16 computing the lodestar award. Professional time reasonably and necessarily expended in securing an
17 award of attorney’s fees is subject to reimbursement. Serrano IV, 32 Cal. 3d 621, 624 (1982).

18 14. Neither Harris & Ruble nor North Bay Law Group has been paid any money for
19 attorneys’ fees in this case. Further, we have advanced all costs. Harris & Ruble seeks only **\$25,000** for
20 reimbursement of the \$38,427.47 in costs reasonably incurred in the prosecution of this matter, all of
21 which are detailed in the cost report attached at **Exhibit 2**. Exhibit 2 consists of detailed records of
22 costs incurred were reasonable and necessary to litigate a case of this magnitude, involving thousands of
23 class members and Aggrieved Employees, extensive discovery and multi-party mediation. The amount
24 requested for reimbursement of costs (\$25,000) is less than the total costs incurred \$38,427.47.

25
26 ³ See also Chavez v. Petrissans, Case No. 1:08-cv-00122 LJO GSA, Doc. No. 89 (E.D. Cal. Dec.
27 15, 2009) (awarding of attorneys’ fees of 33.3 percent of the common fund); Romero v. Producers Dairy
28 Foods, Inc., No. 1:05-cv-0484-DLB, 2007 WL 3492841, at * 4 (E.D. Cal. Nov. 14, 2007) (in a class-
action settlement attorneys’ fees in the amount of 33 percent of common fund were warranted); Bond v.
Ferguson Enterprises, Inc., No. 1:09-cv-01662-OWW-MJS, 2011 WL 2648879, at *11 (E.D. Cal. June
30, 2011) (approving attorneys’ fees in the amount of 30 percent of the common fund).

15. Although an award of attorneys' fees as a percentage of the common fund is both common and universally accepted in wage and hour representative action litigation, I also performed a lodestar analysis for my firm in support of the attorneys' fees request. This firm has maintained detailed records of the time spent and costs incurred by Harris & Ruble investigating the facts, researching the law and analyzing the claims, initiating the case, filing pleadings, attending court, and preparing the current motion for attorney fees in the Settling Cases. These records are available for review by the Court at Exhibit 1. The hours were recorded contemporaneously in increments of 0.1 hours (6 minutes). The Settling Cases required 2,180 hours of work, resulting in a lodestar of \$1,611,061.50, as detailed in the chart below:

<i>Table 1: Counsel's Requested Hourly Rates</i>			
<i>Attorney</i>	<i>Hourly Rate</i>	<i>Hours</i>	<i>Lodestar</i>
A. Harris	\$895	602.1	\$ 538,879.50
D. Garrett	\$825	716.7	\$ 591,277.50
D. Harris	\$805	345.9	\$ 278,449.50
R. Lee	\$425	46.10	\$ 19,592.50
L. Zhan	\$375	138.10	\$ 51,787.50
P. Mohan	\$795	37.80	\$ 30,051
Law Clerks	\$210	109.90	\$ 23,079
C. Nordsten	\$425	116.10	\$ 49,342.50
M. Gal	\$425	67.30	\$28,602.50
<i>Total</i>	\$ 739 (mixed)	2,180	\$ 1,611,061.50

16. The mixed hourly rate for these services is \$739. This firm has spent a considerable amount of time extensively investigating, researching, and litigating these matters, including but not limited to the following: (i) researching and analyzing relevant claims and entity issues; (ii) investigation of job functions, duties, compensation, policies and procedures, etc.; (iii) drafting the PAGA Notice; (iv) drafting the Complaint; (v) drafting the Mediation Brief; (vi) formal discovery including multiple depositions; (vii) negotiating the terms of settlement with Defendant; (viii) communicating with Opposing Counsel; and (vix) preparing the Class Notice; and (x) drafting motions

1 in support of approval of the Settlement. The undersigned estimates that at a bare minimum, an
2 additional ten hours of time will be spent by Harris & Ruble attorneys in the further prosecution of this
3 case, including attendance at the hearing on the motion for final approval, communicating with class
4 members and the claims administrator and attending to related administrative matters involved in
5 bringing the settlement to completion. Therefore, the time records reflect ten hours of estimated time.
6 It is my practice and the policy of Harris & Ruble that all employees record their professional time in
7 tenth-of-an-hour increments on a contemporaneous basis.

8 17. Although a trial judge is deemed to possess unique insight into the value of services
9 rendered in his or her courtroom, this may properly be supplemented by reference to expert testimony,
10 especially as to the value of services rendered before other judges and in other courtrooms. Mandel v.
11 Lackner, 92 Cal. App. 3d 747, 762 (1979). The relevant community is that in which the court sits. The
12 rates used by Class Counsel are within the range of rates recently approved for class actions. See, e.g.,
13 Pierce v. County of Los Angeles, 2012 U.S. Dist. LEXIS 150492, at *42–52 & n.16 (C.D. Cal. Mar. 2,
14 2012) (approving rates of up to \$850); In re HP Laser Printer Litig., 2011 U.S. Dist. LEXIS 98759, at
15 *14–19 (C.D. Cal. Aug. 31, 2011) (approving rates of up to \$800); Multi-Ethnic Immigrant Workers
16 Org. Network v. City of Los Angeles, 2009 U.S. Dist. LEXIS 132269, at *15–16 (C.D. Cal. June 24,
17 2009) (approving rates of up to \$800)⁴. Moreover, this firm’s rates have been approved in connection
18 with other class-wide settlements. This establishes their reasonableness. See Rutti, 2012 U.S. Dist.
19 LEXIS 107677, at *30–31 (explaining that “[a]ffidavits of the Plaintiff’s attorney and other attorneys
20 regarding prevailing fees in the community, and rate determination in other cases, particularly those
21 setting a rate for the Plaintiff’s attorney, are satisfactory evidence of the prevailing market rate”).

22 18. The Harris & Ruble hourly rates have been approved by other courts in Los Angeles and
23 San Francisco. In December, 2019, Alan Harris’ then rate of **\$895** per hours was approved in Alameda
24 County in Altarmirano v. Safeway, Inc., Case No. RG17851392 (Alameda County Superior Court) and
25 Kelley v. Alector Healthcare Services, LLC, Case No. BC618624 (Los Angeles County Superior Court).

27 ⁴ See also Astorga v Snap-On, No. BC506474, 2018 WL 2198826, at *1 (Cal.Super. Jan. 24,
28 2018)(noting partner received \$1,200 per hour in class action); Orian v. Fed’n Int’l des Droits de
L’Homme, 2012 WL 994643, at *2-3 (C.D. Cal. Mar. 22, 2012) (approving \$900 per hour).

1 David Garrett's then rate of \$795 approved in Altamirano and in Methus v. Vons, Case NO.
2 RIC1601315 (Riverside Superior Court, Nov. 20, 2019). Priya Mohan's then rate of \$725 per hour was
3 approved in Altamirano. The then Harris & Ruble then hourly rates were approved in Zubia v.
4 Shamrock Foods Co., Case No. 16-03128-AB (C.D., Cal. 2016). In Zubia the court stated:

5 [U]pon conducting its own review of similar awards, the Court finds that district courts within
6 California have found similar rates reasonable. See *Chambers v. Whirlpool Corp.*, No. CV 11-
7 1733 FMO (JCGx), 2016 WL 5922456, at *14 (C.D. Cal. Oct. 11, 2016) (approving hourly rates
8 between \$485 and \$750 per hour); *Hightower v. JPMorgan Chase Bank, N.A.*, No. CV 11-1802
9 PSG (PLAx), 2015 WL 9664959, at *11 (C.D. Cal. Aug. 4, 2015) (reducing hourly rate of
10 partner in class action litigation from \$750 to \$620 per hour); *Kearney v. Hyundai Motor*
11 *America*, No. SACV 09-1298-JST (MLGx), 2013 WL 3287996, at *8 (C.D. Cal. June 28, 2013)
(approving hourly rates between \$650 and \$800 for Plaintiffs' Counsel in a consumer class
action); *Parkinson v. Hyundai Motor America*, 796 F. Supp. 2d 1160, 1172 (C.D. Cal. 2010)
(approving hourly rates between \$445 and \$675 for Plaintiffs' Counsel in a consumer class
action); *POM Wonderful, LLC v. Purely Juice, Inc.*, No. CV 07-2633, 2008 WL 4351842, at *4
(C.D. Cal. Sept. 22, 2008) (finding rates of \$475 to \$750 for partners and \$275 to \$425 for
associates reasonable in a consumer class action).

12 Zubia at *32-33. The Court in Zubia approved Alan Harris's then rate of \$800 per hour and David
13 Garrett's then hourly rate of \$625 per hour. In Roach v. Red Bull, Los Angeles Superior Court Case
14 No. BC663866 (2017), the Court approved Alan Harris's then rate of \$800 per hour and David Garrett's
15 then hourly rate of \$695 per hour. The Roach case was approved on April 6, 2018. In Marine v.
16 Giltner, Inc., Los Angeles Superior Court Case No. BC587123 (2017), the Court approved Alan Harris's
17 then rate of \$800 per hour and David Garrett's then hourly rate of \$675 per hour as reasonable.

18 19. In a February 23, 2011, article, *The Wall Street Journal* detailed the climb of attorneys'
19 hourly rates over the \$1,000 per hour level. In its December 2008 survey, the National Law Journal
20 ("NLJ") reported that law firms such as White & Case charged up to \$1,260 per hour for its partners,
21 with the average billing rate at \$747 per hour. Similarly, the NLJ reported that, in December of 2008,
22 Dorsey & Whitney had a high-end partner rate of \$1,180 per hour. A sampling of billing rates for
23 associates taken by the NLJ in December of 2008 reveals that, at the Los Angeles office of Manatt,
24 Phelps & Phillips, eighth-year associates bill at \$505 per hour, seventh-year associates at \$485 per hour,
25 sixth-year associates at \$460 per hour, fifth-year associates at \$440 per hour, fourth-year associates at
26 \$410 per hour, third-year associates at \$365 per hour, second-year associates at \$325 per hour, and first-
27 year associates at \$290 per hour.

28 20. After years of wrangling over the matter of attorney fee hourly rates, the Court in Laffey

1 v. Northwest Airlines, Inc., 572 F.Supp. 354, 371 (D.D.C. 1983) ruled that hourly rates for attorneys
2 practicing civil law in the Washington, DC metropolitan area could be categorized by years in practice
3 and adjusted yearly for inflation. The Department of Justice (DOJ) crafted its own rules for, and
4 maintains, its version of the Laffey Matrix (see [http://www.usdoj.gov/usao/dc/Divisions /](http://www.usdoj.gov/usao/dc/Divisions/Civil_Division/Laffey_Matrix_7.html)
5 [Civil_Division/Laffey_Matrix_7.html](http://www.usdoj.gov/usao/dc/Divisions/Civil_Division/Laffey_Matrix_7.html)). After scrutinizing the DOJ's methodology of setting and
6 adjusting hourly rates for the Matrix, reviewing recent court decisions and contacting an expert
7 economist, many firms in the Baltimore-Washington area (and due to FLRA/MSPB rulings, around the
8 country) now utilize the Adjusted Laffey Matrix. The methodology of calculation and benchmarking for
9 this Updated Laffey Matrix has been approved in a number of cases. See, e.g., McDowell v. District of
10 Columbia, Civ. A. No. 00-594 (RCL), LEXSEE 2001 U.S. Dist. LEXIS 8114 (D.D.C. June 4, 2001);
11 Salazar v. Dist. of Col., 123 F.Supp.2d 8 (D.D.C. 2000). A true and correct copy of the current Laffey
12 Matrix is attached hereto as **Exhibit 3**. The Laffey Matrix confirms the requested rates herein and
13 indicates that Alan Harris', David Harris' and David Garrett's rate could be as high as \$914 per hour,
14 higher than requested.

15 21. When I retained an expert in attorney billing, Peter Zeughauser, I asked him to opine on a
16 proper market-based billing rate for class-action cases and to provide me with insight in setting rates for
17 Harris & Ruble's hourly clients. Mr. Zeughauser has nearly twenty years, he has served as a legal
18 management consultant to law firms throughout the United States and has also consulted with numerous
19 law firms with offices in Los Angeles and throughout the United States regarding the appropriate
20 amount to charge clients for services rendered by the firms. Mr. Zeughauser's assessment of a
21 reasonable hourly rate for Harris & Ruble's attorneys (which have been utilized) was based directly
22 upon his in-depth knowledge of the prevailing market rates in Los Angeles. I understand that
23 Zeughauser's recommendation for reasonable hourly rates is to rates that are commensurate with the
24 prevailing market rate. The rates recommended by Zeughauser have risen along with other market rates,
25 as indicated in the Laffey Matrix.

26 22. The following is a partial list of Peter Zeughauser's publications:

27 Peter D. Zeughauser, Alternative Billing: Clients Aren't Biting, Legal Times, May 1, 2000.

28 Peter D. Zeughauser, Is Bigger Better, The American Lawyer, Sept. 2002.

1 Peter D. Zeughauser, Keeping in Touch, The American Lawyer, Nov. 2005.

2 Peter D. Zeughauser, Lawyers are from Mercury, Clients are from Pluto (1999).

3 Peter D. Zeughauser, Leading by Serving, The American Lawyer, Dec. 2006.

4 Peter D. Zeughauser, Overseeing the End, The American Lawyer, Feb. 2009.

5 Peter D. Zeughauser, Recession Resistant, The American Lawyer, July 2007.

6 Peter D. Zeughauser, Rewarding Leadership, The American Lawyer, Jan. 2008.

7 Peter D. Zeughauser, Tower of Billables, 88 A.B.A.J. 14 (Apr. 2002).

8 Peter D. Zeughauser, Alternative Reality, The American Lawyer, May 2009.

9 Peter D. Zeughauser, Beating the Odds, The American Lawyer, July 2007.

10 Peter D. Zeughauser, Beyond the Black Box, The American Lawyer, Oct. 2006.

11 Peter D. Zeughauser, Culling the Laggards, The American Lawyer, Feb. 2003.

12 Peter D. Zeughauser, Is Bigger Better, The American Lawyer, Sept. 2002.

13 Peter D. Zeughauser, Keeping in Touch, The American Lawyer, Nov. 2005.

14 Peter D. Zeughauser, A Lawyers' Lawyer, The American Lawyer, Jan. 2004, at 51–52.

15 Peter D. Zeughauser, Leading by Serving, The American Lawyer, Dec. 2006.

16 Peter D. Zeughauser, Making Lemonade, The American Lawyer, May 2008, at 61.

17 Peter D. Zeughauser, A Midyear Report, The American Lawyer, July 2004.

18 Peter D. Zeughauser, The New Math: Associate Pay Raises Will Have a Domino Effect
19 on the Entire Legal Industry. Clients Will Build In-House Empires, and Many Firms Will
20 Collapse, Legal Times, May 1, 2000, at 46.

21 Peter D. Zeughauser, The New World Order, The American Lawyer, Jan. 2002, at 49.

22 Peter D. Zeughauser, Optimal Organization, The American Lawyer, Mar. 2001, at 63.

23 Peter D. Zeughauser, Overseeing the End, The American Lawyer, Feb. 2009.

24 Peter D. Zeughauser, Paring the Partnership, The American Lawyer, Jul. 2002.

25 Peter D. Zeughauser & Sara Holtz, Partnering Nirvana, The American Lawyer, Nov.
1997, at 36.

26 Peter D. Zeughauser, Partnering: The Key to Strategic Relationship Building for Clients
27 and Law Firms, L. Governance Rev., Autumn 1996, at 1, 3.

28 Peter D. Zeughauser, Practice, Practice, Practice, The American Lawyer, Aug. 2004.

Peter D. Zeughauser, Preparing Successful Responses to Requests for Proposals, Win-

1 Win Billing Strategies: Alternatives That Satisfy Your Clients and You.

2 Peter D. Zeughauser, Price & Product: A Proposal for a Focused ADR Structure, 15
3 Alternatives to High Costs Litig. 141, 155 (1997).

4 Peter D. Zeughauser, Proposal That Provides Incentives for Use of ADR by Law Firms,
5 The Metropolitan Corporate Counsel, Jan. 1998, at 34.

6 Peter D. Zeughauser, Recession Resistant, The American Lawyer, July 2007.

7 Peter D. Zeughauser, Rewarding Leadership, The American Lawyer, Jan. 2008.

8 Peter D. Zeughauser, Show and Tell, The American Lawyer, Nov. 2003.

9 Peter D. Zeughauser, THEN . . . Does Your Firm Have What It Takes to Be Recession-
10 Resistant?, Institute of Management & Administration, Mar. 2009, Vol. 2009 No. 3.

11 Peter D. Zeughauser, Ties That Bind: Collegiality Less Important Than You Think,
12 Institute of Management & Administration, Feb. 2009, Vol. 2009 No. 2.

13 Peter D. Zeughauser, Time to Buckle Up?, The American Lawyer, Sept. 1999, at 51.

14 Peter D. Zeughauser, Tower of Billables, 88 A.B.A.J. 14 (Apr. 2002).

15 Peter D. Zeughauser, A United Front, The American Lawyer, Aug. 2006.

16 Peter D. Zeughauser, The Use of Alternative Fee Arrangements to Achieve Smart Results
17 and Improve Outside Counsel Relationships, 871 PLI Corp. 47, 50-51 (1994).

18 Peter D. Zeughauser, Using Alternative Fee Arrangements to Improve Client
19 Relationships, Law Firm Profitability and Results, Legal Econ., Apr. 1997.

20 Peter D. Zeughauser, Why England Slept, The American Lawyer, Sept. 2003.

21 Peter D. Zeughauser, Your Future Is at Stake, The American Lawyer, May 2003.

22 Peter D. Zeughauser & Ron Beard, Rewarding Leadership, The American
23 Lawyer, Jan. 2008.

24 23. ***Proposed enhancement award:*** The requested \$2,500 class representative enhancement
25 fee to Plaintiff is reasonable given: (1) the substantial time and effort Plaintiff has expended on behalf of
26 the Settlement Class; (2) the risks Plaintiff faces as a result of bringing this action; (3) the fact that
27 Plaintiff put the interests of the class ahead of her own; and (4) the substantial benefit conferred upon the
28 Settlement Class as result of Plaintiff's Action. Plaintiff is giving a full release of all potential claims
against Chipotle, including a 1542 waiver. Settlement, ¶ I(r); X(B)(69).

29 24. Plaintiff Turley has taken an active part in this litigation since early, 2015 (over five
years), conferring with counsel and assisting in gathering information for the prosecution of the lawsuit.
Turley aided in the preparation of the initial complaint, amended complaints and proposed settlements.

1 Turley has spent considerable time providing factual background and consulting with Counsel in
2 connection with a full-day mediation. Turley was subjected to a full-day deposition. *See* Declaration of
3 Tanika Turley (“Turley Decl.”), ¶¶21-28. Turley “had numerous phone calls and meetings with North
4 Bay Law Group and Harris & Ruble prior to the filing of the case, and monthly throughout the
5 proceedings. [Turley] was subject to a full day deposition. [Turley] aided Harris & Ruble with regard
6 to preparation of discovery responses, Opposition to the Motion for Summary Judgment, the
7 confidential mediation brief, and I was involved and aware of the extensive negotiations that took place
8 during the mediation and over the terms of this settlement. Turley Decl., ¶22. Turley spoke with class
9 counsel for case related purposes, such as to discuss and explain Chipotle’s pay system, procedures for
10 final payments, my typical workday, and complaints of other workers. Turley Decl., ¶23. In addition,
11 Turley had numerous discussions regarding the progress of the case and the proposed settlement with
12 other former and current Chipotle employees. *Id.*

13 25. Finally, Plaintiff “undertook the financial risk that, in the event of a judgment in favor of
14 [Defendant] in this action, [she] could have been personally responsible for any costs awarded in favor
15 of [Defendant].” Vasquez v. Coast Valley Roofing, Inc., 266 F.R.D. 482, 491 (E.D. Cal. 2010).
16 Further, there is always the risk in acting as a class representative that Defendant or other companies
17 might be hesitant to hire Plaintiff in the future. It is common knowledge that employers often run a
18 “Google” search of potential employees, and use the results to determine who they will hire. Indeed,
19 enhancement awards are particularly appropriate in employment class actions, where they help to
20 alleviate the stigma upon future employment opportunities for having initiated an action against a former
21 employer.

22
23 I have read the foregoing declaration and the facts set forth therein are true of my own personal
24 knowledge. Executed December 8, 2020, in the County of Los Angeles, State of California.

25 

26 Alan Harris

1
2 **PROOF OF SERVICE**

3 I am an attorney for Plaintiff(s) herein, over the age of eighteen years, and not a party to the within
4 action. My business address is 655 N. Central Ave., 17th Floor, Glendale, CA 91203. On December 8,
2020, I served the within document(s):

5 **DECLARATION OF ALAN HARRIS IN SUPPORT OF MOTION FOR ATTORNEY FEES
6 REIMBURSEMENT OF COSTS AND ENHANCEMENT AWARD**

7 **[PROPOSED] ORDER GRANTING MOTION FOR ATTORNEY FEES. REIMBURSEMENT OF
8 COSTS AND ENHANCEMENT AWARD**

9 **NOTICE OF MOTION AND MOTION FOR ATTORNEY FEES, REIMBURSEMENT OF
10 COSTS AND ENHANCEMENT AWARD**

11 Facsimile: I caused such envelope to be uploaded electronically via e-mail (File & Serve) to:

12 angela.agrusa@us.dlapiper.com
13 levi.heath@us.dlapiper.com
14 Steve.hernandez@dlapiper.com

15 I am readily familiar with the Firm's practice of collection and processing correspondence for mailing.
16 Under that practice it would be deposited with the U.S. Postal Service on that same day with postage
17 thereon fully prepaid in the ordinary course of business, addressed as follows:

18 Angela C. Agrusa
19 Levi W. Heath
20 Steve L. Hernández
21 DLA PIPER LLP (US)
22 2000 Avenue of the Stars
23 Suite 400 North Tower
24 Los Angeles, California 90067-4704

25 MESSNER REEVES LLP
26 Charles C. Cavanagh
27 1430 Wynkoop Street, Suite 300
28 Denver, Colorado 80202

I declare under penalty of perjury that the above is true and correct. Executed on December 8, 2020, at
Los Angeles, California.

23
24 
25 _____
26 David Garrett

Exhibit 1

Date	Attorney Billing - David S. Harris	Description	Hours	Hourly Rate	Total
2/10/2015	DSH	Telephone discussion with T. Turley regarding Chipotle employment issues; attend to issues related to same; conference with M. Solano regarding issues related to same.	1.3	805	\$ 1,046.50
2/12/2015	DSH	Telephone discussion with T. Turley regarding employment; research issues related to Chipotle litigations; attend to issues related to same.	2.3	\$ 805.00	\$ 1,851.50
2/16/2015	DSH	Attend to issues related to potential Chipotle action; discussion with client regarding same.	0.5	\$ 805.00	\$ 402.50
2/27/2015	DSH	Attend to issues related to Chipotle matter; discussion with client re same.	0.3	\$ 805.00	\$ 241.50
3/2/2015	DSH	Telephone discussion with client regarding issues related to employment.	0.2	\$ 805.00	\$ 161.00
3/3/2015	DSH	Meeting with T. Turley regarding issues related to employment with Chipotle; conduct research regarding claims; attend to issues related to same.	2.8	\$ 805.00	\$ 2,254.00
3/5/2015	DSH	Attend to issues related to 226 request; review and respond to emails with A. Harris regarding issues related to new case; telephone discussion with client regarding same.	2.5	\$ 805.00	\$ 2,012.50
3/9/2015	DSH	Conference call with T. Turley and A. Harris regarding issues related to Chipotle claims; attend to issues related to same.	1	\$ 805.00	\$ 805.00
3/10/2015	DSH	Meeting with T. Turley regarding issues related to attorney-client agreement and claims against Chipotle; attend to issues related to same.	2.5	\$ 805.00	\$ 2,012.50
3/11/2015	DSH	Telephone discussion with client and attorneys regarding issues relate to draft complaint; attend to issues related to same.	0.8	\$ 805.00	\$ 644.00
3/12/2015	DSH	Attend to issues related to Chipotle litigation; review and respond to emails regarding fee agreement.	0.4	\$ 805.00	\$ 322.00
3/15/2015	DSH	Conference call with T. Turley and attorneys regarding issues related to employment claims; attend to issues related to same; conduct legal research regarding issues related to same.	1.7	\$ 805.00	\$ 1,368.50
3/23/2015	DSH	Attend to issue related to draft complaint; prepare accompanying documentation for filing; review and prepare final exhibits for same; telephone call with client regarding issues related to final complaint; review and modify same.	3.8	\$ 805.00	\$ 3,059.00

3/24/2015	DSH	Attend to issues related to finalizing draft of complaint and accompanying documentation; review and respond to emails regarding same.	5.3	\$ 805.00	\$ 4,266.50
3/25/2015	DSH	Finalize Civil Coversheet, Summons and Complaint; review and respond to emails regarding same; attend to issues related to same; finalize filing of Complaint and accompanying documents; file same.	4.8	\$ 805.00	\$ 3,864.00
3/26/2015	DSH	Review Notice to Plaintiff; attend to issues related to draft PAGA letter; review and respond to emails regarding same; telephone discussion with client regarding issues related to litigation.	1.3	\$ 805.00	\$ 1,046.50
4/6/2015	DSH	Telephone discussion with client regarding status.	0.3	\$ 805.00	\$ 241.50
4/7/2015	DSH	Review Chipotle's response to 226 letter; attend to issues related to same; telephone conference with client regarding issues related to litigation and 226 response.	1.8	\$ 805.00	\$ 1,449.00
5/4/2015	DSH	Telephone conference with client regarding issues related to litigation and filing of amended complaint; attend to issues related to same.	0.8	\$ 805.00	\$ 644.00
5/6/2015	DSH	Attend to issues related to first amended complaint; draft email to attorneys regarding same.	0.3	\$ 805.00	\$ 241.50
5/13/2015	DSH	Review documentation re clock in/out; attend to issues related to same; draft email regarding same; telephone discussion with client regarding issues related to same.	0.8	\$ 805.00	\$ 644.00
5/14/2015	DSH	Attend to issues related to potential additional claims; conduct research regarding same.	1.3	\$ 805.00	\$ 1,046.50
5/26/2015	DSH	Attend to issues related to pending Chipotle matters; research same.	0.5	\$ 805.00	\$ 402.50
6/19/2015	DSH	Telephone discussion with client regarding status and pending matters.	0.3	\$ 805.00	\$ 241.50
7/22/2015	DSH	Attend to issues related to First Amended Complaint; telephone discussion with cocounsel regarding same; review and modify same; finalize FAC and accompanying exhibits; attend to issues related to same.	3.8	\$ 805.00	\$ 3,059.00
7/23/2015	DSH	Attend to issues related to finalizing filing of First Amended Complaint; file same.	1.8	\$ 805.00	\$ 1,449.00
7/27/2015	DSH	Attend to issue related to First Amended Summons; attend to issues related to service of First Amended Complaint and accompanying documents.	1.3	\$ 805.00	\$ 1,046.50
7/31/2015	DSH	Attend to issues related to finalizing and filing Case Management Statement; telephone discussion with cocounsel regarding same; finalize and file same.	1.3	\$ 805.00	\$ 1,046.50

8/10/2015	DSH	Review order continuing CMC; attend to issues related to same.	0.2	\$ 805.00	\$ 161.00
8/28/2015	DSH	Review Answer filed by Defendant; attend to issues related to same.	1.3	\$ 805.00	\$ 1,046.50
8/29/2015	DSH	Review and research issues related to Answer and affirmative defenses; attend to same.	1.5	\$ 805.00	\$ 1,207.50
9/1/2015	DSH	Review order continuing CMC; attend to issues related to same.	0.1	\$ 805.00	\$ 80.50
9/17/2015	DSH	Review and respond to emails regarding issues related to responsive pleadings; attend to same.	0.2	\$ 805.00	\$ 161.00
10/13/2015	DSH	Attend to issue related to drafting CMC Statement; review and modify same; file same.	1.3	\$ 805.00	\$ 1,046.50
10/15/2015	DSH	Review Defendant's CMC Statement.	0.3	\$ 805.00	\$ 241.50
10/17/2015	DSH	Review order continuing CMC; attend to same.	0.1	\$ 805.00	\$ 80.50
12/15/2015	DSH	Review and respond to emails with opposing counsel regarding issues related to litigation.	0.2	\$ 805.00	\$ 161.00
12/28/2015	DSH	Review and respond to emails with cocounsel	0.1	\$ 805.00	\$ 80.50
4/16/2016	DSH	Review and respond to emails with opposing counsel regarding issues related to pending litigations; review and attend to issues related to same.	0.2	\$ 805.00	\$ 161.00
4/20/2016	DSH	Review notice of deposition of person most knowledgeable; attend to issues related to same.	0.5	\$ 805.00	\$ 402.50
5/5/2016	DSH	Attend to issues related to objections and responses to discovery requests; discussions with cocounsel regarding same; review documents responsive to same.	2.5	\$ 805.00	\$ 2,012.50
5/6/2016	DSH	Attend to issues related to Plaintiff's responses to discovery requests; review and modify same; attend to issues related to same.	3.3	\$ 805.00	\$ 2,656.50
5/9/2016	DSH	Attend to issues related to Chipotle discovery; review and respond to emails with cocounsel regarding matter; review and finalize discovery responses.	2.7	\$ 805.00	\$ 2,173.50
5/10/2016	DSH	Attend to issues related to notice of deposition; coordinate same; review and respond to emails regarding same.	1.5	\$ 805.00	\$ 1,207.50
5/13/2016	DSH	Review and respond to emails with cocounsel regarding tip claims; attend to issues related to same.	0.3	\$ 805.00	\$ 241.50
5/17/2016	DSH	Review and respond to emails with opposing counsel regarding issues related to Defendant's discovery responses; review order continuing CMC.	0.4	\$ 805.00	\$ 322.00
5/20/2016	DSH	Review and respond to emails with opposing counsel regarding issues related to deposition schedule; attend to issues related to same.	0.5	\$ 805.00	\$ 402.50

5/21/2016	DSH	Review and respond to emails with cocounsel regarding deposition scheduling; attend to same.	0.3	\$ 805.00	\$ 241.50
5/23/2016	DSH	Prepare for conference call with opposing counsel; attend to issues related to same; conference call with opposing counsel; attend to follow up issues regarding same.	1.3	\$ 805.00	\$ 1,046.50
5/27/2016	DSH	Attend to issues related to Chipotle deposition scheduling; review and respond to emails regarding same.	0.2	\$ 805.00	\$ 161.00
5/30/2016	DSH	Review Chipotle management handbook; conduct research regarding same.	1.5	\$ 805.00	\$ 1,207.50
5/31/2016	DSH	Attend to issues related to preparing for client deposition; review responsive documents regarding same; review and respond to emails with opposing counsel regarding issues related to discovery and depositions.	3.7	\$ 805.00	\$ 2,978.50
6/1/2016	DSH	Review and respond to emails with opposing counsel regarding issues related to deposition; attend to issues related to same.	0.3	\$ 805.00	\$ 241.50
6/7/2016	DSH	Review and respond to emails with opposing counsel regarding CMC Statement and discovery issues.	0.1	\$ 805.00	\$ 80.50
6/13/2016	DSH	Prepare for meet and confer with opposing counsel; attend to issues related to same; review and respond to emails regarding same.	1.5	\$ 805.00	\$ 1,207.50
6/14/2016	DSH	Attend to issues related to preparing Case Management Conference statement; telephone conference with opposing counsel regarding issues related to same; attend to follow up issues related to same; finalize CMC Statement.	1.7	\$ 805.00	\$ 1,368.50
6/15/2016	DSH	Review and respond to emails with cocounsel.	0.2	\$ 805.00	\$ 161.00
6/16/2016	DSH	Review notice of appearance for Defendant; review and respond to emails regarding issues related to settlement demand; research issues related to same.	1.3	\$ 805.00	\$ 1,046.50
6/17/2016	DSH	Review and respond to emails regarding issues related to mediation/settlement.	0.3	\$ 805.00	\$ 241.50
6/22/2016	DSH	Attend to issue related to Notice of Order Continuing CMC; review and respond to emails with cocounsel regarding issues related to settlement.	0.4	\$ 805.00	\$ 322.00
6/24/2016	DSH	Review discovery requests propounded by Defendant; attend to issues related to same.	0.5	\$ 805.00	\$ 402.50
6/27/2016	DSH	Review and respond to emails regarding issues related to defendant's discovery responses; conference with cocounsel regarding same.	0.4	\$ 805.00	\$ 322.00

6/28/2016	DSH	Attend to issues related to motion for summary adjudication; review and respond to emails regarding same.	0.3	\$ 805.00	\$ 241.50
7/11/2016	DSH	Review documents produced by Defendant; attend to issues related to same; review and respond to emails regarding same.	1.5	\$ 805.00	\$ 1,207.50
7/16/2016	DSH	Review Defendant's response to request for leave to file motion for summary adjudication; attend to issues related to same.	0.4	\$ 805.00	\$ 322.00
8/4/2016	DSH	Attend to issues related to discovery verifications.	0.2	\$ 805.00	\$ 161.00
8/5/2016	DSH	Telephone conference with cocounsel regarding issues related to motion to compel; review and modify drafts of same; attend to issues related to same.	3.8	\$ 805.00	\$ 3,059.00
8/8/2016	DSH	Attend to issues related to motions to compel; review and respond to emails regarding same; telephone discussions with cocounsel regarding same; finalize same.	2.7	\$ 805.00	\$ 2,173.50
8/10/2016	DSH	Attend to issues related to motion to compel; review and respond to emails regarding same.	1	\$ 805.00	\$ 805.00
8/11/2016	DSH	Attend to issues related to motion to compel; review and respond to emails regarding same; telephone discussion with cocounsel regarding same; attend to filing issues; finalize same.	1.3	\$ 805.00	\$ 1,046.50
9/5/2016	DSH	Review Defendant's opposition to motions to compel; attend to issues related to same.	0.5	\$ 805.00	\$ 402.50
9/7/2016	DSH	Attend to issues related to Reply to Motions to Compel; review and respond to emails regarding same; discussion with cocounsel regarding same.	1.5	\$ 805.00	\$ 1,207.50
9/8/2016	DSH	Attend to issues related to motions to compel and reply to same; review and respond to emails regarding same; discussion with cocounsel regarding same.	0.4	\$ 805.00	\$ 322.00
9/9/2016	DSH	Attend to issues related to Reply iso Motion to Compel; review and finalize documentation in support of same; review and respond to emails regarding same; attend to issues related to filing.	3.3	\$ 805.00	\$ 2,656.50
9/14/2016	DSH	Review and respond to emails regarding scheduling of depositions; attend to same; attend to issues related to same.	0.3	\$ 805.00	\$ 241.50
9/15/2016	DSH	Review and respond to emails regarding issues related to motion to compel; attend to issues related to same.	0.2	\$ 805.00	\$ 161.00
9/16/2016	DSH	Attend to issues related to hearing and continuance of motion to compel; review and respond to emails regarding same.	0.2	\$ 805.00	\$ 161.00
9/26/2016	DSH	Review tentative ruling on motion to compel; attend to issues related to same; review and respond to emails regarding same.	0.5	\$ 805.00	\$ 402.50

9/27/2016	DSH	Attend to issues related to amended notices of deposition; review and respond to emails regarding same.	0.5	\$ 805.00	\$ 402.50
10/6/2016	DSH	Review Defendant's Motion for Relief pursuant to CCP 2030.290 re objections; research same; review and respond to emails regarding same.	0.8	\$ 805.00	\$ 644.00
10/7/2016	DSH	Review and respond to emails regarding discovery issues.	0.1	\$ 805.00	\$ 80.50
10/10/2016	DSH	Review and respond to emails regarding discovery; attend to issues related to same.	0.2	\$ 805.00	\$ 161.00
10/11/2016	DSH	Attend to issues related to motion to compel; review and respond to emails regarding same.	0.5	\$ 805.00	\$ 402.50
10/14/2016	DSH	Attend to issues related to proposed order; review and respond to emails regarding same.	0.3	\$ 805.00	\$ 241.50
10/16/2016	DSH	Review order continuing CMC; attend to same; review email correspondence from opposing counsel regarding proposed order; attend to same.	0.3	\$ 805.00	\$ 241.50
10/19/2016	DSH	Review Notice of Order continuing CMC.	0.1	\$ 805.00	\$ 80.50
10/20/2016	DSH	Review Defendant's objection to proposed order; attend to issues related to same.	0.3	\$ 805.00	\$ 241.50
10/27/2016	DSH	Attend to defendant verifications.	0.1	\$ 805.00	\$ 80.50
10/30/2016	DSH	Review and respond to emails with cocounsel.	0.1	\$ 805.00	\$ 80.50
11/1/2016	DSH	Attend to issues related to Motion to Compel; telephone conference with cocounsel and opposing counsel regarding same; attend to issues related to same; review and respond to emails regarding same.	2.3	\$ 805.00	\$ 1,851.50
11/2/2016	DSH	Attend to issues related to Motion to Compel; multiple discussions with cocounsel regarding same.	0.4	\$ 805.00	\$ 322.00
11/23/2016	DSH	Attend to issues related to draft CMC Statement; review and respond to emails with cocounsel regarding same.	0.3	\$ 805.00	\$ 241.50
11/26/2016	DSH	Review Notice of Time and Place for Trial; attend to issues related to same.	0.2	\$ 805.00	\$ 161.00
11/27/2016	DSH	Review supplemental discovery responses; attend to issues related to same.	0.5	\$ 805.00	\$ 402.50
11/29/2016	DSH	Attend to issues related to CMC Statement filed.	0.1	\$ 805.00	\$ 80.50
11/30/2016	DSH	Review order re trial; attend to issues related to objection.	0.7	\$ 805.00	\$ 563.50
12/1/2016	DSH	Attend to issue related to Notice of Objection of trial date; file same; attend to issues related to Plaintiff's document production; review and respond to emails regarding issues related to same; review same.	2.2	\$ 805.00	\$ 1,771.00

12/5/2016	DSH	Attend to issues related to class certification issues; review objections and responses to deposition notices; review and respond to emails regarding same; attend to same.	0.8	\$ 805.00	\$ 644.00
12/6/2016	DSH	Review and respond to emails regarding issues related to objection hearing; conference with cocounsel regarding same.	0.5	\$ 805.00	\$ 402.50
12/7/2016	DSH	Attend to issues related to objection hearing; travel to/from San Francisco for same; attend to same; attend to follow up issues related to same; conference with cocounsel regarding same.	2.8	\$ 805.00	\$ 2,254.00
12/11/2016	DSH	Review notice of appearance for Defendant.	0.1	\$ 805.00	\$ 80.50
12/15/2016	DSH	Review Notice of Order setting CMC; attend to issues related to same; review and respond to emails regarding same.	0.3	\$ 805.00	\$ 241.50
12/21/2016	DSH	Attend to issues related to paystubs hours listed; review research regarding same.	0.3	\$ 805.00	\$ 241.50
12/30/2016	DSH	Telephone call with client regarding status and issues related to litigation; attend to issues related to same.	0.8	\$ 805.00	\$ 644.00
1/27/2017	DSH	Attend to issues relate to renoticed deposition of Gottlieb.	0.2	\$ 805.00	\$ 161.00
1/29/2017	DSH	Attend to issues related to deposition notice.	0.2	\$ 805.00	\$ 161.00
1/30/2017	DSH	Attend to amended notice of deposition of Gottlieb; attend to issues related to same.	0.5	\$ 805.00	\$ 402.50
2/7/2017	DSH	Attend to issues related to tip investigation; draft email regarding same.	0.8	\$ 805.00	\$ 644.00
2/8/2017	DSH	Attend to issues related to in person investigation of Chipotle operations; discussion with M. Solano regarding same; attend to issues related to same; attend to filing of Application for Approval of Complex Designation; review and finalize same; file same.	2.8	\$ 805.00	\$ 2,254.00
2/14/2017	DSH	Review and respond to emails regarding complex designation.	0.1	\$ 805.00	\$ 80.50
2/15/2017	DSH	Attend to issues related to complex designation filing.	0.5	\$ 805.00	\$ 402.50
2/20/2017	DSH	Attend to issues related to preparing Case Management Statement; review and respond to emails regarding same.	0.8	\$ 805.00	\$ 644.00
2/21/2017	DSH	Review order continuing CMC; attend to same; review and respond to emails with cocounsel regarding same.	0.2	\$ 805.00	\$ 161.00
3/7/2017	DSH	Attend to issues related to Gottlieb deposition transcript; review and respond to emails regarding same.	0.4	\$ 805.00	\$ 322.00
3/12/2017	DSH	Review Order Granting Complex Designation and for Single Assignment; attend to issues related to same; research issues related to same.	0.8	\$ 805.00	\$ 644.00
3/21/2017	DSH	Review and respond to emails regarding issues related to CMC.	0.2	\$ 805.00	\$ 161.00

3/28/2017	DSH	Attend to issue related to joint CMC Statement.	0.1	\$ 805.00	\$ 80.50
3/30/2017	DSH	Conduct research regarding Judge Karnow's local rules for CMC's; draft email regarding same.	0.3	\$ 805.00	\$ 241.50
4/5/2017	DSH	Attend to issues related to CMC Statement.	0.2	\$ 805.00	\$ 161.00
4/6/2017	DSH	Conference call with opposing counsel regarding issues related to CMC Statement and deposition scheduling; attend to issues related to same.	0.5	\$ 805.00	\$ 402.50
4/12/2017	DSH	Review and respond to emails regarding issues related to CMC Statement.	0.2	\$ 805.00	\$ 161.00
4/13/2017	DSH	Attend to issues related to Joint Case Management Statement; review and respond to emails regarding same.	0.5	\$ 805.00	\$ 402.50
4/18/2017	DSH	Prepare for Case Management Conference; multiple telephone discussions with cocounsel regarding same; attend to issues related to same; review and respond to emails regarding same.	1.7	\$ 805.00	\$ 1,368.50
4/19/2017	DSH	Prepare for Case Management Conference; attend same; travel to/from San Francisco Superior Court for same; attend to follow up issues related to same; telephone discussion with cocounsel regarding same.	3.5	\$ 805.00	\$ 2,817.50
4/20/2017	DSH	Review Case Management Conference Order No. 1; attend to issues related to same; telephone discussion with cocounsel regarding issues related to same.	1.2	\$ 805.00	\$ 966.00
5/16/2017	DSH	Review and respond to emails with opposing counsel regarding deposition scheduling.	0.1	\$ 805.00	\$ 80.50
5/23/2017	DSH	Attend to issues related to scheduling Plaintiff deposition; review and respond to emails regarding same.	0.2	\$ 805.00	\$ 161.00
5/24/2017	DSH	Review and respond to emails regarding Plaintiff deposition.	0.1	\$ 805.00	\$ 80.50
5/26/2017	DSH	Review notice of deposition of Plaintiff; attend to issues related to same.	0.3	\$ 805.00	\$ 241.50
6/2/2017	DSH	Attend to issues related to deposition of Plaintiff; telephone discussion with client regarding same.	0.5	\$ 805.00	\$ 402.50
6/4/2017	DSH	Prepare objections and response to Defendant's Notice of Deposition of Plaintiff; review documents responsive to same; attend to issues related to same.	3.8	\$ 805.00	\$ 3,059.00
6/5/2017	DSH	Review and modify Plaintiff's objections and responses to Defendant's deposition notice; attend to issues related to same; conference with client to prepare in anticipation of deposition; review documents in anticipation of deposition; attend to issues related to same.	6.5	\$ 805.00	\$ 5,232.50

6/6/2017	DSH	Prepare for deposition of Tanika Turley; meeting with Ms. Turley; serve objections and responses to deposition notice; attend deposition; conference with cocounsel regarding issues related to same; travel to/from San Francisco; attend to follow up issues related to same.	12.5	\$ 805.00	\$ 10,062.50
6/7/2017	DSH	Attend to follow up issues related to deposition; telephone discussion with cocounsel regarding same; telephone discussion with client regarding same; review documents responsive to requests; review documents related to Segovia matter.	2.1	\$ 805.00	\$ 1,690.50
6/20/2017	DSH	Attend to issues related to CMC Statement; review and respond to emails regarding same; conference call with cocounsel regarding same.	0.3	\$ 805.00	\$ 241.50
6/22/2017	DSH	Attend to issue related to Case Management Conference statement; conference call with opposing counsel regarding same; review and respond to emails regarding same.	0.6	\$ 805.00	\$ 483.00
6/26/2017	DSH	Prepare for Case Management Conference; telephone discussion with cocounsel regarding same; review correspondence from opposing counsel regarding documents requested.	0.8	\$ 805.00	\$ 644.00
6/27/2017	DSH	Prepare for Case Management Conference; attend to issues related to same; travel to/from San Francisco; attend Case Management Conference in Department 304; attend to follow up issues related to same; telephone discussion with cocounsel regarding same.	3.8	\$ 805.00	\$ 3,059.00
6/28/2017	DSH	Review Case Management Conference Order No. 2; attend to issues related to same.	0.3	\$ 805.00	\$ 241.50
7/5/2017	DSH	Review documents regarding pending matters in other jurisdictions.	0.3	\$ 805.00	\$ 241.50
7/20/2017	DSH	Telephone discussion with cocounsel regarding Belaire West notice; attend to issues related to same.	0.3	\$ 805.00	\$ 241.50
7/25/2017	DSH	Attend to issues related to Case Management Statement; review and respond to emails regarding same; attend to issues related to petition to stay; attend to issues related to same.	1.5	\$ 805.00	\$ 1,207.50
7/27/2017	DSH	Prepare for Case Management Conference; telephone discussion with cocounsel regarding same.	0.4	\$ 805.00	\$ 322.00
7/28/2017	DSH	Prepare for Case Management Conference; travel to/from San Francisco for same; attend same; attend to follow up issues related to same; telephone discussion with cocounsel regarding same.	3.1	\$ 805.00	\$ 2,495.50
7/29/2017	DSH	Review Case Management Conference Order No. 3; attend to issues related to same.	0.3	\$ 805.00	\$ 241.50

8/3/2017	DSH	Attend to issues related to Defendant's request for additional documents; review and respond to emails regarding same.	0.3	\$ 805.00	\$ 241.50
8/17/2017	DSH	Attend to issues related to Case Management Statement; review and respond to emails regarding same; finalize and file same.	0.8	\$ 805.00	\$ 644.00
8/18/2017	DSH	Review Defendant's CMC Statement; attend to same; review and modify draft Belaire West notice; conference with cocounsel regarding same; attend to issue relate to same.	0.6	\$ 805.00	\$ 483.00
8/21/2017	DSH	Prepare for case management conference; attend to issues related to same; travel to/from San Francisco; attend Case Management Conference; attend to follow up issues related to same; telephone discussion with cocounsel.	3.8	\$ 805.00	\$ 3,059.00
8/23/2017	DSH	Review Case Management Order No. 4; attend to issues related to same.	0.3	\$ 805.00	\$ 241.50
9/15/2017	DSH	Review correspondence from opposing counsel.	0.1	\$ 805.00	\$ 80.50
9/26/2017	DSH	Attend to issues related to Status Conference Statement and request for continuance.	0.2	\$ 805.00	\$ 161.00
9/27/2017	DSH	Review order assigning coordination judge.	0.1	\$ 805.00	\$ 80.50
10/19/2017	DSH	Review Notice of Order regarding hearing on coordination and stay; attend to issues related to same.	0.1	\$ 805.00	\$ 80.50
11/13/2017	DSH	Attend to issues related to Reply to coordination motion; review and respond to emails regarding same.	0.3	\$ 805.00	\$ 241.50
11/14/2017	DSH	Review Notice of Continuance of CMC.	0.1	\$ 805.00	\$ 80.50
12/1/2017	DSH	Review Order Denying Petition for Coordination; attend to issues related to same; review and respond to emails regarding same.	0.5	\$ 805.00	\$ 402.50
12/7/2017	DSH	Review and respond to emails with cocounsel; conference call with cocounsel.	0.2	\$ 805.00	\$ 161.00
12/18/2017	DSH	Review Notice of Order Denying Coordination.	0.1	\$ 805.00	\$ 80.50
12/19/2017	DSH	Attend to issues related to joint CMC Statement; review and respond to emails regarding same.	0.3	\$ 805.00	\$ 241.50
12/21/2017	DSH	Attend to issues related to Belaire West notice; review and respond to emails regarding same.	0.4	\$ 805.00	\$ 322.00
12/26/2017	DSH	Attend to finalizing Joint CMC Statement.	0.2	\$ 805.00	\$ 161.00
12/29/2017	DSH	Prepare for Case Management Conference; travel to/from San Francisco for same; attend same; attend to follow up issues related to same; telephone discussion with cocounsel regarding same.	3.6	\$ 805.00	\$ 2,898.00
12/30/2017	DSH	Review Case Management Order No. 5; attend to issues related to same; telephone discussion with cocounsel regarding same.	0.4	\$ 805.00	\$ 322.00

1/3/2018	DSH	Review Defendant's objection to Bel Aire West notice; attend to issues related to same.	1	\$ 805.00	\$ 805.00
1/10/2018	DSH	Review Order re Belaire West Notice; attend to issues related to same.	0.3	\$ 805.00	\$ 241.50
1/11/2018	DSH	Attend to issues related to Belaire West notice; review and respond to emails regarding same.	0.3	\$ 805.00	\$ 241.50
1/17/2018	DSH	Review Notice of Change of Date of CMC; attend to same; attend to issues related to Belaire West Notice.	0.3	\$ 805.00	\$ 241.50
1/30/2018	DSH	Review and respond to emails from class members in response to Belarie West notice; attend to issues related to same; review and respond to emails with cocounsel regarding same; telephone conversation with multiple class members regarding issues related to employment experiences.	2.8	\$ 805.00	\$ 2,254.00
1/31/2018	DSH	Conference regarding issues related to interview of Chipotle current and former employees; attend to issues related to same; telephone conversations with numerous employees regarding issues related to employment; review and respond to emails regarding issues related to same.	3.3	\$ 805.00	\$ 2,656.50
2/1/2018	DSH	Telephone conference with employees regarding issues related to employment; attend to issues related to same.	3	\$ 805.00	\$ 2,415.00
2/2/2018	DSH	Telephone conference with Chipotles employees regarding issues related to employment; attend to issues related to same.	1.3	\$ 805.00	\$ 1,046.50
2/3/2018	DSH	Telephone conference with multiple employees regarding issues related to employment; attend to issues related to same; review and respond to emails regarding same.	1.5	\$ 805.00	\$ 1,207.50
2/5/2018	DSH	Review and respond to emails from class members; telephone conference with multiple employees regarding issues related to employment; attend to issues related to same.	1.8	\$ 805.00	\$ 1,449.00
2/8/2018	DSH	Telephone conference with Chipotle employee regarding issues related to employment; attend to issues related to same.	1	\$ 805.00	\$ 805.00
2/12/2018	DSH	Telephone conference with Chipotle employee regarding issues related to employment; attend to issues related to same.	0.5	\$ 805.00	\$ 402.50
2/13/2018	DSH	Attend to issues related to employee record requests; review and respond to emails regarding same.	0.3	\$ 805.00	\$ 241.50
3/9/2018	DSH	Review correspondence from opposing counsel regarding issues related to employee recorded requests; attend to issues related to same.	0.3	\$ 805.00	\$ 241.50

3/22/2018	DSH	Attend to issues related to employee data; telephone conversation with cocounsel regarding issues related to same.	0.5	\$ 805.00	\$ 402.50
4/6/2018	DSH	Conference regarding issues related to employee contact; review and respond to emails regarding same; attend to issues related to same.	1.3	\$ 805.00	\$ 1,046.50
4/9/2018	DSH	Conference call regarding issues related to employee contacts; review and respond to emails regarding same; attend to same.	0.6	\$ 805.00	\$ 483.00
4/11/2018	DSH	Attend to issues related to contacting employees; review and respond to emails regarding same.	0.3	\$ 805.00	\$ 241.50
4/12/2018	DSH	Conference regarding issues related to employee declaration; attend to issues related to same.	0.5	\$ 805.00	\$ 402.50
4/19/2018	DSH	Attend to issues related to employee declarations.	0.5	\$ 805.00	\$ 402.50
4/24/2018	DSH	Review and respond to emails regarding employee declarations; attend to issues related to same; telephone conferences with Chipotle employees regarding same.	2.2	\$ 805.00	\$ 1,771.00
4/25/2018	DSH	Telephone calls with Chipotle employees; attend to issues related to declarations.	0.8	\$ 805.00	\$ 644.00
4/26/2018	DSH	Attend to issues related to employee declarations; review and respond to emails regarding same.	0.5	\$ 805.00	\$ 402.50
4/27/2018	DSH	Review employee declarations; attend to issues related to same; review and respond to emails regarding same.	0.6	\$ 805.00	\$ 483.00
5/4/2018	DSH	Attend to issues related to employee declarations; discussions with cocounsel regarding same.	0.8	\$ 805.00	\$ 644.00
5/8/2018	DSH	Attend to issues related to employee declarations.	0.3	\$ 805.00	\$ 241.50
5/10/2018	DSH	Review and respond to emails regarding employee declarations; discussion with employees regarding same; review same.	0.4	\$ 805.00	\$ 322.00
5/17/2018	DSH	Telephone discussion with client regarding issues related to motion for class certification; attend to issues related to same; attend to issues related to declarations iso of same.	3.5	\$ 805.00	\$ 2,817.50
5/18/2018	DSH	Attend to issues related to motion for class certification and declarations iso of same.	0.8	\$ 805.00	\$ 644.00
5/21/2018	DSH	Attend to issues related to motion for class certification and outstanding declarations; review and respond to emails regarding same.	1.3	\$ 805.00	\$ 1,046.50
5/22/2018	DSH	Review and respond to emails regarding issues related to Motion for Class Certification; attend to issues related to same; review same.	2.3	\$ 805.00	\$ 1,851.50

5/23/2018	DSH	Attend to issues related to finalizing Motion for Class Certification; review and respond to emails regarding same; multiple discussions with cocounsel regarding same; attend to issues related to same.	2.5	\$ 805.00	\$ 2,012.50
5/24/2018	DSH	Review Defendant's Motion to Deny Class Certification or Strike Class Allegations; attend to same; discussion with cocounsel regarding same; attend to issues related to notices of deposition.	1.2	\$ 805.00	\$ 966.00
5/29/2018	DSH	Attend to issues related to Case Management Conference statement.	0.3	\$ 805.00	\$ 241.50
5/30/2018	DSH	Review and respond to emails regarding issues related to class certification motion; attend to issues related to same.	0.5	\$ 805.00	\$ 402.50
6/1/2018	DSH	Attend to issues related to motion for class certification; review and respond to emails regarding same; telephone call with cocounsel regarding same.	0.4	\$ 805.00	\$ 322.00
6/3/2018	DSH	Prepare for CMC; telephone discussion with cocounsel regarding same.	0.4	\$ 805.00	\$ 322.00
6/4/2018	DSH	Prepare for Case Management Conference; travel to/from San Francisco for same; attend CMC; attend to follow up issues related to same; review relevant case law regarding issues related to class certification; attend to same.	3.1	\$ 805.00	\$ 2,495.50
6/5/2018	DSH	Review Case Management Order No. 6; attend to issues related to deadlines and same.	0.2	\$ 805.00	\$ 161.00
6/15/2018	DSH	Attend to issues related to depositions; review and respond to emails regarding same.	0.3	\$ 805.00	\$ 241.50
6/29/2018	DSH	Review research regarding motion to decertify; attend to issues related to same.	0.5	\$ 805.00	\$ 402.50
7/3/2018	DSH	Review notices of deposition; attend to same.	0.2	\$ 805.00	\$ 161.00
7/10/2018	DSH	Attend to issues related to deposition of expert; review and respond to emails regarding same.	0.2	\$ 805.00	\$ 161.00
7/11/2018	DSH	Review response to notice of sanctions; attend to same.	0.1	\$ 805.00	\$ 80.50
7/13/2018	DSH	Attend to issues related to notice of depositions.	0.2	\$ 805.00	\$ 161.00
8/15/2018	DSH	Review Defendant's Motion for Summary Adjudication re 1st and 7th causes of action; attend to issues related to same.	1.3	\$ 805.00	\$ 1,046.50
8/20/2018	DSH	Attend to issues related to motion for summary adjudication; review and respond to emails regarding same; telephone discussion with cocounsel regarding same.	0.5	\$ 805.00	\$ 402.50
8/21/2018	DSH	Attend to issues related to discovery disputes; review and respond to emails regarding same.	0.3	\$ 805.00	\$ 241.50

8/27/2018	DSH	Attend to issues related to motion to compel; review and respond to emails regarding same.	1.5	\$ 805.00	\$ 1,207.50
8/28/2018	DSH	Review and respond to emails regarding issues related to discovery; attend to same.	0.3	\$ 805.00	\$ 241.50
9/6/2018	DSH	Review Defendant's Opposition to Motion for Sanctions and Request for Sanctions; attend to issue related to additional employee declarations; attend to issues related to same.	1.2	\$ 805.00	\$ 966.00
9/7/2018	DSH	Attend to issues related to Opposition to Motion to Deny Class Certification.	1	\$ 805.00	\$ 805.00
9/8/2018	DSH	Attend to issues related to Opposition to Motion to Deny Class Certification; telephone discussions with cocounsel regarding same.	2	\$ 805.00	\$ 1,610.00
9/11/2018	DSH	Attend to issues related to Opposition to Motion to Deny Class Certification; telephone discussions with cocounsel regarding same; review same; attend to issues related to same.	2.5	\$ 805.00	\$ 2,012.50
9/12/2018	DSH	Review Defendant's Opposition to Motion for Class Certification and supporting documents; attend to issues related to same; telephone discussion with cocounsel regarding same; review and respond to emails regarding same.	1.3	\$ 805.00	\$ 1,046.50
9/14/2018	DSH	Review and respond to emails regarding issues related to motion for sanctions.	0.1	\$ 805.00	\$ 80.50
9/21/2018	DSH	Attend to issues related to motion for sanctions; review and respond to emails regarding same.	0.2	\$ 805.00	\$ 161.00
9/30/2018	DSH	Review Stipulation to continue motion to compel; attend to issues related to same.	0.1	\$ 805.00	\$ 80.50
10/3/2018	DSH	Review and respond to emails regarding motion to compel.	0.1	\$ 805.00	\$ 80.50
10/9/2018	DSH	Attend to issues related to Reply iso Motion for Class Certification; review same; review and attend to issues related to same.	1	\$ 805.00	\$ 805.00
10/10/2018	DSH	Attend to issues related to Reply iso Motion for Class Certification.	0.5	\$ 805.00	\$ 402.50
10/11/2018	DSH	Attend to issues related to finalizing Reply memorandum and supporting documents iso of Motion for Class Certification; review and respond to emails with cocounsel regarding same.	1.3	\$ 805.00	\$ 1,046.50
10/12/2018	DSH	Review Defendant's Reply iso of Motion to Deny Class Certification; attend to issues related to same; review documents produced by Defendant; attend to same.	0.8	\$ 805.00	\$ 644.00
10/14/2018	DSH	Attend to issues related to Opposition to Motion for Summary Adjudication of 1st and 7th COA; telephone discussions with cocounsel regarding same; attend to same.	0.5	\$ 805.00	\$ 402.50

10/15/2018	DSH	Attend to issues related to finalizing Opposition to Motion for Summary Adjudication.	0.6	\$ 805.00	\$ 483.00
10/23/2018	DSH	Review and respond to emails regarding scheduling.	0.1	\$ 805.00	\$ 80.50
10/25/2018	DSH	Review Defendant's Reply iso of Motion for Summary Adjudication; attend to issues related to same.	0.3	\$ 805.00	\$ 241.50
10/29/2018	DSH	Review Defendant's Motion for Sanctions; telephone discussion with cocounsel regarding issues related to same.	0.5	\$ 805.00	\$ 402.50
10/30/2018	DSH	Prepare for hearing on Motion for Class Certification; review pleadings; review tentative ruling; attend to issues related to same; telephone conference with cocounsel regarding same; review and respond to emails regarding same; attend to same.	4.2	\$ 805.00	\$ 3,381.00
10/31/2018	DSH	Prepare for hearing on Motion for Class Certification; travel to/from San Francisco; attend hearing; attend to follow up issues related to same; discussion with cocounsel regarding same.	5.2	\$ 805.00	\$ 4,186.00
11/2/2018	DSH	Review order on objections; review order granting in part Plaintiff's Motion for Class Certification; attend to issues related to same; telephone discussion with cocounsel regarding same.	1.6	\$ 805.00	\$ 1,288.00
11/9/2018	DSH	Review and respond to emails regarding motion to withdraw; attend to same.	0.2	\$ 805.00	\$ 161.00
11/12/2018	DSH	Attend to issues related to withdrawal of Motion to Compel.	0.2	\$ 805.00	\$ 161.00
11/14/2018	DSH	Review and respond to emails regarding stipulation; conference with cocounsel regarding same.	0.2	\$ 805.00	\$ 161.00
11/15/2018	DSH	Attend to issues related to joint stipulation.	0.2	\$ 805.00	\$ 161.00
11/21/2018	DSH	Review emails from opposing counsel re mediation.	0.1	\$ 805.00	\$ 80.50
12/14/2018	DSH	Attend to issues related to potential mediation.	0.2	\$ 805.00	\$ 161.00
12/28/2018	DSH	Review order reassigning case; conduct research regarding same; telephone discussion with cocounsel regarding same.	0.5	\$ 805.00	\$ 402.50
1/2/2019	DSH	Attend to issues relate to mediation; review and respond to emails regarding same.	0.1	\$ 805.00	\$ 80.50
1/3/2019	DSH	Attend to issues related to stipulation.	0.1	\$ 805.00	\$ 80.50
1/4/2019	DSH	Review order reassigning case; draft email regarding same.	0.2	\$ 805.00	\$ 161.00
4/10/2019	DSH	Discussion with cocounsel regarding issues related to litigation and counsel.	0.2	\$ 805.00	\$ 161.00
4/24/2019	DSH	Attend to issues related to Stipulation to continue CMC.	0.1	\$ 805.00	\$ 80.50
6/3/2019	DSH	Attend to issues related to Stipulation.	0.1	\$ 805.00	\$ 80.50
6/20/2019	DSH	Review Notice of Withdrawal; attend to same.	0.1	\$ 805.00	\$ 80.50

6/26/2019	DSH	Attend to issues related to joint status conference statement; review and respond to emails regarding same.	0.3	\$ 805.00	\$ 241.50
7/3/2019	DSH	Attend to issues related to Joint CMC Statement; review and respond to emails regarding same; attend to same.	0.2	\$ 805.00	\$ 161.00
7/11/2019	DSH	Review Case Management Order No. 7; attend to issues related to same.	0.4	\$ 805.00	\$ 322.00
7/18/2019	DSH	Review trial extension stipulation.	0.1	\$ 805.00	\$ 80.50
7/22/2019	DSH	Attend to issues related to Amended Motion for Summary Adjudication.	0.1	\$ 805.00	\$ 80.50
8/7/2019	DSH	Attend to issues related to order extending deadline to bring case to trial.	0.1	\$ 805.00	\$ 80.50
8/8/2019	DSH	Review order to trial extension; review and respond to emails regarding same.	0.1	\$ 805.00	\$ 80.50
9/11/2019	DSH	Review and respond to emails regarding issues related to mediation; attend to same.	0.2	\$ 805.00	\$ 161.00
9/13/2019	DSH	Conference with cocounsel regarding issues related to mediation; attend to issues related to same; review and respond to emails regarding same.	0.5	\$ 805.00	\$ 402.50
9/20/2019	DSH	Review mediation documents and communication to mediator; attend to issues related to same.	1	\$ 805.00	\$ 805.00
9/25/2019	DSH	Attend to issues related to PAGA notice to LWDA; research issues related to same; attend to same.	1.3	\$ 805.00	\$ 1,046.50
9/26/2019	DSH	Attend to issues related to PAGA notice and mediation; review and respond to emails regarding same.	1.5	\$ 805.00	\$ 1,207.50
9/27/2019	DSH	Attend to issues related to mediation; review and respond to emails regarding same.	0.8	\$ 805.00	\$ 644.00
9/30/2019	DSH	Prepare for mediation; review and respond to emails regarding same; attend to issues related to same.	3.8	\$ 805.00	\$ 3,059.00
10/1/2019	DSH	Travel to Los Angeles for mediation; attend mediation with Jeffrey Kravis and opposing counsel; attend to issues related to same.	16.5	\$ 805.00	\$ 13,282.50
10/2/2019	DSH	Attend to follow up from mediation; travel from Los Angeles to San Francisco; attend to issues related to same.	4.8	\$ 805.00	\$ 3,864.00
10/4/2019	DSH	Attend to issues related to cocounseling agreement; review and respond to emails regarding same.	0.5	\$ 805.00	\$ 402.50
10/9/2019	DSH	Attend to issues related to MOU; review and respond to emails regarding same.	0.6	\$ 805.00	\$ 483.00

10/15/2019	DSH	Attend to issues related to Turley settlement agreement; review and respond to emails regarding same.	0.3	\$ 805.00	\$ 241.50
10/16/2019	DSH	Attend to issues related to continuance of CMC following settlement.	0.1	\$ 805.00	\$ 80.50
10/17/2019	DSH	Review MOU; attend to issues related to same.	0.3	\$ 805.00	\$ 241.50
10/21/2019	DSH	Review order continuing CMC; attend to issues related to same.	0.1	\$ 805.00	\$ 80.50
10/29/2019	DSH	Attend to issues related to longform settlement agreement; review and respond to emails regarding same.	0.3	\$ 805.00	\$ 241.50
11/12/2019	DSH	Review longform settlement agreement; attend to issues related to same.	0.4	\$ 805.00	\$ 322.00
11/14/2019	DSH	Attend to issues related to settlement agreement; review and respond to emails regarding same.	0.3	\$ 805.00	\$ 241.50
11/21/2019	DSH	Attend to issues related to second amended complaint; review and respond to emails regarding same.	0.2	\$ 805.00	\$ 161.00
12/5/2019	DSH	Review and respond to emails regarding settlement agreement; attend to same.	0.2	\$ 805.00	\$ 161.00
12/27/2019	DSH	Review and respond to emails regarding longform settlement; review same; attend to issues related to same.	0.8	\$ 805.00	\$ 644.00
1/4/2020	DSH	Review and respond to emails regarding issues related to longform settlement; attend to issues related to same.	0.7	\$ 805.00	\$ 563.50
1/6/2020	DSH	Review final draft of settlement agreement; attend to issues related to same; review and respond to emails regarding same.	0.5	\$ 805.00	\$ 402.50
1/8/2020	DSH	Attend to issues related to Joint Stipulation regarding upcoming deadlines.	0.3	\$ 805.00	\$ 241.50
1/13/2020	DSH	Review Order re Stipulation to file Second Amended Complaint; attend to issues related to same; attend to issues related to costs.	0.4	\$ 805.00	\$ 322.00
1/15/2020	DSH	Attend to issues related to filing of SAC.	0.3	\$ 805.00	\$ 241.50
1/21/2020	DSH	Review draft motion for preliminary approval; attend to issues related to same; review and respond to emails regarding same.	1.3	\$ 805.00	\$ 1,046.50
1/29/2020	DSH	Attend to issues related to motion for preliminary approval; review same; review and respond to emails regarding same.	1	\$ 805.00	\$ 805.00
1/31/2020	DSH	Attend to issues related to finalizing Motion for Preliminary Approval of Class Action Settlement; review and finalize same; review and respond to emails regarding same.	2.3	\$ 805.00	\$ 1,851.50

2/10/2020	DSH	Review Ex Parte Application re Request to Intervene; attend to issues related to same; Draft Declaration iso Opposition to Ex Parte Application; review and respond to emails regarding same; attend to issues related to same; telephone discussion with cocounsel regarding issues related to same.	4.8	\$ 805.00	\$ 3,864.00
2/11/2020	DSH	Review Defendant's opposition to ex parte application; attend to issues related to same; travel to/from San Francisco; attend hearing with staff clerk; attend to issues related to same.	4.3	\$ 805.00	\$ 3,461.50
2/18/2020	DSH	Review order denying ex parte application to intervene; attend to issues related to same.	0.5	\$ 805.00	\$ 402.50
2/20/2020	DSH	Review emails to opposing counsel; attend to issues related to same.	0.2	\$ 805.00	\$ 161.00
2/21/2020	DSH	Review tentative ruling on motion for class certification; attend to issues related to same; telephone discussion with cocounsel regarding same; attend to same.	1.5	\$ 805.00	\$ 1,207.50
2/22/2020	DSH	Review supplemental declaration re class certification; review and respond to emails regarding same; attend to same.	1	\$ 805.00	\$ 805.00
2/23/2020	DSH	Prepare for hearing on Motion for Preliminary Approval; attend to same.	1.3	\$ 805.00	\$ 1,046.50
2/24/2020	DSH	Prepare for hearing on Motion for Preliminary Approval of Class Action Settlement; attend to issues related to same; travel to/from San Francisco; attend same; discussion with cocounsel and opposing counsel regarding issues related to same; review order regarding same; attend to issues related to same.	4.5	\$ 805.00	\$ 3,622.50
3/3/2020	DSH	Review Notice of Related Cases.	0.1	\$ 805.00	\$ 80.50
3/6/2020	DSH	Attend to supplemental filing iso of Motion for Preliminary Approval; attend to issues related to same; telephone discussion with cocounsel regarding same.	2.2	\$ 805.00	\$ 1,771.00
3/12/2020	DSH	Review tentative ruling on Motion for Preliminary Approval of Class Action Settlement; attend to issues related to same; conference with cocounsel regarding same.	1.5	\$ 805.00	\$ 1,207.50
3/16/2020	DSH	Review and respond to emails regarding tentative.	0.1	\$ 805.00	\$ 80.50
3/27/2020	DSH	Review order of Court denying Motion for Preliminary Approval of Class Action settlement; attend to issues related to same.	1.3	\$ 805.00	\$ 1,046.50
4/10/2020	DSH	Review modified draft of settlement agreement; attend to issues related to same.	0.7	\$ 805.00	\$ 563.50
4/15/2020	DSH	Revie General Order of Court; attend to same.	0.2	\$ 805.00	\$ 161.00

5/1/2020	DSH	Review email from Clerk of Court regarding issues related to complex department.	0.1	\$ 805.00	\$ 80.50
5/7/2020	DSH	Review email from court re status conference; attend to same.	0.2	\$ 805.00	\$ 161.00
5/18/2020	DSH	Prepare for status conference; attend telephonic status conference; attend to follow up issues related to same.	0.5	\$ 805.00	\$ 402.50
5/19/2020	DSH	Review order from status conference; attend to same.	0.2	\$ 805.00	\$ 161.00
5/27/2020	DSH	Attend to issues related to stipulation re motion for preliminary approval; attend to issue related to Plaintiff contact; attend to issues related to third amended complaint; review and respond to emails regarding same.	1.3	\$ 805.00	\$ 1,046.50
5/29/2020	DSH	Attend to issues related to modified settlement agreement; review and respond to emails regarding same.	0.5	\$ 805.00	\$ 402.50
6/4/2020	DSH	Attend to issues related to motion for preliminary approval of class action settlement; discussion with cocounsel regarding same.	1.5	\$ 805.00	\$ 1,207.50
6/5/2020	DSH	Review and respond to emails regarding motion for preliminary approval of class action settlement; attend to issues related to same; finalize same.	1.3	\$ 805.00	\$ 1,046.50
6/9/2020	DSH	Review order re 3rd Amended Complaint; attend to issues related to same.	0.1	\$ 805.00	\$ 80.50
6/11/2020	DSH	Attend to issues related to 3rd Amended Complaint.	0.2	\$ 805.00	\$ 161.00
6/15/2020	DSH	Attend to issues related to Courtcall.	0.1	\$ 805.00	\$ 80.50
6/19/2020	DSH	Review tentative ruling on motion for preliminary approval; attend to same.	0.5	\$ 805.00	\$ 402.50
6/22/2020	DSH	Attend to issues related to preliminary approval hearing; prepare for same.	1	\$ 805.00	\$ 805.00
6/23/2020	DSH	Prepare for hearing; hearing on motion on renewed preliminary approval motion; attend to issues related to same; telephone discussion with cocounsel regarding same.	1.8	\$ 805.00	\$ 1,449.00
6/30/2020	DSH	Attend to issues related to CMC.	0.1	\$ 805.00	\$ 80.50
7/1/2020	DSH	Review order re Plaintiff's renewed Motion for Preliminary Approval; attend to issues related to same; telephone discussion with cocounsel regarding same.	0.7	\$ 805.00	\$ 563.50
7/5/2020	DSH	Telephone discussion with cocounsel in anticipation of CMC; prepare for same; attend to issues related to same.	0.8	\$ 805.00	\$ 644.00
7/6/2020	DSH	Prepare for Case Management Conference; attend same; attend to follow up issues related to same.	1.5	\$ 805.00	\$ 1,207.50
7/7/2020	DSH	Review order after CMC; attend to issues related to same.	0.2	\$ 805.00	\$ 161.00

7/24/2020	DSH	Attend to issues relate to modified settlement agreement; review same.	0.5	\$ 805.00	\$ 402.50
7/28/2020	DSH	Review modified draft settlement; telephone discussion with cocounsel regarding same.	0.7	\$ 805.00	\$ 563.50
8/5/2020	DSH	Attend to issues related to Joint CMC statement; review and respond to emails regarding same.	0.3	\$ 805.00	\$ 241.50
8/7/2020	DSH	Review and respond to emails regarding CMC statement.	0.1	\$ 805.00	\$ 80.50
8/13/2020	DSH	Attend to issues in anticipation of Mandatory Settlement Conference; review and respond to emails regarding same.	1.5	\$ 805.00	\$ 1,207.50
8/14/2020	DSH	Prepare for mandatory settlement conference by Zoom; attend same; attend to follow up issues related to same.	1.8	\$ 805.00	\$ 1,449.00
8/21/2020	DSH	Review modified draft of motion for preliminary approval and supporting documents; attend to issue related to same.	0.7	\$ 805.00	\$ 563.50
9/3/2020	DSH	Attend to issues related to Motion for Preliminary Approval of Class Action Settlement; review and respond to emails regarding same; conference with cocounsel regarding same.	1.7	\$ 805.00	\$ 1,368.50
9/4/2020	DSH	Review motion for preliminary approval of class action settlement; attend to issues related to same; finalize same; multiple discussions with cocounsel regarding same.	1.5	\$ 805.00	\$ 1,207.50
9/21/2020	DSH	Review tentative ruling on motion for preliminary approval; attend to same; discussion with cocounsel regarding same.	0.5	\$ 805.00	\$ 402.50
9/22/2020	DSH	Attend to issues related to hearing on Motion for preliminary approval; review notice.	0.5	\$ 805.00	\$ 402.50
9/23/2020	DSH	Prepare for hearing on Motion for Preliminary Approval; attend same telephonically; attend to follow up issues related to same; telephone discussion with cocounsel regarding same; Review Order after September 23, 2020 hearing; attend to issues related to same.	1.8	\$ 805.00	\$ 1,449.00
9/30/2020	DSH	Review supplemental declaration; attend to same.	0.3	\$ 805.00	\$ 241.50
10/2/2020	DSH	Review order granting Motion for Preliminary Approval; attend to issues related to same.	0.4	\$ 805.00	\$ 322.00
10/3/2020	DSH	Attend to issues related to order granting preliminary approval; review and respond to emails regarding same.	0.3	\$ 805.00	\$ 241.50
10/14/2020	DSH	Review order vacating hearing.	0.1	\$ 805.00	\$ 80.50
10/23/2020	DSH	Review and respond to emails regarding costs.	0.1	\$ 805.00	\$ 80.50
10/27/2020	DSH	Review draft notice and class member mailing packet; attend to issues related to same.	0.5	\$ 805.00	\$ 402.50
11/13/2020	DSH	Review weekly report from claims administrator.	0.1	\$ 805.00	\$ 80.50

11/23/2020	DSH	Review weekly report from claims administrator.	0.1	\$ 805.00	\$ 80.50
11/25/2020	DSH	Review weekly report from claims administrator.	0.1	\$ 805.00	\$ 80.50
12/4/2020	DSH	Review weekly report from claims administrator.	0.1	\$ 805.00	\$ 80.50
Total Attorney Billing			345.9		\$ 278,449.50

Date	Paralegal Billing - J. Michael Solano	Description	Hours	Hourly Rate	Total
2/10/15	JMS	Intake; Conference with David Harris	1.2	\$ 210.00	\$ 252.00
2/12/15	JMS	Follow-up with Client	0.2	\$ 210.00	\$ 42.00
2/16/15	JMS	Follow-up with Client	0.4	\$ 210.00	\$ 84.00
2/27/15	JMS	Follow-up with Client	0.5	\$ 210.00	\$ 105.00
3/2/15	JMS	Follow-up with Client	0.2	\$ 210.00	\$ 42.00
3/3/15	JMS	Conferences with David Harris & Client; Review paystubs	0.2	\$ 210.00	\$ 42.00
3/5/15	JMS	Conferences with David Harris & Client; Prepare 226 Letter	1.2	\$ 210.00	\$ 252.00
3/9/15	JMS	Conferences with David Harris, Alan Harris & Client; Scan: Second Amended Complaint	0.7	\$ 210.00	\$ 147.00
3/13/15	JMS	File Review: Original Complaint	0.2	\$ 210.00	\$ 42.00
3/16/15	JMS	Scan: Certified Mail Proof to Defendant	0.2	\$ 210.00	\$ 42.00
3/24/15	JMS	Scans: Fee Agreement; Prepare exhibits.	1	\$ 210.00	\$ 210.00
3/26/15	JMS	File Review & Organized; Scans: File Stamped Pleadings: Complaint, Summons, Civil Case Cover, ADR & Mediation Info, Notice of Case Management Conference	0.1	\$ 210.00	\$ 21.00
3/27/15	JMS	Prepare LCPAGA Letter	0.4	\$ 210.00	\$ 84.00
4/6/15	JMS	Telephone conference with Client & Conference with David S. Harris	0.3	\$ 210.00	\$ 63.00
4/7/15	JMS	Telephone conference with Client; Conference with David S. Harris; Received, Reviewed and Scan: Defendant Chipotle's 226 Response Documents	0.6	\$ 210.00	\$ 126.00
5/4/15	JMS	Telephone conference with Client	0.2	\$ 210.00	\$ 42.00
5/8/15	JMS	Telephone conference with Client & Alan Harris; File Review: 226 Response Documents	0.5	\$ 210.00	\$ 105.00
5/14/15	JMS	Received, Reviewed and Scan: Employee Clock-In Receipts	0.2	\$ 210.00	\$ 42.00
6/19/15	JMS	Telephone conference with Client	0.3	\$ 210.00	\$ 63.00
7/21/15	JMS	Exhibit Preparation	0.7	\$ 210.00	\$ 147.00
7/27/15	JMS	Review & Scan: File-stamped First Amended Summons and First Amended Complaint	0.3	\$ 210.00	\$ 63.00
7/31/15	JMS	Prepare & File Case Management Statement & Proof of Service	0.3	\$ 210.00	\$ 63.00
10/9/15	JMS	Review Register of Actions; Scan: Notice of Order Continuing CMC	0.3	\$ 210.00	\$ 63.00

10/13/15	JMS	Prepare & File Case Management Statement & Proof of Service; Scan: Notice of Ordering Continuing CMC	0.6	\$ 210.00	\$ 126.00
10/19/15	JMS	Scan: Order Continuing CMC	0.2	\$ 210.00	\$ 42.00
5/31/16	JMS	Conference with David Harris & Alan Harris; Scan: Deposition Preparation Material; Attend Client Meeting at Client's San Francisco Home, Including Travel Time; Conferences with Alan Harris & Client	2.9	\$ 210.00	\$ 609.00
6/24/16	JMS	Received, Reviewed & Scans: Defendant's Discovery	0.5	\$ 210.00	\$ 105.00
7/14/16	JMS	Received, Reviewed & Scans: Defendant's Response & Request to Strike Plaintiff's Statement	0.2	\$ 210.00	\$ 42.00
8/8/16	JMS	Scans: Plaintiff's Motion to Compel	0.5	\$ 210.00	\$ 105.00
8/11/16	JMS	Scan: Defendant's Response & Objection to Plaintiff's Depo Notice	0.2	\$ 210.00	\$ 42.00
9/9/16	JMS	Scans: Defendant's Documents; Plaintiff's Reply Memorandum	0.7	\$ 210.00	\$ 147.00
10/20/16	JMS	Scan: Notice of Order Continuing Status Conference	0.2	\$ 210.00	\$ 42.00
11/28/16	JMS	Scan: Case Management Order Notice of Time and Place of Trial	0.2	\$ 210.00	\$ 42.00
12/1/16	JMS	File Review: Scan Hard File Documents; Scan: Notice of Objection	0.8	\$ 210.00	\$ 168.00
12/5/16	JMS	File Review & Scans: Defendant's Responses & Objections to Plaintiff's Amended Depo Notice of David Gottlieb; FEDEX Packaging	0.3	\$ 210.00	\$ 63.00
12/15/16	JMS	Scan: Notice of Order Setting Case Management Conference	0.2	\$ 210.00	\$ 42.00
12/30/16	JMS	Telephone conference with Client	0.2	\$ 210.00	\$ 42.00
1/30/17	JMS	Scan: Plaintiff's Amended Notice of Deposition of David Gottlieb	0.2	\$ 210.00	\$ 42.00
2/8/17	JMS	Investigation Photos Obtained at Stonestown Location	1.3	\$ 210.00	\$ 273.00
2/9/17	JMS	Scan: Application for Complex Designation; Upload Investigation Photos Obtained	0.6	\$ 210.00	\$ 126.00
2/15/17	JMS	Follow-up Application Payment; Follow-up Department 304 Calls	0.5	\$ 210.00	\$ 105.00
2/21/17	JMS	Scan: Order Continuing CMC	0.2	\$ 210.00	\$ 42.00
3/10/17	JMS	Scan: Order Granting Complex Designation and for Single Assignment	0.2	\$ 210.00	\$ 42.00
4/21/17	JMS	Scan: Case Management Order No. 1	0.2	\$ 210.00	\$ 42.00
5/26/17	JMS	Scan: Notice of Deposition to Plaintiff	0.2	\$ 210.00	\$ 42.00
6/2/17	JMS	Telephone conferences (2) with Client; Notice of Deposition	0.4	\$ 210.00	\$ 84.00
6/5/17	JMS	Draft Plaintiff's Objections & Responses to Defendant's Depo Notice	0.4	\$ 210.00	\$ 84.00
6/6/17	JMS	Scan: Plaintiff's Objections & Responses to Defendant's Depo Notice & Request for Production	0.8	\$ 210.00	\$ 168.00
6/27/17	JMS	Scan: Joint Status Conference Statement	0.2	\$ 210.00	\$ 42.00

6/29/17	JMS	Scan: Defendant's Letter	0.2	\$ 210.00	\$ 42.00
7/14/17	JMS	Scan: Case Management Order No. 2	0.2	\$ 210.00	\$ 42.00
7/31/17	JMS	Scan: Case Management Order No. 3	0.2	\$ 210.00	\$ 42.00
8/17/17	JMS	Scan: Joint Complex Case Status Conference Statement; Plaintiff's Complex Case Status Conference Statement; Courtesy Copy	0.4	\$ 210.00	\$ 84.00
8/18/17	JMS	Scan: Defendant's Status Conference Statement	0.3	\$ 210.00	\$ 63.00
8/21/17	JMS	Scans: Hard File Documents; Conference with Alan Harris	0.6	\$ 210.00	\$ 126.00
8/24/17	JMS	Scan: Case Management Order No. 4	0.2	\$ 210.00	\$ 42.00
9/28/17	JMS	Scan: Joint Request for Continuance of Case Management Conference	0.3	\$ 210.00	\$ 63.00
10/17/17	JMS	Scan: Orange County Superior Court Certificate of Mailing/Electronic Service	0.2	\$ 210.00	\$ 42.00
10/26/17	JMS	Scan: Notice of Order Setting Hearing on Petition for Coordination and Stay	0.2	\$ 210.00	\$ 42.00
1/4/18	JMS	Scan: Defendant's Objections to Plaintiff's Proposed Belaire-West Notice	0.2	\$ 210.00	\$ 42.00
1/30/18	JMS	Investigation: Employee Callers & Interviews	1.2	\$ 210.00	\$ 252.00
1/31/18	JMS	Conference with David Harris, Alan Harris & David Garrett; Investigation: Employee Callers & Interviews	4.7	\$ 210.00	\$ 987.00
2/2/18	JMS	Investigation: Employee Callers & Interviews	0.4	\$ 210.00	\$ 84.00
2/5/18	JMS	Investigation: Employee Callers & Interviews	0.3	\$ 210.00	\$ 63.00
2/8/18	JMS	Investigation: Employee Callers & Interviews	1.2	\$ 210.00	\$ 252.00
2/9/18	JMS	Investigation: Employee Callers & Interviews	0.2	\$ 210.00	\$ 42.00
2/12/18	JMS	File Review: Investigation: Employee Callers & Interviews	2.3	\$ 210.00	\$ 483.00
2/27/18	JMS	Investigation: Employee Callers & Interviews	2.1	\$ 210.00	\$ 441.00
3/1/18	JMS	Investigation: February 2018 Update	0.5	\$ 210.00	\$ 105.00
4/3/18	JMS	Scan: Motion to Compel	0.2	\$ 210.00	\$ 42.00
4/20/18	JMS	Scan: Bel Aire West Contact List; Class Member Declarations; Investigation: March Update	0.5	\$ 210.00	\$ 105.00
4/23/18	JMS	Investigation: Employee Callers & Interviews	1.8	\$ 210.00	\$ 378.00
4/24/18	JMS	Scans: Client Nicholas Simpson Documents	0.4	\$ 210.00	\$ 84.00
4/26/18	JMS	Prepare Class Member Declarations; Conference with David Garrett	1.8	\$ 210.00	\$ 378.00
4/27/18	JMS	Prepare Class Member Declarations; Conference with David Garrett	2.6	\$ 210.00	\$ 546.00
5/2/18	JMS	Prepare Class Member Declarations; Investigation Update	1.5	\$ 210.00	\$ 315.00

5/3/18	JMS	Investigation: Employee Callers & Interviews; Christopher Thompson Meeting at Stonestown	1.7	\$ 210.00	\$ 357.00
5/4/18	JMS	File Review; Investigation: Employee Callers & Interviews; Scans; Conference with David Garrett; Nicholas Simpson documents prepared for Saturday meeting.	1.8	\$ 210.00	\$ 378.00
5/4/18	JMS	Christopher Thompson scans from Client Meeting; Follow-up Client e-mail.	0.4	\$ 210.00	\$ 84.00
5/5/18	JMS	Nicholas Simpson Client Meeting at Stonestown.	0.8	\$ 210.00	\$ 168.00
5/7/18	JMS	Nicholas Simpson scans from Client Meeting; Follow-up Client e-mail.	0.4	\$ 210.00	\$ 84.00
5/10/18	JMS	Prepare Class Member Declarations; Follow-Up Investigation Interviews	2.3	\$ 210.00	\$ 483.00
5/11/18	JMS	Prepare Class Member Declarations; Follow-Up Investigation Interviews	0.5	\$ 210.00	\$ 105.00
5/17/18	JMS	Prepare Class Member Declarations	0.4	\$ 210.00	\$ 84.00
5/18/18	JMS	File review	0.3	\$ 210.00	\$ 63.00
5/21/18	JMS	Prepare Class Member Declarations	0.7	\$ 210.00	\$ 147.00
5/23/18	JMS	Assist with Motion for Class Certification Filing in San Francisco; Courtesy Copies Delivered to Court	5.5	\$ 210.00	\$ 1,155.00
5/29/18	JMS	Christopher Thompson follow-up Client calls.	0.5	\$ 210.00	\$ 105.00
6/4/18	JMS	Scans: Plaintiff Deposition Notices (Multiple) & Plaintiff's Request for Documents	0.6	\$ 210.00	\$ 126.00
6/11/18	JMS	Investigation: Employee Callers & Interviews (Update)	0.3	\$ 210.00	\$ 63.00
6/15/18	JMS	Enclosure Letter to Stephen Moses with Class Certification Filing Documents	0.9	\$ 210.00	\$ 189.00
7/19/18	JMS	Scans: Defendant's Notice of Depositions; Plaintiff's Notice of Motion for Sanctions	0.4	\$ 210.00	\$ 84.00
7/27/18	JMS	Christopher Thompson client telephone conferences; David Harris conference	0.6	\$ 210.00	\$ 126.00
8/6/18	JMS	Telephone conference with Alan Harris. Scan: Amended Notice of Fonus Deposition	0.3	\$ 210.00	\$ 63.00
8/28/18	JMS	Scans: Plaintiff's Motion to Compel and Declaration	0.3	\$ 210.00	\$ 63.00
9/11/18	JMS	Conferences with David Harris and David Garrett; File Plaintiff's Opposition to Defendant Motion to Deny Class Certification; Courtesy Copies Delivered to Court; Travel to San Francisco	3.5	\$ 210.00	\$ 735.00

10/12/18	JMS	Conference with David Harris; Prepare Copies of Reply Memorandum; Responses to Objections; Evidentiary Objections in Opposition; Motion to Deny Class Certification; Alan Harris Declaration	0.7	\$ 210.00	\$ 147.00
10/25/18	JMS	Scans: Stipulation to Continue; Defendant's Reply; Defendant's Objections to Plaintiff's Evidence iso Opposition; Proposed Order	0.5	\$ 210.00	\$ 105.00
10/29/18	JMS	Conference with David Harris; Prepare Copies of Defendant's Motion for Sanctions and Declaration; Plaintiff's Motion for Class Certification; Defendant's Motion to Deny Class Certification; Plaintiff's Opposition; Defendant's Opposition; Plaintiff's Reply Memorandum; Defendant's Reply Memorandum	1.8	\$ 210.00	\$ 378.00
10/30/18	JMS	Scan and Print: Defendant's Objection to Plaintiff's New Evidence; Prepare Motions Hearing Materials	0.4	\$ 210.00	\$ 84.00
10/31/18	JMS	Telephone confence with Alan Harris; Hearing Prep Today; Scan and Print: Declaration & Outline of Argument; Telephone conference David Harris: Travel to San Francisco	2.5	\$ 210.00	\$ 525.00
11/5/18	JMS	Scan: Order on Evidentiary Issues; Order Granting in P art Plaintiff's Motion for Class Certification and Denying as Moot Defendant's Motion to Deny Certification and Strike Class Allegations and Setting CMC	0.3	\$ 210.00	\$ 63.00
11/12/18	JMS	Scan: Notice of Withdrawal of Plaintiff's Motion to Compel	0.2	\$ 210.00	\$ 42.00
1/3/19	JMS	Scan: General Order re Case Reassignment	0.2	\$ 210.00	\$ 42.00
1/7/19	JMS	Scan: Stipulation to Continue CMC and Motion for Summary Judgment/Sanctions Hearing	0.2	\$ 210.00	\$ 42.00
1/18/19	JMS	Scan: File-Stamped Stipulation to Continue CMC and Motion for Summary Judgment/Sanctions Hearing	0.2	\$ 210.00	\$ 42.00
4/26/19	JMS	Conference with David Harris; Calendar Review; Scan: Joint Stipulation to Continue CMC and Motions for Summary Judgment and Sanctions Hearing	0.4	\$ 210.00	\$ 84.00
4/30/19	JMS	Scan: Substitution of Defense Counsel	0.2	\$ 210.00	\$ 42.00
6/7/19	JMS	Scan: Joint Stipulation; Telephone conference with Judge Massullo & Call to Alan Harris	0.5	\$ 210.00	\$ 105.00
6/20/19	JMS	Scan: Notice of Withdrawal of Defense Motion for Sanctions	0.2	\$ 210.00	\$ 42.00
6/28/19	JMS	Conference with David Harris; Scan: Joint Stipulation to Continue Defendant's Motion for Summary Judgment	0.3	\$ 210.00	\$ 63.00
7/5/19	JMS	File Review: Substitution of Defense Counsel	0.2	\$ 210.00	\$ 42.00

7/18/19	JMS	Scan: Joint Stipulation to Extend Time This Action Must Be Brought to Trial	0.2	\$ 210.00	\$ 42.00
7/22/19	JMS	Scan: Defendant's Amended Notice of Motion for Summary Judgment	0.2	\$ 210.00	\$ 42.00
8/8/19	JMS	Scan: Order re: Joint Stipulation to Extend Time re Trial	0.2	\$ 210.00	\$ 42.00
10/3/19	JMS	Update cost ledgers	0.8	\$ 210.00	\$ 168.00
10/17/19	JMS	Scan: Joint Stipulation to Continue CMC	0.2	\$ 210.00	\$ 42.00
10/22/19	JMS	Scan: Order Granting Continuance	0.2	\$ 210.00	\$ 42.00
12/30/19	JMS	Update cost ledgers	0.3	\$ 210.00	\$ 63.00
1/10/20	JMS	Scans: Joint Stipulation to Continue CMC & Joint Stipulation to File Second Amended Complaint	0.3	\$ 210.00	\$ 63.00
1/13/20	JMS	Conference with David S. Harris; Update cost ledgers	0.3	\$ 210.00	\$ 63.00
1/14/20	JMS	Scans: Order Granting Continuance and Order Re: Joint Stipulation to File Second Amended Complaint	0.3	\$ 210.00	\$ 63.00
1/16/20	JMS	Scan: Second Amended Complaint filed 1/15/2020	0.2	\$ 210.00	\$ 42.00
2/10/20	JMS	Scan and Email to David S. Harris: Proposed Intervenor's Ex Parte Application; Declaration of Jeffrey L. Hogue iso; Opposition Declaration	0.3	\$ 210.00	\$ 63.00
2/11/20	JMS	Organize motion pleadings; prepare motion hearing notebook	2.6	\$ 210.00	\$ 546.00
2/13/20	JMS	Review Register of Actions and forward to David S. Harris; Organize Second Amended Complaint, Motion for Preliminary Approval, Moses Declaration, Turley Declaration, Lawrence Declaration, Alan Harris Declaration & Request for Judicial Notice	1.3	\$ 210.00	\$ 273.00
2/14/20	JMS	Conference with David S. Harris, Scan/Organize and forward to David S. Harris Order Re Joint Stipulation & Carrithers Declaration	0.4	\$ 210.00	\$ 84.00
2/18/20	JMS	Scan to David S. Harris: Order Denying Re Proposed Intervenor's Josh Barber and Jose Delgado's Ex Parte Application Re: Request to Intervene	0.2	\$ 210.00	\$ 42.00
2/21/20	JMS	Received, reviewed and telephone call to David Garrett re: tentative ruling	0.3	\$ 210.00	\$ 63.00
2/24/20	JMS	Scan and Email to David S. Harris: Order Re Plaintiffs' Motion for Preliminary Approval of Class Action Settlement	0.2	\$ 210.00	\$ 42.00
3/6/20	JMS	Scan and Email to David S. Harris: Supplemental Moses Declaration	0.2	\$ 210.00	\$ 42.00
3/16/20	JMS	Courtcall contacts on cancellation of hearing post-Covid-19	0.2	\$ 210.00	\$ 42.00
5/14/20	JMS	Scan to David S. Harris: Notice to Prepare Reporter's Transcript	0.2	\$ 210.00	\$ 42.00
5/15/20	JMS	Email from/to David Garrett	0.2	\$ 210.00	\$ 42.00
5/18/20	JMS	File review and emails (2) from/to David Garrett	0.3	\$ 210.00	\$ 63.00
5/22/20	JMS	Email from David Garrett on PAGA declaration	0.2	\$ 210.00	\$ 42.00

5/26/20	JMS	Docu-Sign to David S. Harris: Final Revised Turley SA	0.2	\$ 210.00	\$ 42.00
5/27/20	JMS	Emails from David Garrett (6) re two (Proposed) and Class Plaintiffs Update	0.3	\$ 210.00	\$ 63.00
5/28/20	JMS	Scans to David S. Harris: Stipulation for an Order to Shorten Time to Hear Plaintiffs' Renewed Motion for Preliminary Approval of Amended Class Action Settlement; (Proposed) Order; Conference with David Garrett	0.5	\$ 210.00	\$ 105.00
5/29/20	JMS	Email & Scan to David S. Harris and David Garrett: Order to Shorten Time to Hear Plaintiffs' Renewed Motion for Preliminary Approval of Amended Class Action Settlement; Emails from/to David Garrett (7); Conferences with David Garrett and David S. Harris re: Docu-Sign Declaration.	0.6	\$ 210.00	\$ 126.00
6/1/20	JMS	Email & Scans to David S. Harris and David Garrett: Joint Stipulation to File Third Amended Complaint; Related Case (Porrás v. Chipotle) Notice of Reporter's Transcript	0.3	\$ 210.00	\$ 63.00
6/5/20	JMS	Scans to David S. Harris: Turley Declaration; Thompson Declaration; (Proposed) Order Granting Preliminary Approval; Motion for Preliminary Approval; Alan Harris Declaration	0.5	\$ 210.00	\$ 105.00
6/9/20	JMS	Emails from/to David Garrett on calendar items	0.2	\$ 210.00	\$ 42.00
6/11/20	JMS	Scans to David S. Harris: Order Granting Joint Stipulation to File Third Amended Class Complaint to Facilitate Preliminary Approval of Proposed Class Settlement; Third Amended Complaint.	0.6	\$ 210.00	\$ 126.00
6/15/20	JMS	Emails from David Garrett (3) on two upcoming hearings	0.3	\$ 210.00	\$ 63.00
6/18/20	JMS	Email from David Garrett with Tentative Ruling and Continuance on Motion for Preliminary Hearing	0.2	\$ 210.00	\$ 42.00
6/23/20	JMS	Emails from David Garrett (4) with updates on intervenor filings and hearings, and stipulation, order; Scan to David S. Harris: Order after June 23, 2020 Hearing; Follow-up to David Garrett.	0.6	\$ 210.00	\$ 126.00
6/25/20	JMS	Emails from David Garrett (2) on further intervenor motion and hearing	0.3	\$ 210.00	\$ 63.00
6/26/20	JMS	Prepare Costs Ledger.	1.7	\$ 210.00	\$ 357.00
6/30/20	JMS	Scan to David Harris: Joint Stipulation to Extend Time This Action Must Be Brought to Trial	0.2	\$ 210.00	\$ 42.00
7/7/20	JMS	Scans: Orders for New Trial Date, Mandatory Settlement Conference and After CMC Order; Updated Calendar as per Orders	0.4	\$ 210.00	\$ 84.00

7/27/20	JMS	Conference with David Garrett and followup with David Harris on revised settlement material	0.3	\$ 210.00	\$ 63.00
8/4/20	JMS	Email to David Harris re: Settlement Conference Statement	0.2	\$ 210.00	\$ 42.00
8/17/20	JMS	Scans to David Harris: Stipulations & Proposed Orders as to Shorten Time and Page Limit Increase	0.2	\$ 210.00	\$ 42.00
8/20/20	JMS	Scans to David Harris: Orders Granting Stipulations as to Shorten Time and Page Limit Increase	0.2	\$ 210.00	\$ 42.00
9/9/20	JMS	Reviewed & Scans to David Harris: Turley Class Motion for Preliminary Approval, including Declarations of Class Representative Turley, Claims Administrator, and Class Co-Counsel Alan Harris; Follow-ups with David Harris	0.4	\$ 210.00	\$ 84.00
9/17/20	JMS	Courtcall reminder and scheduling for David Harris	0.3	\$ 210.00	\$ 63.00
9/21/20	JMS	Scan: Tentative Ruling re: Plaintiff's Motion for Preliminary Approval	0.2	\$ 210.00	\$ 42.00
10/2/20	JMS	Scan to David Harris: Order Granting Preliminary Approval	0.2	\$ 210.00	\$ 42.00
10/7/20	JMS	Monitoring Court Calendar as to October 13, 2020 CMC	0.1	\$ 210.00	\$ 21.00
10/15/20	JMS	Scan: Order Vacating CMC	0.2	\$ 210.00	\$ 42.00
TOTAL PARALEGAL BILLING			97.80		\$ 20,538.00

Harris & Ruble Chipotle adv. Turley Selected Time Entries		
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AH	Correspondence from DSH re new case. (.1) Set up new case file. (.1)	Mar 05/15
Posted		0.20
DG	Correspondence with DAH re new case	Mar 05/15
Posted		0.10
AH	Drafting documents and legal research re complaint.	Mar 08/15
Posted		3.50
CP	Drafting documents; Tanika Turley's 226, 1198.5 Demand and DLSE Request	Mar 09/15
Posted		0.50
AH	Correspondence with DLSE re record demand.	Mar 09/15
Posted		0.10
CP	Correspondence with Mike and Alan regarding Tanika Turleys 1198.5 demand and the DLSE request	Mar 09/15
Posted		0.10
DG	Reviewing: Source documents from client	Mar 09/15
Posted		1.10
DG	Drafting documents: Turley Retainer	Mar 09/15
Posted		0.80
DG	Reviewing: Turley intake documents	Mar 09/15
Posted		0.70
DG	Telephone conference with client	Mar 09/15
Posted		0.10
CP	Research; Cases where Chipotle has previously been a party	Mar 09/15
Posted		0.90
AH	Reviewing documents (PACER) and operative pleading re New York overtime litigation.	Mar 09/15
Posted		0.40
CP	Research; Scott v. CHIPotle Complaint and Pacer Docket Sheet	Mar 09/15
Posted		1.10
AH	Correspondence with MS: As discussed earlier today, attached hereto is a copy of the 226 letter se	Mar 09/15
Posted		0.10
DG	Telephone conference with client re new case	Mar 10/15
Posted		0.10
DG	Telephone conference with client	Mar 11/15
Posted		0.10
DG	Drafting documents: Class Action Complaint	Mar 11/15
Posted		0.80
CP	Client administration Updating amicus with Chipotle contact information	Mar 12/15
Posted		0.10
AH	Drafting documents and legal research re complaint	Mar 12/15
Posted		4.50
AH	Correspondence from MS: As per my intake notes and her re-confirmaiton,	Mar 13/15
Posted	REDACTED	0.10
DG	Telephone conference with client	Mar 15/15
Posted		0.10

Harris & Ruble Chipotle adv. Turley Selected Time Entries		
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DG	Reviewing: Draft complaint	Mar 15/15
Posted		1.10
DG	Reviewing: Potential Related Cases (Westlaw)	Mar 15/15
Posted		1.20
AH	Correspondence from defense re personnel file.	Mar 21/15
Posted		0.10
AH	Telephone call to Dave Scott Harris - voice mail - [service of complaint]	Mar 23/15
Posted		0.10
CP	Client administration; Updating amicus with Chipotle counsel contact information	Mar 23/15
Posted		0.10
AH	Telephone call to Arsenio Rodriguez - spoke - We will send him a copy of our case and want to exch	Mar 23/15
Posted		0.10
DG	Filing documentation OTHER NON EXEMPT COMPLAINTS, COMPLAINT FILED BY PLAINTIFF TURLEY, TANIKA INDIV	Mar 25/15
Posted		0.30
PM	Review redlines to Chipotle complaint and email correspondence to D. Harris regarding same.	Mar 25/15
Posted		0.10
DG	Reviewing OTHER NON EXEMPT COMPLAINTS, COMPLAINT FILED BY PLAINTIFF TURLEY, TANIKA INDIVIDUALLY AND	Mar 25/15
Posted		0.10
AH	Drafting documents--final review of complaint	Mar 25/15
Posted		0.30
DG	Reviewing NOTICE TO PLAINTIFF from Court.	Mar 26/15
Posted		0.30
AH	Update chrono and cast of characters.	Mar 26/15
Posted		0.20
AH	Correspondence with DSH re PAGA demand	Mar 26/15
Posted		0.10
CP	Saving ADR package and copies of complaint and summons; updating Amicus	Mar 27/15
Posted		0.20
AH	Correspondence from JMS: we are sending the LCPAGA letter to Secretary Lanier today via certified	Mar 27/15
Posted		0.10
AH	Drafting documents -- Chipotle complaint.	Mar 28/15
Posted		0.20
AH	Drafting documents re analysis of Hernandez case.	Apr 07/15
Posted		0.70
PM	Review and file 1198.5 response from defendant.	Apr 07/15
Posted		0.10
AH	Correspondence from defense, forwarding response to our document requests under 226 and for personn	Apr 07/15
Posted		0.70
PM	Research regarding cases pending against Chipotle.	Apr 07/15
Posted		0.20
AH	Telephone call to Tanika Turley - spoke - With DSH on phone, discuss REDACTED	Apr 07/15
Posted		0.20

Harris & Ruble Chipotle adv. Turley Selected Time Entries

AH Posted	Reviewing documents re In Hernandez v. Chipotle Mexican Grill, Inc., the California Court of Appeal	Apr 08/15 0.10
AH Posted	Reviewing documents--California courts have shifted the burden of proof to employers when inadequat	Apr 08/15 0.20
DG Posted	Reviewing: Chipotle Discovery Responses 000-325	Apr 23/15 2.10
DG Posted	Discovery preparations: Reviewing Chipotle discovery responses	Apr 24/15 0.80
DG Posted	Reviewing 1198.5 Response	May 04/15 0.40
DG Posted	Telephone conference with client re new case	May 05/15 0.90
DG Posted	Telephone conference with client	May 05/15 0.10
PM Posted	Research regarding IWC wage orders and connection with California Labor Code.	May 07/15 0.20
AH Posted	Drafting documents and legal research re FAC.	May 07/15 4.40
AH Posted	Telephone call to Tanika Turley - voice mail - later, she returned and we discussed her experience	May 08/15 0.30
AH Posted	Meeting with employees at Larchmont facility for background information.	May 08/15 0.80
AH Posted	Drafting documents and legal research re First Amended Complaint.	May 08/15 2.20
AH Posted	Correspondence from DSH, forwarding TT daily clock verification samples.	May 13/15 0.10
AH Posted	Telephone call to Tanika Turley - spoke - REDACTED	May 13/15 0.10
AH Posted	Telephone call to Danielle T Felder Esq. - voice mail -	May 13/15 0.10
AH Posted	Telephone call to Danielle T Felder Esq. - voice mail -	May 14/15 0.10
DG Posted	Reviewing: Turley slips showing break times	May 14/15 0.30
PM Posted	Review case documents and handbooks (1.0). Discussion with Alan Harris re potential claims (.3).	May 14/15 1.30
AH Posted	Telephone call to Danielle T Felder Esq. - voice mail -	May 14/15 0.10
AH Posted	Telephone call to Tanika Turley - voice mail -	May 14/15 0.10
AH Posted	Drafting documents and legal research re complaint -- Employees who receive cash tips of \$20 or mor	May 14/15 0.20

Harris & Ruble Chipotle adv. Turley Selected Time Entries

AH Posted	Correspondence from Felder -- As a follow-up to my voicemail, I am responding to your multiple voic	May 15/15 0.10
AH Posted	Reviewing documents -- email from Hart, forwarding Fifth Amended Complaint.	May 15/15 0.30
PM Posted	Review tax regulations re tipping. Research San Luis Obispo docket.	May 18/15 0.40
PM Posted	Review law review article re false claims act and tax fraud.	May 18/15 0.20
DG Posted	Research: OSHA General Requirements	May 22/15 0.10
PM Posted	Research regarding OSHA regulations for non-slip pads.	May 22/15 0.50
DG Posted	Court: Segovia hearing re: final approval	May 25/15 1.70
DG Posted	Reviewing Bebee Declaration 52-1	May 26/15 0.70
PM Posted	Research regarding pending class actions.	May 26/15 0.70
AH Posted	Reviewing documents -- . "Thus, this court relies on Murphy in finding that Section 226.7 premiums	May 31/15 0.10
DG Posted	Reviewing: First Amended Complaint	Jun 05/15 0.70
DG Posted	Reviewing Segovia settlement documents	Jun 08/15 1.20
PM Posted	Review court files for documents pertaining to Segovia v. Chipotle.	Jun 08/15 0.70
PM Posted	Calendar docket entries for related cases	Jun 09/15 0.20
CP Posted	Reviewing - Settled Chipotle case on LA Superior court website with AH	Jun 12/15 0.30
AH Posted	Court CMC before Judge Highberger, travel to CCW to attend. Hearing postponed.	Jun 12/15 0.40
AH Posted	Correspondence from counsel for Objector to 2014 settlement: We filed our Objection with Judge Berl	Jun 12/15 0.10
AH Posted	Correspondence from Quisenberry re his objection in Segovia -- We filed our Objection with Judge Be	Jun 12/15 0.50
AH Posted	Correspondence from Mr. Yoon: "We will try to get back to you tomorrow. We would like to investiga	Jun 15/15 0.10
AH Posted	Court hearing before Judge Berle, granting final approval to \$2,000,000 settlement.	Jun 25/15 1.70
AH Posted	Reviewing documents--from Cal. App. 4th and it is Munoz v. Chipotle Mexican Grill. I like some of	Jul 01/15 0.20

Harris & Ruble Chipotle adv. Turley Selected Time Entries		
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DG	Reviewing: Draft FAC	Jul 14/15
Posted		0.40
DG	Research re: First Amended Complaint	Jul 15/15
Posted		0.80
AH	Drafting documents and legal research re complaint.	Jul 21/15
Posted		2.50
PM	Conference call with A Harris and DS Harris to discuss amendment to complaint and potential false c	Jul 21/15
Posted		0.40
PM	Review email correspondence regarding first amended complaint and telephone call with AH to Mike So	Jul 21/15
Posted		3.40
PM	Telephone conference with AH and DSH re chipotle.	Jul 22/15
Posted		0.10
DG	Filing documentation 1ST AMENDED COMPLAINT (TRANSACTION ID # 100002450) FILED BY PLAINTIFF TURLEY,	Jul 23/15
Posted		0.20
DG	Reviewing SUMMONS ISSUED TO PLAINTIFF TURLEY, TANIKA INDIVIDUALLY AND ON BEHALF OF ALL OTHERS SIMIL	Jul 27/15
Posted		0.10
PM	Review correspondence from Mike Solano regarding 226 records request and PAGA letter.	Jul 27/15
Posted		0.10
DG	Filing documentation SUMMONS ON COMPLAINT (TRANSACTION ID # 100002892), PROOF OF SERVICE ONLY, FILE	Jul 31/15
Posted		0.10
DG	Reviewing CMC Statement	Jul 31/15
Posted		0.50
DG	Filing documentation CASE MANAGEMENT STATEMENT (TRANSACTION ID # 100002940) FILED BY PLAINTIFF TURL	Jul 31/15
Posted		0.10
DG	Reviewing CASE MANAGEMENT CONFERENCE OF AUG-26-2015 CONTINUED TO OCT-28-2015 AT 10:30 AM IN DEPARTM	Aug 10/15
Posted		0.10
DG	Reviewing CASE MANAGEMENT CONFERENCE OF AUG-26-2015 CONTINUED TO OCT-28-2015 AT 10:30 AM IN DEPARTM	Aug 10/15
Posted		0.10
CP	Drafting documents Notice of change of address; filing and serving	Aug 26/15
Posted		0.30
PM	Review file and email correspondence to C. Peacock regarding filing and service of documents includ	Aug 26/15
Posted		0.20
DG	Reviewing ANSWER TO 1ST AMENDED COMPLAINT (TRANSACTION ID # 15238043) FILED BY DEFENDANT CHIPOTLE	Aug 27/15
Posted		2.70
AH	Meeting with Evelyn Carlson to review background of case and her opinions in matter.	Aug 29/15
Posted		1.00
AH	Reviewing documents--Answer to FAC	Aug 30/15
Posted		0.20
AH	Reviewing documents delaying CMC	Aug 31/15
Posted		0.10
CP	Document scanning order continuing CMC	Aug 31/15
Posted		0.10

Harris & Ruble Chipotle adv. Turley Selected Time Entries		
DG Posted	Reviewing NOTICE OF ORDER CONTINUING CASE MANAGEMENT CONFERENCE; (TRANSACTION ID # 100004715) FILED	Sep 01/15 0.10
DG Posted	Filing documentation NOTICE OF CHANGE OF ADDRESS (TRANSACTION ID # 100004716) FILED BY ATTORNEY HAR	Sep 01/15 0.10
DG Posted	Filing documentation NOTICE OF CHANGE OF ADDRESS (TRANSACTION ID # 100004716) FILED BY ATTORNEY HAR	Sep 01/15 0.10
CP Posted	Drafting documents Notice of change of address; Notice of Order Continuing CMC; Executed, scanned,	Sep 01/15 0.80
AH Posted	Correspondence with defense, forwarding our notice of change of address.	Sep 01/15 0.10
AH Posted	Correspondence to defense -- Please see attached notice of order continuing the case management con	Sep 01/15 0.10
AH Posted	Correspondence with DSH -- as regards recording meal periods, here is what Justice Werdergar said	Sep 01/15 0.20
AH Posted	Drafting documents and legal research -- Best cases relating to Unpaid Wages:Under California's Unf	Sep 15/15 0.10
AH Posted	Drafting documents--PLAINTIFF TANIKA TURLEY'S RESPONSE TO DEFENDANT CHIPOTLE SERVICES, LLC'S FIRST	Sep 28/15 1.80
AH Posted	Drafting documents--PLAINTIFF TANIKA TURLEY'S RESPONSE TO DEFENDANT CHIPOTLE SERVICES, LLC'S FIRST	Sep 28/15 2.80
DG Posted	Reviewing: Chipotle 226 Response	Sep 28/15 0.60
DG Posted	Reviewing: Discovery responses to Chipotle	Sep 28/15 1.30
RL Posted	Telephone call to Tanika Turley - spoke Alma Florez- spelling. REDACTED Drafting documents- discovery responses to Chipotle	Sep 28/15 0.10
RL Posted	Reviewing discovery responses	Sep 28/15 1.80
RL Posted	Correspondence with defense re discovery	Sep 28/15 0.70
DG Posted	Reviewing: Discovery responses to Chipotle	Sep 29/15 0.50
DG Posted	Filing documentation CASE MANAGEMENT STATEMENT (TRANSACTION ID # 58010002) FILED BY PLAINTIFF TURLE	Oct 13/15 0.10
DG Posted	Reviewing CASE MANAGEMENT STATEMENT (TRANSACTION ID # 58010002) FILED BY PLAINTIFF TURLEY, TANIKA	Oct 13/15 0.60
AH Posted	Correspondence re CMC statement	Oct 13/15 0.10
PM Posted	Telephone conference with D Harris and Mike Solano re CMC statement due today.	Oct 13/15 0.20
DG Posted	Filing documentation CASE MANAGEMENT STATEMENT (TRANSACTION ID # 15285067) FILED BY DEFENDANT CHIPO	Oct 14/15 0.10

Harris & Ruble Chipotle adv. Turley Selected Time Entries		
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DG	Reviewing CASE MANAGEMENT STATEMENT (TRANSACTION ID # 15285067)	Oct 14/15
Posted	FILED BY DEFENDANT CHIPOTLE SERVICE	0.10
DG	Reviewing CASE MANAGEMENT CONFERENCE OF OCT-28-2015	Oct 15/15
Posted	CONTINUED TO MAY-25-2016 AT 10:30 AM IN DEPARTM	0.10
PM	Email correspondence and telephone conference with DSH regarding preparation	Oct 16/15
Posted	of Chipotle discovery	0.10
PM	Review Order continuing cmc and calendar relevant deadlines.	Oct 19/15
Posted		0.20
AH	Order continuing CMC	Oct 19/15
Posted		0.10
DG	Reviewing: Declaration of B. Arthur	Oct 26/15
Posted		0.10
AH	Reviewing documents--Ayala v. Antelope Valley Newspapers, Inc. re independent	Nov 08/15
Posted	contractor and class	0.10
AH	Correspondence to DSH re damage analysis issues.	Dec 01/15
Posted		0.10
AH	Reviewing Documents -- Document Number: 61 Docket Text:MOTION to	Dec 03/15
Posted	COMPEL Production of Documents by	0.10
AH	Telephone call to Eric De Wames - spoke - He is sending me information from	Dec 10/15
Posted	Segovia class action	0.10
AH	Correspondence from defense, forwarding check for TT and claiming case is over.	Dec 10/15
Posted	Send to Cromwell,	0.10
CP	Drafting documents Interrogatories and Notice of Deposition of PMK	Dec 15/15
Posted		2.00
DG	Telephone conference with client	Dec 20/15
Posted		0.10
AH	Correspondence from defense, forwarding Segovia documents.	Dec 21/15
Posted		0.40
AH	Telephone call from Tanika Turley - spoke - Status. Explain why defense sent	Dec 28/15
Posted	her partial check.	0.20
AH	Drafting documents--motion to compel production of Gottlieb for his deposition.	Jan 05/16
Posted		0.80
DG	Reviewing Agata source docs	Jan 17/16
Posted		0.10
DG	Court hearing re: MPA	Feb 24/16
Posted		0.70
DG	Reviewing: NOD Turley	Apr 06/16
Posted		0.10
DG	Correspondence with defense re revised long form agreement	Apr 09/16
Posted		0.10
DG	Reviewing: Defense letter re: discovery	Apr 11/16
Posted		0.10

Harris & Ruble Chipotle adv. Turley Selected Time Entries

DG	Reviewing: Segovia Settlement Agreement	Apr 11/16
Posted		0.10
RL	Reviewing discovery from Defendant	Apr 11/16
Posted		0.20
AH	Correspondence from defense counsel -- I'll have my assistant look into the issues you raise, and w	Apr 15/16
Posted		0.10
CP	Discovery preparations Form ROGS to defendant.	Apr 18/16
Posted		1.90
CP	Correspondence with AH re discovery in Chipotle and tips distribution in restaurants. Will research	Apr 21/16
Posted		0.20
DG	Research: Cal. Code Labor 350-356	Apr 21/16
Posted		0.20
CP	Drafting documents Request for Production of documents	Apr 21/16
Posted		2.10
CP	Research Research Overtime on commission payouts. Research and analysis on cured wage statements. T	Apr 21/16
Posted		1.20
DG	Reviewing: Requests for Production to Chipotle	Apr 22/16
Posted		0.50
CP	Preparing Discovery - Special Interrogatories	Apr 26/16
Posted		0.70
CP	Drafting documents - Discovery Responses and deposition instruction letter to Tanika Turley.	Apr 27/16
Posted		6.40
AH	Correspondence from TT re her deposition. "Hey Alan, thank you June 2nd would be fine. I'll let my REDACTED	Apr 28/16
Posted		0.10
AH	Telephone call to Providence Restaurant - spoke - Res at 1.45	Apr 29/16
Posted		0.10
AH	Reviewing documents--Hendershot -- held that: [1] trial court's bare conclusion that nine class mem	May 01/16
Posted		0.10
DG	Correspondence with defense re discovery	May 04/16
Posted		0.10
CP	Discovery preparations - discovery responses to second set of ROGS and RFPs and Verification	May 05/16
Posted		1.40
AH	Drafting documents and legal research re motion for class certification.	May 07/16
Posted		7.50
DG	Reviewing: Discovery responses to Second Set of Rogs	May 07/16
Posted		0.50
AH	Telephone call to Tanika Turley - spoke - Status. Discuss discovery responses as well as her REDACTED	May 08/16
Posted		0.30
AH	Drafting documents and legal research re class certification.	May 08/16
Posted		5.80
DG	Reviewing - 10-18-2015 Spong Declaration removal	May 09/16
Posted		0.30

Harris & Ruble Chipotle adv. Turley Selected Time Entries

AH	Correspondence with defense	May 09/16
Posted		0.10
DG	Research: EDD information sheet re tips	May 09/16
Posted		0.10
DG	Research: IRS Reporting Tip Income information sheet	May 09/16
Posted		0.10
AH	Telephone call to Gary Markowitz - spoke - Discuss engagement as an expert.	May 09/16
Posted	REDACTED	0.10
AH	Telephone call to Tanika Turley - spoke - REDACTED	May 09/16
Posted		0.10
DG	Reviewing Discovery to Chipotle	May 09/16
Posted		0.30
CP	Research Tip reporting, tax code and wage statement violation based on failure to report tips.	May 09/16
Posted		1.00
CP	Drafting documents and preparing for service of discovery responses in Chipotle including the RFA's	May 09/16
Posted		4.80
PM	Discuss case with AH.	May 09/16
Posted		0.40
AH	Drafting documents re discovery responses -- Interrogatories; document requests; RFA's	May 09/16
Posted		1.80
DG	Reviewing: Ridenbaugh Declaration (Chipotle)	May 09/16
Posted		0.50
CP	Research PACER - related Chipotle cases for discovery purposes; noticed deposition of Gottlieb and	May 10/16
Posted		1.30
CP	Drafting documents PL Request for Production of Documents set one	May 10/16
Posted		1.10
DG	Telephone conference with other side re: discovery	May 10/16
Posted		0.10
AH	Drafting documents re discovery --	May 10/16
Posted		0.30
DG	Reviewing: Ramirez v. Chipotle docket sheet	May 10/16
Posted		0.10
DG	Reviewing CASE MANAGEMENT CONFERENCE OF MAY-25-2016 CONTINUED TO JUN-29-2016 AT 10:30 AM IN DEPARTM	May 12/16
Posted		0.10
DG	Correspondence with defense re: discovery	May 12/16
Posted		0.10
DG	Reviewing CASE MANAGEMENT CONFERENCE OF MAY-25-2016 CONTINUED TO JUN-29-2016 AT 10:30 AM IN DEPARTM	May 12/16
Posted		0.10
AH	Telephone call to Gary Markowitz - spoke - Discuss his possible role as expert in the case.	May 13/16
Posted		0.20
AH	Telephone call to Gary Markowitz - spoke - Discuss his role as expert on tax reporting issue.	May 13/16
Posted		0.40

Harris & Ruble Chipotle adv. Turley Selected Time Entries

PM	Review email from A Harris re retention of expert on tip issues.	May 13/16
Posted		0.20
AH	Correspondence with DSH re expert and motion for summary adjudication on PAGA. For our MSA we shoul	May 13/16
Posted		0.10
DG	CASE MANAGEMENT CONFERENCE OF MAY-25-2016 CONTINUED TO JUN-29-2016 AT 10:30 AM IN DEPARTMENT 610 F	May 16/16
Posted		0.10
DG	Reviewing: 2015 Annual Report Chipotle	May 17/16
Posted		0.20
DG	Telephone conference with other side re: discovery	May 17/16
Posted		0.10
AH	Correspondence to defense counsel -- Turley v. Chipotle Mexican Grill, Inc. Defendants Request for	May 17/16
Posted		0.10
PM	Review email correspondence from DSH re discovery extension.	May 17/16
Posted		0.10
PM	Review new rules regarding summary judgment motions.	May 17/16
Posted		0.20
AH	Telephone call to Tanika Turley - spoke - Status. Discuss schedule for preparing for her depositi	May 18/16
Posted		0.10
CP	Drafting documents letter to California Franchise tax board re failure to report tip income	May 18/16
Posted		0.50
DG	Drafting documents: Declaration of Evelyn Carlson in Support of Motion for Class Certification	May 18/16
Posted		3.10
DG	Drafting documents: PI's Request for Leave to File MSA on PAGA pursusant to CCP 473(c)	May 19/16
Posted		1.40
AH	Correspondence from De Wames-- Hi Alan: Let's set a call up for Monday. I am free between 11a-2p.	May 20/16
Posted		0.10
CP	Drafting documents Joint stipulation to file summary adjudication on wage statement paga issue	May 20/16
Posted		0.40
DG	Telephone conference with other side re: discovery	May 20/16
Posted		0.10
AH	Correspondence from Mr. De Wames -- The date noticed is not available. We will forward a more forma	May 20/16
Posted		0.10
AH	Correspondence to De Wames, requesting her return our call re the Joint Statement regarding Plainti	May 20/16
Posted		0.10
AH	Correspondence from defense -- The date noticed is not available. We will forward a more formal obj	May 20/16
Posted		0.10
AH	Drafting documents and legal research re MSA. Average Chipotle Mexican Grill hourly pay ranges fro	May 22/16
Posted		3.20
AH	Correspondence to defense -- Why don't we speak at noon? This shall give you an opportunity to read	May 23/16
Posted		0.10
AH	Reviewing documents and legal research to prepare for conference call, today.	May 23/16
Posted		1.20

Harris & Ruble Chipotle adv. Turley Selected Time Entries		
AH Posted	Correspondence to defense counsel, Eric De Wames: Thank you for speaking to us. As we must file t	May 23/16 0.10
AH Posted	Telephone call to Eric De Wames - spoke - Discuss status of joint report and deposition schedule.	May 23/16 0.30
AH Posted	Correspondence defense re conference call to discuss Joint Statement Regarding Plaintiff's Request	May 23/16 0.10
AH Posted	Correspondence to defense -- On May 23, 2016, I wrote to defense counsel regarding our proposed con	May 23/16 0.20
CP Posted	Research and reviewing documents in preparation for MSJ	May 23/16 2.90
CP Posted	Correspondence with AH, DG, and defense re filing of MSJ	May 23/16 0.20
AH Posted	Correspondence to defense -- On May 25, 2016, I wrote to defense counsel - "I still await dates for	May 25/16 0.10
AH Posted	Correspondence to defense counsel -- "I still await dates for the depositions we noticed. When wil	May 25/16 0.10
DG Posted	Telephone call to Charles C Cavanagh - spoke; Telephone conference with other side	May 27/16 0.10
DG Posted	Telephone call to Eric De Wames - spoke; Telephone conference with other side	May 27/16 0.10
AH Posted	Correspondence to defense counsel -- You advised on Monday that we would have a response to the MSA	May 27/16 0.10
DG Posted	Reviewing: Potential Trial Exhibits (crew Handbook)	May 29/16 0.40
AH Posted	Correspondence to client, forwarding employee handbook.	May 29/16 0.10
AH Posted	Drafting documents, legal research and PACER research for related cases to find evidence for use in	May 29/16 4.80
AH Posted	Telephone call to Tanika Turley - voice mail - Later, she returns my call and we review complaint	May 29/16 0.40
AH Posted	Telephone conference with client re preparation for her deposition.	May 30/16 0.60
AH Posted	Correspondence to Client, forwarding FAC.	May 30/16 0.10
DG Posted	Telephone conference with client re deposition	May 30/16 0.10
AH Posted	Correspondence to defense--Can we please set up a time today to discuss outstanding discovery issue	May 31/16 0.10
AH Posted	Correspondence to defense re discovery and MSA -- Thanks so much for letting us know where you want	May 31/16 0.10
DG Posted	Correspondence with defense re: discovery	May 31/16 0.10

Harris & Ruble Chipotle adv. Turley Selected Time Entries

DG	Correspondence with defense re: discovery issues	May 31/16
Posted		0.10
AH	Correspondence from defense -- Please find attached a courtesy copy of the amended deposition notice	May 31/16
Posted		0.10
AH	Correspondence to defense--Can we please set up a time today to discuss outstanding discovery issue	May 31/16
Posted		0.10
AH	Correspondence from De Wames: "As I mentioned, Charles has been tied up in trial and is just return	May 31/16
Posted		0.10
AH	Correspondence from defense -- We will be associating in an additional firm shortly for Chipotle's	May 31/16
Posted		0.10
PM	Research regarding sanctions for late cancellation of deposition.	May 31/16
Posted		0.20
AH	Correspondence from defense -- Per my earlier email the deposition will not be going forward due to	May 31/16
Posted		0.10
AH	Correspondence to defense -- Alan has left for San Francisco for the Turley Deposition scheduled th	May 31/16
Posted		0.10
AH	Drafting documents -- notice of deposition for PMQ, Gottlieb, Chrisman	May 31/16
Posted		0.20
AH	Drafting documents--prepare for redirect of Turley, after defense cross examines her on Thursday.	May 31/16
Posted		3.50
CP	Drafting documents Chipotle Discovery - Notices of deposition (chritsan, Gottlieb), Notice of Depos	May 31/16
Posted		4.10
AH	Reviewing documents -- Item:§ 2025.430. Failure to attend by party giving notice; sanctions; except	May 31/16
Posted		0.20
PM	Review email correspondence from Chipotle's counsel re deposition.	Jun 01/16
Posted		0.10
AH	Correspondence to defense -- At this late date, the Defendant may not take the deposition off calendar	Jun 01/16
Posted		0.20
AH	Correspondence from defense counsel Eric De Wames -- The depo is off calendar and we will notice fo	Jun 01/16
Posted		0.10
AH	Correspondence from defense forwarding Notice of Cancellation of Deposition of TT. Sent at 9:30 a.	Jun 01/16
Posted		0.10
CP	Drafting documents Subpoena NCR	Jun 01/16
Posted		0.60
CP	Drafting documents Whistleblower letters to IRS and CA Tax Board with enclosures	Jun 02/16
Posted		0.90
AH	Correspondence with IRS and Franchise Tax Board re tip issue	Jun 02/16
Posted		0.60
DG	Correspondence with defense re discovery	Jun 05/16
Posted		0.10
AH	Drafting documents--NOD for PMQ witness of defendant.	Jun 05/16
Posted		0.10

Harris & Ruble Chipotle adv. Turley Selected Time Entries

AH Posted	Correspondence to defense -- I am just back in my office today. Your claim that I said I was "goin	Jun 06/16 0.10
AH Posted	Correspondence from IRS re WB. Claim No. 2016-10883.	Jun 07/16 0.10
AH Posted	Correspondence to defense -- It is particularly important that Alan speak with you today as we have	Jun 07/16 0.10
AH Posted	Correspondence from De Wames: The Court follows Rule 3.725 which requires the filling no later t	Jun 07/16 0.10
DG Posted	Telephone call to Charles C Cavanagh - spoke; Telephone conference with other side	Jun 09/16 0.10
DG Posted	Telephone call to Eric De Wames - spoke; Telephone conference with other side	Jun 09/16 0.10
AH Posted	Reviewing documents--Reviewing Vaquero--The furniture companies' attorneys at Littler Mendelson had	Jun 09/16 0.10
PM Posted	Research regarding procedures to combat deposition abuses.	Jun 10/16 0.40
DG Posted	Research re: discovery issues (motion to compel deposition)	Jun 10/16 0.90
PM Posted	Discussion with AH and D. Garrett re compelling depositions due to Defendant's failure to provide d	Jun 10/16 0.20
AH Posted	Correspondence from defense -- We will be available at 11:30 am PST tomorrow for a conference call.	Jun 13/16 0.20
AH Posted	Correspondence to defense -- We remain available, at any time today or tomorrow. Please call us to	Jun 13/16 0.10
PM Posted	Review deposition notices with AH. Preparation of email correspondence to defense counsel regardin	Jun 13/16 0.20
AH Posted	Correspondence to defense -- We remain available, at any time today or tomorrow. Please call us to	Jun 13/16 0.20
AH Posted	Correspondence from defense counsel -- We will be available at 11:30 am PST tomorrow for a conferen	Jun 13/16 0.10
CP Posted	Research Joel Chrisman (noticed deponent) who no longer works for Chipotle according to the chipotl	Jun 14/16 0.30
AH Posted	Correspondence to defense, confirming conference call this morning.	Jun 14/16 0.10
DG Posted	Reviewing CASE MANAGEMENT STATEMENT (TRANSACTION ID # 16165065) FILED BY DEFENDANT CHIPOTLE SERVICE	Jun 14/16 1.10
DG Posted	Reviewing NOTICE OF APPEARANCE FOR CHIPOTLE SERVICES, LLC (TRANSACTION ID # 16165065) FILED BY DEFE	Jun 14/16 0.10
DG Posted	Telephone call to Eric De Wames - spoke; Telephone conference with other side	Jun 14/16 0.50
DG Posted	Telephone call to Robert Mussig - spoke; Telephone conference with other side	Jun 14/16 0.50

Harris & Ruble Chipotle adv. Turley Selected Time Entries

AH Posted	Telephone call to Robert Mussig - spoke - With DG, CN, De Wames and DSH on phone. Discuss CMC, Me	Jun 14/16 0.60
CP Posted	Correspondence with - meet and confer re mediation, joint statement for summary adjudication and di	Jun 14/16 0.50
CP Posted	Correspondence with AH and PM re discovery issues, mediation and summary adjudication in preparatio	Jun 14/16 0.30
CP Posted	Reviewing documents objections to deposition notices.	Jun 14/16 0.20
CP Posted	Correspondence with defense	Jun 14/16 0.10
DG Posted	Reviewing NOTICE OF APPEARANCE FOR CHIPOTLE SERVICES, LLC (TRANSACTION ID # 16165065) FILED BY DEFE	Jun 14/16 0.10
DG Posted	Reviewing CASE MANAGEMENT STATEMENT (TRANSACTION ID # 16165065) FILED BY DEFENDANT CHIPOTLE SERVICE	Jun 14/16 0.20
AH Posted	Drafting documents--CMC statement	Jun 14/16 0.40
DG Posted	Filing documentation CASE MANAGEMENT STATEMENT (TRANSACTION ID # 100021242) FILED BY PLAINTIFF TURL	Jun 15/16 0.10
DG Posted	Reviewing CASE MANAGEMENT STATEMENT (TRANSACTION ID # 100021242) FILED BY PLAINTIFF TURLEY, TANIKA	Jun 15/16 0.40
DG Posted	Reviewing CASE MANAGEMENT CONFERENCE OF JUN-29-2016 CONTINUED TO OCT-26-2016 AT 10:30 AM IN DEPARTM	Jun 15/16 0.10
DG Posted	Reviewing CASE MANAGEMENT CONFERENCE OF JUN-29-2016 CONTINUED TO OCT-26-2016 AT 10:30 AM IN DEPARTM	Jun 15/16 0.10
DG Posted	Correspondence with One Legal	Jun 15/16 0.10
DG Posted	Reviewing CASE MANAGEMENT CONFERENCE OF JUN-29-2016 CONTINUED TO OCT-26-2016 AT 10:30 AM IN DEPARTM	Jun 15/16 0.10
AH Posted	Correspondence FROM DEFENSE -- Please find attached Defendant's Responses and Objections to Plainti	Jun 16/16 0.10
DG Posted	Telephone call to Robert Mussig - spoke	Jun 16/16 0.10
DG Posted	Telephone call to Eric De Wames - spoke; Telephone conference with other side	Jun 16/16 0.10
AH Posted	Telephone call to Charles C Cavanagh - voice mail -	Jun 16/16 0.10
AH Posted	Telephone call to Eric De Wames - spoke - He returned my call. PMK deposition is off calendar. W	Jun 16/16 0.20
AH Posted	Correspondence to defense -- We know something about the size of the class. There are, approximate	Jun 16/16 0.40
CP Posted	Reviewing documents Objections to PI Notice of deposition of Chipotle PMK; drafting discovery	Jun 22/16 2.40

Harris & Ruble Chipotle adv. Turley Selected Time Entries

CP	Drafting documents Notice of Court Order continuing CMC - Plaintiff to give notice	Jun 22/16
Posted		0.30
AH	Correspondence with defense, forwarding notice of CMC.	Jun 22/16
Posted		0.10
DG	Reviewing NOTICE OF ORDER CONTINUING CASE MANAGEMENT CONFERENCE (TRANSACTION ID # 100021699) FILED	Jun 23/16
Posted		0.10
AH	Telephone call to Richard J. in LA Simmons - left message - Please call.	Jun 23/16
Posted		0.10
AH	Telephone call to Charles C Cavanagh - left message -	Jun 23/16
Posted		0.10
AH	Telephone call to Eric De Wames - left message -	Jun 23/16
Posted		0.10
CP	Reviewing documents Chipotle responses to PI RFPs	Jun 23/16
Posted		1.00
DG	Reviewing Chipotle Discovery Extension	Jun 24/16
Posted		0.10
DG	Correspondence with defense re: MSA	Jun 24/16
Posted		0.10
AH	Correspondence with DeWames, attempting to schedule a call.	Jun 24/16
Posted		0.10
CP	Reviewing documents Chipotle responses to form rogs; legal research; motion to compel	Jun 24/16
Posted		2.80
AH	Telephone call to Eric De Wames - voice mail - later, he returned, stating that the Defendant did	Jun 24/16
Posted		0.20
AH	Correspondence to defense re its failure to make proper responses to written discovery.	Jun 25/16
Posted		0.70
AH	Drafting documents and legal research re MSA.	Jun 26/16
Posted		0.80
AH	Drafting documents -- renote of deposition of Gottlieb.	Jun 26/16
Posted		0.10
DG	Review Chipotle Answers to Form Ints (Economic); Discovery preparations	Jun 27/16
Posted		2.40
CP	Drafting documents - joint stipulation to service via email	Jun 27/16
Posted		0.30
DG	Filing documentation STATEMENT REGARDING PLAINTIFFS REQUEST FOR LEAVE OF COURT TO FILE MOTION FOR P	Jun 28/16
Posted		0.10
DG	Drafting documents STATEMENT REGARDING PLAINTIFFS REQUEST FOR LEAVE OF COURT TO FILE MOTION FOR PAR	Jun 28/16
Posted		2.40
DG	Drafting documents: Statement re: MSA on PAGA	Jun 28/16
Posted		2.20
AH	Drafting documents -- Statement re MSA (.1); forward same to defense (.1).	Jun 28/16
Posted		0.20

Harris & Ruble Chipotle adv. Turley Selected Time Entries		
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DG	Correspondence with defense re: MSA	Jun 28/16
Posted		0.10
AH	Telephone call to Richard J. in LA Simmons - spoke - He does not have time to speak now. Too busy	Jun 28/16
Posted		0.10
AH	Drafting documents and legal research re Brinker and time-keeping rules. Lopez v. G.A.T. Airline Gr	Jul 03/16
Posted		2.60
AH	Correspondence ro defense, again requesting they respond to our inquiry concerning document product	Jul 09/16
Posted		0.10
AH	Correspondence with Gary Markowitz re expert retention.	Jul 10/16
Posted		0.20
RL	Reviewing documents from Defendant re Turley	Jul 11/16
Posted		0.30
DG	Reviewing: Chipotle Discovery	Jul 11/16
Posted		1.20
DG	Reviewing RESPONSE AND REQUEST TO STRIKE PLAINTIFFS STATEMENT REGARDING REQUEST FOR LEAVE TO FILE	Jul 13/16
Posted		1.40
DG	Research re RESPONSE AND REQUEST TO STRIKE PLAINTIFFS STATEMENT REGARDING REQUEST FOR LEAVE TO FILE	Jul 13/16
Posted		1.90
AH	Drafting documents deposition outlines for Gottlieb and SF witnesses.	Jul 16/16
Posted		1.80
DG	Reviewing: Chipotle annual report	Jul 21/16
Posted		0.30
DG	Reviewing Brown v. Chipotle case file	Jul 21/16
Posted		0.70
DG	Reviewing Carr v. Chipotle case file	Jul 21/16
Posted		0.40
DG	Reviewing: Gonzalez v. Chipotle case file	Jul 21/16
Posted		0.60
DG	Reviewing Ceron Decl. From Chipotle	Jul 22/16
Posted		0.10
CP	Reviewing documents motion to compel	Aug 01/16
Posted		1.50
CP	Reviewing documents produced by Chipotle in preparation for motion to compel discovery responses	Aug 03/16
Posted		0.40
CP	Drafting documents Separate Statement in support of motion to compel further discovery responses	Aug 03/16
Posted		2.20
AH	Drafting documents-- work on motions to compel.	Aug 04/16
Posted		0.30
DG	Reviewing Separate Statement in support of Motion to Compel	Aug 04/16
Posted		0.70
DG	Telephone call to Mike Solano - spoke; Telephone conference with other side	Aug 04/16
Posted		0.10

Harris & Ruble Chipotle adv. Turley Selected Time Entries

CP Posted	Drafting documents Motion to compel responses to Form Interrogatories; Motion to Compel responses t	Aug 04/16 6.60
AH Posted	Drafting documents and legal research re settlement demand; email to DSH -- Confidential Settlement	Aug 05/16 0.70
AH Posted	Drafting documents and legal research re motion to compel discovery.	Aug 05/16 2.80
CP Posted	Drafting documents Separate Statement - motion to compel further responses to Form ROGS and RFPs.	Aug 05/16 5.70
CP Posted	Drafting documents and Filing: Notice of Motion and Motion to compel further responses; Proposed Or	Aug 08/16 4.20
CP Posted	Drafting documents amending motion to compel to correct department after filing rejection and separ	Aug 10/16 0.10
CP Posted	Research Gratuity trends in the US	Aug 10/16 0.10
DG Posted	Research re: tax implications of gratuities in fast food restaurants	Aug 10/16 0.90
DG Posted	Reviewing AH Decl. Re Motion to Compel	Aug 11/16 1.10
DG Posted	Reviewing: Ammerman v. Chipotle case documents	Aug 11/16 0.30
DG Posted	Reviewing Esparza v. Chipotle case file	Aug 11/16 0.40
DG Posted	Motion to Compel - Deposition; Drafting documents	Aug 11/16 2.90
DG Posted	Reviewing: Estrada v. Chipotle case file	Aug 11/16 0.30
CP Posted	Drafting documents - motion to compel deposition, AH declaration, Exhibits, proposed order - drafti	Aug 11/16 6.70
AH Posted	Drafting documents and legal research -- putative class claims against petitioners Safeway Inc. (Sa	Aug 24/16 0.20
DG Posted	Reviewing ANSWER TO 1ST AMENDED COMPLAINT (TRANSACTION ID # 15238043) FILED BY DEFENDANT CHIPOTLESE	Aug 27/16 0.80
DG Posted	Reviewing Dep Opposition to Mot to Compel	Sep 02/16 0.30
DG Posted	Reviewing SEPARATE STATEMENT OF FACTS OF DISCOVERY ISSUES IN DISPUTE FOR RESPONSES TO PLAINTIFF'S (Sep 02/16 1.10
DG Posted	Reviewing DECLARATION OF ERIC DE WAMES IN SUPPORT OF OPPOSITION TO MOTION TO COMPEL DEPOSITIONS(TRA	Sep 02/16 0.90
DG Posted	Reviewing OPPOSITION TO PLAINTIFFS MOTION TO COMPEL DEPOSITIONS (TRANSACTION ID # 16245052) FILED B	Sep 02/16 0.70
DG Posted	Reviewing DECLARATION OF ERIC DE WAMES IN SUPPORT OF OPPOSITION TO MOTION TO COMPEL WRITTEN DISCOVER	Sep 02/16 0.80

Harris & Ruble Chipotle adv. Turley Selected Time Entries

DG Posted	Reviewing OPPOSITION TO PLAINTIFFS MOTION TO COMPEL FURTHER RESPONSES TO WRITTEN DISCOVERY(TRANSACTION)	Sep 02/16 1.10
CP Posted	Reviewing documents Chipotle opposition to PI motion to compel and supporting documents.	Sep 06/16 1.00
AH Posted	Drafting documents and research re reply to motion to compel depositions.	Sep 08/16 0.80
AH Posted	Drafting documents--reply to motion to compel written discovery	Sep 08/16 1.20
CP Posted	Drafting documents Reply to Def Opp to Motion to Compel Depositions, Form ROGs, and RFPs	Sep 08/16 2.80
DG Posted	Reviewing: C. Nordsten Declaration re Reply to Compel RFP's	Sep 09/16 0.60
DG Posted	Reviewing AH Declaration re: PI Reply Memo re: Motion to Compel	Sep 09/16 0.50
AH Posted	Correspondence to defense -- All: Please see attached Declaration of Alan Harris in support of Plai	Sep 09/16 0.10
AH Posted	Drafting documents and legal research re reply memoranda on discovery issues.	Sep 09/16 2.20
CP Posted	Drafting documents Reply memo to opposition to pl motion to compel depositions, RFPs and Form ROGS,	Sep 09/16 5.80
DG Posted	Reviewing DECLARATION OF CHRISTINA NORDSTEN IN SUPPORT OF REPLY TO PLAINTIFF'S NOTICE OF MOTION AND	Sep 09/16 0.10
DG Posted	Meeting with David Harris re: Chipotle	Sep 14/16 1.50
DG Posted	Research: CA EDD form de231 (wages v. tips)	Sep 14/16 0.20
DG Posted	Reporting; Research Jolley v. Sutter Coast Hosp. Re cancel depo	Sep 14/16 0.20
PM Posted	Meeting regarding settlement posture and upcoming hearings with DSH, A Harris and D. Garrett.	Sep 14/16 0.70
AH Posted	Reviewing documents and legal research re upcoming discovery hearing, this Friday, depositions, int	Sep 14/16 1.40
AH Posted	Drafting documents and legal research re amended complaint. When tips are received by the employee f	Sep 14/16 0.80
AH Posted	Correspondence to defense -- Thanks. That time will be good. Please ask for David Garrett and he	Sep 14/16 0.10
AH Posted	Correspondence to defense--Further to my email of September 8, to which you have not responded, are	Sep 15/16 0.10
DG Posted	Telephone call to Eric De Wames - spoke; Telephone conference with other side	Sep 15/16 0.10
DG Posted	Correspondence with David Harris re: Motion to Compel.	Sep 15/16 0.10

Harris & Ruble Chipotle adv. Turley Selected Time Entries

AH Posted	Reviewing documents to prepare for hearing on Plaintiff's two discovery motions.	Sep 15/16 2.70
AH Posted	Correspondence with defense re cancellation of discovery hearings, set for Friday.	Sep 15/16 0.10
AH Posted	Telephone call to Eric De Wames - spoke - With DG, discuss possible resolution of discovery issues	Sep 15/16 0.20
AH Posted	Correspondence from defense --Today is not good, but I can call at 9am tomorrow morning. Let me kn	Sep 15/16 0.10
DG Posted	Correspondence with defense re: discovery	Sep 15/16 0.10
CP Posted	Reviewing documents - printing documents in preparation for hearing tomorrow morning	Sep 15/16 0.70
DG Posted	Reviewing DISCOVERY 302, MOTION TO COMPEL DEPOSITION OF DAVID GOTTLIEB AND/OR PERSON MOSTKNOWLEDGEA	Sep 16/16 0.10
DG Posted	Reviewing DISCOVERY 302, MOTION TO COMPEL FURTHER RESPONSES IS CONTINUED FROM SEP-16-2016 TO SEP-27	Sep 16/16 0.10
DG Posted	Reviewing MINI MINUTES FOR SEP-16-2016 09:00 AM FOR DEPT 302	Sep 16/16 0.10
AH Posted	Reviewing documents to prepare for oral argument on discovery issues.	Sep 25/16 2.70
AH Posted	Correspondence from defense to Pro Tem judicial officer -- Pursuant to your tentative rulings we	Sep 26/16 0.10
AH Posted	Correspondence from defense -- We submitted to the Judge Pro Tem earlier today that we contested th	Sep 26/16 0.10
AH Posted	Correspondence from DeWames -- Pursuant to your tentative rulings we are advising all parties that	Sep 26/16 0.10
AH Posted	Correspondence from defense--We have reserved November 17 for Mr. Gottlieb's deposition as a PMK in	Sep 26/16 0.10
CP Posted	Reviewing documents tentative ruling motion to compel; drafting proposed order; printing out docume	Sep 26/16 1.80
CP Posted	Drafting documents Amended Notice of Deposition - PMK and David Gottlieb	Sep 27/16 0.80
AH Posted	Hearing on motion to compel in Chipotle Dept 302 - preparation	Sep 27/16 1.50
DG Posted	Reviewing NOTICE OF MOTION FOR RELIEF PURSUANT TO C.C.P. SECTION 2030.290(A) AND 2031.300(A) (TRANS	Sep 27/16 0.10
DG Posted	Reviewing MINI MINUTES FOR SEP-27-2016 09:00 AM FOR DEPT 302	Sep 27/16 0.10
DG Posted	Reviewing MINI MINUTES FOR SEP-27-2016 09:00 AM FOR DEPT 302	Sep 27/16 0.10
AH Posted	Court Hearing re motions to compel discovery.	Sep 27/16 1.00

Harris & Ruble Chipotle adv. Turley Selected Time Entries

AH Posted	Meeting with defense counsel DeWames re discovery and settlement. We need Plaintiff's personnel file	Sep 27/16 0.30
AH Posted	Reviewing documents to prepare for oral argument.	Sep 27/16 1.80
AH Posted	Correspondence to defense -- Please see attached amended notices of deposition. Thanks,	Sep 27/16 0.20
DG Posted	Telephone conference with client re discovery issues	Oct 04/16 0.10
CP Posted	Reviewing documents - Motion for waiver of objections; legal research	Oct 07/16 3.00
DG Posted	Reviewing DECLARATION OF ERIC DE WAMES IN SUPPORT OF MOTION FOR RELIEF FROM OBJECTION WAIVER PURSUAN	Oct 07/16 0.10
DG Posted	Reviewing MOTION FOR RELIEF FROM OBJECTION WAIVER PURSUANT TO C.C.P. SECTIONS 2030.290(A) AND 2031.	Oct 07/16 0.10
DG Posted	Reviewing NOTICE OF MOTION FOR RELIEF PURSUANT TO C.C.P. SECTION 2030.290(A) AND 2031.300(A) (TRANS	Oct 07/16 0.30
DG Posted	Correspondence with defense re discovery issues	Oct 10/16 0.10
DG Posted	Telephone conference with other side re discovery	Oct 10/16 0.10
AH Posted	Correspondence to DeWames -- Further to our discussion the defense will supplement its answers the	Oct 10/16 0.10
AH Posted	Telephone call to Eric De Wames - spoke - Discuss issues involved in discovery motions.	Oct 10/16 0.40
AH Posted	Drafting documents to prepare for discovery motions, tomorrow in SF.	Oct 10/16 6.80
AH Posted	Telephone call to Maggie Saunders - voice mail -	Oct 10/16 0.10
AH Posted	Telephone call to Eric De Wames - spoke - Discuss upcoming discovery hearing. See separate notes.	Oct 10/16 0.80
CP Posted	Court preparations for tomorrows hearing	Oct 10/16 2.00
CP Posted	Correspondence with Eric DeWames and AH re discovery motions - we can agree to preserve the privile	Oct 10/16 0.50
CP Posted	Research opposition to motion for relief from waiver	Oct 10/16 3.40
AH Posted	Telephone call to Eric De Wames - voice mail -	Oct 10/16 0.10
DG Posted	Reviewing LAW AND MOTION 302, PLAINTIFF TANIKA TURLEY'S MOTION TO COMPEL DEPOSITION OF DAVID GOTTLI	Oct 11/16 0.10
DG Posted	Reviewing MINI MINUTES FOR OCT-11-2016 09:30 AM FOR DEPT 302	Oct 11/16 0.10

Harris & Ruble Chipotle adv. Turley Selected Time Entries

DG Posted	Reporting; Reviewing NOTICE OF RELATED MOTIONS (TRANSACTION ID # 16283023) FILED BY DEFENDANT CHIPO	Oct 11/16 0.10
AH Posted	Correspondence from defense re proposed order --Please see attached Complaint, Summons, Civil Case	Oct 11/16 0.20
AH Posted	Court hearing re motion to compel answers to interrogatories and production of documents.	Oct 11/16 3.50
CP Posted	Drafting documents CMC statement	Oct 12/16 0.60
DG Posted	Reviewing CASE MANAGEMENT CONFERENCE OF OCT-26-2016 CONTINUED TO DEC-07-2016 AT 10:30 AM IN DEPARTM	Oct 12/16 0.10
AH Posted	Correspondence De Wames re proposed Order on discovery issues: Please review and provide your comme	Oct 13/16 0.10
DG Posted	Telephone conference with client re discovery issues	Oct 14/16 0.10
CP Posted	Drafting documents and serving Proposed Order re motion to compel	Oct 14/16 0.70
AH Posted	Correspondence to defense re proposed Order -- Thanks for your comments. I tried to call but witho	Oct 14/16 0.10
AH Posted	Correspondence from De Wames -- Thanks for sending. I made slight clarifying changes to the captio	Oct 14/16 0.10
AH Posted	Correspondence with De Wames, requesting date for Brittany Arthur deposition. Research concerning h	Oct 15/16 0.30
AH Posted	Drafting documents and legal research re motion for class certification.	Oct 15/16 2.80
AH Posted	Correspondence from De Wames -- In advance of our discussion tomorrow, attached is the Order Alan d	Oct 16/16 0.10
AH Posted	Correspondence to all counsel -- All: Please see attached notice of order continuing the status con	Oct 18/16 0.10
AH Posted	Correspondence to De Wames, requesting he call us.	Oct 18/16 0.10
CP Posted	Telephone call to Eric De Wames - left message Re the proposed order: please call us back	Oct 19/16 0.10
AH Posted	Correspondence to De Wames -- Dear Eric, Pursuant to Rule 5.125 California Rules of Court, you have	Oct 19/16 0.10
CP Posted	Drafting documents Notice of order continuing status conference	Oct 19/16 0.30
CP Posted	Drafting proposed order with cover letter re order granting plaintiff motion to compel discovery -	Oct 19/16 0.40
DG Posted	Reviewing DECLARATION OF ERIC DE WAMES IN SUPPORT OF OBJECTION TO PLAINTIFFS PROPOSED ORDERREGARDIN	Oct 19/16 0.50
DG Posted	Reviewing OBJECTION TO PLAINTIFF PROPOSED ORDER REGARDING MOTION TO COMPEL HEARING HELD ON OCTOBER1	Oct 19/16 0.30

Harris & Ruble Chipotle adv. Turley Selected Time Entries		
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DG	Telephone conference with client re discovery issues	Oct 20/16
Posted		0.10
AH	Reviewing documents-- Chipotle objections to proposed order re discovery.	Oct 21/16
Posted		0.70
CP	Reviewing opposition to proposed order	Oct 21/16
Posted		0.30
DG	Correspondence with defense re: discovery issues	Oct 24/16
Posted		0.10
CP	Correspondence with AH re proposed order in chipotle	Oct 25/16
Posted		0.10
AH	Correspondence from De Wames -- Could you please provide the basis and relevance of Ms. Arthur's de	Oct 25/16
Posted		0.10
AH	Correspondence to De Wames re deposition schedule.	Oct 25/16
Posted		0.10
AH	Correspondence with defense to set up meet and confer, for tomorrow.	Oct 25/16
Posted		0.10
AH	Correspondence with De Wames re Arthur deposition.	Oct 25/16
Posted		0.20
AH	Correspondence to defense -- With regard to the differences in our proposed Orders relating to the	Oct 25/16
Posted		0.20
DG	Reviewing documents: Chipotle Privilege Log	Oct 26/16
Posted		1.10
DG	Reviewing: Chip. Supp. Responses to RFP	Oct 26/16
Posted		0.30
AH	Telephone call to Eric De Wames - spoke - We want depositions of McDonough, Herrera, Flores, Stins	Oct 26/16
Posted		0.10
AH	Correspondence from court -- Please note that, per request of the moving party, Defendants' Novemb	Oct 26/16
Posted		0.10
AH	Correspondence from Chipotle legal assistant -- Please be advised, Eric DeWames represents Defendan	Oct 26/16
Posted		0.10
AH	Correspondence from defense -- Attached please find the executed verifications to Chipotle Services	Oct 27/16
Posted		0.10
DG	Correspondence with Eric H. De Wames Messner Reeves LLP	Nov 01/16
Posted		0.10
CP	Reviewing Chipotle supplemental responses; research re A privilege log must identify with particula	Nov 01/16
Posted		2.30
DG	Correspondence with Eric De Wames re CMC	Nov 01/16
Posted		0.10
DG	Telephone call to Eric De Wames - spoke; Telephone conference with other side	Nov 01/16
Posted		0.10
DG	Telephone call to Eric De Wames - spoke; Telephone conference with other side	Nov 01/16
Posted		0.10

Harris & Ruble Chipotle adv. Turley Selected Time Entries

AH Posted	Drafting documents--notes re telephone call with De Wames. NOTES ON DISCOVERY MEET AND CONFER PHONE	Nov 01/16 0.10
AH Posted	Correspondence to De Wames re privilege log -- A privilege log must identify with particularity eac	Nov 01/16 0.10
AH Posted	Correspondence to DeWames re interrogatory responses -- Answers must be complete and responsive. Th	Nov 01/16 0.10
AH Posted	Reviewing documents--NOV-01-2016 09:30 AM. Calendar Matter:Compliance Hearing Regarding Responses	Nov 01/16 0.10
AH Posted	Correspondence to De Wames -- Alan Harris is in court in San Francisco, and the judge asked him to	Nov 01/16 0.10
DG Posted	Telephone call to Eric De Wames - spoke; Telephone conference with other side	Nov 01/16 0.10
AH Posted	Correspondence to court -- The Defendant has agreed to deliver further responses to Form Interrogat	Nov 01/16 0.10
AH Posted	Correspondence and phone calls with De Wames re meet and confer on outstanding discovery issues.	Nov 01/16 2.80
AH Posted	Court hearing re discovery issues. Later, receive Order from Hearing--Compliance Hearing Regarding	Nov 01/16 1.30
DG Posted	Reviewing LAW AND MOTION 302, COMPLIANCE HEARING REGARDING RESPONSES AND FURTHER ISSUES REGARDINGRE	Nov 01/16 0.10
DG Posted	Reviewing MINI MINUTES FOR NOV-01-2016 09:30 AM FOR DEPT 302	Nov 01/16 0.10
AH Posted	Correspondence from defense -- Actually Alan. After further consideration I am not comfortable with	Nov 01/16 0.10
AH Posted	Correspondence from defense -- Agreed to points 1,2,3 and 5. We cannot agree to point four because	Nov 01/16 0.10
AH Posted	Court hearing re discovery issues. Defense ordered to provide copy of latest filed complaint in ea	Nov 02/16 1.40
DG Posted	Reviewing LAW AND MOTION 302, COMPLIANCE HEARING REGARDING RESPONSES AND FURTHER ISSUES REGARDINGRE	Nov 02/16 0.10
DG Posted	Reviewing MINI MINUTES FOR NOV-02-2016 09:30 AM FOR DEPT 302	Nov 02/16 0.10
DG Posted	Reviewing DISCOVERY 302, DEFENDANT CHIPOTLE SERVICES, LLC'S MOTION FOR RELIEF PURSUANT TO C.C.P. SE	Nov 02/16 0.10
DG Posted	Reviewing MINI MINUTES FOR NOV-02-2016 09:00 AM FOR DEPT 302	Nov 02/16 0.10
AH Posted	Correspondence from defense -- I just learned that, unfortunately, Mr. Gottlieb will be unavailable	Nov 04/16 0.10
DG Posted	Reviewing proposed order re discovery issues	Nov 09/16 0.10
AH Posted	Correspondence with	Nov 09/16 0.10

Harris & Ruble Chipotle adv. Turley Selected Time Entries

CP	Drafting documents proposed order	Nov 09/16
Posted		0.40
AH	Drafting documents and legal research re motion for class certification.	Nov 11/16
Posted		2.50
CP	Drafting documents amended notices of deposition; discovery	Nov 11/16
Posted		0.70
AH	Correspondence to defense --In response to your email below please see attached amended deposition	Nov 11/16
Posted		0.10
AH	Correspondence from De Wames re depositions --Confirmed for Mr.Gottlieb who will be the only PMK re	Nov 11/16
Posted		0.10
AH	Correspondence from De Wames -- December 21 and 22 are also confirmed for Mr. Stinson and Ms. Flore	Nov 14/16
Posted		0.10
DG	Reviewing: Chip Supp Answers to Form Ints.	Nov 15/16
Posted		0.30
AH	Telephone call to Gary Markowitz - spoke - Discuss case status.	Nov 20/16
Posted		0.10
AH	Correspondence to defense -- please call re 2016 California Rules of Court Rule 3.724. Duty to meet	Nov 22/16
Posted		0.10
AH	Drafting documents re Case Management Conference statement.	Nov 22/16
Posted		0.40
AH	Correspondence re courtesy copy delivry.	Nov 23/16
Posted		0.10
PM	Attention to preparation filing and service case management statement.	Nov 23/16
Posted		2.80
AH	Drafting documents and legal research re motion for class certificaiton -- review related cases.	Nov 23/16
Posted		5.80
AH	Correspondence from De Wames -- We already met and conferred in late May per the rule when the June	Nov 23/16
Posted		0.10
AH	Drafting documents -- CMC statement.	Nov 23/16
Posted		0.50
AH	Correspondence to defense -- Dear Counsel, please find attached Plaintiff's Case Management Stateme	Nov 23/16
Posted		0.40
AH	Reviewing documents--DEFENDANT CHIPOTLE SERVICES, LLC SUPPLEMENTAL RESPONSES TO PLAINTIFF'S FIRST S	Nov 23/16
Posted		0.40
AH	Reviewing documents--defense privilege log.	Nov 23/16
Posted		0.10
DG	Reviewing: Chipotle Privilege Log #2	Nov 27/16
Posted		0.20
AH	Correspondence to DeWames re discovery --I am back from vacation and would like to discuss this wit	Nov 27/16
Posted		0.10
AH	Reviewing documents--defendant's supplemental interrogatory and document request.	Nov 27/16
Posted		0.10

Harris & Ruble Chipotle adv. Turley Selected Time Entries

CP	Correspondence with AH re discovery and trial date	Nov 30/16
Posted		0.30
CP	Reviewing documents notice of trial date set in chipotle	Nov 30/16
Posted		0.10
AH	Correspondence from De Wames -- This is my fifth unanswered request for a response respective to PI	Nov 30/16
Posted		0.10
CP	Correspondence with AH and DHS re objection to trial date; Drafting Documents - Notice of objection	Dec 01/16
Posted		1.00
AH	Drafting documents--notice of objection to order setting trial date.	Dec 01/16
Posted		0.20
DG	Reviewing: Hard File Chipotle Discovery documents	Dec 01/16
Posted		0.80
DG	Reviewing Beebee deposition	Dec 01/16
Posted		0.30
AH	Drafting documents to prepare outlines for upcoming depositions.	Dec 01/16
Posted		0.80
CP	Discovery preparations compiling Turley documents and batestamping for service	Dec 01/16
Posted		0.70
AH	Correspondence to De Wames -- Dear Eric, please see attached Plaintiff's production of documents st	Dec 01/16
Posted		0.10
AH	Correspondence re hearing, next week -- As requested, this objection has been filed with the Court,	Dec 01/16
Posted		0.10
DG	Reviewing Plaintiff's Discovery Responses	Dec 02/16
Posted		0.90
DG	Reviewing A. Brittany Payroll Objection	Dec 02/16
Posted		0.10
DG	Meeting with CP and AH re: discovery	Dec 02/16
Posted		0.20
CP	Meeting with AH and DG re deposition dates	Dec 02/16
Posted		0.20
AH	Drafting documents and legal research re memo in support of class certification.	Dec 03/16
Posted		7.70
AH	Correspondence to client re certification issueses --The attached file, toward the end, reflects you	Dec 03/16
Posted		0.10
AH	Correspondence with defense	Dec 03/16
Posted		0.10
AH	Reviewing documents-- TT meal and rest break records from Aloha. No rest breaks on 8/21, 22, 25.	Dec 03/16
Posted		0.10
AH	Correspondence with client re deposition preparation and motion for class certification.	Dec 04/16
Posted		0.10
AH	Drafting documents and legal research re memo in support of class certification.	Dec 04/16
Posted		6.50

Harris & Ruble Chipotle adv. Turley Selected Time Entries

CP	Reviewing documents in preparation for chipotle deposition on thursday	Dec 05/16
Posted		1.90
AH	Telephone call to Eric De Wames - spoke - We will reschedule the deposition for January -- Gottlie	Dec 05/16
Posted		0.10
CP	Correspondence with AH, legal research re PAGA notice; we should amend the PAGA notice to include t	Dec 07/16
Posted		1.00
DG	Reporting OBJECTION HEARING OF DEC-07-2016 HELD. PROCEEDINGS NOT REPORTED. JUDGE JOHN K. STEWART;CL	Dec 07/16
Posted		0.10
CP	Reviewing documents Chipotle objections to PI Notice of taking depo of PMK	Dec 08/16
Posted		0.10
DG	Correspondence with defense re: discovery	Dec 08/16
Posted		0.10
DG	Correspondence with defense re: discovery	Dec 08/16
Posted		0.10
AH	Correspondence from defense, forwarding objections to PMK notice of deposition.	Dec 08/16
Posted		0.10
DG	Reviewing REMOVED FROM MASTER COURT CALENDAR ON SEP-25-2017. ASSIGNED TO CASE MANAGEMENTDEPARTMENT	Dec 08/16
Posted		0.10
DG	Correspondence with defense re: discovery	Dec 15/16
Posted		0.10
CP	Reviewing documents Responses to ROGS in preparation for supplementing responses due today; draftin	Dec 15/16
Posted		4.60
AH	Correspondence concerning Notice of CMC; drafting same.	Dec 15/16
Posted		0.20
CP	Predominant Common Legal and Factual Issues Regarding the Paystub Claims and showing Total hours ea	Dec 21/16
Posted		3.00
AH	Correspondence from defense -- "I hope you are feeling better. We have two date options for Mr. Got	Dec 23/16
Posted		0.10
AH	Reviewing documents--2016 WL 7403288, C.D. California, Tseng v. Nordstrom, Inc., "In light of PAGA'	Jan 04/17
Posted		0.30
AH	Telephone call to Eric De Wames - voice mail -	Jan 05/17
Posted		0.10
AH	Correspondence to defense: "I understand we are confirmed for January 24 (Gottlieb) but have not p	Jan 05/17
Posted		0.10
AH	Telephone call to Eric De Wames - voice mail -	Jan 06/17
Posted		0.10
AH	Correspondence from De Wames -- I apologize for the delay. I've been out and catching up this weeke	Jan 07/17
Posted		0.10
AH	Correspondence to Gary Markowitz re meeting next Tuesday afternoon.	Jan 13/17
Posted		0.10
DG	Telephone conference with client	Jan 14/17
Posted		0.10

Harris & Ruble Chipotle adv. Turley Selected Time Entries		
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AH	Correspondence to De Wames -- I have a previously set hearing in San Francisco for February 10. We	Jan 14/17
Posted		0.10
DG	Telephone conference with client	Jan 16/17
Posted		0.10
AH	Telephone call to Eric De Wames - voice mail -	Jan 17/17
Posted		0.10
AH	Correspondence to De Wames re need for him to provide dates for depositions.	Jan 17/17
Posted		0.10
AH	Correspondence from defense re deposition schedule.	Jan 18/17
Posted		0.30
AH	Meeting with expert Markowitz and DG re expert report in the case.	Jan 26/17
Posted		0.50
AH	Correspondence with defense re Gottlieb deposition (.1); work on outline for same (.5).	Jan 27/17
Posted		0.60
AH	Drafting documents and legal research re motion to certify class; Gottlieb deposition, it being a b	Jan 29/17
Posted		3.70
DG	Correspondence with defense re: discovery	Jan 30/17
Posted		0.10
AH	Correspondence to De Wames -- I just called to confirm our deposition in Denver, this Friday, at 10	Jan 31/17
Posted		0.10
AH	Telephone call to Eric De Wames - voice mail -	Jan 31/17
Posted		0.10
AH	Drafting documents re class certification brief and preparation for PMK deposition.	Feb 01/17
Posted		3.20
AH	Telephone call to Roz L. Dorf - spoke - Discuss possible court reporters.	Feb 02/17
Posted		0.60
AH	Drafting documents re outline of Gottlieb deposition questions to prepare for his deposition, tomor	Feb 02/17
Posted		7.50
AH	Telephone call to Eric De Wames - voice mail -	Feb 02/17
Posted		0.10
CP	Discovery preparations for Deposition of Gottlieb tomorrow	Feb 02/17
Posted		1.60
AH	Meeting with witness and De Wames for deposition in Denver.	Feb 03/17
Posted		7.00
AH	Reviewing documents to prepare for deposition (1.5); return to LA (3)	Feb 03/17
Posted		4.50
AH	Meeting -- visit Chipotle store in Larchmont to photograph tip jar, which was filled to brim. REDACTED	Feb 03/17
Posted		0.40
DG	Correspondence with defense re: discovery issues	Feb 05/17
Posted		0.10
AH	Telephone call to Eric De Wames - voice mail -	Feb 06/17
Posted		0.10

Harris & Ruble Chipotle adv. Turley Selected Time Entries

RL	Reviewing correspondence re case	Feb 06/17
Posted		0.10
AH	Drafting documents and legal research re application for transfer to complex department.	Feb 08/17
Posted		0.30
AH	Correspondence from DSH re draft Application for Complex Litigation designation.	Feb 08/17
Posted	Review same. (.3)	0.30
DG	Reviewing APPLICATION FOR APPROVAL OF COMPLEX LITIGATION DESIGNATION (TRANSACTION ID # 60187284) FI	Feb 08/17
Posted		0.10
RL	Reviewing status of case with C. nordsten	Feb 09/17
Posted		0.60
AH	Correspondence to DeWames -- Please advise dates for the initial witness depositions. Do I need to	Feb 10/17
Posted		0.10
AH	Telephone call to Eric De Wames - voice mail -	Feb 10/17
Posted		0.10
AH	Correspondence from DG re tip jar at Chipotle Del Mar. Forward to DSH.	Feb 12/17
Posted		0.10
RL	Reviewing status of case	Feb 14/17
Posted		0.50
AH	Correspondence to De Wames re deposition schedule -- These days are good for us. We will send revi	Feb 15/17
Posted		0.10
DG	Telephone conference with client	Feb 15/17
Posted		0.10
DG	Reviewing 226 Letter for Lawrence Lattoure	Feb 17/17
Posted		0.10
DG	Reviewing CASE MANAGEMENT CONFERENCE OF MAR-08-2017	Feb 17/17
Posted	CONTINUED TO APR-19-2017 AT 10:30 AM IN DEPARTM	0.10
RL	Prepping discovery - RFP's	Feb 20/17
Posted		0.10
AH	Correspondence re complex filing fee -- The Complex Application was filed but they filing service d	Feb 20/17
Posted		0.10
RL	Reviewing docket re status of CMC conference and communication with co-counsel re same	Feb 20/17
Posted		0.40
RL	Drafting documents-CMC statement	Feb 20/17
Posted		0.30
AH	Drafting documents--CMC statement. From RL -- Here is the draft CMC Statement and attachment. Alan	Feb 20/17
Posted		0.10
RL	Drafting documents- CMC statement- moved b/c of court order	Feb 21/17
Posted		0.50
RL	Reviewing documents- notice of court order	Feb 21/17
Posted		0.10
AH	Reviewing documents--Morgan v. United Retail Inc.	Feb 22/17
Posted		0.20

Harris & Ruble Chipotle adv. Turley Selected Time Entries		
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AH	Drafting documents -- motion for class certification -- research re Morgan v. United Retail and tot	Feb 22/17
Posted		0.30
RL	Reviewing documents- court order re continuance	Feb 23/17
Posted		0.10
DG	Reviewing Mintzer declaration re: collective action	Mar 02/17
Posted		0.60
RL	Research re case discussing total hours worked	Mar 03/17
Posted		0.50
RL	Reviewing court order re CMC	Mar 07/17
Posted		0.20
DG	Reviewing ORDER GRANTING COMPLEX DESIGNATION AND FOR SINGLE ASSIGNMENT TO JUDGE CURTIS KARNOW FORAL	Mar 08/17
Posted		0.10
AH	Correspondence with expert and legal research re class certification. Ask Gary Bowler re tip issu	Mar 09/17
Posted		1.70
AH	Reviewing documents -- order re complex designation.	Mar 10/17
Posted		0.10
AH	Correspondence to De Wames -- Dear Eric,	Mar 24/17
Posted	Please confirm the appearance of Mr. Stinson and Ms. FI	0.10
AH	Correspondence from DeWames re discovery--	Mar 26/17
Posted	Although we provided availability back in mid-February	0.10
DG	Reviewing NOTICE NOTICE OF CHANGE OF ADDRESS (TRANSACTION ID # 60419180) FILED BY DEFENDANT CHIPOTL	Apr 03/17
Posted		0.10
AH	Correspondence and drafting re CMC statement.	Apr 05/17
Posted		0.20
AH	Drafting documents and legal research re motion to compel and motion to refrain from leading object	Apr 05/17
Posted		0.80
DG	Telephone call to Eric De Wames - spoke; Telephone conference with other side	Apr 06/17
Posted		0.20
PM	Conference with AH regarding motion to compel deposition responses.	Apr 07/17
Posted		0.10
DG	Reviewing: Complex Designation Order	Apr 07/17
Posted		0.10
DG	Reviewing: Aloha Rest Break data for Turley	Apr 09/17
Posted		0.80
DG	Correspondence with Eric Dewames re: CMC statement	Apr 11/17
Posted		0.10
DG	Hi David:	Apr 12/17
Posted	I believe it is due tomorrow, but attached is the statement with our position. I left	0.10
DG	Telephone conference with client	Apr 13/17
Posted		0.10
DG	Reviewing:Crew handbook for chipotle	Apr 19/17
Posted		0.70

Harris & Ruble Chipotle adv. Turley Selected Time Entries

DG Posted	Telephone call to Dave Scott Harris - spoke; Telephone conference with other side	Apr 19/17 0.10
DG Posted	Telephone call to Dave Scott Harris - spoke; Telephone conference with other side	Apr 19/17 0.10
DG Posted	Reviewing ORDER CASE MANAGEMENT ORDER NO.1 (TRANSACTION #60501144)	Apr 19/17 0.10
DG Posted	Court INITIAL CASE MANAGEMENT CONFERENCE IS HELD ON APR-19-2017. MATTER IS SET FOR FURTHER CASEMANA	Apr 19/17 0.50
DG Posted	Reviewing MINUTES FOR APR-19-2017 3:00 PM	Apr 19/17 0.10
AH Posted	Correspondence re today's CMC.	Apr 19/17 0.10
AH Posted	Telephone call to Tanika Turley - spoke - Status.	Apr 21/17 0.30
DG Posted	Telephone - exchange of voice mail with defense re: discovery issues	Apr 24/17 0.10
DG Posted	Research re: related Chipotle cases	May 02/17 0.10
DG Posted	Telephone conference with client	May 02/17 0.10
DG Posted	Telephone - exchange of voice mail with defense re: discovery issues	May 05/17 0.10
DG Posted	Reviewing: Notice of Ruling in Barber Case	May 08/17 0.10
RL Posted	Client administration gathering contact information	May 16/17 0.40
AH Posted	Telephone call to Tanika Turley - spoke - Status. Discuss her upcoming deposition.	May 19/17 0.30
AH Posted	Telephone call to Tanika Turley - spoke - Discussed potential availability for a deposition	May 19/17 0.20
DG Posted	Reviewing: Def. Chipotle 3rd Set RFP	May 22/17 0.80
AH Posted	Telephone call to Eric De Wames - voice mail - [we need to confirm deposition dates. If I am on t	May 24/17 0.20
AH Posted	Correspondence to defense re depositions -- "we need to confirm deposition dates. If I am on the p	May 24/17 0.40
AH Posted	Correspondence with defense re Stinson deposition. June 8 is OK for Stinson, in Mill Valley. Thank	May 24/17 0.10
AH Posted	Correspondence to De Wames -- June 6, 2017 will work for the deposition of Ms. Turley. Please conf	May 24/17 0.10
AH Posted	Correspondence to client re deposition -- June 6, 2017 will work for the deposition of Ms. Turley.	May 24/17 0.10

Harris & Ruble Chipotle adv. Turley Selected Time Entries		
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AH	Telephone call to Eric De Wames - voicemail --	May 24/17
Posted		0.10
AH	Correspondence to de Wames re Turley deposition -- Further to our conversation, as I have heard not	May 24/17
Posted		0.10
AH	Telephone call to Eric De Wames - voice mail -	May 24/17
Posted		0.10
AH	Telephone call to Tanika Turley - spoke - Discuss her deposition on 9/30. I still need to confirm	May 24/17
Posted		0.20
AH	Correspondence to Mary Donnelly, forwarding FAC -- "David Harris and David Garrett (who you have me	May 29/17
Posted		0.10
AH	Telephone call to Mary Donnelly - spoke - Discuss outline of case and her expertise in the area. S	May 29/17
Posted		0.20
AH	Correspondence regarding Stinson deposition.	May 30/17
Posted		0.10
RL	Drafting documents - answer to RFP, Set Three	Jun 02/17
Posted		0.50
AH	Reviewing documents to prepare for Turley deposition (1.4); speak with DSH and client regarding her	Jun 05/17
Posted		1.80
AH	Reviewing documents to prepare for Turley deposition.	Jun 05/17
Posted		0.60
AH	Telephone call to Tanika Turley - spoke - Review her deposition with her in calls during the day.;	Jun 06/17
Posted		0.50
AH	Telephone conference with DSH and Client re progress of her deposition.	Jun 06/17
Posted		0.40
AH	Reviewing documents to prepare for Stinson deposition.	Jun 06/17
Posted		6.50
AH	Correspondence to Hogue, forwarding Segovia documents produced by Chipotle.	Jun 06/17
Posted		0.10
DG	Telephone call to Dave Scott Harris - spoke; Telephone conference with other side	Jun 07/17
Posted		0.10
AH	Drafting documents ro prepare outline for examination of Stinson, tomorrow.	Jun 07/17
Posted		6.70
RL	Discovery preparations- prepare exhibits to depositino	Jun 07/17
Posted		0.30
AH	Discovery preparations -- Stinson deposition.	Jun 08/17
Posted		8.00
RL	Correspondence with all plaintiffs attorneys conference call	Jun 09/17
Posted		0.50
RL	Research issue on motion to compel	Jun 09/17
Posted		1.50
AH	Telephone call to Tanika Turley - spoke - We have to find witness --Pittsburg, CA.	Jun 09/17
Posted		0.30

Harris & Ruble Chipotle adv. Turley Selected Time Entries

AH Posted	Telephone call to Alma Flores - spoke - With TT on phone, we will speak with her, tomorrow morning	Jun 09/17 0.20
AH Posted	Telephone call to Alma Flores - voice mail -	Jun 10/17 0.10
AH Posted	Telephone call to Tanika Turley - spoke - She was called in to the office by Alma at the end of he	Jun 10/17 0.40
AH Posted	Drafting documents and legal research re MCC.	Jun 10/17 2.10
DG Posted	Telephone conference with client	Jun 11/17 0.10
AH Posted	Correspondence to defense -- When may we speak about the joint CMC statement, due on Thursday. How	Jun 20/17 0.10
DG Posted	Telephone call to Jeffrey L. Hogue - spoke; Correspondence with; Telephone conference with other s	Jun 21/17 0.10
AH Posted	Telephone call to Devon K. Roepcke - spoke - I suggest we ask for 20 % of our group and 100% of th	Jun 22/17 0.10
DG Posted	Telephone call to Robert Mussig - spoke; Telephone conference with other side	Jun 22/17 0.10
AH Posted	Telephone call to Marines' Memorial Club & Hotel - spoke - No room	Jun 26/17 0.10
AH Posted	Court hearing on continued CMC. With David Harris in open court in SF. Defense on phone.	Jun 27/17 1.00
DG Posted	Reviewing ORDER CASE MANAGEMENT ORDER NO.2 (TRANSACTION #60784538)	Jun 27/17 0.10
DG Posted	Court CASE MANAGEMENT CONFERENCE IS HELD ON JUN-27-2017 MATTER IS SET FOR FURTHER CASEMANAGEMENT CO	Jun 27/17 0.50
AH Posted	Telephone call to Jeffrey L. Hogue - spoke - Status re what took place at our hearing; they have r	Jun 29/17 0.40
AH Posted	Telephone call to Andrew Quisenberry - spoke - With Hogue, discuss case status.	Jul 05/17 0.10
DG Posted	Research: Petition for Coordination	Jul 13/17 1.10
DG Posted	Correspondence with Jeff Hogue re coordination	Jul 15/17 0.10
RL Posted	Drafting documents Petition for Coordination	Jul 18/17 5.80
DG Posted	Reviewing: Declaration of Alan Harris	Jul 18/17 0.50
RL Posted	Drafting documents Declaration of Service	Jul 19/17 0.90
RL Posted	Drafting documents Decl of Harris iso petition for coordination	Jul 19/17 0.80

Harris & Ruble Chipotle adv. Turley Selected Time Entries

RL	Drafting documents Proof of Filing	Jul 19/17
Posted		0.20
PM	Work with Min Ji Gal re petition for coordination.	Jul 19/17
Posted		0.30
RL	Drafting documents petition for coordination	Jul 19/17
Posted		1.70
RL	Drafting documents editing all documents re petition for coordination	Jul 19/17
Posted		1.90
AH	Correspondence from Barber counsel re notice issues -- I wanted to follow up with you to hear the s	Jul 20/17
Posted		0.10
AH	Telephone call to Richard J. in LA Simmons - voice mail -	Jul 20/17
Posted		0.10
DG	Reviewing: Petition for Coordination	Jul 20/17
Posted		0.90
DG	Correspondence with Barber counsel	Jul 20/17
Posted		0.10
PM	Review filing procedure for Petition for Coordination. Email correspondence to AH, Min Ji and D. G	Jul 21/17
Posted		0.30
RL	Reviewing rules regarding submission of petition for coordination	Jul 21/17
Posted		0.10
AH	Telephone call to Eric De Wames - voice mail -	Jul 21/17
Posted		0.10
AH	Telephone call to Richard J. in LA Simmons - voice mail -	Jul 21/17
Posted		0.10
AH	Telephone call to Tanika Turley - spoke - Does not recall whether she had the same number. Think	Jul 21/17
Posted		0.10
AH	Telephone call to Robert Mussig - spoke - Does not know about order requiring us to file joint sta	Jul 21/17
Posted		0.30
DG	Telephone call to Jeffrey L. Hogue - spoke; Telephone conference with other side	Jul 21/17
Posted		0.10
DG	Correspondence with other side:	Jul 25/17
Posted	Gentlemen:	0.10
	Attached is the joint statement we will file today	
AH	Drafting documents and legal research re petition for coordination.	Jul 25/17
Posted		0.80
AH	Drafting documents and legal research re joint CMC statement	Jul 25/17
Posted		0.70
RL	Drafting documents editing petition for coordination and declaration	Jul 25/17
Posted		1.40
RL	Filing documentation petition for coordination with Judicial Council and serving all parties	Jul 25/17
Posted		3.60

Harris & Ruble Chipotle adv. Turley Selected Time Entries

RL	Drafting documents proof of filing and declaration of service	Jul 25/17
Posted		0.40
DG	Reviewing: Notice of Submission of Motion for Coordination	Jul 25/17
Posted		0.20
AH	Correspondence from counsel for Barber -- I have a question: Why didn't you guys tell us you were g	Jul 25/17
Posted		0.10
AH	Correspondence from defense re joint cmc statement	Jul 25/17
Posted		0.10
AH	Correspondence from attorney service in SF -- Subject: eFiling order submitted for TANIKA TURLEY VS	Jul 25/17
Posted		0.10
AH	Correspondence to court -- Please find attached a courtesy copy of a Petition for Coordination and	Jul 25/17
Posted		0.10
RL	Document scanning - saving filestamped filing	Jul 26/17
Posted		0.20
RL	Correspondence with judicial council and all parties re declaration of service	Jul 26/17
Posted		1.30
AH	Correspondence to defense -- Please call David Garrett or me regarding the hearing, tomorrow. Than	Jul 27/17
Posted		0.10
AH	Correspondence to defense -- Is there a time tomorrow afternoon for a conference call regarding coo	Jul 27/17
Posted		0.10
AH	Correspondence from defense counsel Mussig --I called you earlier today and left a message. I have	Jul 27/17
Posted		0.10
DG	Telephone call to Eric De Wames - spoke; Telephone conference with other side	Jul 27/17
Posted		0.10
AH	Telephone call to Richard J. in LA Simmons - voice mail -	Jul 27/17
Posted		0.10
DG	Telephone - exchange of voice mail with defense re coordination	Jul 27/17
Posted		0.10
AH	Correspondence to defense -- I had hoped for a meeting before court but you aren't here. Alan Harri	Jul 28/17
Posted		0.10
AH	Correspondence with Further to Case Management Order No. 2, dated June 27, 2017, we await your input	Jul 28/17
Posted		0.10
DG	Reviewing ORDER CASE MANAGEMENT ORDER NO.3 (TRANSACTION #60913857)	Jul 28/17
Posted		0.10
DG	Court CASE MANAGEMENT CONFERENCE IS HELD ON JUL-28-2017. MATTER IS SET FOR FURTHER CASEMANAGEMENT C	Jul 28/17
Posted		0.50
DG	Reviewing MINUTES FOR JUL-28-2017 2:00 PM	Jul 28/17
Posted		0.10
AH	Telephone call to Tanika Turley - spoke - She can do her deposition at any time; will send documen	Jul 31/17
Posted		0.20
DG	Telephone call to Jeffrey L. Hogue - spoke; Telephone conference with other side	Jul 31/17
Posted		0.10

Harris & Ruble Chipotle adv. Turley Selected Time Entries

AH Posted	Telephone call to Jeffrey L. Hogue - spoke - Discuss case status; joint prosecution; Belaire notic	Aug 02/17 0.40
AH Posted	Correspondence from Hogue to Clerk of Court in San Francisco: This correspondence concerns the att	Aug 03/17 0.10
AH Posted	Correspondence from defense to Court -- Chipotle opposes coordination of the Turley and Barber matt	Aug 03/17 0.10
AH Posted	Correspondence to defense -- am writing to respond to your email: Please confirm that you will b	Aug 04/17 0.20
AH Posted	Correspondence from Barber counsel -- I am attaching a copy of our SAC which shows that changes fro	Aug 11/17 0.20
DG Posted	Telephone call to Eric De Wames - spoke; Telephone conference with other side	Aug 17/17 0.10
DG Posted	Telephone call to Richard J. Simmons - spoke; Telephone conference with other side	Aug 17/17 0.10
DG Posted	Telephone call to Robert Mussig - spoke; Telephone conference with other side	Aug 17/17 0.10
AH Posted	Telephone call to Tanika Turley - spoke - Status	Aug 17/17 0.10
AH Posted	Drafting documents--CMC statement for next Monday.	Aug 17/17 0.80
AH Posted	Correspondence with defense re CMC statement.	Aug 17/17 0.40
AH Posted	Telephone call from Robert Mussig - spoke - Status. He will be on court call. His partner gave a	Aug 18/17 0.30
AH Posted	Court CMC conference in SF. (.3) Trave (6)	Aug 21/17 6.30
DG Posted	Court COMPLEX LITIGATION CASE MANAGEMENT CONFERENCE HELD ON AUG-21-2017, IN DEPT. 304. THE COURTAND	Aug 21/17 0.50
DG Posted	Reviewing MINUTES FOR AUG-21-2017 2:00 PM	Aug 21/17 0.10
DG Posted	Reviewing DEFENDANTS STATUS CONFERENCE STATEMENT (TRANSACTION ID # 61009585) FILED BY DEFENDANTCHIP	Aug 21/17 0.30
AH Posted	Correspondence with counsel in coordination case re call on Tuesday.	Sep 15/17 0.10
RL Posted	Drafting documents Notice of Order	Sep 21/17 0.80
RL Posted	Reviewing documents correspondence from Judicial Council	Sep 21/17 0.10
RL Posted	Filing documentation Orders in Barber and Turley re Order Assigning Coordination Motion Judge	Sep 21/17 0.80
AH Posted	Correspondence from Mussig, defense counsel -- This will acknowledge receipt of the order assigning	Sep 22/17 0.10

Harris & Ruble Chipotle adv. Turley Selected Time Entries		
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AH	Drafting documents re CMC statement for hearing in SF on Monday.	Sep 27/17
Posted		0.80
AH	Telephone call to Robert Mussig - spoke - With DSH and DG, request joint CMC asking for deferral o	Sep 27/17
Posted		0.30
RL	Filing documentation notices in Turley and Barber	Sep 27/17
Posted		0.40
RL	Filing documentation refiling on File and Serve Express	Sep 27/17
Posted		0.10
AH	Correspondence to defense --	Sep 28/17
Posted	Can you please extend the courtesy of a return email or phone call?	0.10
DG	Reviewing CASE MANAGEMENT CONFERENCE SET FOR OCT-02-2017 IS CONTINUED TO NOV-17-2017 AT 2:00 PM IN	Sep 29/17
Posted		0.10
AH	Telephone call to Tanika Turley - spoke - Status. Awaiting ruling on related nature of another ca	Oct 11/17
Posted		0.10
RL	Reviewing documents order setting hearing on coordination	Oct 18/17
Posted		0.10
RL	Drafting documents notices re order setting hearing on coordination	Oct 18/17
Posted		0.50
RL	Correspondence with defendants re order setting hearing and stay	Oct 18/17
Posted		0.30
RL	Filing documentation - order on hearing and stay for Turley	Oct 18/17
Posted		0.20
RL	Filing documentation barber hearing and stay notice via one legal	Oct 18/17
Posted		0.30
DG	Reviewing MATTER IS STAYED PENDING HEARING ON PETITION FOR COORDINATION. CASE MANAGEMENT CONFERENCE	Oct 19/17
Posted		0.10
DG	Reviewing: Declaration of Robert Mussig (coordination)	Nov 03/17
Posted		0.30
DG	Telephone - exchange of voice mail with defense re: coordination	Nov 10/17
Posted		0.10
DG	Reviewing NOTICE OF CONTINUANCE OF CASE MANAGEMENT CONFERENCE (TRANSACTION #61361503)	Nov 14/17
Posted		0.10
DG	Correspondence with File & Serve 61361503NOTICE OF CONTINUANCE OF CASE MANAGEMENT CONFERENCE	Nov 14/17
Posted		0.10
AH	Call with Chipotle co counsel re strategy for hearing on Friday. We want to send BAW notice to all	Nov 15/17
Posted		0.20
AH	Drafting documents -- prepare outline for coordination argument, tomorrow.	Nov 16/17
Posted		2.20
AH	Telephone call to Robert Mussig - spoke - Called re argument, tomorrow. Tentative is against us.	Nov 16/17
Posted		0.10
RL	Reviewing tentative ruling	Nov 16/17
Posted		0.40

Harris & Ruble Chipotle adv. Turley Selected Time Entries

RL	Research on coordination prior to hearing	Nov 16/17
Posted		0.50
RL	Research safeway case	Nov 16/17
Posted		0.40
DG	Reviewing: Tentative Ruling	Nov 16/17
Posted		0.10
DG	Court: Motion for Coordination	Nov 17/17
Posted		2.50
AH	Drafting documents and legal research re certification.	Nov 18/17
Posted		2.20
PM	Review docket and notice re case management conference.	Dec 08/17
Posted		0.20
DG	Correspondence with File & Serve Notice of Order Denying Tanika Turley Petition for Coordination in	Dec 14/17
Posted		0.10
DG	Drafting documents: Belaire West notice	Dec 17/17
Posted		0.30
DG	Telephone call to Jeffrey L. Hogue - spoke; Telephone conference with other side	Dec 18/17
Posted		0.10
DG	Reviewing NOTICE OF ORDER DENYING TANIKA TURLEY PETITION FOR COORDINATION IN JUDICIAL COUNCILCOORDI	Dec 18/17
Posted		0.50
PM	Attention to review of file in preparation for case management conference.	Dec 19/17
Posted		0.50
AH	Correspondence from Mussig -- A signed copy of the joint report is attached. Thank you for handlin	Dec 26/17
Posted		0.10
AH	Filing and Reviewing documents -- joint CMC statement.	Dec 26/17
Posted		0.10
AH	Correspondence file File & Serve -- A new transaction with transaction ID 61501441 matches your ale	Dec 26/17
Posted		0.10
MJ	Filing documentation - joint case management statement on FileandServExpress	Dec 26/17
Posted		0.50
AH	Reviewing documents to prepare for court call appearance.	Dec 29/17
Posted		0.80
AH	Drafting documents -- revised Belaire West notice.	Dec 29/17
Posted		0.40
AH	Correspondence to Simmons et al., I have attempted to modify the attached Notice in accord with the	Dec 29/17
Posted		0.10
MJ	Drafting documents editing belaire west notice	Dec 29/17
Posted		0.60
AH	Drafting documents--Belaire-West Notices.	Dec 29/17
Posted		0.80
DG	Reviewing ORDER CASE MANAGEMENT ORDER NO. 5 (TRANSACTION ID 61513390)	Dec 29/17
Posted		0.50

Harris & Ruble Chipotle adv. Turley Selected Time Entries

DG	Reviewing MINUTES FOR DEC-29-2017 9:00 AM	Dec 29/17
Posted		0.10
DG	Correspondence with File & Serve CASE MANAGEMENT ORDER NO. 5	Dec 29/17
Posted		0.10
DG	Correspondence with File & Serve RE: BELAIRE-WEST NOTICE	Jan 01/18
Posted		0.10
DG	Reviewing OBJECTIONS TO PLAINTIFFS PROPOSED BELAIRE-WEST NOTICE (TRANSACTION ID # 61523888) FILED B	Jan 03/18
Posted		0.40
DG	Correspondence with File & Serve Defendant Chipotle Services, LLCs Objections to Plaintiffs Propose	Jan 03/18
Posted		0.10
AH	Correspondence to defense -- If you have other claims admins. that you want to give bids, please fe	Jan 04/18
Posted		0.10
AH	Correspondence from Dahl Administration -- Attached is our proposal for your 35,000 person emailed	Jan 04/18
Posted		0.10
AH	Correspondence from Dahl re Belaire notice -- Thank you for reaching out and giving us the opportun	Jan 04/18
Posted		0.10
DG	Correspondence with with ILYM regarding submission of bid for Bel-Aire West Notice	Jan 04/18
Posted		0.10
DG	Correspondence with Dahl regarding submission of bid for Bel-Aire West Notice	Jan 04/18
Posted		0.10
DG	Correspondence with Simpluris regarding submission of bid for Bel-Aire West Notice	Jan 04/18
Posted		0.10
DG	Correspondence with CPT regarding submission of bid for Bel-Aire West Notice	Jan 04/18
Posted		0.10
DG	Correspondence with Phoenix regarding submission of bid for Bel-Aire West Notice	Jan 04/18
Posted		0.10
DG	Reviewing ORDER RE: BELAIRE-WEST NOTICE (TRANSACTION ID 61553895)	Jan 10/18
Posted		0.50
PM	Review Court Order regarding belaire west notice.	Jan 11/18
Posted		0.20
AH	Correspondence to Chipotle counsel re Notice to Class -- Thank you for your constructive comments.	Jan 11/18
Posted		0.20
DG	Correspondence with File & Serve NOTICE CHANGE OF DATE FOR CASE MANAGEMENT CONFERENCE	Jan 17/18
Posted		0.10
DG	Telephone conference with other side	Jan 19/18
Posted		0.10
AH	Correspondence with Phoenix re Belaire Notice -- Thank you for your email and the opportunity to	Jan 19/18
Posted		0.10
AH	Correspondence to administrator re BAW notice -- We would like to engage Phoenix to send out this N	Jan 19/18
Posted		0.10
AH	Correspondence to defense re BAW notice -- Your changes are fine. I am going to forward to the clai	Jan 19/18
Posted		0.10

Harris & Ruble Chipotle adv. Turley Selected Time Entries

DG Posted	Telephone - exchange of voice mail Mike Sutherland re: Chipotle Class Notice proposal	Jan 24/18 0.10
DG Posted	Telephone conference with putative class member who received Belaire West notice	Jan 25/18 0.10
AH Posted	Correspondence from administrator re Notice -- Thanks for the follow up. We should a sample email	Jan 25/18 0.10
AH Posted	Correspondence to administrator re formatting of Belair Notice.	Jan 25/18 0.10
AH Posted	Correspondence from administrator Phoenix re Belaire notice -- Thank you David. Once we receive th	Jan 26/18 0.10
AH Posted	Correspondence to Phoenix, approving form of Notice.	Jan 26/18 0.10
AH Posted	Correspondence from Phoenix administor -- Below is a sample email as requested. Please let me kno	Jan 26/18 0.10
DG Posted	Correspondence with Claims Admin. re notice	Jan 26/18 0.20
DG Posted	Reviewing Belaire-West Notice	Jan 26/18 0.50
DG Posted	Telephone conference with client Tabatabai re deposition	Jan 28/18 0.10
AH Posted	Correspondence from administrator, Phoenix. I hope you're well. I wanted to give you a heads up, w	Jan 29/18 0.10
AH Posted	Correspondence from Alexa Olmos -- "Hello, I am emailing you regarding an email I received about a	Jan 30/18 0.10
AH Posted	Correspondence from Jurnee Simone -- Hello, I? received an email on the the Turley v. Chipotle case	Jan 30/18 0.10
AH Posted	Correspondence from David Goudy: Hi my name is David. I received an email in regards to case CG	Jan 30/18 0.10
AH Posted	Correspondence from potential witness Michael Garcia -- I get spam emails all the time about	Jan 30/18 0.10
AH Posted	Correspondence from Gabriel Martinelli--I use to work for chipotle in Fresno ca and was a horrible	Jan 30/18 0.10
MJ Posted	Telephone call to Justin Lubianetsky - spoke	Jan 30/18 0.10
AH Posted	Correspondence from Janice Herbert, potential witness -- You can most certainly reach out to me if	Jan 30/18 0.10
AH Posted	Correspondence from Ron Simpson -- Hi my name is ron, i was wondering exactly what i do with this?	Jan 30/18 0.10
AH Posted	Correspondence from Aryn Howell -- I just received an email regarding a class action lawsuit agains	Jan 30/18 0.10
DG Posted	Correspondence with Claims Admin. Re mailing. Counsel, Please be advised the e-mailing was com	Jan 30/18 0.10

Harris & Ruble Chipotle adv. Turley Selected Time Entries

MJ	Telephone call to Kadiedra Crawford - spoke	Jan 30/18
Posted		0.10
MJ	Telephone call to Ceasar Martinez - spoke	Jan 30/18
Posted		0.10
MJ	Telephone call to Ashley Stopani - spoke	Jan 30/18
Posted		0.10
DG	Telephone - exchange of voice mail with Jeff Houdek re: emailing bid for Class Belaire-West Notice	Jan 31/18
Posted		0.20
MJ	Telephone call to Yaricsa Picon - spoke	Jan 31/18
Posted		0.10
AH	Telephone call to Javier Salguero - spoke - Status. He wants us to represent him. Quit two or th	Jan 31/18
Posted		0.40
AH	Telephone call to Elora Chloe Dorn - spoke - She is current employee. Started part time at 17. T	Jan 31/18
Posted		0.30
AH	Telephone call to Tanika Turley - spoke - Status. Reviewed mailing.	Jan 31/18
Posted		0.30
MJ	Telephone call to Taraneh Tabatabai - spoke	Feb 01/18
Posted		0.10
AH	Telephone call from Arnulfo Chanchola - left message - Left word for me to call back. Call taken	Feb 01/18
Posted		0.10
AH	Correspondence from Fred Mittwer, former employee at Newbury Park -- Hello I'm a former of Chipotle	Feb 02/18
Posted		0.10
DG	Drafting documents: Template Declaration for Class Members	Feb 02/18
Posted		2.10
DG	Drafting documents: Elizabeth Macias Declaration	Feb 03/18
Posted		1.20
AH	Telephone call to Fredrick Mittwer - left message - Left work with his Aunt. He will be there for	Feb 03/18
Posted		0.10
AH	Correspondence from potential witness -- Hi i would like information on what can i do. Adriana Bar	Feb 03/18
Posted		0.10
AH	Correspondence to A. Reyes Barvoza -- Thanks for reaching out to us. I would like to speak with you	Feb 03/18
Posted		0.10
AH	Correspondence to Fred Mittwer -- Thanks for reaching out to us. I tried to call you today, and wa	Feb 03/18
Posted		0.10
AH	Telephone call from Elizabeth Macias - spoke - Status. She wants unpaid vacation pay and continui	Feb 03/18
Posted		0.50
AH	Telephone call to Arnulfo Chanchola - no answer - Picked up but I think was out of range.	Feb 03/18
Posted		0.10
AH	Telephone call to Janie Salguero - spoke - Status. She wants us to represent her. See draft decl	Feb 03/18
Posted		0.60
AH	Correspondence to class member Elizabeth Aspeitia. -- Thanks so much for your response. I would li	Feb 04/18
Posted		0.10

Harris & Ruble Chipotle adv. Turley Selected Time Entries

AH Posted	Correspondence to Alexa Olmos, potential witness: "Thanks so much for your response. For your info	Feb 04/18 0.10
AH Posted	Correspondence to Jurnee Simone -- We all appreciate your response. For your information, I attach	Feb 04/18 0.10
AH Posted	Correspondence to potential client David Goudy -- We all appreciate your response. For your informa	Feb 04/18 0.10
AH Posted	Correspondence to potential witness, Michael Garcia -- This is not spam. We all appreciate your re	Feb 04/18 0.10
AH Posted	Correspondence to Gabriel Marinelli --We all appreciate your response. For your information, I atta	Feb 04/18 0.10
AH Posted	Correspondence to Janice Herbert -- We all appreciate your response. For your information, I attach	Feb 04/18 0.10
DG Posted	Drafting documents: Agata Ebona Declaration	Feb 05/18 1.40
AH Posted	Telephone call from Agata Ebona - spoke - Status. Former Chipotle employee in San Diego. Worked	Feb 05/18 0.40
DG Posted	Telephone conference with putative class member	Feb 05/18 0.10
AH Posted	Correspondence from former employee Elizabeth Aspeitia. "To whom it may concern , At my time wo	Feb 06/18 0.10
DG Posted	Reporting: Status of Belaire West notice mailing	Feb 07/18 0.10
MJ Posted	Telephone call to Soloman Coleman - spoke	Feb 09/18 0.10
DG Posted	Reviewing NOTICE OF MOTION AND MOTION FOR SANCTIONS AGAINST PLAINTIFFS COUNSEL PURSUANT TO THECOURT	Feb 10/18 1.30
DG Posted	Telephone - exchange of voice mail putative class member	Feb 14/18 0.10
AH Posted	Correspondence from Phoenix -- Attached is the weekly report. The graph is based on when the	Feb 16/18 0.10
DG Posted	Correspondence with File & Serve ORDER RE PROPOSED INTERVENORS JOSH BARBER AND JOSE DELGADOS EX PA	Feb 18/18 0.10
DG Posted	Telephone conference with putative class member	Feb 19/18 0.10
AH Posted	Correspondence from Phoenix -- Attached is the weekly report. The graph is based on when the	Feb 23/18 0.10
AH Posted	Correspondence with DFEH -- Notice to Complainant's Attorney DFEH Matter Number: 201802-01330323	Feb 23/18 0.20
AH Posted	Meeting with DG and Jason La Sure. Explain duties and responsibilities of class representative. H	Feb 23/18 1.20

Harris & Ruble Chipotle adv. Turley Selected Time Entries

DG	Reviewing Lucia documents re Turley case	Feb 23/18
Posted		0.30
DG	Reviewing: Turner v. Chipotle case file	Feb 23/18
Posted		0.80
AH	Telephone call to Brazil Branch - spoke - She called re status. I said I would call her back re s	Feb 24/18
Posted		0.20
AH	Correspondence re Le Sure right to sue.	Feb 28/18
Posted		0.10
AH	Correspondence re EEOC right to sue letter. Speak with Mr. LeSure	Feb 28/18
Posted		0.10
DG	Drafting documents: Le Sure retainer	Mar 01/18
Posted		0.40
DG	Meeting with new client Jason Le Sure	Mar 01/18
Posted		2.90
AH	Correspondence with LeSure re settlement.	Mar 01/18
Posted		0.10
LZ	Document scanning: scanned docs and sent it out via certified mail to Chipotle	Mar 07/18
Posted		0.20
AH	Telephone call from Brazil Branch - spoke - She has not yet received her letter for 226 document d	Mar 08/18
Posted		0.30
LZ	Drafting documents drafted 226 letter for Brazil Branch; Client administration prepared 226 letter	Mar 08/18
Posted		1.30
DG	Research re class members declarations for class cert. Motion due 5-22	Mar 21/18
Posted		2.40
AH	Correspondence from Phoenix, forwarding data for those who did not opt-out.	Mar 21/18
Posted		0.20
DG	Drafting documents: Generic Class member declaration for class cert. motion	Mar 25/18
Posted		2.00
LC	Scanning source doc from Le Sure, employee handbooks, timekeeping docs, edd - mc	Mar 25/18
Posted		1.00
LC	Telephone conference with Jason Le Sure - update for AH re: last paycheck deposit date is 3/9/18 -	Mar 25/18
Posted		0.10
AH	Review Chipotle current Management and crew handbooks -- Accounting validates breaks.; Reviewing do	Mar 31/18
Posted		0.40
DG	Reviewing Stinson Deposition	Apr 01/18
Posted		1.60
MJ	Drafting documents belaire west contact list	Apr 11/18
Posted		0.20
AH	Telephone call with Brazil Branch - Spoke ---	Apr 15/18
Posted		0.40
AH	Telephone call to Brazil Branch - spoke - Status. REDACTED	Apr 15/18
Posted		0.40

Harris & Ruble Chipotle adv. Turley Selected Time Entries		
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LC	Filing documentation - scan and file - Branch demand letter - mc	Apr 15/18
Posted		0.20
DG	Interview witness: Antonio Ramirez	Apr 17/18
Posted		1.70
DG	Drafting documents: Antonio Ramirez Declaration	Apr 17/18
Posted		2.40
MJ	Correspondence with Tamiera Smith	Apr 17/18
Posted		0.40
DG	Interview witness: Albert Chavez	Apr 19/18
Posted		2.20
DG	Drafting documents: Declaration of Alberto Chavez in Support of Motion for Class Cert.	Apr 19/18
Posted		1.90
DG	Interview witness: Taraneh Tabatabai	Apr 19/18
Posted		2.80
LZ	Reviewing documents class member declaration	Apr 19/18
Posted		0.50
MJ	Reviewing documents declaration for class members	Apr 19/18
Posted		0.70
AH	Correspondence with Antonio Ramirez re draft declaration.	Apr 24/18
Posted		0.20
DG	Interview witness: Janie Salguero	Apr 25/18
Posted		1.70
DG	Drafting documents Declaration of Janie Salguero in Support of Motion for Class Cert.	Apr 25/18
Posted		1.90
DG	Drafting documents Declaration of Taraneh Tabatabai in Support of Motion for Class Cert.	Apr 25/18
Posted		2.10
AH	Correspondence re witnesses -- We already did the declaration for Nick Simpson earlier in the wee	Apr 27/18
Posted		0.10
DG	Interview witness: Tamiera Smith	Apr 29/18
Posted		1.10
DG	Interview witness: Christopher Thompson	May 01/18
Posted		1.80
DG	Filing documentation Securing class member signatures on declarations (Tabatabai)	May 01/18
Posted		0.10
DG	Filing documentation: Trouble shooting DocuSign for Class Member declarations	May 01/18
Posted		0.30
DG	Reviewing Scott v. Chipotle docket	May 01/18
Posted		0.10
DG	Filing documentation Securing class member signatures on declarations (Ramirez)	May 02/18
Posted		0.10
DG	Drafting documents Declaration of Christopher Thompson in Support of Motion for Class Cert.	May 03/18
Posted		2.50

Harris & Ruble Chipotle adv. Turley Selected Time Entries

DG	Interview witness: Luke Smith	May 03/18
Posted		1.10
DG	Interview witness: Nicholas Simpson	May 04/18
Posted		2.20
AH	Correspondence from JMS -- Christopher Thompson signed yesterday. See attached. Alan, please sign t	May 04/18
Posted		0.10
DG	Drafting documents Declaration of Nicholas Simpson in Support of Motion for Class Cert.	May 05/18
Posted		2.90
DG	Drafting documents: Vargas Declaration	May 05/18
Posted		1.10
DG	Interview witness Grayson Texeira	May 07/18
Posted		1.50
DG	Drafting documents: Declaration of Tamiera Smith	May 09/18
Posted		1.90
DG	Interview witness: Mark Rentfrow	May 10/18
Posted		1.90
DG	Drafting documents Declaration of Mark Rentfrow in Support of Motion for Class Cert.	May 10/18
Posted		1.90
DG	Filing documentation Securing class member signatures on declarations (Simpson)	May 10/18
Posted		0.10
DG	Filing documentation Securing class member signatures on declarations (Rentfrow)	May 10/18
Posted		0.10
DG	Drafting documents: Moses Declaration	May 10/18
Posted		2.80
DG	Research Re: Moses Declaration	May 10/18
Posted		2.20
DG	Interview witness: Arnulfo Canchola	May 11/18
Posted		1.10
DG	Filing documentation: Securing class member signatures on declarations (Chavez)	May 11/18
Posted		0.10
DG	Reviewing Nick Simpson retainer/226/FLSA consent	May 11/18
Posted		0.10
DG	Reviewing Salazar v. Chipotle docket sheet	May 11/18
Posted		0.10
LZ	Client administration retainer	May 11/18
Posted		1.30
DG	Interview witness: Coriana Duncan	May 12/18
Posted		1.30
DG	Drafting documents: Carlson Declaration for Class Cert.	May 13/18
Posted		1.10
DG	Interview witness: Naeem Khayat	May 14/18
Posted		1.90

Harris & Ruble Chipotle adv. Turley Selected Time Entries

DG	Interview witness Kadiedra Crawford	May 14/18
Posted		1.80
DG	Drafting documents Declaration of Naeem Khayat in Support of Motion for Class Cert.	May 15/18
Posted		1.60
DG	Drafting documents: Assembling Declarations for Class Cert. motion	May 16/18
Posted		2.10
DG	Drafting documents Declaration of K. Crawford in Support of Motion for Class Cert.	May 16/18
Posted		2.00
DG	Drafting documents: Declaration of Luke Smith in Support of Motion for Class Cert.	May 16/18
Posted		1.30
DG	Drafting documents Declaration of Grayson Texeira in Support of Motion for Class Cert.	May 16/18
Posted		2.10
DG	Interview witness Karima White	May 16/18
Posted		1.60
DG	Drafting documents Declaration of Karima White in Support of Motion for Class Cert.	May 16/18
Posted		1.60
DG	Filing documentation Securing class member signatures on declarations - Khayat	May 16/18
Posted		0.10
DG	Interview witness: Lucas Milligan	May 16/18
Posted		1.10
DG	Drafting documents: Declaration of Lucas Milligan	May 16/18
Posted		1.00
DG	Drafting documents: Declaration of Coriana Duncan	May 16/18
Posted		0.90
DG	Reviewing Ross v. Chipotle docket	May 16/18
Posted		0.10
AH	Drafting documents and legal research re class complaint.	May 17/18
Posted		7.50
AH	Telephone call to Tanika Turley - spoke - Status. Review substance of her draft declaration re re	May 17/18
Posted		0.30
DG	Drafting documents: Turley Declaration in Support of Motion for Class Cert.	May 18/18
Posted		3.10
AH	Drafting documents--work on motion for class certification.	May 18/18
Posted		4.80
DG	Reviewing: Barber case documents	May 18/18
Posted		0.30
DG	Drafting documents Declaration of in Support of Motion for Class Cert.	May 19/18
Posted		1.40
DG	Reviewing MacroSolve v. Chipotle case	May 20/18
Posted		0.10
AH	Drafting documents and legal research re motion for class certification.	May 20/18
Posted		7.40

Harris & Ruble Chipotle adv. Turley Selected Time Entries

AH	Telephone call to Tanika Turley - spoke - Status. Final review of her Declaration.	May 20/18
Posted	I may execute	0.30
DG	Drafting documents: Declaration of Nicole Johnson in Support of Motion for Class Cert.	May 21/18
Posted		1.20
DG	Reviewing: Article Karnow - classic settlement problems	May 21/18
Posted		0.20
DG	Reporting; Reviewing Class Action materials - Judge Karnow	May 21/18
Posted		0.20
DG	Reviewing Judge Karnow's Concerns for Class Action settlements	May 21/18
Posted		0.20
MJ	Drafting documents calculating meal break violations	May 21/18
Posted		3.50
LZ	Research on Bluford Note 3: "As a general rule if the defendant's liability can be determined by fa	May 21/18
Posted		5.90
MJ	Drafting documents editing meal break violation exhibit	May 21/18
Posted		0.60
MJ	Drafting documents rest break violations	May 21/18
Posted		1.70
MJ	Research Karnow guidelines on class certification	May 21/18
Posted		1.00
MJ	Drafting documents editing motion for class cert	May 22/18
Posted		2.30
DG	Reviewing: Deposition of Tanika Turley	May 22/18
Posted		1.30
LZ	Drafting documents class certification motion; Research on cases for class cert motion	May 22/18
Posted		7.90
MJ	Drafting documents editing for content	May 22/18
Posted		2.10
MJ	Reviewing rest break violation calculations	May 22/18
Posted		1.40
MJ	Drafting documents Moses Decl	May 22/18
Posted		0.90
DG	Reporting; Reviewing Motion for Class Cert.	May 22/18
Posted		0.30
DG	Reviewing; Declaration of Stephen Moses	May 22/18
Posted		0.90
DG	Telephone conference with client re: class cert.	May 22/18
Posted		0.10
AH	Telephone call to Tanika Turley - spoke - Status.	May 22/18
Posted		0.20
AH	Reviewing documents--defense motion to strike class allegations.	May 23/18
Posted		2.50

Harris & Ruble Chipotle adv. Turley Selected Time Entries

DG	Drafting documents: Redacting Moses Declaration for filing	May 23/18
Posted		0.20
DG	Drafting documents: Redacting Harris Decl. For filing	May 23/18
Posted		0.20
LZ	Drafting documents motion for class cert	May 23/18
Posted		2.70
MJ	Drafting documents editing Moses Decl.	May 23/18
Posted		2.60
PM	Attention to review and editing of documents in support of class certification.	May 23/18
Posted		1.80
AH	Drafting documents and legal research re motion for class certification.	May 23/18
Posted		6.70
MJ	Drafting documents Editing Memorandum	May 23/18
Posted		2.00
AH	Correspondence from court -- Case Name:Turley, Tanika vs Chipotle Services LLC et al	May 23/18
Posted	Case Numb	0.10
DG	Reviewing APPENDIX OF EMPLOYEE DECLARATIONS IN SUPPORT OF DEFENDANT CHIPOTLE SERVICES, LLCs MOTION	May 23/18
Posted		1.10
DG	Correspondence with File & Serve Notice of MotionNotice of Motion and Motion for Class Certificat	May 23/18
Posted		0.10
DG	Correspondence with File & Serve Notice of MotionDefendant Chipotle Services, LLCs Notice of Mot	May 23/18
Posted		0.10
DG	Correspondence with File & Serve OtherAppendix of Employee Declarations in Support of Defendant Ch	May 23/18
Posted		0.10
DG	Reporting; Research E. Smiley LinkedIn and Westlaw	May 24/18
Posted		0.20
DG	Drafting documents: NOD Keller	May 24/18
Posted		0.10
AH	Drafting documents--opposition to CS motion to strike class allegations.	May 24/18
Posted		4.80
MJ	Drafting documents RFPs set two	May 24/18
Posted		1.60
MJ	Drafting documents Notice of Deposition of Esther Smiley, Compliance Director	May 24/18
Posted		0.20
MJ	Reviewing documents declarations in support of motion to decertify	May 24/18
Posted		2.00
MJ	Drafting documents RFPs, Set two NOD	May 24/18
Posted		0.40
MJ	Research new witnesses for deposition	May 24/18
Posted		0.30
MJ	Drafting documents Notice of Deposition for 8 witnesses	May 24/18
Posted		0.80

Harris & Ruble Chipotle adv. Turley Selected Time Entries

DG	Reviewing NOTICE OF MOTION AND MOTION TO DENY CLASS CERTIFICATION AND OR STRIKE CLASS ALLEGATIONS(T	May 24/18
Posted		1.30
AH	Correspondence to defense, forwarding discovery requests.	May 24/18
Posted		0.80
AH	Correspondence from Galloway re her work as manager.	May 25/18
Posted		0.20
AH	Reviewing documents -- defense 350 declarations.	May 25/18
Posted		3.70
IC	Client administration: Researching Date of Hire for all employees - IC	May 25/18
Posted		2.00
AH	Correspondence from Milan Galloway re her case.	May 26/18
Posted		0.10
AH	Telephone call from Christopher Thompson - voice mail - Message -- Hi my name is Christopher Thomp	May 28/18
Posted		0.20
IC	Client administration: Researching Date of Hire for all employees - IC	May 29/18
Posted		2.00
LZ	Correspondence with client re retainer	May 29/18
Posted		0.40
AH	Telephone call to Milan Galloway - spoke - Status. She wants us to represent her. Does not know	May 29/18
Posted		0.30
DG	Drafting documents JOINT CASE MANAGEMENT STATEMENT (TRANSACTION ID # 62075769) FILED BY PLAINTIFF T	May 29/18
Posted		0.50
DG	Reviewing additional declarations filed by Defense--over 350	May 29/18
Posted		3.40
MJ	Reviewing documents Boupheko case	May 30/18
Posted		0.80
DG	Reviewing Judge Brick Guidelines for Class Settlements	Jun 01/18
Posted		0.20
AH	Correspondence from defense -- Defendant Chipotle Services, LLCs Objections to Plaintiffs Notice of	Jun 01/18
Posted		0.10
DG	Correspondence with File & Serve ObjectionsDefendant Chipotle Services, LLCs Objections to Plainti	Jun 01/18
Posted		0.10
AH	Reviewing documents-- Defendant Chipotle Services, LLCs Objections to Plaintiffs Notice of Deposit	Jun 01/18
Posted		0.10
AH	Telephone call from Brazil Branch - voice mail -	Jun 04/18
Posted		0.10
MJ	Reviewing dates and filed documents for hearing	Jun 04/18
Posted		0.40
AH	Meeting with defense counsel after court to try to coordinate dates on depositions. He said send a	Jun 04/18
Posted		0.10
DG	Reviewing ORDER CASE MANAGEMENT ORDER NO.6 (TRANSACTION #62096189)	Jun 04/18
Posted		0.70

Harris & Ruble Chipotle adv. Turley Selected Time Entries		
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DG	Court CASE MANAGEMENT CONFERENCE IS HELD ON JUN-04-2018.	Jun 04/18
Posted	BRIEFING SCHEDULE FOR MOTION FORCERTIFICAT	0.50
DG	Reviewing MINUTES FOR JUN-04-2018 2:00 PM	Jun 04/18
Posted		0.10
DG	Reviewing ADDED TO CALENDAR FOR DEFENDANT CHIPOTLE SERVICES,	Jun 04/18
Posted	LLC'S MOTION TO DENY CLASS CERTIFICATI	0.10
DG	Correspondence with File & Serve CASE MANAGEMENT ORDER NO.6	Jun 04/18
Posted		0.10
MJ	Reviewing deposition dates still on calendar and those that are off.	Jun 12/18
Posted		0.10
DG	Telephone conference with client re deposition	Jun 12/18
Posted		0.10
AH	Telephone call to Stephen Moses - spoke - Status. He has not received moving	Jun 14/18
Posted	papers.	0.10
AH	Correspondence to dfense counsel Mussig -- On May 24, 2018, we emailed you,	Jun 18/18
Posted	requesting dates and lo	0.10
DG	Telephone conference with other side re depositions	Jun 18/18
Posted		0.10
AH	Correspondence with defense re the full Chavez declaration--four pages total.	Jun 20/18
Posted		0.10
DG	Reviewing: Chipotle Witness Chronology	Jun 25/18
Posted		0.30
DG	Correspondence with File & Serve Defendant Chipotle Services, LLCs Responses	Jun 25/18
Posted	to Plaintiffs Request	0.10
DG	Reviewing Defendant Chipotle Services, LLCs Responses to Plaintiffs Request for	Jun 26/18
Posted	Production of Docum	1.10
DG	Reviewing MINUTES FOR JUN-27-2017 9:00 AM	Jun 27/18
Posted		0.10
AH	Drafting documents and legal research re opposition to defense class action	Jun 28/18
Posted	motion.	2.70
DG	Drafting documents: Analysis of Chipotle Motion to Decertify	Jun 29/18
Posted		0.40
DG	Correspondence with File & Serve Defendant Chipotle Services, LLCs Objections	Jul 03/18
Posted	to Plaintiffs Notice	0.10
DG	Correspondence with File & Serve ObjectionsDefendant Chipotle Services, LLCs	Jul 03/18
Posted	Objections to Plaint	0.10
AH	Correspondence with Mr. Moses re his deposition.	Jul 10/18
Posted		0.10
DG	Correspondence with File & Serve DepositionDefendants Notice of Deposition of	Jul 10/18
Posted	Plaintiffs Expert S	0.10
AH	Correspondence from Mussig -- Please see the attached response to your	Jul 11/18
Posted	purported "Notice of Motion	0.20

Harris & Ruble Chipotle adv. Turley Selected Time Entries

MJ Posted	Reviewing served documents for subpoenas and status of objections to depositions	Jul 12/18 0.40
DG Posted	Drafting documents: Declaration of Javier Salguero	Jul 12/18 1.20
AH Posted	Correspondence to defense -- On Friday, June 15, 2018, you wrote to me regarding "deposition schedu	Jul 12/18 0.50
AH Posted	Correspondence with SM -- Your deposition has been noticed for August 6, 2018. Please call me tomo	Jul 12/18 0.10
AH Posted	Reviewing documents to prepare for depositions and opposition to defense motion to deny certificati	Jul 13/18 4.40
AH Posted	Telephone conference with Moses re discovery deposition	Jul 13/18 0.20
DG Posted	Reviewing: Def. Objection to Donna Ludwig Depo.	Jul 13/18 0.10
DG Posted	Reviewing: Def. Obj. To NOD Francis	Jul 13/18 0.10
DG Posted	Drafting documents: Fonua NOD	Jul 13/18 0.20
AH Posted	Meeting with Class Member Javier Salguero and DG. He wants to have us represent him, and be a clas	Jul 13/18 1.70
LZ Posted	Research on witness' addresses	Jul 13/18 4.00
AH Posted	Drafting documents--Notices of Deposition. Case Name:Turley, Tanika vs Chipotle Services LLC et	Jul 13/18 0.80
DG Posted	Reviewing Salguero Retainer	Jul 15/18 0.10
AH Posted	Correspondence from Moses re preparation for deposition.	Jul 15/18 0.10
DG Posted	Meeting with Le Sure in Preparing for deposition	Jul 16/18 3.50
AH Posted	Correspondence from defense re discovery -- I called you twice today in an attempt to meet and co	Jul 17/18 0.10
DG Posted	Reviewing: Motion for Sanctions	Jul 17/18 0.30
AH Posted	Correspondence with Turley re her deposition, upcoming.	Jul 17/18 0.20
AH Posted	Telephone call to Robert Mussig - spoke - Telephone conferences with RM re discovery. With DG. S	Jul 18/18 0.20
MJ Posted	Drafting documents editing motion for sanctions	Jul 18/18 2.20
AH Posted	Drafting documents and legal research re sanctions. Case Name:Turley, Tanika vs Chipotle Servic	Jul 18/18 0.80

Harris & Ruble Chipotle adv. Turley Selected Time Entries

AH	Correspondence to defense -- It is absolutely untrue that I "abruptly hung up" on your after either	Jul 18/18
Posted		0.10
DG	Telephone conference with other side re class discovery	Jul 18/18
Posted		0.10
DG	Telephone conference with client Crawford re deposition	Jul 18/18
Posted		0.10
DG	Correspondence with File & Serve Defendants Notice of Depositions	Jul 18/18
Posted		0.10
AH	Telephone call to Kadiedra Crawford - voice mail -	Jul 19/18
Posted		0.20
AH	Telephone call to Taraneh Tabatabai - spoke - Status. She was takeout specialist. Vacation paid	Jul 19/18
Posted		0.20
AH	Telephone call to Taraneh Tabatabai - voice mail -	Jul 19/18
Posted		0.10
DG	Reporting; Reviewing Notices of Deposition	Jul 19/18
Posted		1.40
AH	Correspondence to defense re deposition schedule--Both Ms. Salguero and Ms. Tabatabai received depo	Jul 20/18
Posted		0.10
AH	Reviewing documents--expert fees--California Code, Government Code - GOV § 68092.5	Jul 20/18
Posted		0.10
AH	Correspondence to witness Crawford -- Please send us copies of the relevant emails and checks from	Jul 20/18
Posted		0.10
AH	Correspondence from Tabatabai, forwarding wage statements -- Attached is my pay slip from my last p	Jul 20/18
Posted		0.20
AH	Telephone call to Stephen Moses - spoke - Status. Discuss his upcoming deposition. We will speak	Jul 20/18
Posted		0.10
AH	Telephone call to Kadiedra Crawford - spoke - Status. With DG. See email.	Jul 20/18
Posted		0.20
MJ	Research expert fees, document production	Jul 20/18
Posted		0.60
DG	Telephone conference with client Crawford re: depo	Jul 20/18
Posted		0.10
AH	Drafting documents and legal research re class briefing. ". . . the specificity required in the rem	Jul 21/18
Posted		0.70
AH	Correspondence to Moses, forwarding NOD and his declaration.	Jul 21/18
Posted		0.10
DG	Discovery preparations: Preparing for Crawford deposition	Jul 23/18
Posted		1.80
AH	Correspondence from Mussig -- I am out of the office with limited access to email. If you need imm	Jul 23/18
Posted		0.10
AH	Drafting documents -- Objection to Deposition Notice of Janie Salguero	Jul 23/18
Posted		0.20

Harris & Ruble Chipotle adv. Turley Selected Time Entries		
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DG	Discovery preparations: Preparing for Thompson deposition	Jul 25/18
Posted		1.10
DG	Correspondence with File & Serve Discovery - use for electronic service only	Jul 25/18
Posted	Defendant Chipotle Ser	0.10
DG	Reviewing Tabatabai Payroll documents produced in preparation for deposition	Jul 26/18
Posted		3.20
DG	Reviewing JOINT COMPLEX CASE STATUS CONFERENCE STATEMENT	Jul 26/18
Posted	(TRANSACTION ID # 60896678) FILED BYDEFEND	0.10
AH	Correspondence to Moses re CLP declaration, forward same.	Jul 28/18
Posted		0.10
AH	Correspondence re SDT on TT -- she has 14 SDT's for other persons and said	Jul 29/18
Posted	she will meet me at 9 a.	0.20
AH	Drafting documents--outline opposition to defense motion re class certification.	Jul 29/18
Posted		0.30
AH	Telephone call to Stephen Moses - spoke - Status. Review declaration to prepare	Jul 29/18
Posted	for his depositio	1.40
DG	Reviewing case documents for depositions	Jul 29/18
Posted		2.10
DG	Interview witness Daniel Funes	Aug 01/18
Posted		2.10
DG	Drafting documents Declaration of Daniel Funes in Support of Motion for Class	Aug 01/18
Posted	Cert.	2.30
DG	Drafting documents: Retainer for Daniel Funes	Aug 01/18
Posted		0.30
DG	Interview witness Susan Carrithers	Aug 01/18
Posted		1.80
DG	Drafting documents Declaration of Susan Carrithers in Support of Motion for	Aug 01/18
Posted	Class Cert.	1.90
DG	Interview witness: Brianna Smith	Aug 01/18
Posted		2.20
DG	Drafting documents: Declaration of Brianna Smith	Aug 01/18
Posted		1.80
AH	Correspondence to defense, requesting payment of witness fee.	Aug 01/18
Posted		0.10
DG	Telephone conference with expert witness re declaration	Aug 01/18
Posted		1.10
DG	Attend discovery: Deposition of Taraneh Tabatabai	Aug 01/18
Posted		4.50
AH	Discovery -- deposition of witness from Corona store, Tabatabai.	Aug 01/18
Posted		3.50
AH	Meeting with TT re arbitration and substance of her case in that tribunal.	Aug 01/18
Posted		0.80

Harris & Ruble Chipotle adv. Turley Selected Time Entries

DG	Interview witness: Michelle Brownlee	Aug 02/18
Posted		1.50
DG	Drafting documents: Declaration of Michelle Brownlee	Aug 02/18
Posted		1.90
AH	Telephone call to Stephen Moses - spoke - Status.	Aug 02/18
Posted		0.20
AH	Correspondence with defense re Crawford deposition in San Diego.	Aug 03/18
Posted		0.10
AH	Reviewing documents--62308309	Aug 03/18
Posted	Document Title(s): Defendants Amended Notice of Deposition to Kadie	0.10
AH	Drafting documents--prepare deposition outlines.	Aug 03/18
Posted		2.10
AH	Correspondence from defense --	Aug 03/18
Posted	Defendants Amended Notice of Deposition to Janie Salguero Authori	0.10
LC	Reviewing documents - scanning in depo of Taraneh Tabatabai	Aug 03/18
Posted		0.20
DG	Correspondence with File & Serve Defendants Amended Notice of Deposition to Janie Salguero	Aug 03/18
Posted		0.10
DG	Correspondence with File & Serve Defendants Amended Notice of Deposition to Kadiedra Crawford	Aug 03/18
Posted		0.10
DG	Discovery preparations: Preparation of depo outline for Jared Fonua	Aug 04/18
Posted		1.80
AH	Telephone call to Tanika Turley - spoke - Speak with Stephen Moses re her work for Chipotle.	Aug 04/18
Posted		0.20
AH	Telephone call to Stephen Moses - spoke - Status. Prepare for his deposition. Have group discuss	Aug 04/18
Posted		0.50
AH	Correspondence (confidential) from class member -- "I received a call from 2488808641-8641 Min comp	Aug 06/18
Posted		0.10
AH	Telephone call to Robert Mussig - spoke - Confirm their witness in Mill Valley on Friday; San Dieg	Aug 07/18
Posted		0.30
LC	Correspondence with Taraneh Tabaitabai forwarding witness fee	Aug 07/18
Posted		0.10
AH	Telephone call to Taraneh Tabatabai - voice mail -	Aug 07/18
Posted		0.10
AH	Telephone call to Robert Mussig - voice mail - DG and AH return. Went to VM.	Aug 07/18
Posted		0.10
DG	Research regarding deponent Jared Fonua	Aug 08/18
Posted		2.20
PM	Correspondence with the court reporter.	Aug 08/18
Posted		0.20
DG	Telephone conference with other side re depositions	Aug 08/18
Posted		0.10

Harris & Ruble Chipotle adv. Turley Selected Time Entries

AH Posted	Drafting documents and legal research re opposition to Chipotle motion to strike class allegations.	Aug 08/18 5.30
AH Posted	Meeting with Noah and PM re settlement issues for our upcoming conference at end of August. Discus	Aug 09/18 0.20
AH Posted	Drafting documents to prepare for deposition of GM, Napa, tomorrow.	Aug 09/18 5.60
DG Posted	Reviewing documents Thompson Payroll documents produced in preparation for deposition	Aug 10/18 2.10
DG Posted	Correspondence with File and Serve DEFENDANTS AMENDED NOTICE OF DEPOSITION TO CHRISTOPHER THOMPSON	Aug 10/18 0.10
AH Posted	Deposition of Jared Fonua in Mill valley	Aug 10/18 5.50
AH Posted	Drafting documents to prepare for Moses deposition in Palm Springs.	Aug 10/18 2.70
AH Posted	Correspondence with Mussig re deposition schedule -- I just want to confirm that we will doing the	Aug 10/18 0.10
AH Posted	Correspondence from class member. "Hello, I was wondering if I may be able to get any information	Aug 11/18 0.10
AH Posted	Meeting with SM re his upcoming deposition.	Aug 11/18 6.30
DG Posted	Reviewing Crawford Payroll documents produced in preparation for deposition	Aug 12/18 2.20
DG Posted	Reviewing Salguero Payroll documents produced in preparation for deposition	Aug 12/18 1.90
AH Posted	Telephone call to Stephen Moses - spoke - Discuss upcoming deposition.	Aug 12/18 0.10
DG Posted	Research re MSJ	Aug 12/18 1.10
DG Posted	Reviewing Crawford Shift Analysis	Aug 13/18 0.60
AH Posted	Telephone call to Janie Salguero - no answer - VM full	Aug 13/18 0.20
MJ Posted	Reviewing time records for thompson	Aug 13/18 1.50
DG Posted	Attend discovery: Deposition of Christopher Thompson	Aug 13/18 4.50
MJ Posted	Correspondence with Janie Salguero	Aug 13/18 0.30
AH Posted	Telephone call to Firoz Azizi - spoke - Status. He has worked for about a year at Livermore Outle	Aug 13/18 0.30
DG Posted	Discovery preparations: Meeting with Kadiedra Crawford to prep for Deposition.	Aug 13/18 0.90

Harris & Ruble Chipotle adv. Turley Selected Time Entries

DG	Attend discovery: Deposition of Kadiedra Crawford (San Diego) + Travel time	Aug 13/18
Posted		6.40
DG	Attend discovery: Deposition of Christopher Thompson	Aug 13/18
Posted		4.10
AH	Drafting documents--prepare for depositions of Crawford and Thompson.	Aug 13/18
Posted		6.70
AH	Correspondence with class member Azizi. Thanks for taking the time to speak with me tonight. Since	Aug 13/18
Posted		0.10
DG	Correspondence with File & Serve Notice of MotionDefendant Chipotle Services, LLCs Notice of Mot	Aug 14/18
Posted		0.10
DG	Research: Opposition to Motion to Deny Certification	Aug 14/18
Posted		1.30
MJ	Reviewing documents re Salguero payroll data analysis to find missed and late meal breaks to prepar	Aug 14/18
Posted		2.00
DG	Reviewing SEPARATE STATEMENT OF FACTS IN SUPPORT OF ITS MOTION FOR SUMMARY ADJUDICATION OF PLAINTIF	Aug 14/18
Posted		1.70
DG	Reviewing MOTION FOR SUMMARY JUDGMENT DEFENDANT CHIPOTLE SERVICES, LLCs NOTICE OF MOTION AND MOTION	Aug 14/18
Posted		0.10
AH	Discovery preparations for (2.0) and deposition of Salguero (2.5)	Aug 14/18
Posted		4.50
AH	Correspondence from defense -- We will depose Mr. Moses on August 24th in Palm Springs.	Aug 14/18
Posted		0.10
	We wil	
DG	Attend discovery: Deposition of Janie Salguero	Aug 14/18
Posted		4.30
AH	Drafting documents and legal research re opposition to defendant's MSJ	Aug 14/18
Posted		2.20
DG	Drafting documents: Opp. Memorandum Motion to Deny Cert.	Aug 15/18
Posted		1.10
LZ	Drafting documents opposition to MSJ	Aug 15/18
Posted		7.20
DG	Correspondence with client re deposition Jason Le Sure	Aug 16/18
Posted		2.10
LZ	Drafting documents oppo to SMJ	Aug 16/18
Posted		6.10
DG	Reviewing: Oppostion to MSJ	Aug 16/18
Posted		1.90
AH	Correspondence from Mussig re discovery.	Aug 16/18
Posted		0.10
DG	Correspondence with File & Serve Defendants Notice of Deposition to Jason Le Sure	Aug 17/18
Posted		0.10
DG	Correspondence with File and Serve Defendants Amended Notice of Deposition of Plaintiffs Expert Ste	Aug 17/18
Posted		0.10

Harris & Ruble Chipotle adv. Turley Selected Time Entries

DG	Reviewing class member declarations	Aug 17/18
Posted		0.40
AH	Correspondence with	Aug 17/18
Posted	Document Title(s): Defendants Notice of Deposition to Jason Le Sure Defendan	0.10
AH	Correspondence to defense re depositions. Declarant Naeem Khayat is available	Aug 17/18
Posted	on August 22, but is	0.10
AH	Telephone call to Stephen Moses - spoke - Discuss upcoming deposition.	Aug 18/18
Posted		0.20
AH	Telephone call to Stephen Moses - spoke - Status. Discuss his documents.	Aug 19/18
Posted		0.10
AH	Drafting documents --	Aug 20/18
Posted	PLAINTIFF T. TURLEY'S OBJECTION TO AMENDED NOTICE OF DEPOSITION AND OTHER D	0.10
DG	Reviewing: Expert's notes re: rest breaks	Aug 20/18
Posted		0.10
DG	Drafting documents: Objection to Deposition of Stephen Moses	Aug 20/18
Posted		2.50
LZ	Research on accord and satisfaction; Drafting documents drafted oppo to MSJ	Aug 21/18
Posted		4.40
MJ	Research prior PAGA statute and its applicability to complaint and FAC	Aug 21/18
Posted		0.30
DG	Discovery preparations: meeting with Jason Le Sure for depo prep	Aug 21/18
Posted		2.80
AH	Correspondence to defense re deposition of Moses, expert for Plaintiffs: --	Aug 21/18
Posted	Here is a link to the	0.10
DG	Correspondence with File & Serve Defendant Notice of Deposition to Mark	Aug 22/18
Posted	Rentfrow	0.10
AH	Reviewing documents and organizing for preparation for Moses deposition with	Aug 22/18
Posted	him.	0.80
LZ	Drafting documents motion to compel	Aug 22/18
Posted		2.70
DG	Attend discovery: Deposition of Jason Le Sure	Aug 22/18
Posted		8.50
AH	AH in Palm Springs for dep of Steve Moses - pick up copies of exhibits for	Aug 23/18
Posted	preparation; travel and	6.30
DG	Attend discovery: Deposition of Kadiedra Crawford, San Diego, California	Aug 23/18
Posted		4.10
DG	Attend discovery: Meeting with client	Aug 23/18
Posted		1.00
LZ	Drafting documents motion to compel separate statement	Aug 23/18
Posted		5.50
AH	Correspondence from Mussig, re discovery --	Aug 23/18
Posted	We still are not sure exactly what you wish to meet a	0.10

Harris & Ruble Chipotle adv. Turley Selected Time Entries

AH	Correspondence to defense --	Aug 23/18
Posted	Of course you know that we are unable to take part in a meet and co	0.10
DG	Correspondence with File & Serve ObjectionsDefendant Chipotle Services LLC	Aug 24/18
Posted	Objection to Plaintiff	0.10
AH	Moses Depo in Palm Springs - preparation and attendance. Evelyn Mah is court reporter.	Aug 24/18
Posted		3.00
LZ	Drafting documents motion to compel; proposed order, Ah's decl; Exhibits, etc.	Aug 24/18
Posted		7.30
AH	Meeting with workers at LA store.	Aug 25/18
Posted		0.30
AH	Drafting documents and legal research re motion to compel and opposition to defense motion to strik	Aug 26/18
Posted		7.10
AH	Correspondence from File and Serve -- Turley, Tanika vs Chipotle Services LLC et al	Aug 27/18
Posted	Case Number:	0.10
AH	Correspondence from defense -- You and your colleague Mr. Harris have repeatedly delayed this case	Aug 27/18
Posted		0.10
AH	Correspondence from File and Serve Express -- Turley, Tanika vs Chipotle Services LLC et al	Aug 27/18
Posted	Case N	0.10
DG	Reviewing: Motion to Compel RFP	Aug 27/18
Posted		0.20
PM	Research regarding motion to compel discovery responses.	Aug 27/18
Posted		0.20
MJ	Research Rutter citation	Aug 27/18
Posted		0.10
MJ	Drafting documents editing separate stmt of discovery issues	Aug 27/18
Posted		1.20
MJ	Drafting documents editing Harris Decl and motion to compel	Aug 27/18
Posted		1.20
AH	Drafting documents and legal research re Motion to Compel/Opposition to Defendant's Motion to Deny	Aug 27/18
Posted		6.60
LZ	Drafting documents motion to compel; prepared for exhibits	Aug 27/18
Posted		2.90
LC	Filing documentation - scanning depositions of Kadiedra Crawford and Christopher Thompson (MM)	Aug 28/18
Posted		1.00
DG	Telephone call to Robert Mussig - spoke; Telephone conference with other side	Aug 28/18
Posted		0.10
DG	Reviewing Salguero Depo Exhibits	Aug 29/18
Posted		0.30
DG	Reviewing: Notice of Motion for MSJ	Aug 29/18
Posted		0.10
LC	Reviewing documents - copying and filing depo of Jamie Salguero (MM)	Aug 29/18
Posted		0.30

Harris & Ruble Chipotle adv. Turley Selected Time Entries

AH Posted	Correspondence to defense -- I have taken a couple of days off and am only now turning to your emai	Aug 31/18 0.20
DG Posted	Drafting documents: Alan Harris Decl. In Support of Opposition to Motion to Deny Cert.	Sep 01/18 1.40
DG Posted	Drafting documents: Request for Judicial Notice in Opp. To Motion to Deny Cert.	Sep 04/18 1.90
LC Posted	Filing documentation - scanning and filing depo of Jason LeSure (MM)	Sep 05/18 0.40
AH Posted	Drafting documents and legal research re Opposition to Motion to Strike class allegations.	Sep 05/18 7.50
DG Posted	Research re rights of absent class members.	Sep 05/18 2.30
DG Posted	Correspondence with File & Serve OppositionDefendant Chipotle Services, LLCs Opposition to Plainti	Sep 06/18 0.10
DG Posted	Reviewing REQUEST FOR JUDICIAL NOTICE IN SUPPORT OF OPPOSITION TO MOTION FOR SANCTIONS AND REQUESTF	Sep 06/18 0.60
DG Posted	Reviewing DECLARATION OF ROBERT MUSSIG IN SUPPORT OF OPPOSITION TO MOTION FOR SANCTIONS AND REQUEST	Sep 06/18 0.40
DG Posted	Reviewing OPPOSITION TO MOTION FOR SANCTIONS AND REQUEST FOR SANCTIONS AGAINST PLAINTIFF AND HERCOU	Sep 06/18 1.10
DG Posted	Le Sure Payroll documents produced in preparation for deposition	Sep 07/18 2.20
DG Posted	Interview witness: Brazil Branch	Sep 07/18 1.70
DG Posted	Drafting documents: Declaration of Brazil Branch	Sep 07/18 2.10
LC Posted	Correspondence and printing for Steven Moses (MM)	Sep 07/18 0.20
AH Posted	Drafting documents and legal research re opposition to motion to strike class allegations.	Sep 07/18 5.50
DG Posted	Reporting: Deposition Transcripts of Kadiedra Crawford	Sep 07/18 2.90
LZ Posted	Motions prepared transcript excerpts for motion to decertify	Sep 07/18 2.90
DG Posted	Reviewing: Stinson depo transcript	Sep 07/18 0.40
DG Posted	Reviewing deposition transcript of K. Crawford	Sep 07/18 2.40
DG Posted	Research: Pirjada v. Superior Court	Sep 08/18 0.10
AH Posted	Drafting documents -- opposition to motion to strike class allegations.	Sep 08/18 8.30

Harris & Ruble Chipotle adv. Turley Selected Time Entries

AH Posted	Drafting documents--Case Name:Turley, Tanika vs Chipotle Services LLC et al Case Number:CGC	Sep 08/18 0.20
DG Posted	Drafting documents OPPOSITION TO DEFENDANT CHIPOTLE SERVICES, LLC MOTION TO DENY CLASS CERTIFICATIO	Sep 08/18 2.10
DG Posted	Drafting documents: Evidentiary Objections in Opposition to Motion to Deny Certification	Sep 10/18 0.90
DG Posted	Reviewing: CS Witness Chronology for 350 Chipotle witnesses	Sep 10/18 0.60
AH Posted	Drafting documents and legal research re opposition to motion to strike.	Sep 10/18 6.70
MJ Posted	Reviewing documents decert motion re Lampe	Sep 10/18 0.30
DG Posted	Reviewing Transcription of Jared Fonua	Sep 10/18 1.10
LZ Posted	Motions prepared exhibits (excerpts of depo transcripts of Thompson, Iesure, Fonua and Salguero) fo	Sep 10/18 7.70
DG Posted	Reviewing deposition transcript of Jason Le Sure	Sep 10/18 2.60
DG Posted	Correspondence with File & Serve OppositionDefendant Chipotle Services, LLCs Memorandum Of Points	Sep 11/18 0.10
AH Posted	Drafting documents re opposition to motion to strike class allegations.	Sep 11/18 7.50
MJ Posted	Drafting documents table of contents and Authorities to opposition	Sep 11/18 0.40
LZ Posted	Motions prepared exhibit of Tabatabai's transcript excerpts;	Sep 11/18 1.60
MJ Posted	Drafting documents editing opposition to motion to decertify	Sep 11/18 1.60
LC Posted	Reviewing documents - scanning depo of Taraneh Tabatai. (MM)	Sep 11/18 0.30
MJ Posted	Drafting documents making changes re edits to main draft of brief	Sep 11/18 2.10
DG Posted	Drafting documents DECLARATION OF ALAN HARRIS IN SUPPORT OF OPPOSITION TO DEFENDANT MOTION TO DENY	Sep 11/18 0.90
DG Posted	Reviewing PROOF OF SERVICE RE DEFENDANT CHIPOTLE SERVICES, LLCS OPPOSITION TO PLAINTIFFS MOTION FOR	Sep 11/18 0.10
DG Posted	Reviewing REQUEST FOR JUDICIAL NOTICE IN SUPPORT OF DEFENDANT CHIPOTLE SERVICES, LLCS OPPOSITION TO	Sep 11/18 0.10
DG Posted	Reviewing REQUEST FOR JUDICIAL NOTICE IN SUPPORT OF DEFENDANT CHIPOTLE SERVICES, LLCS OPPOSITION TO	Sep 11/18 0.10
DG Posted	Reviewing COMPENDIUM OF TESTIMONY AND EVIDENCE IN SUPPORT OF DEFENDANT CHIPOTLE SERVICES, LLCSOPPOS	Sep 11/18 0.10

Harris & Ruble Chipotle adv. Turley Selected Time Entries		
DG Posted	Reviewing APPENDIX OF EMPLOYEE DECLARATIONS IN SUPPORT OF DEFENDANT CHIPOTLE SERVICES, LLC SOPPOSITI	Sep 11/18 0.10
DG Posted	Reviewing MEMORANDUM OF POINTS AND AUTHORITIES IN OPPOSITION TO PLAINTIFFS MOTION FOR CLASS CERTIFIC	Sep 11/18 0.10
DG Posted	Reviewing: Deposition of Stephen Moses	Sep 11/18 0.60
DG Posted	Reviewing deposition transcript of Jared Fonua	Sep 11/18 3.40
DG Posted	Reviewing: Turley Appendix of Employee Declarations Vol. 1	Sep 12/18 2.60
DG Posted	Reviewing Reviewing: Turley Appendix of Employee Declarations Vol. 2	Sep 12/18 3.10
AH Posted	Telephone call to Brett D Young - spoke - Clerk called re their filing in response to our draft mo	Sep 12/18 0.20
MJ Posted	Reviewing email from File & serv re confirmation of filing	Sep 12/18 0.10
AH Posted	Telephone call to Curtis Karnow - spoke - Court did not receive a motion for sanctions but an oppo	Sep 12/18 0.10
AH Posted	Telephone call to Brett D Young - spoke - Clerk called re their filing in response to our draft mo	Sep 12/18 0.20
MJ Posted	Reviewing documents filed motion to compel documents	Sep 12/18 0.50
MJ Posted	Reviewing documents opposition to motion to compel sanctions	Sep 12/18 0.50
MJ Posted	Correspondence with File and ServExpress re correctly filed motion to compel	Sep 12/18 0.20
DG Posted	Reviewing docket sheet for Motion for Sanctions	Sep 12/18 0.10
DG Posted	Reviewing Reviewing: Turley Appendix of Employee Declarations Vol. 3	Sep 13/18 3.70
DG Posted	Reviewing: Turley Appendix of Employee Declarations Vol. 4	Sep 14/18 2.90
AH Posted	Correspondence from defense counsel Robert Mussig -- We write to address the motion for sanctions	Sep 14/18 0.20
DG Posted	Reviewing Turley Appendix of Employee Declarations Vol. 5	Sep 15/18 3.10
DG Posted	Drafting documents: Le Sure PAGA notice	Sep 15/18 2.10
AH Posted	Drafting documents and legal research re Chipotle threat of sanctions.	Sep 15/18 2.50
AH Posted	Drafting documents and legal research re reply in support of class certification.	Sep 15/18 3.20

Harris & Ruble Chipotle adv. Turley Selected Time Entries

DG	Reviewing: Deposition Transcript of Janie Salguero	Sep 15/18
Posted		2.80
DG	Reviewing transcript of Taraneh Tabatabai Deposition	Sep 16/18
Posted		3.10
DG	Reviewing transcript of Christopher Thompson deposition	Sep 16/18
Posted		2.50
LZ	Research on PAGA waiver	Sep 19/18
Posted		6.20
DG	Reviewing Turley Appendix of Employee Declarations Vol. 6	Sep 20/18
Posted		2.20
LZ	Drafting documents oppo to MSJ	Sep 20/18
Posted		3.80
DG	Reviewing Depo Transcript of Christopher Thompson	Sep 20/18
Posted		2.60
AH	Drafting documents--Plaintiff's Evidentiary Objections To Defendant Chipotle Services, Llc's Separa	Sep 21/18
Posted		0.20
AH	Correspondence from Chipotle --- REDACTED	Sep 21/18
Posted		0.10
AH	Drafting documents and legal research re defense bizarre allegations that our safe harbor motion wa	Sep 21/18
Posted		0.40
LZ	Drafting documents MSJ	Sep 21/18
Posted		6.00
DG	Reviewing documents with deponent: Deposition of Chris Thompson	Sep 24/18
Posted		1.10
LZ	Drafting documents motion to SMJ	Sep 24/18
Posted		3.50
DG	Meeting with Jason Le Sure to review deposition transcript	Sep 25/18
Posted		3.10
LZ	Drafting documents oppo to MSJ	Sep 25/18
Posted		2.20
DG	Reviewing Turley Appendix of Employee Declarations Vol. 7	Sep 26/18
Posted		2.50
LZ	Drafting documents oppo to MSJ	Sep 26/18
Posted		1.90
DG	Negotiations: Preparing for Mediation	Sep 27/18
Posted		3.50
DG	Interview witness: Firoz Azizi	Sep 27/18
Posted		1.70
DG	Drafting documents: Declaration of Firoz Azizi	Sep 27/18
Posted		1.40
AH	Correspondence with class member Firoz Aziz re DECLARATION OF FIROZ AZIZ IN SUPPORT OF PLAINTIFF'S	Sep 27/18
Posted		0.30

Harris & Ruble Chipotle adv. Turley Selected Time Entries		
AH	Correspondence with defense re discovery issues.	Sep 27/18
Posted		0.30
LZ	Motions oppo to MSJ	Sep 27/18
Posted		2.00
AH	Drafting documents--stipulation re Plaintiff's discovery demands of Defendant.	Sep 28/18
Posted		0.30
AH	Correspondence to Mussig re discovery meet and confer. --Thank you for a productive call. Please r	Sep 28/18
Posted		0.20
LZ	Drafting documents oppo to MSJ	Sep 28/18
Posted		6.70
DG	Reviewing Turley Appendix of Employee Declarations Vol. 8	Sep 30/18
Posted		1.70
AH	Correspondence with defense re stipulation concerning Plaintiff's requests for discovery from defen	Sep 30/18
Posted		0.20
LZ	Motions oppo to MSJ	Sep 30/18
Posted		2.70
AH	Correspondence from File & Serve Express -- Documents: Joint Stipulation to Continue Dates for Moti	Oct 01/18
Posted		0.10
DG	Reviewing: Def. MSJ	Oct 01/18
Posted		0.30
DG	Reviewing: Declaration of Robert Mussig in support of MSJ	Oct 01/18
Posted		0.30
AH	Reviewing documents--Court:CA Superior Court County of San Francisco-Civil Case Name:Turley, T	Oct 01/18
Posted		0.10
DG	Reviewing MOTION TO COMPEL SET FOR OCT-17-2018 IS NOW ONTINUED TO NOV-20-2018 AT 2:00 PM IN 304 BY	Oct 02/18
Posted		0.10
DG	Reviewing documents: Reviewing deposition for accuracy with K. Crawford	Oct 03/18
Posted		1.40
DG	Drafting documents: Harris Decl. In Opposition to MSJ	Oct 03/18
Posted		0.30
DG	Reviewing ORDER JOINT STIPULATION TO CONTINUE DATES FOR PLAINTIFF TURLEY MOTION TO COMPEL FURTHERRE	Oct 03/18
Posted		0.10
DG	Correspondence with File & Serve JOINT STIPULATION TO CONTINUE DATES FOR PLAINTIFF TURLEY MOTION TO	Oct 05/18
Posted		0.10
AH	Correspondence from File and Serve-- JOINT STIPULATION TO CONTINUE DATES FOR PLAINTIFF TURLEY MOT	Oct 05/18
Posted		0.10
AH	Drafting documents and legal research re motion for class certification.	Oct 08/18
Posted		4.40
DG	Telephone conference with client: F. Azizi re Chip. Arb. agreement	Oct 08/18
Posted		0.10
AH	Drafting documents and legal research re reply in support of certification. "[A]n employer may not	Oct 09/18
Posted		6.30

Harris & Ruble Chipotle adv. Turley Selected Time Entries

PM	Research regarding opposition to motion for summary judgment.	Oct 10/18
Posted		0.30
LZ	Drafting documents edited oppo to MSJ	Oct 10/18
Posted		0.90
DG	Research re: Motion for Summary Judgment	Oct 10/18
Posted		1.10
DG	Drafting documents REPLY TO DEFENDANT CHIPOTLE SERVICES, LLC OPPOSITION TO PLAINTIFFS MOTION FOR CL	Oct 10/18
Posted		2.90
AH	Correspondence from File & Serve Express --PLAINTIFF TURLEY'S REPLY TO DEFENDANT CHIPOTLE SERVICE	Oct 11/18
Posted		0.10
AH	Correspondence from File & Serve Express -- DECLARATION OF ALAN HARRIS AND REQUEST FOR JUDICIAL NOT	Oct 11/18
Posted		0.10
DG	Correspondence with File & Serve ReplyDefendant Chipotle Services, LLCs Reply Memorandum in Supor	Oct 11/18
Posted		0.10
DG	Filing documentation: Reply Memorandum to Opposition to Motion to Certify	Oct 11/18
Posted		0.10
DG	Telephone call to Gary Markowitz - spoke; Taxation advice	Oct 11/18
Posted		0.10
DG	Drafting documents: Reply to Opposition to Motion for Class Cert.	Oct 11/18
Posted		5.40
DG	Drafting documents DECLARATION OF ALAN HARRIS AND REQUEST FOR JUDICIAL NOTICE IN SUPPORT OF PLAINTI	Oct 11/18
Posted		1.90
DG	Reviewing OBJECTIONS TO PLAINTIFFS EVIDENCE (TRANSACTION ID # 62552044) FILED BY DEFENDANT CHIPOTLE	Oct 11/18
Posted		0.80
DG	Reviewing APPENDIX OF EVIDENCE IN SUPPORT OF DEFENDANT CHIPOTLE SERVICES, LLCS REPLY IN SUPPORT OF	Oct 11/18
Posted		1.60
DG	Reviewing REPLY MEMORANDUM IN SUPORT OF ITS MOTION TO DENY CLASS CERTIFICATION (TRANSACTION ID #625	Oct 11/18
Posted		0.70
DG	Drafting documents RESPONSE TO OBJECTIONS OF DEFENDANT CHIPOTLE SERVICES, LLC TO EVIDENCE SUBMITTED	Oct 11/18
Posted		1.40
DG	Drafting documents: Opposition to Motion for Summary Judgment	Oct 12/18
Posted		6.10
AH	Telephone call to Tanika Turley - spoke - Status. Discuss her declaration.	Oct 12/18
Posted		0.20
LZ	Drafting documents edited the oppo to MSJ	Oct 12/18
Posted		2.60
PM	Research regarding whether meal premium wages can support a 203 claim for penalties.	Oct 14/18
Posted		0.30
AH	Telephone call to Tanika Turley - spoke - Status	Oct 14/18
Posted		0.40
DG	Drafting documents DECLARATION OF TANIKA TURLEY IN SUPPORT OF PLAINTIFF OPPOSITION TO MSJ (TRANSACT	Oct 14/18
Posted		0.90

Harris & Ruble Chipotle adv. Turley Selected Time Entries		
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DG	Drafting documents OPPOSITION TO CHIPOTLE SERVICES, LLCS MOTION FOR SUMMARY ADJUDICATION OF PLAINTI	Oct 14/18
Posted		2.90
DG	Drafting documents: Turley Decl. In Support of Opp. To MSJ	Oct 15/18
Posted		1.30
DG	Interview witness: Tanika Turley re: alleged settlement check	Oct 15/18
Posted		0.90
AH	Correspondence from File & Serve Express p-- PLAINTIFFSâ€™™ OPPOSITION TO CHIPOTLE SERVICES, LLCâ€™™S	Oct 15/18
Posted		0.10
AH	Correspondence from File & Serve Express -- 62561443 Documents: DECLARATION OF ALAN HARRIS IN SUPP	Oct 15/18
Posted		0.10
AH	Correspondence from File & Serve Express -- Documents: Joint Stipulation to Continue Date for Chipo	Oct 15/18
Posted		0.10
DG	Reviewing: Chipotle Reply to Opposition to Deny Class Certification	Oct 15/18
Posted		0.90
DG	Filing documentation: MSJ Evidentiary Objections	Oct 15/18
Posted		0.10
DG	Filing documentation: Opposition to MSJ	Oct 15/18
Posted		0.10
MJ	Drafting documents TOC and TOA for MSJ Opposition	Oct 15/18
Posted		0.50
LZ	Drafting documents Edited the oppo and prepared exhibits for it	Oct 15/18
Posted		4.40
MJ	Research LWDA issue	Oct 15/18
Posted		1.00
DG	Correspondence with defense regarding arbitration agreement	Oct 15/18
Posted		0.10
DG	Drafting documents DECLARATION OF ALAN HARRIS IN SUPPORT OF PLAINTIFF OPPOSITION TO DEFENDANT CHIPO	Oct 15/18
Posted		2.30
DG	Drafting documents PLAINTIFF EVIDENTIARY OBJECTIONS TO DEFENDANT CHIPOTLE SERVICES, LLC SEPARATE ST	Oct 15/18
Posted		1.80
AH	Drafting documents -- opposition to MJS.	Oct 15/18
Posted		7.20
AH	Drafting documents--work on outline for oral argument, class cert.	Oct 20/18
Posted		0.80
DG	Reviewing Defendant Chipotle Services, LLCs Objection to Plaintiffs New Evidence Submitted on Repl	Oct 20/18
Posted		0.60
DG	Reviewing Defendant Chipotle Services, LLCs Notice of Motion and Motion for Sanctions Against Plain	Oct 20/18
Posted		0.80
AH	Telephone call to Robert Mussig - voice mail -	Oct 22/18
Posted		0.10
DG	Correspondence with T. Milligan (defense counsel) re: arbitration agreement	Oct 23/18
Posted		0.10

Harris & Ruble Chipotle adv. Turley Selected Time Entries

DG	Reviewing: Chipotle arbitration agreement	Oct 23/18
Posted		0.80
DG	Correspondence with T. Milligan re arbitration agreements	Oct 23/18
Posted		0.10
DG	Correspondence with File & Serve ReplyDefts Reply ISO Its Motion for Summary Adjudication of Pltfs	Oct 24/18
Posted		0.10
AH	Correspondence from file and serve express -- Documents: Joint Stipulation to Continue Date for Chi	Oct 24/18
Posted		0.10
AH	Correspondence from Mussig --	Oct 24/18
Posted	This will confirm that the parties have agreed to move the hearin	0.10
DG	Reviewing OBJECTIONS TO PLTFS EVIDENCE ISO HER OPPOSITION TO DEFS MOTION FOR SUMMARY ADJUDICATION(T	Oct 24/18
Posted		0.80
DG	Reviewing REPLY ISO ITS MOTION FOR SUMMARY ADJUDICATION OF PLTFS FIRST AND SEVENTH CAUSES OF ACTION	Oct 24/18
Posted		1.10
DG	ReviewingDefts Reply ISO Its Motion for Summary Adjudication of Pltfs First and Seventh Causes of A	Oct 25/18
Posted		0.80
LZ	Drafting documents DLSE letter	Oct 25/18
Posted		0.30
AH	Correspondence with DLSE requesting decisions in other cases.	Oct 25/18
Posted		0.10
AH	Correspondence with defense re hearing dates.	Oct 26/18
Posted		0.10
AH	Correspondence from Mussig re schedule -- None of the dates provided work for us. We spoke to the	Oct 26/18
Posted		0.10
AH	Correspondence from Mr. Mussig: The Court scheduled another hearing on December 20th earlier this m	Oct 26/18
Posted		0.10
LC	Reviewing documents - scanning and filing (MM).	Oct 26/18
Posted		0.10
LZ	Research on new cases for oral argument	Oct 26/18
Posted		2.20
AH	Reviewing documents to prepare for oral argument on class certification.	Oct 27/18
Posted		3.20
DG	Correspondence with File & Serve Hampton LLP-Los AngelesNotice of Motion Defendant Chipotle Serv	Oct 29/18
Posted		0.10
MJ	Reviewing motion for sanctions and Decl in support	Oct 29/18
Posted		0.10
MJ	Reviewing documents in preparation for class cert hearing	Oct 29/18
Posted		2.50
DG	Reviewing DEFENDANT CHIPOTLE SERVICES, LLC'S MOTION FOR SUMMARY ADJUDICATION OF PLAINTIFF'S FIRST A	Oct 29/18
Posted		2.10
DG	Reviewing DECLARATION OF ROBERT MUSSIG IN SUPPORT OF DEFENDANT CHIPOTLE SERVICES, LLCS MOTION FORSA	Oct 29/18
Posted		1.10

Harris & Ruble Chipotle adv. Turley Selected Time Entries

LZ	Research for oral argument re the Motion for class cert	Oct 29/18
Posted		7.00
MJ	Reviewing documents objections to evidence in Ptf's reply	Oct 30/18
Posted		0.30
MJ	Drafting documents exhibit for opposition to motion for sanctions	Oct 30/18
Posted		0.20
MJ	Reviewing documents tentative ruling	Oct 30/18
Posted		0.20
DG	Reviewing OBJECTION TO PLAINTIFFS NEW EVIDENCE SUBMITTED ON REPLY IN SUPPORT OF HER MOTION FOR CLAS	Oct 30/18
Posted		0.30
LZ	Research	Oct 30/18
Posted		5.20
DZ	Correspondence from Alan Harris via email re Tentative Ruling on Pl.'s Mot. for Class Certification	Oct 30/18
Posted		0.10
DZ	Correspondence from David Garrett via e-mail re Tentative Ruling on Pl.'s Mot. for Class Certificat	Oct 30/18
Posted		0.10
DZ	Reviewed Tentative Ruling on Pl.'s Mot. for Class Certification and Def.'s Mot. to Deny Certificati	Oct 30/18
Posted		0.20
LZ	Research on commonality	Oct 31/18
Posted		4.30
MJ	Research chipotle discovery responses	Oct 31/18
Posted		0.60
PM	Conferences with AH and D. Garrett re hearing.(.2) Research re class certification when there are	Oct 31/18
Posted		0.50
DG	Court COMPLEX LITIGATION - DEFENDANT'S MOTION TO DENY CLASS CERTIFICATION AND/OR STRIKE CLASSALLEGA	Oct 31/18
Posted		0.90
DG	Reviewing MINUTES FOR OCT-31-2018 2:00 PM	Oct 31/18
Posted		0.10
DG	Drafting documents: Tabatabai Retainer	Nov 01/18
Posted		0.60
AH	Correspondence from court -- ORDER ON EVIDENTIARY ISSUES IN CONNECTION WITH (1) PLAINTIFFS MOTION	Nov 02/18
Posted		0.10
AH	Reviewing documents--certification orders.	Nov 02/18
Posted		0.40
DG	Correspondence with File & Serve OrderORDER ON EVIDENTIARY ISSUES IN CONNECTION WITH (1) PLAINTIF	Nov 02/18
Posted		0.10
DG	Reviewing: Ediscovery list - Thompson Reuters	Nov 02/18
Posted		0.10
LZ	Reviewing documents reviewed decision on Manuel Vigueras v. Red Robin International, Inc., et al.	Nov 02/18
Posted		1.20
DG	Reviewing ORDER GRANTING IN PART PLAINTIFF'S MOTION FOR CLASS CERTIFICATION; AND DENYING AS MOOTDEF	Nov 02/18
Posted		0.70

Harris & Ruble Chipotle adv. Turley Selected Time Entries

DG Posted	Reviewing 304 - DEFENDANT'S MOTION TO DENY CERTIFICATION AND STRIKE CLASS ALLEGATIONS, TAKEN UNDERS	Nov 02/18 0.10
DG Posted	Drafting documents 304 - PLAINTIFF'S MOTION FOR CLASS CERTIFICATION, TAKEN UNDER SUBMISSION ON OCT-	Nov 02/18 0.10
DG Posted	Reviewing ORDER ON EVIDENTIARY ISSUES IN CONNECTION WITH (1) PLAINTIFF'S MOTION FOR CLASS CERTIFICA	Nov 02/18 0.60
DG Posted	Correspondence with T. Milligan regarding arbitration	Nov 05/18 0.10
DZ Posted	Meeting with Alan Harris re Order Granting in Part Pl.'s Mot. for Class Certification.	Nov 05/18 0.10
DZ Posted	Legal research re writ of mandate for immediate appeal of Order Granting in Part Pl.'s Mot. for Cla	Nov 05/18 0.50
DZ Posted	Drafted internal mem. re writ-of-mandate legal research.	Nov 05/18 0.30
DZ Posted	Correspondence with Alan Harris via e-mail re writ-of-mandate legal research.	Nov 05/18 0.10
DZ Posted	Reviewed Order Granting in Part Pl.'s Mot. for Class Certification.	Nov 05/18 0.50
AH Posted	Correspondence from ND Cal-- A new version of the Court's Procedural Guidance for Class Action Set	Nov 08/18 0.20
DG Posted	Drafting documents: Stipulation to Continue CMC	Nov 09/18 0.90
DG Posted	Drafting documents: Notice of Withdrawal of Motion	Nov 09/18 1.10
DG Posted	Drafting documents: Tolling agreement on PAGA case	Nov 10/18 1.10
MJ Posted	Reviewing filed withdrawal of motion to compel responses.	Nov 12/18 0.10
LC Posted	Reviewing documents - scanning and filing (MM).	Nov 13/18 0.20
DG Posted	Reviewing NOTICE OF WITHDRAWAL OF MOTION TO COMPEL FURTHER RESPONSES TO REQUESTS FOR PRODUCTIONOF D	Nov 13/18 0.10
AH Posted	Reviewing documents re order approving change in date for CMC; docket.	Nov 15/18 0.20
AH Posted	Correspondence from court -- Document Title(s):JOINT STIPULATION AND ORDER TO CONTINUE DATE FOR CAS	Nov 15/18 0.10
DG Posted	Correspondence with File & Serve JOINT STIPULATION AND ORDER TO CONTINUE DATE FOR CASE MANAGEMENT	Nov 15/18 0.10
DG Posted	Reviewing ORDER - JOINT STIPULATION AND ORDER TO CONTINUE DATE FOR CASE MANAGEMENT CONFERENCE(TRANS	Nov 15/18 0.10
DG Posted	Reviewing COMPLEX LITIGATION - CASE MANAGEMENT CONFERENCE SET FOR NOV-20-2018 CONTINUED TO JAN-25-2	Nov 15/18 0.10

Harris & Ruble Chipotle adv. Turley Selected Time Entries

AH	Correspondence with DSH re work on mandamus.	Nov 16/18
Posted		0.10
DG	Correspondence with defense re mediation	Nov 18/18
Posted		0.10
DG	Drafting documents: Tabatabai, Taraneh vs Chipotle Services, LLC arbitration demand	Nov 18/18
Posted		2.40
DG	Drafting documents: Jason Le Sure Arbitration Demand	Nov 19/18
Posted		2.10
DG	Filing documentation Tabatabai, Taraneh vs Chipotle Services, LLC Ref No. 1220060844 arbitration	Nov 19/18
Posted		0.40
DZ	Meeting with Alan Harris and David Garrett re possible Writ Petition concerning Order Denying Class	Nov 20/18
Posted		0.30
DZ	Legal research re writ petitions.	Nov 20/18
Posted		1.00
DZ	Drafted internal mem. re writ-petition research.	Nov 20/18
Posted		0.50
DZ	Further meeting with David Garrett re writ-petition research.	Nov 20/18
Posted		0.10
DZ	Correspondence with Alan Harris and David Garrett re writ-petition research.	Nov 20/18
Posted		0.10
PM	Meeting regarding next steps in Chipotle including research and motion for summary judgment.	Nov 20/18
Posted		0.20
DZ	Correspondence from David Garrett via e-mail re class-wide evid.	Nov 20/18
Posted		0.10
DZ	Responsive correspondence from David Garrett via e-mail re possible Writ Petition re Certification	Nov 20/18
Posted		0.10
DG	Filing documentation Salguero, Janie vs. Chipotle Services, LLC - JAMS Ref No. 1220060846 arbitrati	Nov 24/18
Posted		0.40
DG	Drafting documents Salguero, Janie vs. Chipotle Services, LLC - JAMS Ref No. 1220060846 arbitration	Nov 24/18
Posted		1.90
DG	Drafting documents: Crawford Retainer	Nov 26/18
Posted		0.60
AH	Correspondence with defense re mediation.	Nov 26/18
Posted		0.10
DG	Filing documentation: Le Sure arbitration demand Le Sure, Jason vs. Chipotle Services, LLC Ref No	Nov 29/18
Posted		0.40
DG	Filing documentation Demand for Arbitration - Kadiedra Crawford - Ref #1240023449	Nov 29/18
Posted		0.40
DZ	Correspondence from David Garrett via e-mail re mediation.	Nov 30/18
Posted		0.10
AH	Correspondence with defense re call to set up mediation.	Nov 30/18
Posted		0.10

Harris & Ruble Chipotle adv. Turley Selected Time Entries		
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DG	Meeting with AH and MG re: mediation	Dec 02/18
Posted		0.10
AH	Correspondence to defense re mediation.	Dec 05/18
Posted		0.10
DZ	Correspondence from David Garrett via e-mail re mediation.	Dec 07/18
Posted		0.10
AH	Correspondence with defense re mediation.	Dec 07/18
Posted		0.10
DZ	Correspondence from David Garrett via e-mail re PAGA claims.	Dec 12/18
Posted		0.10
AH	Correspondence with Mussig re mediation.	Dec 12/18
Posted		0.10
DZ	Correspondence from David Garrett via e-mail re teleconference re mediation.	Dec 14/18
Posted		0.10
DZ	Correspondence from Robert Mussig via e-mail re teleconference re mediation.	Dec 14/18
Posted		0.10
AH	Correspondence re mediation.	Dec 14/18
Posted		0.10
DZ	Correspondence from Robert Mussig via e-mail re mediation.	Dec 19/18
Posted		0.10
DZ	Correspondence from David Garrett via e-mail re mediation.	Dec 19/18
Posted		0.10
LC	Correspondence with Stephen Moses. (MM)	Dec 28/18
Posted		0.10
DG	Reviewing ORDER GENERAL ORDER RE CASE REASSIGNMENT	Dec 28/18
Posted		0.10
DG	Reviewing: JAMS correspondence for Tabatabai	Jan 02/19
Posted		0.10
DZ	Correspondence from Robert Mussig via e-mail re mediation.	Jan 02/19
Posted		0.10
DZ	Correspondence from Liana Bickford via e-mail re mediation.	Jan 02/19
Posted		0.10
DZ	Correspondence from David Garrett via e-mail re mediation.	Jan 02/19
Posted		0.10
DG	Correspondence with File & Serve GENERAL ORDER RE CASE REASSIGNMENT and AUTHORIZATION TO RE-ASSIGN	Jan 03/19
Posted		0.10
DG	Research re: Joint prosecution agreement	Jan 03/19
Posted		1.90
DZ	Correspondence from David Garrett via e-mail re Stipulation to Continue Case Mgmt. Conference.	Jan 03/19
Posted		0.10
DZ	Further correspondence from David Garrett via e-mail re mediation.	Jan 03/19
Posted		0.10

Harris & Ruble Chipotle adv. Turley Selected Time Entries

DZ	Correspondence from Robert Mussig via e-mail re mediation.	Jan 03/19
Posted		0.10
AH	Correspondence re mediation.	Jan 03/19
Posted		0.20
DG	Drafting documents Karima White retainer	Jan 04/19
Posted		0.70
DZ	Correspondence from David Garrett via e-mail re Stipulation to Continue Case Mgmt. Conference.	Jan 04/19
Posted		0.10
DZ	Correspondence from Robert Mussig via e-mail re revisions to Stipulation to Continue Case Mgmt. Con	Jan 04/19
Posted		0.10
DZ	Correspondence from Robert Mussig via e-mail re executed Stipulation to Continue Case Mgmt. Confere	Jan 07/19
Posted		0.10
LZ	Drafting documents edited stipulation to continue cmc and hearing and scanned it in	Jan 07/19
Posted		0.50
DG	Correspondence with defense re: Salguero arbitration agreemen	Jan 07/19
Posted		0.10
DG	Reviewing Salguero arbitration agreement	Jan 07/19
Posted		0.50
DG	Drafting documents Funes, Daniel vs Chipotle Services, LLC Ref No. 1220061167 arbitration demand	Jan 08/19
Posted		1.80
LC	Reviewing documents - scanning and filing (MM).	Jan 08/19
Posted		0.30
DG	Drafting documents: Stephen Ajayi retainer	Jan 09/19
Posted		0.40
AH	Correspondence with mediator, forwarding signed mediation agreement.	Jan 10/19
Posted		0.10
AH	Correspondence with mediator re upcoming mediation.	Jan 11/19
Posted		0.10
AH	Telephone call to Stephen Moses - spoke - Status.	Jan 11/19
Posted		0.10
DG	Correspondence re mediation	Jan 13/19
Posted		0.10
DG	Correspondence with with witness Aziz regarding Chipotle case.	Jan 14/19
Posted		0.10
DG	Drafting documents: K. White retainer	Jan 15/19
Posted		0.40
DG	Drafting documents Le Sure PAGA complaint	Jan 15/19
Posted		3.50
DZ	Correspondence from Robert Mussig via e-mail re Stipulation to Continue Case Mgmt. Conference.	Jan 15/19
Posted		0.10
LC	Reviewing documents - scanning and filing (MM).	Jan 15/19
Posted		0.10

Harris & Ruble Chipotle adv. Turley Selected Time Entries

LC	Reviewing documents - scanning and filing (MM).	Jan 16/19
Posted		0.20
DG	Reviewing COMPLEX LITIGATION CALENDAR SET FOR JAN-25-2019	Jan 16/19
Posted	CONTINUED TO MAY-22-2019 AT 2:00 PM IN 30	0.10
DG	Reviewing ORDER JOINT STIPULATION TO CONTINUE CASE MANAGEMENT	Jan 16/19
Posted	CONFERENCE AND HEARING DATE FORDEFEND	0.10
DG	Correspondence with File & Serve JOINT STIPULATION TO CONTINUE CASE	Jan 18/19
Posted	MANAGEMENT CONFERENCE AND HEARI	0.10
DG	Drafting documents: Azizi Firoz retainer	Jan 20/19
Posted		0.30
DG	Correspondence with defense re: Azizi arb. agreement	Jan 22/19
Posted		0.10
DG	Drafting documents : Firoz Azizi Arbitration Demand	Jan 24/19
Posted		1.70
DG	Filing documentation Azizi, Firoz vs Chipotle Services, LLC	Jan 24/19
Posted	Ref No. 1220061318 arbitration demand	0.40
AH	Correspondence with defense re tolling agreement for PAGA case; drafting.	Jan 28/19
Posted		0.20
DZ	Correspondence from David Garrett via e-mail re Tolling Agreement.	Jan 28/19
Posted		0.10
AH	Drafting documents--tolling agreement.	Jan 28/19
Posted		0.10
DG	Filing documentation White, Karima vs Chipotle Services, LLC	Jan 30/19
Posted	Ref No. 1240023497 arbitration deman	0.40
DG	Drafting documents White, Karima vs Chipotle Services, LLC	Jan 30/19
Posted	Ref No. 1240023497 arbitration demand	0.40
DG	Correspondence with defense re: Crawford arb. agreement	Jan 30/19
Posted		0.10
DG	Research re Funes arb. Agreement	Jan 30/19
Posted		0.10
DG	Drafting documents: Salguero Retainer	Feb 01/19
Posted		0.40
AH	Telephone call to Stephen Moses - spoke - Status	Feb 02/19
Posted		0.10
DG	Correspondence with defense re: Mediation	Feb 03/19
Posted		0.10
DG	Drafting documents: Javier Salguero Arbitration Demand	Feb 06/19
Posted		1.80
DG	Filing documentation Salguero, Javier vs Chipotle Services, LLC	Feb 06/19
Posted	Ref No. 1240023498 arbitration de	0.40
DG	Research re Salguero Arb. agreement	Feb 06/19
Posted		0.10

Harris & Ruble Chipotle adv. Turley Selected Time Entries

DG	Research re: white arb. agreement	Feb 06/19
Posted		0.10
DG	Filing documentation 19STCV05589	Feb 20/19
Posted	JASON LE SURE, ET AL. VS CHIPOTLE SERVICES, LLC	0.40
DG	Reviewing 02/20/2019 Notice of Case Assignment - Unlimited Civil Case	Feb 20/19
Posted	Filed by Clerk	0.10
DG	Drafting documents 02/20/2019 Civil Case Cover Sheet	Feb 20/19
Posted	Filed by Jason Le Sure (Plaintiff); Kadiedra	0.30
DG	Filing documentation 02/20/2019 Civil Case Cover Sheet	Feb 20/19
Posted	Filed by Jason Le Sure (Plaintiff); Kadiedr	0.10
DG	Drafting documents 02/20/2019 Summons (on Complaint)	Feb 20/19
Posted	Filed by Jason Le Sure (Plaintiff); Kadiedra	0.10
DG	Filing documentation 02/20/2019 Summons (on Complaint)	Feb 20/19
Posted	Filed by Jason Le Sure (Plaintiff); Kadiedr	0.10
DG	Negotiations: Preparation for Mediation	Mar 05/19
Posted		0.90
DG	Telephone call to Robert Mussig - spoke; Telephone conference with other side	Mar 05/19
Posted		0.10
DG	Reviewing docket sheet CV-19-000937 PORRAS, JERAE vs CHIPOTLE SERVICES LLC	Mar 19/19
Posted		0.10
AH	Telephone call to Stephen Moses - spoke - Status	Mar 20/19
Posted		0.10
DG	Telephone call to Devon K. Roepcke - spoke; Telephone conference with other side	Mar 28/19
Posted		0.10
AH	Correspondence with LWDA re DLSE cases	Mar 28/19
Posted		0.10
LZ	Drafting documents DLSE letter and mailed	Mar 28/19
Posted		0.40
AH	Correspondence from Mediator. "This email will confirm that the mediation for the above referenced	Mar 29/19
Posted		0.10
AH	Correspondence from Mediator -- Yes. We received an email yesterday to postpone. I'll have my assis	Mar 29/19
Posted		0.10
AH	Correspondence from defense re settlement -- The date does not work for Chipotle but we will work c	Mar 29/19
Posted		0.10
AH	Correspondence from Mediator -- Defense Counsel, does April 16th work for you?	Mar 29/19
Posted		0.10
AH	Correspondence re mediation. To FM and defense -- May we know available dates for Ms. Zadeh? Plai	Mar 31/19
Posted		0.10
AH	Correspondence from First Mediation.	Apr 01/19
Posted		0.10
AH	Correspondence from defense -- We will agree to your request to enter into a stipulation continuing	Apr 03/19
Posted		0.10

Harris & Ruble Chipotle adv. Turley Selected Time Entries

AH Posted	Correspondence to defense, requesting it send stipulation -- in response to yesterday email from it	Apr 04/19 0.10
AH Posted	Correspondence from mediator -- Attached please find a revised notice for the above referenced matt	Apr 12/19 0.10
DG Posted	Reviewing CASE MANAGEMENT CONFERENCE AND MOTION HEARING SET FOR MAY-22-2019 CONTINUED TO JUL-11-201	Apr 24/19 0.10
DG Posted	Reviewing CASE MANAGEMENT CONFERENCE AND MOTION HEARING SET FOR MAY-22-2019 CONTINUED TO JUL-11-201	Apr 24/19 0.10
DG Posted	Reviewing ORDER JOINT STIPULATION AND ORDER TO CONTINUE CASE MANAGEMENT CONFERENCE AND MOTIONHEARIN	Apr 24/19 0.10
DG Posted	Correspondence with File and Serve JOINT STIPULATION AND ORDER TO CONTINUE CASE MANAGEMENT CONFERE	Apr 25/19 0.10
AH Posted	Correspondence -- Court:CA Superior Court County of San Francisco-Civil Case Name:Turley	Apr 25/19 0.10
LC Posted	Reviewing documents - scanning and filing (MM).	Apr 26/19 0.10
DG Posted	Reviewing SUBSTITUTION OF ATTORNEY, (TRANSACTION ID # 100070306): AGRUSA, ANGELA C. SUBSTITUTED FOR	Apr 29/19 0.10
AH Posted	Correspondence re mediation--Please let us know your availability tomorrow or Thursday for a call t	May 06/19 0.10
AH Posted	Correspondence from defense -- Defendant is not available for a mediation on June 4, but we are int	May 14/19 0.10
DG Posted	Correspondence with mediator	May 15/19 0.10
AH Posted	Correspondence with First Mediation Corporation re scheduling.	May 15/19 0.10
DG Posted	Correspondence with defense re: mediation	May 31/19 0.10
AH Posted	Correspondence to defense -- Please see the attached revised stipulation to continue the CMC so tha	Jun 03/19 0.10
DG Posted	Reviewing B. Branch source docs	Jun 05/19 0.20
AH Posted	Correspondence -- Court:CA Superior Court County of San Francisco-Civil Case Name:Turley,	Jun 06/19 0.10
AH Posted	Telephone conference with Court and defense re denial of stipulation re settlement conference.	Jun 07/19 0.30
AH Posted	Drafting documents and legal research re trial schedule and five year rule.	Jun 07/19 3.80
AH Posted	Telephone call -- VM -- from court -- Mr. Harris my name is Daniel make work for complex litigation	Jun 07/19 0.10
DG Posted	Reviewing Magadia Decision	Jun 10/19 0.10

Harris & Ruble Chipotle adv. Turley Selected Time Entries

PM	Review and revised proposed class notice.	Jun 10/19
Posted		0.50
DG	Correspondence with mediator	Jun 12/19
Posted		0.10
DG	Telephone conference with other side re mediator	Jun 12/19
Posted		0.10
DG	Drafting documents: CMC Statement	Jun 13/19
Posted		0.90
DG	Drafting documents: Class Notice	Jun 13/19
Posted		1.50
DG	Drafting documents: Notice of Withdrawal	Jun 13/19
Posted		0.80
DG	Drafting documents: Stip. To Continue MSJ	Jun 13/19
Posted		0.80
DG	Drafting documents: Stip for continuance of MSJ	Jun 19/19
Posted		0.80
LC	Reviewing documents - scanning and filing (MM).	Jun 24/19
Posted		0.10
AH	Correspondence to defense -- Thank you for the call regarding the stip to continue the Motion for S	Jun 25/19
Posted		0.10
AH	Correspondence from One Legal -- Case Management Statement filed, charge \$32.75.	Jun 28/19
Posted		0.10
DG	Drafting documents JOINT COMPLEX CASE MANAGEMENT STATEMENT (TRANSACTION ID # 63509645) FILED BY PLA	Jul 02/19
Posted		0.60
AH	Correspondence from file & Serve -- Joint Case Management Statement	Jul 03/19
Posted		0.10
AH	Correspondence with defense re MSJ -- As I mentioned, I received a call from the Clerk in Dept. 3	Jul 03/19
Posted		0.10
AH	Correspondence to DSH -- For some reason File and Serve Xpress hasn't worked for a week, and One Le	Jul 03/19
Posted		0.10
AH	Correspondence with defense re mediation of non-class issues.	Jul 03/19
Posted		0.10
AH	Reviewing documents to prepare for oral argument.	Jul 11/19
Posted		2.20
AH	Meeting with Heath, mediation and trial preparation; stipulations and witnesses.	Jul 11/19
Posted		0.60
AH	Court CMC in SF	Jul 11/19
Posted		0.10
DG	Correspondence with File & Serve CASE MANAGEMENT ORDER NO.7	Jul 11/19
Posted		0.10
DG	Court COMPLEX LITIGATION - CASE MANAGEMENT CONFERENCE. HEARING HELD. PER ORDER FILED THIS DATE, THE	Jul 11/19
Posted		0.50

Harris & Ruble Chipotle adv. Turley Selected Time Entries		
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DG	Reviewing ORDER CASE MANAGEMENT ORDER NO.7 (TRANSACTION #63538880)	Jul 11/19
Posted		0.10
DG	Reviewing MINUTES FOR JUL-11-2019 2:00 PM	Jul 11/19
Posted		0.10
DG	Drafting documents: JOINT STIPULATION TO EXTEND THE TIME WITHIN WHICH THIS ACTION MUST BE BROUGHT	Jul 12/19
Posted		1.10
DG	Telephone call to Levi Heath - spoke; Telephone conference with other side	Jul 18/19
Posted		0.10
DG	Correspondence with File & Serve Defendant Chipotle Services, LLCs Amended Notice of Motion for Sum	Jul 22/19
Posted		0.10
DG	Reviewing COMPLEX LITIGATION - DEFENDANT CHIPOTLE SERVICES, LLC'S AMENDED NOTICE OF MOTION FORSUMMA	Jul 22/19
Posted		0.10
DG	Reviewing DEFENDANT CHIPOTLE SERVICES, LLCS AMENDED NOTICE OF MOTION FOR SUMMARY ADJUDICATION(TRANS	Jul 22/19
Posted		0.10
PM	Attention to research in preparation for conference with defense.	Jul 24/19
Posted		0.30
DG	Telephone call to Levi Heath - spoke; Telephone conference with other side	Jul 24/19
Posted		0.10
AH	Telephone call to Levi Heath - spoke - Discuss outstanding issues. See separate notes.	Jul 24/19
Posted		0.50
DG	Reviewing 18CV-01694 Maurice Jenkins vs Chipotle Services, LLC	Jul 24/19
Posted		0.10
AH	Telephone call to Tanika Turley - spoke - Discuss case status. I will meet her soon to prepare fo	Jul 25/19
Posted		0.30
LC	Meeting with - served Chipotle in Larchmont. The manager, Carla Nguin, mid 20s, black hair, brown e	Jul 30/19
Posted		1.00
DG	Telephone call to Kadiedra Crawford - spoke; Telephone conference with client	Jul 31/19
Posted		0.10
DG	Telephone call to Janie Salguero - spoke; Telephone conference with client	Jul 31/19
Posted		0.10
LC	Reviewing documents - scanning and filing (MM).	Jul 31/19
Posted		0.10
DG	Telephone conference with client Taraneh Tabatabai	Jul 31/19
Posted		0.10
DG	Reviewing: Tabatabai Arbitration Agreement	Jul 31/19
Posted		0.40
DG	Reviewing 08/01/2019 Proof of Service by Substituted Service Filed by Jason Le Sure (Plaintiff); K	Aug 01/19
Posted		0.10
DG	Filing documentation 08/01/2019 Proof of Service by Substituted Service Filed by Jason Le Sure (PI	Aug 01/19
Posted		0.40
DG	Drafting documents 08/01/2019 Proof of Service by Substituted Service Filed by Jason Le Sure (Plai	Aug 01/19
Posted		0.30

Harris & Ruble Chipotle adv. Turley Selected Time Entries

DG	Drafting documents 08/01/2019 Case Management Statement	Aug 01/19
Posted	Filed by Jason Le Sure (Plaintiff); Kadied	0.80
DG	Filing documentation 08/01/2019 Case Management Statement	Aug 01/19
Posted	Filed by Jason Le Sure (Plaintiff); Kadi	0.20
LC	Reviewing documents - scanning and filing (MM).	Aug 01/19
Posted		0.10
DG	Drafting documents: Tolling Agreement for Ajayi	Aug 06/19
Posted		0.90
DG	Correspondence with witness S.A.	Aug 06/19
Posted		0.10
DG	Reviewing ORDER RE: JOIUNT STIPULATION TO EXTEND THE TIME WITHIN WHICH THIS ACTION MUST BE BROUGHT	Aug 07/19
Posted		0.10
DG	Correspondence with ORDER RE JOINT STIPULATION TO EXTEND THE TIME WITHIN WHICH THIS ACTION MUST BE	Aug 08/19
Posted		0.10
DG	Telephone conference with client re mediation	Aug 14/19
Posted		0.10
DG	Reviewing 08/20/2019 Minute Order ((Case Management Conference))	Aug 20/19
Posted	Filed by Clerk	0.50
DG	Court 08/20/2019 at 08:30 AM in Department 34	Aug 20/19
Posted	Case Management Conference - Held	1.50
AH	In court for CMC Chipotle PAGA Dept. 34 - - Matter continued until October.	Aug 20/19
Posted		1.10
DG	Telephone call to Levi Heath - spoke; Telephone conference with other side	Aug 20/19
Posted		0.10
AH	Telephone call to Tanika Turley - spoke - Status.	Aug 20/19
Posted		0.10
DG	Reviewing Docket Sheet Case CIVDS1910956 - **COMPLEX CASE**SANCHEZ-V-CHIPOTLE	Aug 20/19
Posted		0.20
DG	Reviewing Segovia Settlement Documents	Aug 21/19
Posted		0.70
AH	Drafting documents and legal research re mediation brief.	Aug 24/19
Posted		1.40
DG	Correspondence with defense re Ajayi arbitration	Aug 26/19
Posted		0.10
DG	Research re mediation	Aug 27/19
Posted		0.20
DG	Drafting documents 08/29/2019 Notice and Acknowledgment of Receipt	Aug 27/19
Posted		0.60
DG	Drafting documents: Mediation Brief	Aug 28/19
Posted		1.10
DG	Filing documentation 08/29/2019 Notice and Acknowledgment of Receipt	Aug 29/19
Posted	Filed by Jason Le Sure (Plain	0.30

Harris & Ruble Chipotle adv. Turley Selected Time Entries

DG	Telephone conference with client re mediation	Sep 03/19
Posted		0.10
DG	Correspondence with mediator scheduler	Sep 03/19
Posted		0.10
DG	Research re: Confidential Mediation Brief; Research	Sep 04/19
Posted		2.90
PM	Research for preparation of mediation brief.	Sep 04/19
Posted		0.20
DG	Reviewing: Exhibits to Mediation Brief	Sep 05/19
Posted		0.30
DG	Research re replacing class representative	Sep 05/19
Posted		0.70
DG	Correspondence with mediator scheduling	Sep 05/19
Posted		0.10
MJ	Drafting documents editing mediation brief	Sep 05/19
Posted		1.50
AH	Drafting documents and legal research re mediation brief, 226.	Sep 05/19
Posted		6.70
DG	Correspondence with mediator scheduler	Sep 05/19
Posted		0.10
AH	Correspondence with mediator re settlement	Sep 06/19
Posted		0.10
AH	Telephone call to Levi Heath - voice mail - Status. 13 or 14 pay periods involved. 10/2/14 to 3/	Sep 09/19
Posted		0.10
IC	Client administration Draft prelim costs	Sep 09/19
Posted		0.70
DG	Telephone call to Jeffrey Krivis - spoke; Telephone conference with	Sep 12/19
Posted		0.10
DG	Telephone conference with mediator	Sep 14/19
Posted		0.10
DG	Drafting documents: supplemental mediation brief	Sep 16/19
Posted		1.10
DG	Telephone conference with client re mediation	Sep 16/19
Posted		0.10
AH	Telephone call to Steve Hernandez - voice mail -	Sep 17/19
Posted		15.00
DG	Telephone conference with mediator	Sep 17/19
Posted		0.10
AH	Drafting documents and legal research re MSA 226(a).	Sep 17/19
Posted		5.50
MJ	Drafting documents TOA for Chipotle 226 brief	Sep 18/19
Posted		0.20

Harris & Ruble Chipotle adv. Turley Selected Time Entries

AH	Telephone call to Jeffrey Krivis - spoke - With DG, we counter at 1 - 4.	Sep 18/19
Posted		0.10
DG	Correspondence with defense regarding MPA	Sep 18/19
Posted		0.10
AH	Correspondence with defense re MSJ.	Sep 18/19
Posted		0.10
DG	Reviewing Wage Order 5	Sep 19/19
Posted		0.90
PM	Research regarding meal break policy.	Sep 19/19
Posted		0.40
DG	Telephone conference with mediator	Sep 19/19
Posted		0.10
PM	Research regarding section 203 penalties and status of San Luis ambulance case.	Sep 19/19
Posted	(.4) Email correspon	0.60
AH	Drafting documents and legal research re supplemental mediation brief for Krivis, DLA Piper, Winsto	Sep 20/19
Posted		3.70
DG	Research: Total Hours worked case - Morgan v. United Retail incorporate company. 186 Cal.App4th 113	Sep 20/19
Posted		0.20
LZ	Drafting documents DLSE request and submitted	Sep 20/19
Posted		0.20
PM	Conference with AH regarding mediation.	Sep 20/19
Posted		0.40
DG	Drafting documents: Mediation brief	Sep 20/19
Posted		3.10
DG	Negotiations - Preparation for Mediation	Sep 22/19
Posted		1.20
AH	Drafting documents and legal research re PAGA issues -- preparation for upcoming mediation with Jef	Sep 22/19
Posted		6.50
DG	Telephone conference with other side re mediation	Sep 23/19
Posted		0.10
DG	Correspondence with Jeff Krivis	Sep 23/19
Posted		0.10
AH	Correspondence with Krivis re mediation and settlement.	Sep 23/19
Posted		0.10
AH	Telephone call to Raul Perez - left message -	Sep 23/19
Posted		0.10
DG	Reviewing: Capstone PAGA analysis	Sep 24/19
Posted		0.30
DG	Research: Capstone Amey v. Cinemark	Sep 24/19
Posted		0.10
PM	Conference with DG and research regarding class member conflicts.	Sep 24/19
Posted		0.30

Harris & Ruble Chipotle adv. Turley Selected Time Entries

DG	Research re: Mediation	Sep 24/19
Posted		1.30
DG	Correspondence with mediator	Sep 24/19
Posted	Turley, et al. v. Chipotle Services, LLC, et al.	0.10
	Tuesday, Octobe	
MJ	Reviewing status of settlement re Captstone and Barber	Sep 24/19
Posted		0.40
PM	Conference with AH, DG, M.Gal regarding mediation preparations and settlement meetings.	Sep 24/19
Posted		0.80
DG	Telephone call to Steve Hernandez - spoke; Telephone conference with other side	Sep 24/19
Posted		0.10
MJ	Research 226 Paga only cases	Sep 24/19
Posted		2.30
AH	Drafting documents and legal research re mediation	Sep 24/19
Posted		4.30
PM	Conference with DG re mediation.	Sep 25/19
Posted		0.20
MJ	Reviewing Amey v. Cinemark	Sep 25/19
Posted		0.20
DG	Telephone conference with mediator	Sep 25/19
Posted		0.30
PM	Conference with AH and DG in preparation for mediation and settlement conference.	Sep 25/19
Posted		0.90
PM	Attention to research regarding PAGA.	Sep 25/19
Posted		0.60
DG	Telephone conference with mediator	Sep 26/19
Posted		0.10
MJ	Research multi ptf attorney strategy	Sep 26/19
Posted		0.50
DG	Meeting with Capstone re: settlement	Sep 26/19
Posted		1.10
DG	Telephone conference with client re mediation	Sep 26/19
Posted		0.10
MJ	Meeting	Sep 26/19
Posted		1.20
AH	Meeting with Capstone re upcoming mediation.	Sep 26/19
Posted		0.70
AH	Drafting documents	Sep 26/19
Posted		0.10
DG	Correspondence with defense re mediation	Sep 27/19
Posted		0.10

Harris & Ruble Chipotle adv. Turley Selected Time Entries

AH	Correspondence and drafting re settlement issues; prepare for mediation.	Sep 27/19
Posted		0.80
MJ	Reviewing facts of mediation posture	Sep 27/19
Posted		0.80
MJ	Research joint prosecution agreements	Sep 27/19
Posted		1.30
DG	Drafting documents: Joint Prosecution Agreement	Sep 28/19
Posted		0.30
DG	Correspondence with Roepke re: mediation	Sep 29/19
Posted		0.10
AH	Telephone call to Tanika Turley - spoke - Status.	Sep 30/19
Posted		0.30
LZ	Discussion with the firm re tomorrow's mediation	Sep 30/19
Posted		1.00
PM	Meeting with all counsel in preparation mediation.	Sep 30/19
Posted		1.10
AH	Reviewing documents to prepare for mediation	Sep 30/19
Posted		4.70
MJ	Court - attending mediation excluding travel time	Oct 01/19
Posted		9.50
DG	Negotiations: Full day Mediation 11.5	Oct 01/19
Posted		11.50
PM	Mediation.	Oct 01/19
Posted		11.10
AH	Meeting with mediator Jeff Krivis, defense, co-counsel.	Oct 01/19
Posted		11.40
DG	Reviewing draft MOU following mediation	Oct 02/19
Posted		0.10
DG	Reviewing: Barber Appeal Documents	Oct 03/19
Posted		0.70
DG	Reviewing: MOU	Oct 03/19
Posted		0.10
DG	Reviewing: Writ of Mandamus in Barber case	Oct 03/19
Posted		2.20
AH	Telephone call to Jeffrey L. Hogue - voice mail -	Oct 03/19
Posted		0.10
DG	Telephone call to Jeffrey L. Hogue - voice mail; Telephone - exchange of voice mail	Oct 03/19
Posted		0.10
DG	Telephone call to Steve Hernandez - spoke; Telephone conference with other side	Oct 03/19
Posted		0.50
AH	Reviewing documents--Barber writ of mandate re arbitration issue.	Oct 03/19
Posted		0.80

Harris & Ruble Chipotle adv. Turley Selected Time Entries		
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AH	Correspondence re SAC	Oct 03/19
Posted		0.10
AH	Correspondence with counsel for Barber	Oct 03/19
Posted		0.10
AH	Correspondence re settlement drafts and confirming discovery.	Oct 04/19
Posted		0.30
DG	Drafting documents: Joint Prosecution Agreement	Oct 04/19
Posted		2.30
DG	Telephone call to Steve Hernandez - spoke; Telephone conference with other side	Oct 04/19
Posted		0.10
AH	Telephone call to Steve Hernandez - spoke - Status of settlement negotiation.	Oct 04/19
Posted	Discuss with DG and	0.10
DG	Correspondence with defense re: settlement	Oct 04/19
Posted		0.10
DG	Correspondence with defense re settlement	Oct 04/19
Posted		0.10
AH	Correspondence re SAC	Oct 04/19
Posted		0.10
DG	Drafting documents: Second Amended Complaint	Oct 09/19
Posted		0.70
DG	Reviewing settlement Distribution notes	Oct 09/19
Posted		0.10
DG	Correspondence with defense re: MOU	Oct 10/19
Posted		0.10
DG	Negotiations: Mediation with Jeff Krivis	Oct 10/19
Posted		10.00
DG	Reviewing: Turley Signed Class Settlement MOU	Oct 15/19
Posted		0.70
DG	Research re Second Amended Complaint	Oct 15/19
Posted		0.80
AH	Telephone call to Tanika Turley - spoke - Status of settlement resolution.	Oct 15/19
Posted		0.10
LZ	Reviewing MOU settlement	Oct 16/19
Posted		0.30
DG	Reviewing: Turley Chipotle Executed MOU	Oct 17/19
Posted		0.60
DG	Correspondence with defense re; settlement	Oct 19/19
Posted		0.10
DG	Reviewing documents for Mediation	Oct 20/19
Posted		3.10
DG	Correspondence with File & Serve RE STIPULATION AND ORDER GRANTING CONTINUANCE OF CASE MANAGEMENT	Oct 21/19
Posted		0.10

Harris & Ruble Chipotle adv. Turley Selected Time Entries

DG	Correspondence with defense re: continued CMC	Oct 21/19
Posted		0.10
DG	Reviewing ORDER RE: STIPULATION AND ORDER GRANTING CONTINUANCE OF CASE MANAGEMENT CONFERENCE FOLLOWI	Oct 21/19
Posted		0.10
AH	Correspondence with Carrithers re settlement.	Oct 29/19
Posted		0.20
AH	Correspondence from Hernandez re PAGA settlement issues.	Oct 29/19
Posted		0.10
AH	Telephone conference with Phoenix re proposed digital notice campaign.	Oct 29/19
Posted		0.20
DG	Drafting documents: Long form agreement	Oct 29/19
Posted		4.50
AH	Telephone call to Jeffrey L. Hogue - left message -	Oct 30/19
Posted		0.10
AH	Telephone call to Jeffrey L. Hogue - spoke - Status. We do not have a long form, yet. I hope we	Oct 31/19
Posted		0.20
DG	Reviewing: Opposition of Chipotle to Motion for Coordination	Nov 03/19
Posted		1.10
DG	Reviewing: Second Amended complaint	Nov 04/19
Posted		0.40
DG	Drafting documents 11/05/2019 Stipulation and Order (NOTICE OF SETTLEMENT AND JOINT REQUEST TO CONT	Nov 04/19
Posted		0.90
DG	Filing documentation 11/05/2019 Stipulation and Order (NOTICE OF SETTLEMENT AND JOINT REQUEST TO CO	Nov 05/19
Posted		0.20
DG	Drafting documents: Long form class settlement	Nov 12/19
Posted		3.80
AH	Correspondence with cocounsel re settlement issues.	Nov 13/19
Posted		0.10
DG	Drafting documents: Second Amended Complaint	Nov 21/19
Posted		3.20
DG	Drafting documents: Stipulation to File Second Amended Complaint	Nov 21/19
Posted		1.90
AH	Drafting documents--prepare for hearing on approval of settlement.	Nov 22/19
Posted		0.30
DG	Reviewing: Turley PAGA MOU	Nov 26/19
Posted		0.90
DG	Drafting documents Demand for Arbitration - Kadiedra Crawford - Ref #1240023449	Nov 28/19
Posted		1.90
AH	Correspondence from Roepke re status.	Dec 13/19
Posted		0.10
DG	Reviewing: Karima White settlement agreement	Dec 19/19
Posted		1.80

Harris & Ruble Chipotle adv. Turley Selected Time Entries

AH	Drafting documents--long form in Turley, with exhibits.	Dec 27/19
Posted		0.40
DG	Correspondence with S. Hernandez re: arbitration agreements	Dec 27/19
Posted		0.10
DG	Client administration: Signatures on Arb. settlements	Jan 02/20
Posted		0.20
DG	Reviewing: PAGA long form agreement	Jan 03/20
Posted		1.30
DG	Research re: Class Notice	Jan 07/20
Posted		2.10
DG	Reviewing: PAGA long form agreement	Jan 08/20
Posted		1.10
DG	Drafting documents: Arb. Settlements from mediation	Jan 10/20
Posted		1.30
DG	Reviewing Stephen Ajayi settlment agreement	Jan 10/20
Posted		1.10
DG	Reviewing Firoz settlement agreement	Jan 10/20
Posted		1.40
DG	Reviewing: Le Sure settlement agreement	Jan 11/20
Posted		1.40
DG	Correspondence with JMS re: MPA	Jan 11/20
Posted		0.10
DG	Reviewing: Funes settlement agreement	Jan 12/20
Posted		1.30
DG	Reviewing: Tabatabai settlement agreement	Jan 13/20
Posted		1.90
DG	Reviewing COMPLEX LITIGATION - DEFENDANT CHIPOTLE SERVICES, LLC'S MOTION FOR SUMMARY ADJUDICATION S	Jan 13/20
Posted		0.10
DG	Reviewing ORDER RE JOINT STIPULATION TO FILE SECOND AMENDED CLASS COMPLAINT TO FACILITATE PRELIMINA	Jan 13/20
Posted		0.10
DG	Reviewing COMPLEX LITIGATION - CASE MANAGEMENT CONFERENCE SET FOR FEB-03-2020 IS CONTINUED TO FEB-2	Jan 13/20
Posted		0.10
DG	Reviewing ORDER RE: JOINT STIPULATION TO CONTINUE CONFERENCE FOLLOWING SETTLEMENT (TRANSACTION64621	Jan 13/20
Posted		0.10
DG	Reviewing timesheets for accuracy	Jan 13/20
Posted		2.30
DG	Correspondence with File & Serve OrderORDER RE: JOINT STIPULATION TO CONTINUE CONFERENCE FOLLOWING	Jan 14/20
Posted		0.10
DG	Telephone conference with client Thompson	Jan 14/20
Posted		0.10
DG	Reviewing 2ND AMENDED COMPLAINT ** CLASS ACTION ** ; DEMAND FOR JURY TRIAL (TRANSACTION ID # 646270	Jan 15/20
Posted		0.10

Harris & Ruble Chipotle adv. Turley Selected Time Entries		
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DG	Research re: PAGA approval	Jan 16/20
Posted		1.10
DG	Reviewing: PAGA Long Form agreement	Jan 16/20
Posted		0.90
DG	Reviewing time records for accuracy	Jan 16/20
Posted		4.10
DG	Reviewing deposition transcript for accuracy with client Tabatabai	Jan 17/20
Posted		0.70
DG	Reviewing: Rimler v. Postmates Tentative ruling re: Prelim. Approval	Jan 17/20
Posted		1.10
DG	Reviewing mediation information	Jan 17/20
Posted		0.20
DG	Reviewing Turley Appendix of Employee Declarations Vol. 6	Jan 17/20
Posted		3.70
DG	Reviewing: Standing Order for Prelim. Approval Dept. 304	Jan 17/20
Posted		1.20
DG	Drafting documents: Assembling Exhibits for Harris PAGA Declaration	Jan 17/20
Posted		0.90
DG	Drafting documents: Motion for Prelim. Approval	Jan 17/20
Posted		3.50
AH	Drafting documents re declaration in support of settlement	Jan 17/20
Posted		0.30
DG	Correspondence with defense re: discovery	Jan 17/20
Posted		0.10
DG	Reviewing costs bill for accuracy	Jan 17/20
Posted		2.40
DG	Research: Re Preliminary Approval Issues	Jan 18/20
Posted		2.60
DG	Drafting documents: Class Notice	Jan 18/20
Posted		1.40
MJ	Reviewing order granting coupon settlement	Jan 18/20
Posted		0.20
DG	Negotiations: Preparations of Exhibits to Long Form Settlement Agreement	Jan 18/20
Posted		2.70
DG	Drafting documents: Declaration of Alan Harris in Support of Settlement Approval	Jan 19/20
Posted		2.40
DG	Drafting documents: Motion for Prelim. Approval of Class Action Settlement	Jan 19/20
Posted		4.50
DG	Reviewing A. Harris revisions to MPA motion	Jan 19/20
Posted		0.30
AH	Drafting documents and legal research re MPA.	Jan 19/20
Posted		3.20

Harris & Ruble Chipotle adv. Turley Selected Time Entries

DG	Drafting documents: Harris Decl. In Support of Motion for Prelim. Approval	Jan 20/20
Posted		3.20
DG	Drafting documents: CLIENT ACKNOWLEDGEMENT OF JOINT PROSECUTION AND ATTORNEY FEE SPLIT AGREEMENT	Jan 20/20
Posted		0.90
DG	Correspondence with claims admin. Re bid	Jan 20/20
Posted		0.10
DG	Drafting documents: Declaration of Alan Harris	Jan 20/20
Posted		4.10
DG	Reviewing: Christopher Thompson source documents	Jan 21/20
Posted		0.80
DG	Correspondence with defense re: MPA	Jan 21/20
Posted		0.10
DG	Drafting documents: Notice of Class Action Settlement for Prelim. Approval	Jan 22/20
Posted		2.90
DG	Reviewing: Time records for accuracy	Jan 23/20
Posted		1.50
DG	Reviewing: Expert Declaration in Support of Motion for Prelim. Approval	Jan 24/20
Posted		2.90
AH	Correspondence from FileandServe -- JOINT STIPULATION TO FILE SECOND AMENDED CLASS COMPLAINT TO FAC	Jan 24/20
Posted		0.10
AH	Correspondence with Moses re Declaration and settlement.	Jan 25/20
Posted		0.10
DG	Correspondence with defense re: mediation	Jan 28/20
Posted		0.10
AH	Drafting documents and legal research re MPA	Jan 28/20
Posted		6.70
AH	Telephone call to Susan Carrithers - voice mail -	Jan 28/20
Posted		0.10
DG	Telephone call to Susan Carrithers - spoke	Jan 28/20
Posted		0.10
DG	Correspondence with defense re stipulation	Jan 28/20
Posted		0.10
DG	Reviewing ORDER RE JOINT STIPULATION FOR AN ORDER ALLOWING ADDITIONAL PAGES FOR MEMORANDUM OF PLAINT	Jan 30/20
Posted		0.10
AH	Correspondence with Barber counsel re status.	Jan 31/20
Posted		0.10
AH	Drafting documents -- PLAINTIFFS' NOTICE OF MOTION AND MOTION FOR PRELIMINARY APPROVAL OF CLASS ACT	Jan 31/20
Posted		4.70
DG	Telephone call to Jeffrey L. Hogue - spoke	Jan 31/20
Posted		0.10
DG	Reviewing DECLARATION OF JODEY LAWRENCE OF PHOENIX CLASS ACTION ADMINISTRATION SOLUTIONS IN SUPPORT	Jan 31/20
Posted		0.80

Harris & Ruble Chipotle adv. Turley Selected Time Entries

DG Posted	Reviewing DECLARATION OF STEPHEN MOSES IN SUPPORT OF PLAINTIFFS MOTION FOR PRELIMINARY APPROVAL OFC	Jan 31/20 1.50
DG Posted	Reviewing: Receipt re: download of Barber items	Feb 02/20 0.10
AH Posted	Telephone call to Jeffrey L. Hogue - spoke - Status. With DG.	Feb 03/20 0.30
LC Posted	Office matter- Organized and prepared case files (JTB)	Feb 07/20 3.00
AH Posted	Drafting documents and legal research re opposition to ex parte petition to intervene, scheduled wi	Feb 10/20 4.80
PM Posted	Attention to research for preparation opposition to ex parte application motion to intervene.	Feb 10/20 0.40
MJ Posted	Reviewing call records between Alan and Hogue & Belong re ex parte	Feb 10/20 0.40
DG Posted	Reviewing DECLARATION OF DAVID HARRIS IN SUPPORT OF OPPOSITION TO EX PARTE MOTION TO INTERVENE(TRAN	Feb 10/20 0.10
DG Posted	Reviewing REQUEST FOR JUDICIAL NOTICE IN SUPPORT OF PROPOSED INTERVENORS JOSH BARBER AND JOSEDELGAD	Feb 10/20 2.10
DG Posted	Reviewing PROPOSED INTERVENORS JOSH BARBER AND JOSE DELGADOS EX PARTE APPLICATION RE: REQUEST TOINT	Feb 10/20 1.10
DG Posted	Reviewing DECLARATION OF JEFFREY L. HOGUE IN SUPPORT OF PROPOSED INTERVENORS EX PARTE APPLICATION R	Feb 10/20 1.10
DG Posted	Drafting documents: Opposition to Ex Parte Motion to Intervene	Feb 10/20 3.20
DG Posted	Research: Opposition to Motion to Intervene	Feb 10/20 1.20
DG Posted	Correspondence with File & Serve OppositionDefendants Opposition to Ex Parte Petition to Intervene	Feb 11/20 0.10
AH Posted	Declaration of David Garrett in Support of Opposition to Ex Parte Motion to Intervene	Feb 11/20 0.10
AH Posted	Drafting documents and legal research re outline of argument at ex parte.	Feb 11/20 1.40
DG Posted	Reviewing DEFENDANTS EVIDENTIARY OBJECTIONS TO THE PROPOSED INTERVENORS EX PARTE APP RE RJN ANDDECL	Feb 11/20 0.40
DG Posted	Reviewing DEFENDANTS REQUEST FOR JUDICIAL NOTICE ISO OPP TO EX PARTE APPLICATION TO INTERVENE(TRANS	Feb 11/20 0.50
DG Posted	Reviewing DECLARATION OF STEVE L. HERNANDEZ ISO OPP TO EX PARTE APPLICATION TO INTERVENE (TRANSACTION	Feb 11/20 0.40
DG Posted	Reviewing DEFENDANTS OPPOSITION TO EX PARTE PETITION TO INTERVENE (TRANSACTION ID # 64707918) FILED	Feb 11/20 0.40
DG Posted	Drafting documents DECLARATION OF DAVID GARRETT IN SUPPORT OF OPPOSITION TO EX PARTE MOTION TO INTE	Feb 11/20 1.10

Harris & Ruble Chipotle adv. Turley Selected Time Entries

DG	Research: Certified Mail Proof - Turley 226	Feb 13/20
Posted		0.10
AH	Drafting documents -- execute PAGA settlement agreement.	Feb 13/20
Posted		0.10
AH	Correspondence from One Legal -- • Notice of Filing of [Amended Proposed] Complaint • Proof of	Feb 13/20
Posted		0.10
LC	Office matter-Organized and prepared case files for settlement (JTB)	Feb 13/20
Posted		2.00
DG	Correspondence with File & Serve JOINT STIPULATION FOR AN ORDER ALLOWING ADDITIONAL PAGES FOR MEMO	Feb 14/20
Posted		0.10
DG	Reviewing ORDER RE PROPOSED INTERVENORS JOSH BARBER AND JOSE DELGADO'S EX PARTE APPLICATION RE:REQU	Feb 18/20
Posted		0.50
DG	Reviewing: Barber Ex Parte to Lift Stay	Feb 20/20
Posted		2.90
AH	Meeting with Moses in PS	Feb 23/20
Posted		1.20
DG	Correspondence with File & Serve ORDER RE PLAINTIFFS MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTI	Feb 24/20
Posted		0.10
DG	Telephone conference with client re approval hearing	Feb 24/20
Posted		0.10
AH	Court hearing re MPA.	Feb 24/20
Posted		0.70
AH	Reviewing documents to prepare for MPA hearing.	Feb 24/20
Posted		1.70
DG	Reviewing ORDER RE PLAINTIFFS' MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT(TRANSACTION)	Feb 24/20
Posted		0.10
DG	Court: Motion to Intervene	Feb 24/20
Posted		1.50
DG	Reviewing article about Chipote MPA on Hogue and Belong website	Feb 26/20
Posted		0.10
AH	Reviewing documents--order re settlement.	Feb 26/20
Posted		0.20
AH	CMC - Le Sure PAGA in LASC; prepare notice.	Feb 27/20
Posted		0.30
AH	Telephone call to Jeffrey L. Hogue - spoke - Left word	Feb 27/20
Posted		0.10
AH	Reviewing documents and legal research -- posting on web site of Barber counsel	Feb 27/20
Posted		0.20
DG	Telephone conference with client re approval hearing	Feb 28/20
Posted		0.10
AH	Telephone call to Jeffrey L. Hogue - spoke - Status of his web page	Feb 28/20
Posted		0.10

Harris & Ruble Chipotle adv. Turley Selected Time Entries

AH Posted	Correspondence with defense -- Please see the revised Class Notice attached. (I combined all of th	Mar 02/20 0.10
AH Posted	Telephone call to Tanika Turley - spoke - Status.	Mar 03/20 0.10
DG Posted	Reviewing NOTICE OF RELATED CASE. CV-19-000937 (STANISLAUS) (TRANSACTION ID # 64783988) FILED BY IN	Mar 03/20 0.10
AH Posted	Reviewing declaration with Steve Moses.	Mar 03/20 0.30
DG Posted	Correspondence with Jeff Hogue re: free burrito article	Mar 05/20 0.10
DG Posted	Reviewing: Supplemental Decl. Of Alan Harris	Mar 06/20 0.20
AH Posted	Drafting documents -- SUPPLEMENTAL DECLARATION OF STEPHEN MOSES IN SUPPORT OF PLAINTIFFS' MOTION FO	Mar 06/20 0.20
DG Posted	Correspondence with Tyler Belong re: intervention	Mar 09/20 0.10
AH Posted	Correspondence with Belong and other counsel re his failure to serve ex parte papers.	Mar 09/20 0.30
AH Posted	Drafting documents and legal research re opposition to ex parte application to intervene; Harris De	Mar 09/20 2.20
DG Posted	Telephone conference with client re approval hearing	Mar 10/20 0.10
AH Posted	Reviewing documents -- tentative ruling on MPA.	Mar 12/20 0.30
AH Posted	Correspondence to court -- re topics for Monday -- 1) The Court's concerns regarding the adequacy	Mar 13/20 0.10
DG Posted	Court: Continued Approval hearing	Mar 16/20 0.70
AH Posted	Correspondence to court--The parties would like to bring to the Court's attention that the March 16	Mar 16/20 0.10
AH Posted	Correspondence re settlement.	Mar 19/20 0.20
AH Posted	Correspondence re appeal in PAGA case.	Mar 19/20 0.30
DG Posted	Reviewing revised long form	Mar 20/20 0.30
AH Posted	Drafting documents and legal research re appeal.	Mar 21/20 1.40
AH Posted	Correspondence re Court Order -- The time period provided in Code of Civil Procedure sections 583.3	Mar 24/20 0.20
DG Posted	Correspondence with File & Serve Re Plaintiffs Continued Motion For Preliminary Approval of Class	Mar 26/20 0.10

Harris & Ruble Chipotle adv. Turley Selected Time Entries

DG	Correspondence with defense re: new longform	Mar 26/20
Posted		0.10
DG	Correspondence with defense re: refiling MPA	Mar 26/20
Posted		0.10
DG	Reviewing ORDER RE PLAINTIFF'S CONTINUED MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT	Mar 26/20
Posted		0.30
AH	Reviewing documents--order re MPA	Mar 26/20
Posted		0.10
AH	Correspondence re new date for LeSure CMC in LA, Judge Linfield.	Mar 28/20
Posted		0.10
DG	Drafting documents: Deposition prep letter to client	Apr 27/20
Posted		1.10
DG	Correspondence with Dept. 304 re: telephonic hearing	May 01/20
Posted		0.10
AH	Correspondence from court --I hope this message finds you well. As you are aware, the COVID-19 pan	May 01/20
Posted		0.10
LC	Drafting documents- Notice of Cont of Hearing & Order (5/28/20); file and serve (JTB)	May 03/20
Posted		0.50
LC	Drafting documents- Notice of Cont of Hearing and Order (6/22); file & serve (JTB)	May 03/20
Posted		0.50
AH	Correspondence with court--Good morning, Keenan. The Parties have conferred and we are available on	May 04/20
Posted		0.10
DG	Correspondence with Dept. 304 re telephonic hearing	May 07/20
Posted		0.10
AH	Correspondence from court -- Thank you all for conferring and getting back to me so quickly. Judge	May 07/20
Posted		0.10
AH	Reviewing documents and legal research re appeal of PAGA case settlement.	May 14/20
Posted		3.30
DG	Correspondence with Dept. 304 Status Update	May 18/20
Posted		0.10
DG	Correspondence with JMS re: status update for Dept. 304	May 18/20
Posted		0.10
DG	Court MAY 18, 2020 TELEPHONIC STATUS CONFERENCE (TRANSACTION 65646295)	May 18/20
Posted		0.50
DG	Correspondence with File & Serve ORDER AFTER MAY 18, 2020 TELEPHONIC STATUS CONFERENCE	May 19/20
Posted		0.10
AH	Correspondence re court order-- Court:CA Superior Court County of San Francisco-Civil Case Na	May 19/20
Posted		0.10
DG	Reviewing ORDER AFTER MAY 18, 2020 TELEPHONIC STATUS CONFERENCE (TRANSACTION 65646295)	May 19/20
Posted		0.20
AH	Reviewing documents--Settlement Agreement.	May 23/20
Posted		0.20

Harris & Ruble Chipotle adv. Turley Selected Time Entries		
DG	Telephone conference with client re approval hearing	May 24/20
Posted		0.10
DG	Correspondence with defense re: proposed order	May 26/20
Posted		0.10
DG	Correspondence with defense re MPA	May 27/20
Posted		0.10
AH	Reviewing documents--JOINT STIPULATION FOR AN ORDER TO SHORTEN TIME TO HEAR PLAINTIFFS' RENEWED MOT	May 27/20
Posted		0.10
AH	Reviewing documents--JOINT STIPULATION FOR AN ORDER ALLOWING ADDITIONALPAGES FOR MEMORANDUM FOR PL	May 27/20
Posted		0.10
AH	Correspondence re settlement issues.	May 27/20
Posted		0.30
DG	Correspondence with File & Serve JOINT STIPULATION FOR AND ORDER ALLOWING ADDITIONAL PAGES FOR MEM	May 28/20
Posted		0.10
DG	Correspondence with defense re: TAC and Stip	May 28/20
Posted		0.10
DG	Drafting documents Stipulation for TAC	May 28/20
Posted		0.20
DG	Reviewing ORDER JOINT STIPULATION FOR AN ORDER TO SHORTEN TIME TO HEAR PLAINTIFFS' RENEWED MOTION F	May 28/20
Posted		0.10
DG	Reviewing ORDER JOINT STIPULATION FOR AN ORDER ALLOWING ADDITIONAL PAGES FOR MEMORANDUM FORPLAINTIF	May 28/20
Posted		0.10
AH	Drafting documents--MPA	May 28/20
Posted		0.80
AH	Correspondence from defense -- Here's the Settlement Agreement signed by Chipotle, David. I'm revie	May 29/20
Posted		0.10
DG	Correspondence with defense re: signed settlement agreement	May 29/20
Posted		0.10
DG	Drafting documents: Third Amended Complaint	May 29/20
Posted		1.40
DG	Telephone conference with client re signing of settlement agreement	May 29/20
Posted		0.10
DG	Telephone conference with claims admin. Re class settlement bid	May 29/20
Posted		0.10
AH	Reviewing--JOINT STIPULATION TO FILE THIRD AMENDED CLASS COMPLAINT TO FACILITATE PRELIMINARY APPROV	May 29/20
Posted		0.10
DG	Correspondence with defense re MPA motion	May 30/20
Posted		0.10
AH	Drafting documents -- work on renewed MPA.	May 31/20
Posted		1.60
DG	Drafting documents: Third Amended Complaint	Jun 01/20
Posted		2.90

Harris & Ruble Chipotle adv. Turley Selected Time Entries

DG	Telephone conference with client re approval hearing	Jun 02/20
Posted		0.10
AH	Drafting documents -- MPA and TAC	Jun 02/20
Posted		2.20
DG	Reviewing changes to settlement agreement from defense	Jun 04/20
Posted		0.40
DG	Reviewing to Class Notice from defense	Jun 04/20
Posted		0.70
AH	Drafting documents re Plaintiffs' renewed motion for preliminary approval of class settlement.	Jun 05/20
Posted		0.40
DG	Reviewing DECLARATION OF CHRISTOPHER THOMPSON IN SUPPORT OF PLAINTIFFS' RENEWED MOTION FORPRELIMINA	Jun 05/20
Posted		0.10
DG	Reviewing ORDER ON JOINT STIPULATION TO FILE THIRD AMENDED COMPLAINT TO FACILITATE PRELIMINARY APPR	Jun 09/20
Posted		0.10
DG	Correspondence with File & Serve JOINT STIPULATION TO FILE THIRD AMENDED CLASS ACTION COMPLAINT TO	Jun 11/20
Posted		0.10
AH	Reviewing documents --	Jun 11/20
Posted	Document Title(s): JOINT STIPULATION TO FILE THIRD AMENDED CLASS ACTION C	0.10
DG	Reviewing 3RD AMENDED COMPLAINT (TRANSACTION ID # 65693793) FILED BY PLAINTIFF TURLEY, TANIKA INDIV	Jun 11/20
Posted		0.10
AH	Correspondence with court --	Jun 15/20
Posted	In its May 19, 2020, Order the Court ordered the parties to contact	0.10
DG	Correspondence with Complex Litigation re: call in number for hearing	Jun 15/20
Posted		0.10
DG	Correspondence with defense re: call in number for hearing	Jun 15/20
Posted		0.10
AH	Reviewing documents-- order continuing hearing on MPA from 6/19 to 6/23; docket.	Jun 16/20
Posted		0.10
DG	Court COMPLEX LITIGATION - MOTION FOR PRELIMINARY APPROVAL SET FOR JUN-19-2020 IS CONTINUED TO JUN-	Jun 16/20
Posted		0.90
AH	Correspondence with claims administrator	Jun 18/20
Posted		0.10
AH	Correspondence from court, forwarding tentative ruling. I hope you have been well. A tentative rul	Jun 19/20
Posted		0.10
AH	Drafting documents and legal research re tentative.	Jun 19/20
Posted		3.30
AH	Reviewing documents from Court re class action settlement tentative ruling -- I hope you have bee	Jun 19/20
Posted		0.10
AH	Drafting documents and legal research in preparation for hearing on MPA next week.	Jun 20/20
Posted		5.60
AH	Telephone call to Steve Hernandez - spoke - Discuss settlement issues. Tomorrow, ask him about Ba	Jun 22/20
Posted		0.90

Harris & Ruble Chipotle adv. Turley Selected Time Entries

AH Posted	Drafting documents and legal research re motion for preliminary approval of class settlement.	Jun 22/20 7.80
DG Posted	Correspondence with File & Serve ORDER AFTER JUNE 23, 2020 HEARING	Jun 23/20 0.10
AH Posted	Court argument re MPA.	Jun 23/20 0.70
AH Posted	Drafting documents--stipulation re trial date.	Jun 23/20 0.40
DG Posted	Court hearing re: MPA	Jun 23/20 0.70
AH Posted	Correspondence from Law360--I'm a reporter with Law360 and I'm covering the case, Tanika Turley et	Jun 23/20 0.10
DG Posted	Reviewing ORDER AFTER JUNE 23, 2020 HEARING (TRANSACTION 65720046)	Jun 23/20 0.20
DG Posted	Correspondence with defense re: stipulations	Jun 29/20 0.10
AH Posted	Correspondence with defense re settlement and extended date in which to commence trial.	Jun 30/20 0.10
DG Posted	Correspondence with File & Serve Order re: plaintiffs renewed motion for preliminary approval of c	Jul 01/20 0.10
AH Posted	Reviewing documents-- Order re: plaintiffs renewed motion for preliminary approval of class action	Jul 01/20 0.20
DG Posted	Reviewing ORDER RE PLAINTIFFS' RENEWED MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT(T	Jul 01/20 0.40
DG Posted	Telephone conference with client re approval hearing	Jul 02/20 0.10
AH Posted	Correspondence with David Winston re settlement issues -- I requested the Delgado Court Complaint f	Jul 03/20 0.10
AH Posted	Reviewing documents to prepare for hearing, tomorrow. Discuss with DG.	Jul 05/20 2.20
DG Posted	Correspondence with File & Serve Joint Stipulation to Extend The Time Within Which This Action Mus	Jul 06/20 0.10
DG Posted	Correspondence with File & Serve Order Setting Mandatory Settlement Conference	Jul 06/20 0.10
AH Posted	Drafting documents--A new transaction with transaction ID 65747487 matches your alert criteria for:	Jul 06/20 0.10
DG Posted	Correspondence with Dept. 613 re MSC	Jul 06/20 0.10
AH Posted	Correspondence from court -- Please be advised that a Mandatory Settlement Conference has been set	Jul 06/20 0.10
DG Posted	Reviewing ORDER SETTING MANDATORY SETTLEMENT CONFERENCE (TRANSACTION ID #65747814)	Jul 06/20 0.10

Harris & Ruble Chipotle adv. Turley Selected Time Entries		
DG Posted	Reviewing ORDER - JOINT STIPULATION TO EXTEND THE TIME WITHIN WHICH THIS ACTION MUST BE BROUGHT TO	Jul 06/20 0.10
DG Posted	Court CASE MANAGEMENT CONFERENCE - HEARING HELD. COUNSEL WILL PARTICIPATE IN JUDICIAL MEDIATIONAND	Jul 06/20 0.50
DG Posted	Reviewing MINUTES FOR JUL-06-2020 9:15 AM	Jul 06/20 0.10
DG Posted	Correspondence with File & Serve Order After July 6, 2020 Case Management Conference	Jul 07/20 0.10
AH Posted	Reviewing documents--Court Order after CMC	Jul 07/20 0.10
DG Posted	Reviewing ORDER AFTER JULY 6, 2020 CASE MANAGEMENT CONFERENCE (TRANSACTION ID #65751357)	Jul 07/20 0.10
DG Posted	Reviewing Order After CMC	Jul 07/20 0.50
DG Posted	Reviewing Class Action Settlement	Jul 24/20 1.10
DG Posted	Telephone - exchange of voice mail with other side re: MSC	Jul 24/20 0.10
AH Posted	Correspondence re class settlement	Jul 27/20 0.20
DG Posted	Correspondence with defense re: stipulation	Jul 30/20 0.10
AH Posted	Drafting documents -- JOINT MANDATORY SETTLEMENT CONFERENCE STATEMENT	Aug 02/20 1.20
DG Posted	Reviewing ORDER ON JOINT STIPULATION TO SHORTEN TIME TO HEAR PLAINTIFFS' MOTION FOR PRELIMINARYAPPR	Aug 02/20 0.10
DG Posted	Drafting documents: Mandatory Settlement Conference Statement	Aug 03/20 3.50
AH Posted	Correspondence to clerk- Can you please advise of the availability of a date for a hearing on prel	Aug 03/20 0.10
DG Posted	Telephone conference with other side re MSC	Aug 04/20 0.10
DG Posted	Reviewing MSC statement with defense	Aug 05/20 0.30
AH Posted	Correspondence from Janney -- MSC - Mandatory Settlement Conference -- At: Civic Center Courthouse-	Aug 05/20 0.30
AH Posted	Correspondence from court -- As you know, a Mandatory Settlement Conference has been set on Aug-14-	Aug 07/20 0.10
AH Posted	Telephone call to Stephen Moses - spoke - Status	Aug 09/20 0.20
AH Posted	Correspondence with court re date for MPA.	Aug 11/20 0.10

Harris & Ruble Chipotle adv. Turley Selected Time Entries

AH	Reviewing documents re MPA	Aug 11/20
Posted		0.10
DG	Correspondence with defense re: MSC	Aug 11/20
Posted		0.10
AH	Correspondence re upcoming mediation.	Aug 12/20
Posted		0.10
AH	Correspondence re MSC	Aug 13/20
Posted		0.10
DG	Correspondence with Dept. 613 re: MSC	Aug 13/20
Posted		0.10
DG	Correspondence with defense re stips	Aug 14/20
Posted		0.10
DG	Correspondence with Steve Hernandez re MPA	Aug 14/20
Posted		0.10
DG	Drafting documents: Class Action Settlement Agreement	Aug 14/20
Posted		3.10
DG	Court: Mandatory Settlement Conference	Aug 14/20
Posted		1.00
DG	Reviewing DECLARATION OF ESTHER SMILEY IN SUPPORT OF DEFENDANT CHIPOTLE SERVICES, LLCS MOTION FORSU	Aug 14/20
Posted		0.10
DG	Reviewing DECLARATION OF ROBERT MUSSIG IN SUPPORT OF DEFENDANT CHIPOTLE SERVICES, LLCS MOTION FORSU	Aug 14/20
Posted		0.30
DG	Reviewing MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF ITS MOTION FOR SUMMARY ADJUDICATION O	Aug 14/20
Posted		1.10
AH	Correspondence re settlement --	Aug 15/20
Posted	Document Title(s):--JOINT STIPULATION FOR AN ORDER TO SHORTEN TIM	0.10
DG	Correspondence with File & Serve The filing fees were increased by \$20.00.	Aug 17/20
Posted	Document Title(s):	0.10
DG	Correspondence with File & Serve JOINT STIPULATION FOR AN ORDER ALLOWING ADDITIONAL PAGES FOR MEMOR	Aug 20/20
Posted		0.10
AH	Reviewing documents--A new transaction with transaction ID 65865819 matches your alert criteria for	Aug 20/20
Posted		0.10
AH	Drafting documents -- MPA	Aug 20/20
Posted		1.50
DG	Drafting documents: Motion for Prelim. Approval	Aug 20/20
Posted		3.20
DG	Reviewing ORDER ON JOINT STIPULATION FOR AN ORDER ALLOWING ADDITIONAL PAGES FOR MEMORANDUM FOR PLAIN	Aug 20/20
Posted		0.10
PM	Research regarding recent Ninth Circuit filing.	Aug 21/20
Posted		0.10
DG	Drafting documents: Declaration of Alan Harris in Support of Motion for Prelim. Approval	Aug 21/20
Posted		2.80

Harris & Ruble Chipotle adv. Turley Selected Time Entries

DG Posted	Reviewing DECLARATION OF ALAN HARRIS IN SUPPORT OF PLAINTIFFS MOTION TO COMPEL FURTHER RESPONSES TO	Aug 27/20 0.10
DG Posted	Reviewing SEPARATE STATEMENT OF DISCOVERY ISSUES IN DISPUTE FOR PLAINTIFF'S REQUEST FOR PRODUCTION	Aug 27/20 0.10
DG Posted	Drafting documents: Declaration of Alan Harris in Support of Prelim. Approval	Aug 28/20 2.10
DG Posted	Drafting documents: Class Notice	Sep 01/20 1.10
DG Posted	Reviewing DECLARATION OF JODEY LAWRENCE OF PHOENIX CLASS ACTION ADMINISTRATION SOLUTIONS IN SUPPORT	Sep 01/20 0.20
AH Posted	Drafting documents--A new transaction with transaction ID 65907583 matches your alert criteria for:	Sep 04/20 0.20
AH Posted	Drafting documents--A new transaction with transaction ID 65907575 matches your alert criteria for:	Sep 04/20 0.10
DG Posted	Correspondence with S. Hernandez re MPA hearing	Sep 04/20 0.10
DG Posted	Drafting documents: Motion for Prelim. Approval	Sep 04/20 2.40
DG Posted	Client administration: Getting Plaintiff Signature on settlement agreement	Sep 04/20 0.20
DG Posted	Reviewing: Deposition Transcript of Christopher Thompson	Sep 11/20 1.30
AH Posted	Correspondence with Chipotle counsel re mediation questionnaire and motion to strike appeal.	Sep 12/20 0.10
DG Posted	Reviewing Salguero Transcript	Sep 14/20 0.50
DG Posted	Correspondence with defense re settlement	Sep 15/20 0.10
DG Posted	Correspondence with defense regarding settlement	Sep 16/20 0.10
AH Posted	Correspondence re mediation questionnaire in court of appeal.	Sep 18/20 0.10
AH Posted	Reviewing documents--. A tentative ruling for the hearing next Tuesday is attached. I would appre	Sep 21/20 0.20
DG Posted	Correspondence with defense re: prelim. Approval hearing	Sep 21/20 0.10
DG Posted	Correspondence with Complex Litigation re hearing	Sep 21/20 0.10
DG Posted	Correspondence with regarding MPA	Sep 21/20 0.10
AH Posted	Drafting documents--proposed Order re preliminary approval	Sep 22/20 0.10

Harris & Ruble Chipotle adv. Turley Selected Time Entries

DG Posted	Correspondence with File & Serve ORDER AFTER SEPTEMBER 23, 2020 HEARING	Sep 23/20 0.10
AH Posted	Correspondence from FS--A new transaction with transaction ID 65959345 matches your alert criteria	Sep 23/20 0.10
DG Posted	Telephone conference with client re approval hearing	Sep 23/20 0.10
AH Posted	Correspondence to defense -- Attached please find the proposed addendum on Turley, along with the	Sep 23/20 0.10
DG Posted	Court: Motion for Prelim. Approval	Sep 23/20 0.50
DG Posted	Reviewing ORDER AFTER SEPTEMBER 23, 2020 HEARING - [***FSX E-SERVICE TRANSACTION ID: 65959345***]	Sep 23/20 0.30
DG Posted	Correspondence with defense regarding Class Notice	Sep 24/20 0.10
AH Posted	Correspondence with court re proposed order	Sep 29/20 0.10
DG Posted	Correspondence with Complex Litigation re hearing	Sep 29/20 0.10
AH Posted	Correspondence with FS--A new transaction with transaction ID 65979085 matches your alert criteria	Sep 30/20 0.10
AH Posted	Drafting documents--AH supplemental declaration.	Sep 30/20 0.30
DG Posted	Correspondence with File & Serve ORDER GRANTING PRELIMINARY APPROVAL OF AMENDED CLASS ACTION SETTLE	Oct 02/20 0.10
AH Posted	Correspondence from FS--A new transaction with transaction ID 65986398 matches your alert criteria	Oct 02/20 0.10
DG Posted	Reviewing ORDER GRANTING PRELIMINARY APPROVAL OF AMENDED CLASS ACTION SETTLEMENT(TRANSACTION6598639	Oct 02/20 0.20
AH Posted	Correspondence with Plaintiff Turley re status.	Oct 03/20 0.10
AH Posted	Drafting documents to office to explain procedures to be followed upon receipt of inquiries from cl	Oct 03/20 0.30
AH Posted	Correspondence with administrator-- Thank you for the opportunity to administer the Turley v. Chi	Oct 05/20 0.10
AH Posted	Telephone call to Dave Scott Harris - spoke - Left word re preparation of fee petition and motion	Oct 05/20 0.10
DG Posted	Correspondence with defense re Notice	Oct 07/20 0.10
DG Posted	Reviewing: Revised Class Notice	Oct 07/20 0.30
AH Posted	Correspondence to court- On October 2, 2020, the Court granted Preliminary Approval of the Class Se	Oct 09/20 0.10

Harris & Ruble Chipotle adv. Turley Selected Time Entries		
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DG	Correspondence with Complex court re settlement	Oct 09/20
Posted		0.10
AH	Correspondence with court re no need to appear next Tuesday.	Oct 09/20
Posted		0.10
DG	Correspondence with co-counsel re hearing	Oct 10/20
Posted		0.10
DG	Correspondence with claims admin. Re notice	Oct 13/20
Posted		0.10
DG	Correspondence with File & Serve ORDER VACATING OCTOBER 13, 2020 CASE MANAGEMENT CONFERENCE	Oct 14/20
Posted		0.10
AH	Correspondence from F&S -- A new transaction with transaction ID 66022310 matches your alert criter	Oct 14/20
Posted		0.10
DG	Reviewing: ORDER VACATING OCTOBER 13, 2020 CASE MANAGEMENT CONFERENCE (TRANSACTION #66022310)	Oct 14/20
Posted		0.10
DG	Correspondence with defense re Notice	Oct 15/20
Posted		0.10
AH	Correspondence from Phoenix-- We received the data on Friday, October 16th. We are currently revie	Oct 19/20
Posted		0.10
DG	Correspondence with claims admin.	Oct 19/20
Posted		0.10
DG	Correspondence with claims admin. Re Mailing documents	Oct 20/20
Posted		0.10
DG	Telephone conference with client	Oct 21/20
Posted		0.10
DG	Correspondence with defense	Oct 22/20
Posted		0.10
DG	Reviewing: Order Granting Prelim. Approval prior to mailing	Oct 22/20
Posted		0.10
DG	Correspondence with defense re: Notice process	Oct 23/20
Posted		0.10
DG	Correspondence with defense regarding Class Notice	Oct 23/20
Posted		0.10
AH	Telephone call to Stephen Moses - spoke - Status	Oct 26/20
Posted		0.10
AH	Correspondence from administrator-- Attached are the formatted mailing documents for your review	Oct 27/20
Posted		0.10
DG	Correspondence with claims admin. Re Notice	Oct 27/20
Posted		0.10
DG	Reviewing: Class Notice Materials	Oct 27/20
Posted		1.90
DG	Correspondence with defense regarding Class Notice	Oct 27/20
Posted		0.10

Harris & Ruble Chipotle adv. Turley Selected Time Entries		
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DG	Correspondence with defense regarding Class Notice	Oct 27/20
Posted		0.10
DG	Drafting documents: Declaration of Tanika Turley in Support of Motion for Attorney Fees	Oct 28/20
Posted		1.20
DG	Correspondence with claims admin. Re Class Notice	Oct 28/20
Posted		0.10
DG	Telephone conference with client	Oct 28/20
Posted		0.10
DG	Correspondence with defense regarding Class Notice	Oct 29/20
Posted		0.10
AH	Correspondence with Phoenix Administration re formatting Notice to class	Oct 29/20
Posted		0.10
DG	Reviewing: spreadsheet with payment totals to class members	Oct 30/20
Posted		1.10
DG	Correspondence with defense regarding Class Notice	Oct 30/20
Posted		0.10
AH	Correspondence from administrator-- Please be advised the initial mailing & emailing were completed	Nov 02/20
Posted		0.10
DG	Correspondence with claims administrator re website	Nov 02/20
Posted		0.10
DG	Reviewing Class Notice Package for mailing	Nov 02/20
Posted		0.90
DG	Correspondence with Claims Admin. Re class notice	Nov 02/20
Posted		0.10
DG	Reviewing time sheets for attorney fees motion	Nov 03/20
Posted		2.20
DG	Correspondence with defense regarding Class Notice	Nov 03/20
Posted		0.10
DG	Drafting documents: [proposed] Order Granting Motion for Attorney Fees	Nov 04/20
Posted		1.20
DG	Drafting documents: Motion for Attorney Fees, Reimbursement of Costs and Enhancement Award	Nov 05/20
Posted		3.10
DG	Research re: attorney fees motion	Nov 05/20
Posted		0.80
DG	Telephone conference with client re Motion for Attorney fees	Nov 05/20
Posted		0.10
DG	Drafting documents: [proposed] Order Granting Final Approval	Nov 05/20
Posted		0.70
DG	Correspondence with defense regarding Class Notice	Nov 05/20
Posted		0.10
DG	Correspondence with defense re: settlement	Nov 05/20
Posted		0.10

Harris & Ruble Chipotle adv. Turley Selected Time Entries

DG	Telephone conference with client regarding Notice	Nov 05/20
Posted		0.10
DG	Reviewing OBJECTIONS TO PLAINTIFFS EVIDENCE (TRANSACTION ID # 62440956) FILED BY DEFENDANT CHIPOTLE	Nov 05/20
Posted		0.10
DG	Reviewing APPENDIX OF EMPLOYEE DECLARATIONS IN SUPPORT OF DEFENDANT CHIPOTLE SERVICES, LLC SOPPOSITI	Nov 05/20
Posted		0.10
DG	Reviewing LAW AND MOTION 302, PLAINTIFF TANIKA TURLEY'S MOTION TO COMPEL FURTHER RESPONSES TO FORM I	Nov 05/20
Posted		0.10
DG	Reviewing NOTICE TO PLAINTIFF	Nov 05/20
Posted		0.10
DG	Reviewing 1ST AMENDED COMPLAINT (TRANSACTION ID # 100002450) FILED BY PLAINTIFF TURLEY, TANIKA INDI	Nov 05/20
Posted		0.10
DG	Reviewing cost bill for attorney fees motion	Nov 06/20
Posted		0.90
DG	Drafting documents: Thompson settlement	Nov 10/20
Posted		1.10
DG	Drafting documents: Motion for Final Approval	Nov 10/20
Posted		2.30
DG	Correspondence with defense regarding Thompson settlement	Nov 11/20
Posted		0.10
AH	Correspondence re -- Attached is the weekly report.	Nov 13/20
Posted		0.10
DG	Telephone conference with client re settlement	Nov 16/20
Posted		0.10
DG	Telephone conference with client re approval hearing	Nov 17/20
Posted		0.10
DG	Reviewing time records for accuracy	Nov 17/20
Posted		1.50
DG	Correspondence with defense regarding Class Notice	Nov 17/20
Posted		0.10
DG	Reviewing case hours	Nov 18/20
Posted		0.10
DG	Reviewing Costs for case	Nov 18/20
Posted		0.30
DG	Correspondence with defense re: Notice	Nov 18/20
Posted		0.10
DG	Reviewing claims admin. Website for accuracy	Nov 18/20
Posted		0.10
DG	Reporting: Claims Admin. Report for the week	Nov 18/20
Posted		0.10
DG	Research: Duran v. US Bank Nat. ASsocation	Nov 18/20
Posted		0.10

Harris & Ruble Chipotle adv. Turley Selected Time Entries		
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DG	Drafting documents: Declaration of Tanika Turley in Support of Final Approval	Nov 18/20
Posted		1.10
AH	Correspondence from administration re weekly report.	Nov 20/20
Posted		0.10
DG	Client administration: Attendance at final approval hearing, handling class member calls, supervisi	Nov 20/20
Posted		10.00
DG	Drafting documents: Declaration of Alan Harris in Support of Final Approval	Nov 20/20
Posted		3.20
AH	Correspondence from Phoenix--Attached is the weekly report.	Nov 25/20
Posted		0.10
AH	Correspondence from administrator-- Attached are the preliminary calculations for your review and a	Nov 28/20
Posted		0.10
MC1	Reviewing documents	Dec 06/20
Posted	Preparation of Case Costs: -Westlaw -Postage -File & Serve Express -Sup	5.30
DG	Reviewing Case Costs	Dec 07/20
Posted		0.10
DG	Reviewing: Motion for Attorney Fees	Dec 07/20
Posted		0.30
DG	Reviewing: Declaration of Alan Harris	Dec 07/20
Posted		0.20
DG	Filing documentation: Motion for Attorney Fees, Reimbursement of Costs and Enhancement Award	Dec 09/20
Posted		0.20

Exhibit 2

NORTH BAY LAW GROUP -- CLIENT COSTS LEDGER

CLIENTS: **Tanika Turley, et al.**
 MATTER: **Turley vs. Chipotle**

Invoice Date	Type	Description	Charges
3/5/2015	Postage	Certified Mailing: Chipotle Services, LLC (226 Letter)	\$6.49
3/25/2015	Filing Fees	Bay City Legal: Summons, Complaint filing in San Francisco County Superior Court	\$450.00
3/27/2015	Postage	Certified Mailing: Chipotle Services, LLC & California Labor & Workforce Development Agency (PAGA)	\$16.48
7/27/2015	Filing Fees	One Legal: First Amended Summons, First Amended Complaint	\$39.95
7/27/2015	Service/Handling Fees	One Legal: First Amended Summons, First Amended Complaint	\$22.90
7/30/2015	Process Service	One Legal: Chipotle Service	\$68.95
7/30/2015	Filing Fees	One Legal	\$14.95
7/31/2015	Filing Fees	One Legal: Case Management Statement	\$22.90
10/13/2015	Filing Fees	File & Serve Xpress	\$7.00
2/8/2016	Filing Fees	File & Serve Xpress	\$9.50
8/31/2016	Filing Fees	File & Serve Xpress: Plaintiff's Motion To Compel Discovery	\$450.50
9/9/2016	Filing Fees	File & Serve Xpress: Plaintiff's Motion To Compel, Reply Memorandum	\$73.70
10/20/2016	Filing Fees	File & Serve Xpress: Notice of Order Continuing Status Conference	\$7.00
12/7/2016	Mileage, Bridge Toll & Parking	Objection Hearing, San Francisco Superior Court, San Francisco, CA	\$27.12
12/31/2016	Filing Fees	File & Serve Xpress	\$47.50
3/1/2017	Filing Fees	File & Serve Xpress: Application for Complex Designation With Statutory Fee	\$1,074.00
2/8/2017	Filing Fees	One Legal: Courtesy Copy Application for Complex Designation	\$26.95
3/7/2017	Court Reporter	Stevens - Koenig: Deposition of David Bruce Gottlieb	\$1,283.75
4/19/2017	Mileage, Bridge Toll & Parking	Case Management Conference, San Francisco Superior Court, San Francisco, CA	\$27.40

6/6/2017	Mileage, Bridge Toll & Parking	Client's Deposition in San Francisco, CA	\$55.62
6/6/2017	Business Meal	Boudin Bakery & Café, San Francisco, CA	\$13.17
6/27/2017	Mileage, Bridge Toll & Parking	Case Management Conference, San Francisco Superior Court, San Francisco, CA	\$27.12
6/27/2017	Travel	Uber, San Francisco, CA	\$26.30
7/28/2017	Mileage, Bridge Toll & Parking	Case Management Conference, San Francisco Superior Court, San Francisco, CA	\$27.40
8/17/2017	Court Reporter	Litigation Services: 7/28/2017 Hearing before Honorable Judge Curtis Karnow	\$225.00
8/17/2017	Filing Fees	File & Serve Xpress: Plaintiff's Complex Case Status Conference Statement	\$15.00
8/21/2017	Mileage, Bridge Toll & Parking	Case Management Conference, San Francisco Superior Court, San Francisco, CA	\$27.40
12/29/2017	Mileage, Bridge Toll & Parking	Case Management Conference, San Francisco Superior Court, San Francisco, CA	\$27.40
5/22/2018	Transcript Fee	Certified Copy of Client's Deposition Transcript	\$901.90
5/24/2018	Filing Fees	File & Serve Xpress: Plaintiff's Motion for Class Certification; Declaration et al.	\$75.00
6/4/2018	Mileage, Bridge Toll & Parking	Case Management Conference, San Francisco Superior Court, San Francisco, CA	\$27.40
10/31/2018	Mileage, Bridge Toll & Parking	Motion for Class Certification, San Francisco Superior Court, San Francisco, CA	\$27.40
2/11/2020	Mileage, Bridge Toll & Parking	Motion to Intervene, San Francisco Superior Court, San Francisco, CA	\$27.40
2/24/2020	Mileage, Bridge Toll & Parking	Motion for Preliminary Approval of Class Action Settlement, San Francisco Superior Court, San Francisco, CA	\$27.40
6/23/2020	Court Call	Telephonic Appearance Fee	\$94.00
7/6/2020	Court Call	Telephonic Appearance Fee	\$94.00
9/23/2020	Court Call	Telephonic Appearance Fee	\$94.00
Total Costs			\$5,489.95

Harris and Ruble
Chipotle - Costs
All Transactions

Trans #	Date	Name	Source Name	Memo	Amount
54100 - Client Cost					
54110 - Misc client cost - billable					
22,663	03/21/2018	Chipotle	Chipotle	Chipotle - Phoenix Settlement Administration Bel Air Notice	5,793.30
Total 54110 - Misc client cost - billable					5,793.30
54115 - Transcripts					
9,072	07/10/2017	Chipotle	A. Maggi Saunders & Associates	Original Transcript: Edward Stinson Inv#21708	1,423.00
18,271	08/13/2018	Chipotle	Chipotle	Original Transcripts - Deposition of Christopher Thompson	1,500.00
12,120	08/24/2018	Chipotle	Litigation Service & Tech of Ca., LLC	Original Transcripts - Deposition of Janie Salguero	225.00
18,268	09/07/2018	Chipotle	Chipotle	Original Transcripts - Deposition of Kadiedra Crawford	1,900.00
12,274	09/13/2018	Chipotle	A. Maggi Saunders & Associates	Original Transcript and One Copy: Jared Fonua Inv#221849	1,129.00
16,201	01/18/2020	Chipotle	Civil Public Web	Chipotle	7.50
17,299	02/27/2020	Chipotle	Pacer	Chipotle 41 pages	4.10
18,270	08/01/2020	Chipotle	Chipotle	Original Transcripts - Deposition of Taraneh Tabatabai	1,500.00
Total 54115 - Transcripts					7,688.60
54120 - Witness Fees					
12,048	03/01/2018	Chipotle	Stephen Moses	Expert Witness	1,250.00
Total 54120 - Witness Fees					1,250.00
54130 - Filing Fees					
19,008	08/06/2020	Chipotle	Janney & Janney	Chipotle Inv #3744318 Mandatory Settlement Conference	259.00
19,158	08/24/2020	Chipotle	One Legal LLC	Chipotle - Order #15009798 Joint MSC Statement	62.00
23,765	12/07/2020	Chipotle	Chipotle	Motion for Attorney Fees, Reimbursement of Costs and Enhancement Award	60.00
23,765	12/07/2020	Chipotle	Chipotle	Motion for Final Approval of Class Action Settlement	60.00
Total 54130 - Filing Fees					441.00
54140 - Research Fees					
6,978	12/31/2015	Chipotle	Thomson Reuters	Chipotle 1/01/15-12/31/15	125.00
9,765	01/03/2017	Chipotle	Thomson Reuters	Chipotle 1/01/16-12/31/16	250.00
12,441	12/26/2017	Chipotle	Thomson Reuters	Chipotle 1/01/17-12/31/17	386.46
15,558	12/31/2018	Chipotle	Thomson Reuters	Chipotle1/01/18-12/31/18	5,041.45
16,100	11/21/2019	Chipotle	Thomson Reuters	Chipotle 1/01/19-12/31/19	1,007.43
18,045	05/06/2020	Chipotle	Thomson Reuters	Chipotle 3/01/20-3/31/20	4.19
18,857	08/05/2020	Chipotle	Thomson Reuters	Chipotle 7/01/20-7/31/20	17.78
Total 54140 - Research Fees					6,832.31
54160 - Courier Services/ Attorney Serv					
23,788	09/01/2017	Chipotle	File and ServeXpress	Chipotle CM 8/27/17	20.00
23,787	10/02/2017	Chipotle	File and ServeXpress	Chipotle - Notice of Order Assigning Coordination Judge	15.00
23,787	10/02/2017	Chipotle	File and ServeXpress	Chipotle CM 9/28/17	20.00
23,787	10/02/2017	Chipotle	File and ServeXpress	Chipotle - Notice of Order Assigning Coordination Motion Judge	40.70
23,787	10/02/2017	Chipotle	File and ServeXpress	Chipotle - Joint Complex Case Status Conference Statement and Request for Continuance Pending H...	41.80
23,785	11/17/2017	Chipotle	File and ServeXpress	Chipotle - Notice of Order Setting Hearing on Petition for Coordination and Stay	40.70
23,785	11/17/2017	Chipotle	File and ServeXpress	Chipotle CM 10/18/17	20.00
23,786	12/01/2017	Chipotle	File and ServeXpress	Chipotle CM 11/14/17	20.00
13,141	01/16/2018	Chipotle	File and ServeXpress	Chipotle - Joint Complex Case Status Conference Statement	41.50
13,141	01/16/2018	Chipotle	File and ServeXpress	Chipotle CM 12/29/17	20.00
13,333	02/21/2018	Chipotle	File and ServeXpress	Chipotle CM 1/17/18	20.00

Harris and Ruble
Chipotle - Costs
All Transactions

Trans #	Date	Name	Source Name	Memo	Amount
14,098	03/12/2018	Chipotle	File and ServeXpress	Chipotle CM 2/27/18	20.00
14,100	04/21/2018	Chipotle	File and ServeXpress	Chipotle CM 3/27/18	20.00
14,101	05/16/2018	Chipotle	File and ServeXpress	Chipotle CM 4/27/18	20.00
14,102	06/17/2018	Chipotle	File and ServeXpress	Chipotle - REQUEST FOR JUDICIAL NOTICE IN SUPPORT OF PLAINTIFFS MOTION FOR CLASS CERTIFIC	15.00
14,102	06/17/2018	Chipotle	File and ServeXpress	Chipotle - Case Management Statement Turley, Tanika (Plaintiff)	40.40
14,102	06/17/2018	Chipotle	File and ServeXpress	Chipotle - Plaintiffs Request for Documents Set Two PI Notice of Deposition of Smiley PI Notice ...	8.00
14,102	06/17/2018	Chipotle	File and ServeXpress	Chipotle CM 5/30/18	20.00
14,103	07/12/2018	Chipotle	File and ServeXpress	Chipotle CM 6/25/18	20.00
14,104	08/17/2018	Chipotle	File and ServeXpress	Chipotle - Notice of Deposition of Rebecca E. Romero Notice of Deposition of Lorena Sanchez Noti...	8.00
14,104	08/17/2018	Chipotle	File and ServeXpress	Chipotle - Notice of Motion and Motion for Sanctions Turley, Tanika (Plaintiff)	8.00
14,104	08/17/2018	Chipotle	File and ServeXpress	Chipotle - Objection to Deposition Notice of Janie Salguero Turley, Tanika (Plaintiff)	8.00
14,104	08/17/2018	Chipotle	File and ServeXpress	Chipotle CM 7/25/18	20.00
14,105	09/17/2018	Chipotle	File and ServeXpress	Chipotle - Notice of Deposition of Jared Fonua	8.00
14,105	09/17/2018	Chipotle	File and ServeXpress	Chipotle - PLAINTIFF T. TURLEYS OBJECTION TO AMENDED NOTICE OF DEPOSITION AND OTHER DISC	8.00
14,105	09/17/2018	Chipotle	File and ServeXpress	Chipotle - PLAINTIFF T. TURLEYS OBJECTION TO NOTICE OF DEPOSITION OF MARK RENTFROW	8.00
14,105	09/17/2018	Chipotle	File and ServeXpress	Chipotle - PLAINTIFFS NOTICE OF MOTION AND MOTION TO COMPEL FURTHER RESPONSES TO PLAIN	42.10
14,105	09/17/2018	Chipotle	File and ServeXpress	Chipotle - SEPARATE STATEMENT OF DISCOVERY ISSUES IN DISPUTE FOR PLAINTIFFS REQUEST FOR	42.30
14,105	09/17/2018	Chipotle	File and ServeXpress	Chipotle - Declaration of Alan Harris IN SUPPORT OF PLAINTIFFS MOTION TO COMPEL FURTHER RESPOI	57.30
14,105	09/17/2018	Chipotle	File and ServeXpress	Chipotle CM 8/27/18	20.00
14,106	10/15/2018	Chipotle	File and ServeXpress	Chipotle - Plaintiff's Notice of Motion AND MOTION TO COMPEL FURTHER RESPONSES TO PLAINTIFFS RE	60.00
14,106	10/15/2018	Chipotle	File and ServeXpress	Chipotle - PLAINTIFFS OPPOSITION TO DEFENDANT CHIPOTLE SERVICES, LLC MOTION TO DENY CLAS	15.00
14,106	10/15/2018	Chipotle	File and ServeXpress	Chipotle - Declaration of Alan Harris in Support of Opposition to Defendant Motion to Deny Class...	15.00
14,106	10/15/2018	Chipotle	File and ServeXpress	Chipotle CM 9/11/18	20.00
14,107	11/15/2018	Chipotle	File and ServeXpress	Chipotle - Joint Stip to Continue Dates for Mtn to Compel	61.00
14,107	11/15/2018	Chipotle	File and ServeXpress	Chipotle - Reply to Def Opposition to Plaintiff's Mtn for Class Certification	48.70
14,107	11/15/2018	Chipotle	File and ServeXpress	Chipotle - Declaration of AH and Request for Judicial Notice in Support of Plaintiff's Reply to Def	50.80
14,107	11/15/2018	Chipotle	File and ServeXpress	Chipotle - Plaintiff's Opp to Mtn for Summary Adjudication of Plaintiff's First and Seventh Caus...	46.70
14,107	11/15/2018	Chipotle	File and ServeXpress	Chipotle - Declaration of AH in Supp of Plaintiff Opp to Def Mtn for Summary Adj of Plaintiff Fi...	48.40
14,107	11/15/2018	Chipotle	File and ServeXpress	Chipotle - Jnt Stip to Continue Date for Chipotle Mtn for Summary Adj for Two Days	61.20
14,107	11/15/2018	Chipotle	File and ServeXpress	Chipotle CM 10/30/18	20.00
14,108	12/14/2018	Chipotle	File and ServeXpress	Chipotle - Notice of Withdrawal of Motion to Compel Further Responses	40.30
14,108	12/14/2018	Chipotle	File and ServeXpress	Chipotle - Joint Stipulation to Continue Case Management Conference	61.20
14,108	12/14/2018	Chipotle	File and ServeXpress	Chipotle CM 11/15/18	20.00
20,655	01/12/2019	Chipotle	File and ServeXpress	Chipotle CM 12/28/18	20.00
20,656	02/13/2019	Chipotle	File and ServeXpress	Chipotle - Stipulation to Continue CMC	61.20
20,656	02/13/2019	Chipotle	File and ServeXpress	Chipotle CM 1/18/19	20.00
20,657	03/16/2019	Chipotle	File and ServeXpress	Chipotle CM 2/27/19	20.00
20,658	04/15/2019	Chipotle	File and ServeXpress	Chipotle CM 3/28/19	20.00
20,659	05/23/2019	Chipotle	File and ServeXpress	Chipotle CM 4/25/19	20.00
20,660	06/18/2019	Chipotle	File and ServeXpress	Chipotle CM 5/28/19	20.00
20,661	07/13/2019	Chipotle	File and ServeXpress	Chipotle - JOINT STIPULATION TO CONTINUE CASE MANAGEMENT CONFERENCE AND MOTION HEARIN	61.20
20,661	07/13/2019	Chipotle	File and ServeXpress	Chipotle CM 6/6/2019	20.00
20,662	08/21/2019	Chipotle	File and ServeXpress	Chipotle - Joint Case Management Stmt	42.20
20,662	08/21/2019	Chipotle	File and ServeXpress	Chipotle - JOINT STIPULATION TO EXTEND THE TIME WITHIN WHICH THIS ACTION MUST BE BROUGHT	40.80
20,662	08/21/2019	Chipotle	File and ServeXpress	Chipotle CM 7/22/19	20.00

Harris and Ruble
Chipotle - Costs
All Transactions

Trans #	Date	Name	Source Name	Memo	Amount
20,663	09/16/2019	Chipotle	File and ServeXpress	Chipotle CM 8/8/19	20.00
20,664	10/11/2019	Chipotle	File and ServeXpress	Chipotle CM 9/27/19	20.00
20,665	11/13/2019	Chipotle	File and ServeXpress	Chipotle - JOINT STIPULATION TO CONTINUE CASE MANAGEMENT CONFERENCE FOLLOWING SETTLE	61.00
20,665	11/13/2019	Chipotle	File and ServeXpress	Chipotle CM 10/21/19	20.00
16,707	12/15/2019	Chipotle	File and ServeXpress	Chipotle CM 11/27/19	20.00
16,720	01/22/2020	Chipotle	File and ServeXpress	Chipotle CM 12/27/19	20.00
17,286	02/25/2020	Chipotle	File and ServeXpress	Chipotle - Joint Stipulation to Continue Case Management Conference Following Settlement Turley,...	61.00
17,286	02/25/2020	Chipotle	File and ServeXpress	Chipotle - JOINT STIPULATION TO FILE SECOND AMENDED CLASS COMPLAINT TO FACILITATE PRELIM	69.30
17,286	02/25/2020	Chipotle	File and ServeXpress	Chipotle - Second Amended Complaint	46.40
17,286	02/25/2020	Chipotle	File and ServeXpress	Chipotle - JOINT STIPULATION FOR AN ORDER ALLOWING ADDITIONAL PAGES FOR MEMORANDUM FC	40.80
17,286	02/25/2020	Chipotle	File and ServeXpress	Chipotle - PLAINTIFFS' NOTICE OF MOTION AND MOTION FOR PRELIMINARY APPROVAL OF CLASS ACT	47.80
17,286	02/25/2020	Chipotle	File and ServeXpress	Chipotle - DECLARATION OF TANIKA TURLEY IN SUPPORT OF PLAINTIFFS' MOTION FOR PRELIMINARY	65.70
17,286	02/25/2020	Chipotle	File and ServeXpress	Chipotle - CM 1/31/20	20.00
17,576	03/15/2020	Chipotle	File and ServeXpress	Chipotle - JOINT STIPULATION FOR AN ORDER ALLOWING ADDITIONAL PAGES FOR MEMORANDUM FC	20.00
17,576	03/15/2020	Chipotle	File and ServeXpress	Chipotle- Declaration of David Harris in Support of Opposition to Ex Parte Motion to Intervene T...	15.00
17,576	03/15/2020	Chipotle	File and ServeXpress	Chipotle - PLAINTIFFS' OPPOSITION TO EX PARTE MOTION AND MOTION TO INTERVENE; MEMORANDU	44.80
17,576	03/15/2020	Chipotle	File and ServeXpress	Chipotle - DECLARATION OF ALAN HARRIS IN OPPOSITION TO EX PARTE APPLICATION TO INTERVENE	43.30
17,576	03/15/2020	Chipotle	File and ServeXpress	Chipotle - Declaration of David Garrett in Support of Opposition to Ex Parte Motion to Intervene...	41.00
17,576	03/15/2020	Chipotle	File and ServeXpress	Chipotle - DECLARATION OF SUSAN CARRITHERS IN SUPPORT OF PLAINTIFFS' MOTION FOR PRELIMIN	41.10
17,576	03/15/2020	Chipotle	File and ServeXpress	Chipotle - SUPPLEMENTAL DECLARATION OF ALAN HARRIS IN SUPPORT OF MOTION FOR PRELIMINAR	46.10
17,576	03/15/2020	Chipotle	File and ServeXpress	Chipotle - SUPPLEMENTAL DECLARATION OF ALAN HARRIS IN SUPPORT OF MOTION FOR PRELIMINAR	46.00
17,576	03/15/2020	Chipotle	File and ServeXpress	Chipotle - CM 2/24/20	20.00
17,884	04/13/2020	Chipotle	File and ServeXpress	Chipotle - SUPPLEMENTAL DECLARATION OF STEPHEN MOSES IN SUPPORT OF PLAINTIFFS' MOTION I	45.60
17,884	04/13/2020	Chipotle	File and ServeXpress	Chipotle - CM 3/26/20	20.00
18,071	05/16/2020	Chipotle	File and ServeXpress	Chipotle - PLAINTIFFS' NOTICE OF MOTION AND MOTION FOR PRELIMINARY APPROVAL OF CLASS ACT	60.00
18,071	05/16/2020	Chipotle	File and ServeXpress	Chipotle - CM 4/27/20	20.00
18,497	06/19/2020	Chipotle	File and ServeXpress	Chipotle - JOINT STIPULATION FOR AN ORDER ALLOWING ADDITIONAL PAGES FOR MEMORANDUM FC	61.00
18,497	06/19/2020	Chipotle	File and ServeXpress	Chipotle - JOINT STIPULATION FOR AN ORDER TO SHORTEN TIME TO HEAR PLAINTIFFS' RENEWED MC	61.00
18,497	06/19/2020	Chipotle	File and ServeXpress	Chipotle - JOINT STIPULATION TO FILE THIRD AMENDED CLASS COMPLAINT TO FACILITATE PRELIMIN,	51.40
18,497	06/19/2020	Chipotle	File and ServeXpress	Chipotle - CM 5/29/20	20.00
18,681	07/20/2020	Chipotle	File and ServeXpress	Chipotle - JOINT STIPULATION TO FILE THIRD AMENDED CLASS COMPLAINT TO FACILITATE PRELIMIN,	20.00
18,681	07/20/2020	Chipotle	File and ServeXpress	Chipotle - DECLARATION OF JODEY LAWRENCE OF PHOENIX CLASS ACTION ADMINISTRATION SOLUT	45.80
18,681	07/20/2020	Chipotle	File and ServeXpress	Chipotle - PLAINTIFFS' NOTICE OF MOTION AND MOTION FOR PRELIMINARY APPROVAL OF CLASS ACT	103.30
18,681	07/20/2020	Chipotle	File and ServeXpress	Chipotle - DECLARATION OF ALAN HARRIS IN SUPPORT OF RENEWED MOTION FOR PRELIMINARY APF	65.80
18,681	07/20/2020	Chipotle	File and ServeXpress	Chipotle - 3rd Amended Complaint 6/11/20	46.40
18,681	07/20/2020	Chipotle	File and ServeXpress	Chipotle - JOINT STIPULATION TO EXTEND THE TIME WITHIN WHICH THIS ACTION MUST BE BROUGHT	40.50
18,681	07/20/2020	Chipotle	File and ServeXpress	Chipotle - CM 6/30/20	20.00
19,001	08/18/2020	Chipotle	File and ServeXpress	Chipotle - JOINT STIPULATION TO EXTEND THE TIME WITHIN WHICH THIS ACTION MUST BE BROUGHT	20.00
19,001	08/18/2020	Chipotle	File and ServeXpress	Chipotle - CM 7/7/20	20.00
22,714	09/18/2020	Chipotle	File and ServeXpress	Chipotle v Turley - Joint Stip for Order to Shorten Time to Hear Plaintiff's Mtn 8/15/20	81.60
22,714	09/18/2020	Chipotle	File and ServeXpress	Chipotle - CM 8/20/20	20.00
22,992	10/14/2020	Chipotle	File and ServeXpress	Chipotle - PLAINTIFFS NOTICE OF MOTION AND MOTION FOR PRELIMINARY APPROVAL OF CLASS ACT	105.10
22,992	10/14/2020	Chipotle	File and ServeXpress	Chipotle - DECLARATION OF ALAN HARRIS IN SUPPORT OF MOTION FOR PRELIMINARY APPROVAL OF	58.70
22,992	10/14/2020	Chipotle	File and ServeXpress	Chipotle - SUPPLEMENTAL DECLARATION OF ALAN HARRIS IN SUPPORT OF MOTION FOR PRELIMINAR	44.00
22,992	10/14/2020	Chipotle	File and ServeXpress	Chipotle - CM 9/30/20	20.00

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Trans #	Date	Name	Source Name	Memo	Amount
23,424	11/14/2020	Chipotle	File and ServeXpress	Chipotle CM 10/14/20	20.00
Total 54160 - Courier Services/ Attorney Serv					3,526.00
54170 - Mediation Fees					
14,753	01/07/2019	Chipotle	First Mediation Corporation	FMC Case# 9308 Mediation Date 04/10/19	7,000.00
23,766	05/10/2019	Chipotle	Chipotle	Mediation Fee Reimbursed in Porrás case	-7,000.00
Total 54170 - Mediation Fees					0.00
54190 - Printing & Photocopies					
23,709	03/25/2015	Chipotle	Chipotle	66 pages - OTHER NON EXEMPT COMPLAINTS, COMPLAINT FILED BY PLAINTIFF TURLEY, TANIKA INDIV	16.50
23,708	07/23/2015	Chipotle	Chipotle	62 pages - 1ST AMENDED COMPLAINT (TRANSACTION ID # 100002450) FILED BY PLAINTIFF TURLEY, T/	15.50
23,707	07/27/2015	Chipotle	Chipotle	1 page - SUMMONS ISSUED TO PLAINTIFF TURLEY, TANIKA INDIVIDUALLY AND ON BEHALF OF ALL OTI	0.25
23,706	07/31/2015	Chipotle	Chipotle	1 page - SUMMONS ON COMPLAINT (TRANSACTION ID # 100002892), PROOF OF SERVICE ONLY, FILED	0.25
23,705	08/27/2015	Chipotle	Chipotle	16 pages - ANSWER TO 1ST AMENDED COMPLAINT (TRANSACTION ID # 15238043) FILED BY DEFENDAI	4.00
23,704	06/23/2016	Chipotle	Chipotle	4 pages - NOTICE OF ORDER CONTINUING CASE MANAGEMENT CONFERENCE (TRANSACTION ID # 10	1.00
23,703	06/28/2016	Chipotle	Chipotle	10 pages - STATEMENT REGARDING PLAINTIFFS REQUEST FOR LEAVE OF COURT TO FILE MOTION FC	2.50
23,702	08/12/2016	Chipotle	Chipotle	215 pages - EXHIBITS 1-11 TO DECLARATION OF ALAN HARRIS IN SUPPORT OF MOTION TO COMPEL D	53.75
23,702	08/12/2016	Chipotle	Chipotle	95 pages - DECLARATION OF ALAN HARRIS IN SUPPORT OF MOTION TO COMPEL DEPOSITION OF DAV	23.75
23,702	08/12/2016	Chipotle	Chipotle	28 pages - MOTION TO COMPEL DEPOSITION OF DAVID GOTTLIEB AND/OR PERSON MOST KNOWLEDG	7.00
23,702	08/12/2016	Chipotle	Chipotle	4 pages -NOTICE OF MOTION TO COMPEL DEPOSITION OF DAVID GOTTLIEB AND/OR PERSON MOST K	1.00
23,702	08/12/2016	Chipotle	Chipotle	22 pages -SEPARATE STATEMENT OF FACTS (TRANSACTION ID # 59413757) FILED BY PLAINTIFF TURL	5.50
23,702	08/12/2016	Chipotle	Chipotle	84 pages - DECLARATION OF ALAN HARRIS (TRANSACTION ID # 59413757) FILED BY PLAINTIFF TURLE'	21.00
23,702	08/12/2016	Chipotle	Chipotle	28 pages - MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF MOTION TO COMPEL (TRAN	7.00
23,702	08/12/2016	Chipotle	Chipotle	28 pages - NOTICE OF MOTION AND MOTION TO COMPEL FURTHER RESPONSES (TRANSACTION ID # !	7.00
23,702	08/12/2016	Chipotle	Chipotle	4 pages - RESPONSE AND REQUEST TO STRIKE PLAINTIFFS STATEMENT REGARDING REQUEST FOR	1.00
23,701	09/02/2016	Chipotle	Chipotle	40 pages - SEPARATE STATEMENT OF FACTS OF DISCOVERY ISSUES IN DISPUTE FOR RESPONSES TO	10.00
23,701	09/02/2016	Chipotle	Chipotle	12 pages - DECLARATION OF ERIC DE WAMES IN SUPPORT OF OPPOSITION TO MOTION TO COMPEL I	3.00
23,701	09/02/2016	Chipotle	Chipotle	24 pages - OPPOSITION TO PLAINTIFFS MOTION TO COMPEL DEPOSITIONS (TRANSACTION ID # 16245	6.00
23,701	09/02/2016	Chipotle	Chipotle	20 pages - DECLARATION OF ERIC DE WAMES IN SUPPORT OF OPPOSITION TO MOTION TO COMPEL \	5.00
23,701	09/02/2016	Chipotle	Chipotle	24 pages - OPPOSITION TO PLAINTIFFS MOTION TO COMPEL FURTHER RESPONSES TO WRITTEN DIS'	6.00
23,700	09/09/2016	Chipotle	Chipotle	6 pages - DECLARATION OF ALAN HARRIS IN SUPPORT OF PLAINTIFFS REPLY MEMORANDUM (TRANS	1.50
23,700	09/09/2016	Chipotle	Chipotle	15 pages - REPLY MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF PLAINTIFFS MOTION	3.75
23,700	09/09/2016	Chipotle	Chipotle	18 pages - DECLARATION OF CHRISTINA NORDSTEN IN SUPPORT OF REPLY TO PLAINTIFF'S NOTICE (4.50
23,700	09/09/2016	Chipotle	Chipotle	32 pages - DECLARATION OF CHRISTINA NORDSTEN IN SUPPORT OF REPLY TO PLAINTIFF'S NOTICE (8.00
23,700	09/09/2016	Chipotle	Chipotle	18 pages - DECLARATION OF ALAN HARRIS IN SUPPORT OF REPLY TO PLAINTIFF'S NOTICE OF MOTIO	4.50
23,699	11/23/2016	Chipotle	Chipotle	8 pages - CASE MANAGEMENT STATEMENT (TRANSACTION ID # 100006612) FILED BY PLAINTIFF TURLI	2.00
23,698	12/01/2016	Chipotle	Chipotle	4 pages - NOTICE OF OBJECTION (TRANSACTION ID # 59898864) FILED BY PLAINTIFF TURLEY, TANIKA	1.00
23,697	08/21/2017	Chipotle	Chipotle	3 pages - ORDER CASE MANAGEMENT ORDER NO.4 (TRANSACTION #61026193)	0.75
23,696	09/27/2017	Chipotle	Chipotle	3 pages - NOTICE OF ORDER ASSIGNING COORDINATION JUDGE (TRANSACTION ID # 61169745) FILED	0.75
23,695	09/28/2017	Chipotle	Chipotle	8 pages - JOINT COMPLEX CASE STATUS CONFERENCE STATEMENT AND REQUEST FOR CONTINUAN	2.00
23,694	12/18/2017	Chipotle	Chipotle	3 pages - NOTICE OF ORDER DENYING TANIKA TURLEY PETITION FOR COORDINATION IN JUDICIAL CC	0.75
23,693	12/26/2017	Chipotle	Chipotle	8 pages - JOINT COMPLEX CASE STATUS CONFERENCE STATEMENT (TRANSACTION ID # 61501441) FI	2.00
23,692	01/10/2018	Chipotle	Chipotle	3 pages - ORDER RE: BELAIRE-WEST NOTICE (TRANSACTION ID 61553895	0.75
23,691	05/23/2018	Chipotle	Chipotle	354 pages - MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF ITS MOTION TO DENY CLA:	88.50
23,691	05/23/2018	Chipotle	Chipotle	399 pages - APPENDIX OF EMPLOYEE DECLARATIONS IN SUPPORT OF DEFENDANT CHIPOTLE SERVIC	99.75
23,691	05/23/2018	Chipotle	Chipotle	289 pages - APPENDIX OF EMPLOYEE DECLARATIONS IN SUPPORT OF DEFENDANT CHIPOTLE SERVIC	72.25

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23,691	05/23/2018	Chipotle	Chipotle	284 pages - APPENDIX OF EMPLOYEE DECLARATIONS IN SUPPORT OF DEFENDANT CHIPOTLE SERVICE	71.00
23,691	05/23/2018	Chipotle	Chipotle	360 pages-APPENDIX OF EMPLOYEE DECLARATIONS IN SUPPORT OF DEFENDANT CHIPOTLE SERVICE	90.00
23,691	05/23/2018	Chipotle	Chipotle	373 pages - APPENDIX OF EMPLOYEE DECLARATIONS IN SUPPORT OF DEFENDANT CHIPOTLE SERVICE	93.25
23,691	05/23/2018	Chipotle	Chipotle	261 pages -APPENDIX OF EMPLOYEE DECLARATIONS IN SUPPORT OF DEFENDANT CHIPOTLE SERVICE	65.25
23,691	05/23/2018	Chipotle	Chipotle	18 pages - DECLARATION OF STEPHEN MOSES IN SUPPORT OF PLAINTIFFS MOTION FOR CLASS CERTIFICATION	4.50
23,691	05/23/2018	Chipotle	Chipotle	12 pages - DECLARATION OF TANIKA TURLEY IN SUPPORT OF PLAINTIFFS MOTION FOR CERTIFICATION	3.00
23,691	05/23/2018	Chipotle	Chipotle	543 pages - DECLARATION OF ALAN HARRIS IN SUPPORT OF PLAINTIFFS MOTION FOR CLASS CERTIFICATION	135.75
23,691	05/23/2018	Chipotle	Chipotle	30 pages - NOTICE OF MOTION AND MOTION FOR CLASS CERTIFICATION; AND MEMORANDUM OF POINTS AND AUTHORITIES	7.50
23,690	05/24/2018	Chipotle	Chipotle	89 pages - REQUEST FOR JUDICIAL NOTICE IN SUPPORT OF PLAINTIFFS MOTION FOR CLASS CERTIFICATION	22.25
23,690	05/24/2018	Chipotle	Chipotle	360 pages - APPENDIX OF EMPLOYEE DECLARATIONS IN SUPPORT OF DEFENDANT CHIPOTLE SERVICE	90.00
23,690	05/24/2018	Chipotle	Chipotle	80 pages - REQUEST FOR JUDICIAL NOTICE IN SUPPORT OF DEFENDANT'S MOTION TO DENY CLASS CERTIFICATION	20.00
23,690	05/24/2018	Chipotle	Chipotle	68 pages - REQUEST FOR JUDICIAL NOTICE IN SUPPORT OF DEFENDANT'S MOTION TO DENY CLASS CERTIFICATION	17.00
23,690	05/24/2018	Chipotle	Chipotle	40 pages -APPENDIX OF EVIDENCE IN SUPPORT OF DEFENDANT CHIPOTLE SERVICES, LLCS MOTION TO DENY CLASS CERTIFICATION	10.00
23,690	05/24/2018	Chipotle	Chipotle	28 pages - APPENDIX OF EVIDENCE IN SUPPORT OF DEFENDANT CHIPOTLE SERVICES, LLCS MOTION TO DENY CLASS CERTIFICATION	7.00
23,690	05/24/2018	Chipotle	Chipotle	54 pages - COMPENDIUM OF TESTIMONY AND EVIDENCE IN SUPPORT OF DEFENDANTS MOTION TO DENY CLASS CERTIFICATION	13.50
23,690	05/24/2018	Chipotle	Chipotle	28 pages - MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF ITS MOTION TO DENY CLASS CERTIFICATION	7.00
23,689	05/29/2018	Chipotle	Chipotle	8 pages - JOINT CASE MANAGEMENT STATEMENT (TRANSACTION ID # 62075769) FILED BY PLAINTIFF	2.00
13,062	08/11/2018	Chipotle	Chipotle	253 pages copies for meeting with Moses	63.25
23,688	08/14/2018	Chipotle	Chipotle	12 pages - DECLARATION OF ESTHER SMILEY IN SUPPORT OF DEFENDANT CHIPOTLE SERVICES, LLC	3.00
23,688	08/14/2018	Chipotle	Chipotle	38 pages - DECLARATION OF ROBERT MUSSIG IN SUPPORT OF DEFENDANT CHIPOTLE SERVICES, LLC	9.50
23,688	08/14/2018	Chipotle	Chipotle	28 pages - MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF ITS MOTION FOR SUMMARY JUDGMENT	7.00
23,688	08/14/2018	Chipotle	Chipotle	68 pages - SEPARATE STATEMENT OF FACTS IN SUPPORT OF ITS MOTION FOR SUMMARY ADJUDICATION	17.00
13,072	08/20/2018	Chipotle	Chipotle	147 pages copies	36.75
13,057	08/23/2018	Chipotle	Chipotle	723 pages Copies for documents to prepare for depo	180.75
23,687	08/27/2018	Chipotle	Chipotle	18 pages - DECLARATION OF ALAN HARRIS IN SUPPORT OF PLAINTIFFS MOTION TO COMPEL FURTHER DISCOVERY	4.50
23,687	08/27/2018	Chipotle	Chipotle	46 pages - SEPARATE STATEMENT OF DISCOVERY ISSUES IN DISPUTE FOR PLAINTIFF'S REQUEST FOR PRODUCTION	11.50
23,687	08/27/2018	Chipotle	Chipotle	28 pages - MOTION TO COMPEL FURTHER RESPONSES TO PLAINTIFF'S REQUEST FOR PRODUCTION	7.00
23,687	08/27/2018	Chipotle	Chipotle	24 pages - NOTICE OF MOTION AND MOTION TO COMPEL FURTHER RESPONSES TO PLAINTIFF'S REQUEST FOR PRODUCTION	6.00
23,686	09/06/2018	Chipotle	Chipotle	60 pages - REQUEST FOR JUDICIAL NOTICE IN SUPPORT OF OPPOSITION TO MOTION FOR SANCTIONS	15.00
23,686	09/06/2018	Chipotle	Chipotle	24 pages - REQUEST FOR JUDICIAL NOTICE IN SUPPORT OF OPPOSITION TO MOTION FOR SANCTIONS	6.00
23,686	09/06/2018	Chipotle	Chipotle	20 pages - OPPOSITION TO MOTION FOR SANCTIONS AND REQUEST FOR SANCTIONS AGAINST PLAINTIFF	5.00
13,059	09/07/2018	Chipotle	Chipotle	823 pages copies of transcripts and exhibits - opposition motion to strike class allegations	205.75
23,685	09/11/2018	Chipotle	Chipotle	84 pages - REQUEST FOR JUDICIAL NOTICE IN SUPPORT OF DEFENDANT CHIPOTLE SERVICES, LLCS MOTION TO DENY CLASS CERTIFICATION	21.00
23,685	09/11/2018	Chipotle	Chipotle	64 pages - REQUEST FOR JUDICIAL NOTICE IN SUPPORT OF DEFENDANT CHIPOTLE SERVICES, LLCS MOTION TO DENY CLASS CERTIFICATION	16.00
23,685	09/11/2018	Chipotle	Chipotle	12 pages - OBJECTIONS TO PLAINTIFFS EVIDENCE (TRANSACTION ID # 62440956) FILED BY DEFENDANT	3.00
23,685	09/11/2018	Chipotle	Chipotle	59 pages - COMPENDIUM OF TESTIMONY AND EVIDENCE IN SUPPORT OF DEFENDANT CHIPOTLE SERVICES, LLCS MOTION TO DENY CLASS CERTIFICATION	14.75
23,685	09/11/2018	Chipotle	Chipotle	373 pages - APPENDIX OF EMPLOYEE DECLARATIONS IN SUPPORT OF DEFENDANT CHIPOTLE SERVICES, LLCS MOTION TO DENY CLASS CERTIFICATION	93.25
23,685	09/11/2018	Chipotle	Chipotle	261 pages - APPENDIX OF EMPLOYEE DECLARATIONS IN SUPPORT OF DEFENDANT CHIPOTLE SERVICES, LLCS MOTION TO DENY CLASS CERTIFICATION	65.25
23,685	09/11/2018	Chipotle	Chipotle	354 pages - APPENDIX OF EMPLOYEE DECLARATIONS IN SUPPORT OF DEFENDANT CHIPOTLE SERVICES, LLCS MOTION TO DENY CLASS CERTIFICATION	88.50
23,685	09/11/2018	Chipotle	Chipotle	289 pages - APPENDIX OF EMPLOYEE DECLARATIONS IN SUPPORT OF DEFENDANT CHIPOTLE SERVICES, LLCS MOTION TO DENY CLASS CERTIFICATION	72.25
23,685	09/11/2018	Chipotle	Chipotle	399 pages - APPENDIX OF EMPLOYEE DECLARATIONS IN SUPPORT OF DEFENDANT CHIPOTLE SERVICES, LLCS MOTION TO DENY CLASS CERTIFICATION	99.75
23,685	09/11/2018	Chipotle	Chipotle	59 pages - APPENDIX OF EMPLOYEE DECLARATIONS IN SUPPORT OF DEFENDANT CHIPOTLE SERVICES, LLCS MOTION TO DENY CLASS CERTIFICATION	14.75
23,685	09/11/2018	Chipotle	Chipotle	84 pages - APPENDIX OF EMPLOYEE DECLARATIONS IN SUPPORT OF DEFENDANT CHIPOTLE SERVICES, LLCS MOTION TO DENY CLASS CERTIFICATION	21.00
23,685	09/11/2018	Chipotle	Chipotle	289 pages - APPENDIX OF EMPLOYEE DECLARATIONS IN SUPPORT OF DEFENDANT CHIPOTLE SERVICES, LLCS MOTION TO DENY CLASS CERTIFICATION	72.25
23,685	09/11/2018	Chipotle	Chipotle	261 pages - APPENDIX OF EVIDENCE IN SUPPORT OF DEFENDANT CHIPOTLE SERVICES, LLCS MOTION TO DENY CLASS CERTIFICATION	65.25

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23,685	09/11/2018	Chipotle	Chipotle	354 pages - APPENDIX OF EVIDENCE IN SUPPORT OF DEFENDANT CHIPOTLE SERVICES, LLC'S OPPOS	88.50
23,685	09/11/2018	Chipotle	Chipotle	28 pages - MEMORANDUM OF POINTS AND AUTHORITIES IN OPPOSITION TO PLAINTIFFS MOTION FOR	7.00
23,685	09/11/2018	Chipotle	Chipotle	21 pages - REQUEST FOR JUDICIAL NOTICE IN SUPPORT OF PLAINTIFFS OPPOSITION TO DEFENDANT	5.25
23,685	09/11/2018	Chipotle	Chipotle	18 pages - EVIDENTIARY OBJECTIONS IN OPPOSITION TO CHIPOTLE DECLARATIONS (TRANSACTION I	4.50
23,685	09/11/2018	Chipotle	Chipotle	28 pages - OPPOSITION TO DEFENDANT CHIPOTLE SERVICES, LLC MOTION TO DENY CLASS CERTIFIC	7.00
23,684	10/03/2018	Chipotle	Chipotle	3 pages - ORDER JOINT STIPULATION TO CONTINUE DATES FOR PLAINTIFF TURLEY MOTION TO COMI	0.75
23,683	10/11/2018	Chipotle	Chipotle	506 pages - DECLARATION OF ALAN HARRIS AND REQUEST FOR JUDICIAL NOTICE IN SUPPORT OF PL	126.50
23,683	10/11/2018	Chipotle	Chipotle	12 pages - EVIDENTIARY OBJECTIONS IN OPPOSITION TO CHIPOTLE DECLARATIONS (TRANSACTION I	3.00
23,683	10/11/2018	Chipotle	Chipotle	18 pages - RESPONSE TO OBJECTIONS OF DEFENDANT CHIPOTLE SERVICES, LLC TO EVIDENCE SUBI	4.50
23,683	10/11/2018	Chipotle	Chipotle	20 pages - REPLY TO DEFENDANT CHIPOTLE SERVICES, LLC OPPOSITION TO PLAINTIFFS MOTION FO	5.00
13,052	10/13/2018	Chipotle	Chipotle	372 pages Copies made while preparing opposition to defense MSJ	93.00
23,682	10/15/2018	Chipotle	Chipotle	84 pages - DECLARATION OF ALAN HARRIS IN SUPPORT OF PLAINTIFF OPPOSITION TO DEFENDANT C	21.00
23,682	10/15/2018	Chipotle	Chipotle	8 pages - PLAINTIFF EVIDENTIARY OBJECTIONS TO DEFENDANT CHIPOTLE SERVICES, LLC SEPARATE	2.00
23,682	10/15/2018	Chipotle	Chipotle	23 pages - DECLARATION OF TANIKA TURLEY IN SUPPORT OF PLAINTIFF OPPOSITION TO MSJ (TRANS	5.75
23,682	10/15/2018	Chipotle	Chipotle	28 pages - OPPOSITION TO CHIPOTLE SERVICES, LLC'S MOTION FOR SUMMARY ADJUDICATION OF PL	7.00
23,681	10/24/2018	Chipotle	Chipotle	18 pages - OBJECTIONS TO PLTF'S EVIDENCE ISO HER OPPOSITION TO DEF'S MOTION FOR SUMMARY	4.50
23,681	10/24/2018	Chipotle	Chipotle	20 pages - REPLY ISO ITS MOTION FOR SUMMARY ADJUDICATION OF PLTF'S FIRST AND SEVENTH CAL	5.00
23,680	10/29/2018	Chipotle	Chipotle	26 pages - DEFENDANT CHIPOTLE SERVICES, LLC'S MOTION FOR SUMMARY ADJUDICATION OF PLAIN	6.50
23,680	10/29/2018	Chipotle	Chipotle	61 pages - DECLARATION OF ROBERT MUSSIG IN SUPPORT OF DEFENDANT CHIPOTLE SERVICES, LLC	15.25
23,680	10/29/2018	Chipotle	Chipotle	22 pages - NOTICE OF MOTION AND MOTION FOR SANCTIONS AGAINST PLAINTIFFS COUNSEL PURSU.	5.50
13,058	11/02/2018	Chipotle	Chipotle	32 pages copies of certification orders	8.00
23,678	11/02/2018	Chipotle	Chipotle	14 pages - ORDER GRANTING IN PART PLAINTIFF'S MOTION FOR CLASS CERTIFICATION; AND DENYIN	3.50
23,679	11/02/2018	Chipotle	Chipotle	18 pages - OBJECTION TO PLAINTIFFS NEW EVIDENCE SUBMITTED ON REPLY IN SUPPORT OF HER M	4.50
23,677	11/13/2018	Chipotle	Chipotle	2 pages - NOTICE OF WITHDRAWAL OF MOTION TO COMPEL FURTHER RESPONSES TO REQUESTS FC	0.50
23,676	04/24/2019	Chipotle	Chipotle	3 pages - ORDER JOINT STIPULATION AND ORDER TO CONTINUE CASE MANAGEMENT CONFERENCE	0.75
23,675	08/07/2019	Chipotle	Chipotle	3 pages - ORDER RE: JOIUNT STIPULATION TO EXTEND THE TIME WITHIN WHICH THIS ACTION MUST I	0.75
23,672	01/13/2020	Chipotle	Chipotle	3 pages - ORDER RE JOINT STIPULATION TO FILE SECOND AMENDED CLASS COMPLAINT TO FACILITA	0.75
23,673	01/13/2020	Chipotle	Chipotle	3 pages - ORDER RE: JOINT STIPULATION TO CONTINUE CONFERENCE FOLLOWING SETTLEMENT (TR	0.75
23,671	01/15/2020	Chipotle	Chipotle	60 pages -2ND AMENDED COMPLAINT ** CLASS ACTION ** ; DEMAND FOR JURY TRIAL (TRANSACTION I	15.00
23,674	01/21/2020	Chipotle	Chipotle	3 pages - ORDER RE: STIPULATION AND ORDER GRANTING CONTINUANCE OF CASE MANAGEMENT C	0.75
23,670	01/30/2020	Chipotle	Chipotle	3 pages - ORDER RE JOINT STIPULATION FOR AN ORDER ALLOWING ADDITIONAL PAGES FOR MEMOF	0.75
23,399	01/31/2020	Chipotle	Chipotle	99 pages - DECLARATION OF ALAN HARRIS IN SUPPORT OF MOTION FOR PRELIMINARY APPROVAL OF	24.75
23,399	01/31/2020	Chipotle	Chipotle	10 pages - DECLARATION OF JODEY LAWRENCE OF PHOENIX CLASS ACTION ADMINISTRATION SOLU'	2.50
23,669	01/31/2020	Chipotle	Chipotle	8 pages DECLARATION OF TANIKA TURLEY IN SUPPORT OF PLAINTIFFS MOTION FOR PRELIMINARY A	2.00
23,669	01/31/2020	Chipotle	Chipotle	18 pages - DECLARATION OF STEPHEN MOSES IN SUPPORT OF PLAINTIFFS MOTION FOR PRELIMINAF	4.50
23,669	01/31/2020	Chipotle	Chipotle	28 pages - 18 pages - DECLARATION OF STEPHEN MOSES IN SUPPORT OF PLAINTIFFS MOTION FOR PI	7.00
23,398	02/10/2020	Chipotle	Chipotle	12 pages - DECLARATION OF DAVID GARRETT IN OPPOSITION TO EX PARTE APPLICATION TO INTERV	3.00
23,398	02/10/2020	Chipotle	Chipotle	22 pages - DECLARATION OF ALAN HARRIS IN OPPOSITION TO EX PARTE APPLICATION TO INTERVENI	5.50
23,398	02/10/2020	Chipotle	Chipotle	22 pages -DECLARATION OF ALAN HARRIS IN OPPOSITION TO EX PARTE APPLICATION TO INTERVENE	5.50
23,398	02/10/2020	Chipotle	Chipotle	18 pages -OPPOSITION TO EX PARTE MOTION AND MOTION TO INTERVENE; MEMORANDUM OF POINT	4.50
23,398	02/10/2020	Chipotle	Chipotle	6 pages - DECLARATION OF DAVID HARRIS IN SUPPORT OF OPPOSITION TO EX PARTE MOTION TO IN'	1.50
23,398	02/10/2020	Chipotle	Chipotle	481 pages - REQUEST FOR JUDICIAL NOTICE IN SUPPORT OF PROPOSED INTERVENORS JOSH BARBE	120.25
23,398	02/10/2020	Chipotle	Chipotle	28 pages - PROPOSED INTERVENORS JOSH BARBER AND JOSE DELGADOS EX PARTE APPLICATION R	7.00
23,398	02/10/2020	Chipotle	Chipotle	10 pages - DECLARATION OF JEFFREY L. HOGUE IN SUPPORT OF PROPOSED INTERVENORS EX PART	2.50
23,397	02/11/2020	Chipotle	Chipotle	12 pages - DEFENDANTS EVIDENTIARY OBJECTIONS TO THE PROPOSED INTERVENORS EX PARTE AP	3.00

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23,397	02/11/2020	Chipotle	Chipotle	64 pages - DEFENDANTS REQUEST FOR JUDICIAL NOTICE ISO OPP TO EX PARTE APPLICATION TO INT	16.00
23,397	02/11/2020	Chipotle	Chipotle	8 pages - DECLARATION OF STEVE L. HERNANDEZ ISO OPP TO EX PARTE APPLICATION TO INTERVEN	2.00
23,397	02/11/2020	Chipotle	Chipotle	18 pages - DEFENDANTS OPPOSITION TO EX PARTE PETITION TO INTERVENE (TRANSACTION ID # 647	4.50
23,397	02/11/2020	Chipotle	Chipotle	12 pages - DECLARATION OF DAVID GARRETT IN SUPPORT OF OPPOSITION TO EX PARTE MOTION TO	3.00
23,396	02/14/2020	Chipotle	Chipotle	8 pages - DECLARATION OF SUSAN CARRITHERS IN SUPPORT OF PLAINTIFFS MOTION FOR PRELIMIN.	2.00
23,395	02/18/2020	Chipotle	Chipotle	3 pages - ORDER RE PROPOSED INTERVENORS JOSH BARBER AND JOSE DELGADO'S EX PARTE APPL	0.75
23,394	02/24/2020	Chipotle	Chipotle	12 pages - ORDER RE PLAINTIFFS' MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEM	3.00
23,394	02/24/2020	Chipotle	Chipotle	18 pages - SUPPLEMENTAL DECLARATION OF ALAN HARRIS IN SUPPORT OF MOTION FOR PRELIMINA	4.50
23,393	03/03/2020	Chipotle	Chipotle	3 pages - NOTICE OF RELATED CASE. CV-19-000937 (STANISLAUS) (TRANSACTION ID # 64783988) FILE	0.75
23,392	03/06/2020	Chipotle	Chipotle	34 pages - SUPPLEMENTAL DECLARATION OF ALAN HARRIS IN SUPPORT OF MOTION FOR PRELIMINA	8.50
23,392	03/06/2020	Chipotle	Chipotle	22 pages - SUPPLEMENTAL DECLARATION OF STEPHEN MOSES IN SUPPORT OF PLAINTIFFS MOTION	5.50
23,391	05/28/2020	Chipotle	Chipotle	3 pages - ORDER JOINT STIPULATION FOR AN ORDER TO SHORTEN TIME TO HEAR PLAINTIFFS' RENE	0.75
22,941	06/05/2020	Chipotle	Chipotle	104 pages - DECLARATION OF ALAN HARRIS IN SUPPORT OF RENEWED MOTION FOR PRELIMINARY A	26.00
23,390	06/05/2020	Chipotle	Chipotle	32 pages - NOTICE OF MOTION AND MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLE	8.00
23,390	06/05/2020	Chipotle	Chipotle	12 pages - DECLARATION OF CHRISTOPHER THOMPSON IN SUPPORT OF PLAINTIFFS' RENEWED MOT	3.00
23,390	06/05/2020	Chipotle	Chipotle	12 pages - DECLARATION OF TANIKA TURLEY IN SUPPORT OF PLAINTIFFS' RENEWED MOTION FOR P	3.00
23,390	06/05/2020	Chipotle	Chipotle	8 pages - DECLARATION OF JODEY LAWRENCE OF PHOENIX CLASS ACTION ADMINISTRATION SOLUTI	2.00
22,940	06/11/2020	Chipotle	Chipotle	68 pages - 3RD AMENDED COMPLAINT (TRANSACTION ID # 65693793)	17.00
22,939	07/07/2020	Chipotle	Chipotle	3 pages - ORDER AFTER JULY 6, 2020 CASE MANAGEMENT CONFERENCE (TRANSACTION ID #6575135	0.75
22,929	08/20/2020	Chipotle	Chipotle	3 pages - ORDER ON JOINT STIPULATION FOR AN ORDER ALLOWING ADDITIONAL PAGES FOR MEMOF	0.75
22,938	08/20/2020	Chipotle	Chipotle	3 pages - ORDER ON JOINT STIPULATION TO SHORTEN TIME TO HEAR PLAINTIFFS' MOTION FOR PREI	0.75
22,925	09/04/2020	Chipotle	Chipotle	122 pages - Declaration of AH in Support of Motion for Preliminary Approval of Class Action Sett...	30.50
22,926	09/04/2020	Chipotle	Chipotle	12 pages - DECLARATION OF JODEY LAWRENCE OF PHOENIX CLASS ACTION ADMINISTRATION SOLU"	3.00
22,927	09/04/2020	Chipotle	Chipotle	6 pages - DECLARATION OF TANIKA TURLEY IN SUPPORT OF MOTION FOR PRELIMINARY APPROVAL C	1.50
22,928	09/04/2020	Chipotle	Chipotle	36 pages - MOTION / NOTICE OF MOTION & MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION	9.00
22,924	09/23/2020	Chipotle	Chipotle	2 pages - Order After 9/23/20 Hearing ID #65959345	0.50
22,923	09/30/2020	Chipotle	Chipotle	22 pages - Supplemental Declaration of AH in Support of Motion for Prelimniary Approval of Class...	5.50
22,922	10/02/2020	Chipotle	Chipotle	16 pages - Order Granting Preliminary Approval of Amended Class Action Settlement ID 65986398	4.00
22,921	10/14/2020	Chipotle	Chipotle	2 pages - Order Vacating 10/13/20 Case Management Conf Trans ID 66022310	0.50
Total 54190 - Printing & Photocopies					3,187.75
54200 - Court Parking					
13,060	08/01/2018	Chipotle	Chipotle	Parking for deposition	44.00
13,063	08/01/2018	Chipotle	Chipotle	Paid to witness parking and mileage for depostion	60.00
13,054	08/14/2018	Chipotle	Chipotle	Salguero deposition	44.00
13,072	08/20/2018	Chipotle	Chipotle	Parking for Witness	44.00
13,072	08/20/2018	Chipotle	Chipotle	Alan Parking	44.00
Total 54200 - Court Parking					236.00
54220 - Postage					
23,758	07/18/2018	Chipotle	Chipotle	Charles C Cavanagh, MESSNER REEVES LLP	1.10
23,757	08/07/2018	Chipotle	Chipotle	To Client T.T.	0.47
23,756	09/07/2018	Chipotle	Chipotle	Mr Steven Moses	1.63
23,755	09/13/2018	Chipotle	Chipotle	A. Maggi Saunders & Associates (Deposition)	0.47
23,754	09/17/2018	Chipotle	Chipotle	To Client K.C.	2.68
23,753	09/21/2018	Chipotle	Chipotle	CHIPOTLE Services, LLC., Agent for Service of Process,, COGENCY GLOBAL INC.,, 1325 J STREET STE ...	7.84

Harris and Ruble
Chipotle - Costs
All Transactions

Trans #	Date	Name	Source Name	Memo	Amount
23,752	10/15/2018	Chipotle	Chipotle	CHIPOTLE Services, LLC., Agent for Service of Process., COGENCY GLOBAL INC., 1325 J STREET STE ...	9.74
23,751	11/15/2018	Chipotle	Chipotle	To Client. J.L.	2.46
23,750	11/19/2018	Chipotle	Chipotle	Charles C Cavanagh, MESSNER REEVES LLP	2.82
23,749	11/20/2018	Chipotle	Chipotle	Charles C Cavanagh, MESSNER REEVES LLP	3.92
23,749	11/20/2018	Chipotle	Chipotle	To Client. J.L.	3.92
23,749	11/20/2018	Chipotle	Chipotle	Charles C Cavanagh, MESSNER REEVES LLP	3.92
23,748	11/26/2018	Chipotle	Chipotle	Sheppard Mullin, Richard Simmons	1.10
23,747	11/27/2018	Chipotle	Chipotle	Charles C Cavanagh, MESSNER REEVES LLP	0.47
23,747	11/27/2018	Chipotle	Chipotle	Sheppard Mullin, Richard Simmons	1.10
23,737	12/28/2018	Chipotle	Chipotle	Stephen Moses (Expert)	2.47
23,745	08/01/2019	Chipotle	Chipotle	John Shunk, Charles C. Cavanagh, MESSNER REEVES LLP	0.95
23,745	08/01/2019	Chipotle	Chipotle	Levi W. Heath, DLA PIPER LLP (US)	0.95
23,743	08/05/2019	Chipotle	Chipotle	Angela C. Agrusa, Levi W. Heath, Steve L. Hernandez, DLA PIPER LLP (US)	0.95
23,743	08/05/2019	Chipotle	Chipotle	Charles C Cavanagh, MESSNER REEVES LLP	0.95
23,742	08/06/2019	Chipotle	Chipotle	Angela C. Agrusa, Levi W. Heath, Steve L. Hernandez, DLA PIPER LLP (US)	0.65
23,741	08/07/2019	Chipotle	Chipotle	To Client. J.L.	0.80
23,741	08/07/2019	Chipotle	Chipotle	To Client. S.C.	0.80
23,740	08/09/2019	Chipotle	Chipotle	Angela C. Agrusa, Levi W. Heath, Steve L. Hernandez, DLA PIPER LLP (US)	4.00
23,740	08/09/2019	Chipotle	Chipotle	To Client J.S.	0.80
23,740	08/09/2019	Chipotle	Chipotle	Charles C Cavanagh, MESSNER REEVES LLP	0.80
23,739	08/12/2019	Chipotle	Chipotle	Angela C. Agrusa, Levi W. Heath, Steve L. Hernandez, DLA PIPER LLP (US)	0.65
23,739	08/12/2019	Chipotle	Chipotle	Charles C Cavanagh, MESSNER REEVES LLP	0.65
23,736	03/06/2020	Chipotle	Chipotle	Jeffrey Hogue, Devon K. Roepcke Hogue & Belong, 170 Laurel Street, San Diego, CA 92101-1419, US	0.50
23,738	09/21/2020	Chipotle	Chipotle	Charles C Cavanagh, MESSNER REEVES LLP	0.65
23,738	09/21/2020	Chipotle	Chipotle	Angela C. Agrusa, Levi W. Heath, Steve L. Hernandez, DLA PIPER LLP (US)	0.65
Total 54220 · Postage					60.86
Total 54100 · Client Cost					29,015.82
66700 · Professional Fees					
14,866	08/01/2019	Chipotle	Zelenski Law Professional Corp	Chipotle Invoice# 138	1,390.50
Total 66700 · Professional Fees					1,390.50
68100 · Telephone Expense					
68101 · Conferences Calling					
18,498	06/19/2020	Chipotle	Court Call	Chipotle ID #10683303	94.00
18,499	06/19/2020	Chipotle	Court Call	Chipotle ID #10645671	94.00
18,473	06/24/2020	Chipotle	Court Call	Chipotle Refund ID #10683303	-94.00
18,479	07/01/2020	Chipotle	Court Call	Chipotle ID #10683303	94.00
22,580	09/26/2020	Chipotle	Court Call	Chipotle ID #10852093 Motion on 9/23/20	94.00
Total 68101 · Conferences Calling					282.00
Total 68100 · Telephone Expense					282.00
68400 · Travel Expense					
68401 · Meals					
13,066	08/09/2018	Chipotle	Chipotle	meal with witness	14.00
13,062	08/11/2018	Chipotle	Chipotle	lunch with witness	8.00
13,072	08/20/2018	Chipotle	Chipotle	lunch with witness	28.00

Harris and Ruble
Chipotle - Costs
All Transactions

Trans #	Date	Name	Source Name	Memo	Amount
13,064	08/24/2018	Chipotle	Lulu California Bistro	Meal with Witness	84.00
13,068	08/24/2018	Chipotle	Chipotle	Lunch with Witness	68.75
13,055	08/25/2018	Chipotle	M Cafe	Lunch with Witness	22.72
13,069	10/30/2018	Chipotle	Walgreens - Rite Aid - Whole Foods	Travel Expense - Motion for Class Cert.	25.99
13,071	10/31/2018	Chipotle	Walgreens - Rite Aid - Whole Foods	Travel Expense - Motion for Class Cert.	8.52
Total 68401 - Meals					259.98
68402 - Airfare					
13,964	08/09/2018	Chipotle	Southwest Airlines	SWA MRNQLT: Burbank to Oakland for Chipotle hearing	215.98
13,963	10/29/2018	Chipotle	Southwest Airlines	SWA W3FAP6: Orange County to San Francisco	243.98
17,278	02/23/2020	Chipotle	Southwest Airlines	Chipotle - DG Flight to SF for hearing	451.96
17,279	02/23/2020	Chipotle	Southwest Airlines	Chipotle - AH Flight Conf #UYQLAK for hearing	451.96
Total 68402 - Airfare					1,363.88
68403 - Lodging					
13,065	08/09/2018	Chipotle	The Acqua Hotel	Travel expense for Deposition	324.24
Total 68403 - Lodging					324.24
68404 - Taxi Service					
13,073	08/09/2018	Chipotle	Uber	Oakland Airport to Mill Valley, CA	50.26
13,053	10/31/2018	Chipotle	Chipotle	Burbank Airport to Rosewood Los Angeles	22.52
16,542	01/29/2020	Chipotle	Uber	For Chipotle	1.00
16,543	01/29/2020	Chipotle	Uber	For Chipotle	39.39
Total 68404 - Taxi Service					113.17
68406 - Parking					
17,291	02/25/2020	Chipotle	impaRK	PARKING LOT & GARAGE	9.00
Total 68406 - Parking					9.00
68407 - Mileage					
9,748	03/23/2018	Chipotle	Shawn Shamoeil.	Chipotle	3.30
13,060	08/01/2018	Chipotle	Chipotle	Miles for deposition	5.94
13,062	08/11/2018	Chipotle	Chipotle	Travel to Palm Springs for Moses	69.22
13,054	08/14/2018	Chipotle	Chipotle	Salguero deposition	7.56
13,072	08/20/2018	Chipotle	Chipotle	Mileage for depostion	9.81
13,056	08/26/2018	Chipotle	Chipotle	Trip to Palm Springs for Moses deposition and meetings	76.14
15,819	12/04/2019	Chipotle	MinJi Gal	Chipolte - Mediation at Century City 12 Miles	6.96
Total 68407 - Mileage					178.93
Total 68400 - Travel Expense					2,249.20
Total Case Costs					32,937.52

Exhibit 3

LAFFEY MATRIX

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			Years Out of Law School *				
Year	Adjustmt Factor**	Paralegal/ Law Clerk	1-3	4-7	8-10	11-19	20 +
6/01/20- 5/31/21	1.015894	\$206	\$378	\$465	\$672	\$759	\$914
6/01/19- 5/31/20	1.0049	\$203	\$372	\$458	\$661	\$747	\$899
6/01/18- 5/31/19	1.0350	\$202	\$371	\$455	\$658	\$742	\$894
6/01/17- 5/31/18	1.0463	\$196	\$359	\$440	\$636	\$717	\$864
6/01/16- 5/31/17	1.0369	\$187	\$343	\$421	\$608	\$685	\$826
6/01/15- 5/31/16	1.0089	\$180	\$331	\$406	\$586	\$661	\$796
6/01/14- 5/31/15	1.0235	\$179	\$328	\$402	\$581	\$655	\$789
6/01/13- 5/31/14	1.0244	\$175	\$320	\$393	\$567	\$640	\$771
6/01/12- 5/31/13	1.0258	\$170	\$312	\$383	\$554	\$625	\$753
6/01/11- 5/31/12	1.0352	\$166	\$305	\$374	\$540	\$609	\$734
6/01/10- 5/31/11	1.0337	\$161	\$294	\$361	\$522	\$589	\$709
6/01/09- 5/31/10	1.0220	\$155	\$285	\$349	\$505	\$569	\$686
6/01/08- 5/31/09	1.0399	\$152	\$279	\$342	\$494	\$557	\$671
6/01/07-5/31/08	1.0516	\$146	\$268	\$329	\$475	\$536	\$645
6/01/06-5/31/07	1.0256	\$139	\$255	\$313	\$452	\$509	\$614
6/1/05-5/31/06	1.0427	\$136	\$249	\$305	\$441	\$497	\$598
6/1/04-5/31/05	1.0455	\$130	\$239	\$293	\$423	\$476	\$574
6/1/03-6/1/04	1.0507	\$124	\$228	\$280	\$405	\$456	\$549
6/1/02-5/31/03	1.0727	\$118	\$217	\$267	\$385	\$434	\$522
6/1/01-5/31/02	1.0407	\$110	\$203	\$249	\$359	\$404	\$487
6/1/00-5/31/01	1.0529	\$106	\$195	\$239	\$345	\$388	\$468
6/1/99-5/31/00	1.0491	\$101	\$185	\$227	\$328	\$369	\$444
6/1/98-5/31/99	1.0439	\$96	\$176	\$216	\$312	\$352	\$424
6/1/97-5/31/98	1.0419	\$92	\$169	\$207	\$299	\$337	\$406

6/1/96-5/31/97	1.0396	\$88	\$162	\$198	\$287	\$323	\$389
6/1/95-5/31/96	1.032	\$85	\$155	\$191	\$276	\$311	\$375
6/1/94-5/31/95	1.0237	\$82	\$151	\$185	\$267	\$301	\$363

The methodology of calculation and benchmarking for this Updated Laffey Matrix has been approved in a number of cases. See, e.g., *McDowell v. District of Columbia*, Civ. A. No. 00-594 (RCL), LEXSEE 2001 U.S. Dist. LEXIS 8114 (D.D.C. June 4, 2001); *Salazar v. Dist. of Col.*, 123 F.Supp.2d 8 (D.D.C. 2000).

* “Years Out of Law School” is calculated from June 1 of each year, when most law students graduate. “1-3” includes an attorney in his 1st, 2nd and 3rd years of practice, measured from date of graduation (June 1). “4-7” applies to attorneys in their 4th, 5th, 6th and 7th years of practice. An attorney who graduated in May 1996 would be in tier “1-3” from June 1, 1996 until May 31, 1999, would move into tier “4-7” on June 1, 1999, and tier “8-10” on June 1, 2003.

** The Adjustment Factor refers to the nation-wide Legal Services Component of the Consumer Price Index produced by the Bureau of Labor Statistics of the United States Department of Labor.