

1 SAMUEL T. REES (State Bar No. 58099)
THOMAS P. BLEAU (State Bar No. 152945)
2 MARTIN R. FOX (State Bar No. 155783)
BLEAU FOX
3 2801 West Empire Avenue
Burbank, California 91504
4 Telephone: (818) 748-3434
Facsimile: (818) 748-3436

5 Attorneys for Plaintiff
6 and the Plaintiff Class

7
8
9
10 SUPERIOR COURT OF THE STATE OF CALIFORNIA
11 COUNTY OF ORANGE

12 RAYMOND STODDARD and)
SANTIAGO MEDINA etc.,)

13 Plaintiffs,)

14 vs.)

15 EQUILON ENTERPRISES, LLC, et)
16 al.,)

17 Defendants.)

Case No. 30-2010-00395208-CU-0E-CXC

Hon. James J. Di Cesare
Department C 16

CLASS ACTION

**DECLARATION OF SAMUEL T.
REES IN SUPPORT OF MOTION
FOR AN AWARD OF ATTORNEYS'
FEES, COSTS AND EXPENSES
AND A SERVICE AWARD TO THE
CLASS REPRESENTATIVE**

**[Filed Concurrently with
Memorandum of Points and
Authorities and Notice of Motion]**

Date: July 16, 2021
Time: 9:30 a.m.
Dept: C 16
Complaint Filed: August 2, 2010
Trial Date: None Set

1 I, SAMUEL T. REES, declare:

2 1. I am an attorney at law duly licensed to practice in California and
3 Louisiana. I am “Of Counsel” to Bleau Fox, a PLC, Class Counsel herein. Bleau
4 Fox was appointed Class Counsel herein.

5 2. I have represented Plaintiff Santiago Medina (“Medina”) since prior
6 to the commencement of this Action in 2010.

7 3. I have nearly 50 years of experience as a civil litigator. I received by
8 AB and JD from the University of Southern California in 1970 and 1973,
9 respectively. I have litigated many labor and employment law matters. For
10 many years, I served as a judicial arbitrator for the Los Angeles Superior Court.
11 I have also served as Judge *pro tem* for the First and Second City Courts in New
12 Orleans, Louisiana having been so appointed by the Louisiana Supreme Court.
13 For 2 years, I was general counsel for a NYSE multi-national manufacturer and
14 responsible for all litigation involving that corporation and its subsidiaries. I
15 have been appointed counsel by the United States Supreme Court.

16 4. Prior to this Action, I have represented plaintiffs in several class
17 actions including those related to this action.

18 5. At all times, I have been the lead trial attorney for this Action,
19 involved in all aspects of this matter. I was the primary lawyer involved in the
20 settlement negotiations and documentation.

21 6. My normal billing rate on class actions has been and is \$600 per
22 hour, although my rate is low based upon the rates of other similarly
23 experienced counsel in the Los Angeles community.

24 7. Attached hereto as Exhibit A is a true and correct spreadsheet
25 showing the time and charges incurred in connection with this Action. Except
26 for some minor assistance by others at Bleau Fox, all of the services performed
27 on this Action have been by me. The time expended on this Action by me has
28 been recorded as 683.7 although those hours are understated. At my normal

1 hourly rate and without adjustment for either risk or delayed payment, my
2 services have a reasonable value of at least \$410,220.

3 8. Attached hereto as Exhibit B is the current *Laffey Matrix* which has
4 not been adjusted upward for the increased consumer price index amounts for
5 the Los Angeles area. This exhibit establishes that my hourly rate on this
6 matter is reasonable.

7 9. Attached hereto as Exhibit C is a true and correct copy of my current
8 resume.

9 10. Attached hereto as Exhibit D is a true and correct copy of the costs
10 and expenses incurred by Bleau Fox prepared under my supervision. Those
11 costs and expenses total \$11,367.24 without adjustment for delayed payment or
12 risk and do not include all of the charges for either copying or computerized legal
13 research.

14 11. I prepared the "Background" section of the memorandum supporting
15 this motion. The facts therein are true. Most of the facts are contained in the
16 Third Amended and Restated Settlement Agreement and also may be verified by
17 prior filings in this Action.

18 12. With regard to the appropriate multiplier to be applied to all fees, I
19 am of opinion that the following facts are relevant:

20 A. Representation of the named plaintiffs has at all times been on
21 a contingency fee basis. Substantial hours were devoted to this representation,
22 all of which services were at risk should the claims be unsuccessful. In addition,
23 there has been a continuing risk of the ability of Defendant R&M Pacific Rim,
24 Inc. ("R&M") to pay any judgment. Further, substantial costs were incurred and
25 financed by Bleau Fox, the most significant of these has been mediation fees and
26 filing fees.

27 B. The settlement, if finally approved, will result in substantial
28 payments to the Class Members.

1 C. The amount of time which I devoted to this matter precluded
2 me from accepting other matters, further diminishing my income.

3 13. Medina has been active participant in this Action and has taken his
4 role, first as putative class representative and later as Representative Plaintiff,
5 seriously. Medina has stayed in constant communication, has reviewed and
6 commented on settlement negotiations and documents, complaints and strategic
7 plans, has reviewed and commented upon substantial documents produced
8 during discovery in the Wales Action, has provided valuable insight into Shell
9 station operations and procedures and has submitted to deposition. Medina has
10 made himself available to discuss the action on very short notice.

11 14. Medina has endured substantial risks. Costs incurred by Shell and
12 R&M in this Action have not been *de minimus* and Medina persevered
13 notwithstanding the risk of an adverse decision and cost award against him.

14 15. In my opinion, the Service Award of \$5,000 is fully justified merely
15 by applying a reasonable hourly rate to the amount of time Medina has
16 expended in prosecuting the claims herein.

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

19 Dated: June 1, 2021

20 _____
21 /s/ Samuel T. Rees

22 Samuel T. Rees
23
24
25
26
27
28

EXHIBIT A

BLEAU FOX TIMESHEETS

	A	B	C	D	E	F
1	DATE	ATTORNEY	DESCRIPTION	TIME	Rate	Fee
2	6/29/2010	STR	Email from and to Galvez re new action, draft and revise lengthy email to Stoddard.	2.7	\$600.00	\$1,620.00
3	7/2/2010	STR	Draft and revise lengthy email to Medina.	1.4	\$600.00	\$840.00
4	7/9/2010	STR	Email from Stoddard and response.	0.2	\$600.00	\$120.00
5	7/12/2010	STR	Review Stoddard Retainer and email re same.	0.3	\$600.00	\$180.00
6	7/14/2010	STR	Review Stoddard Depo Summary, commence drafting complaint.	5.2	\$600.00	\$3,120.00
7	7/15/2010	STR	Continue research and drafting complaint.	4.7	\$600.00	\$2,820.00
8	7/16/2010	STR	Finalize draft complaint and email to Stoddard for review, email to Medina re retainer and strategy.	3.6	\$600.00	\$2,160.00
9	7/20/2010	STR	Email from Medina and respond to same.	0.3	\$600.00	\$180.00
10	7/21/2010	STR	Research re wrongful termination, email to Medina with draft complaint for review.	2.8	\$600.00	\$1,680.00
11	7/22/2010	STR	Email from Medina, review taped material.	1.6	\$600.00	\$960.00
12	7/29/2010	STR	Modify and finalize draft complaint.	3.9	\$600.00	\$2,340.00
13	8/2/2010	STR	File Complaint, review notice of filing.	0.2	\$600.00	\$120.00
14	8/6/2010	STR	Organize service packages, emails to defense counsel, email from Kessler re same	1.4	\$600.00	\$840.00
15	8/9/2010	STR	Respond to Kessler, further emails with same.	1.2	\$600.00	\$720.00
16	8/13/2010	STR	Email from Kessler re service.	0.2	\$600.00	\$120.00
17	8/17/2010	STR	Arrange for service.	0.2	\$600.00	\$120.00
18	8/18/2010	STR	Emails re service status	0.1	\$600.00	\$60.00
19	8/20/2010	STR	Email complaint packages to clients	0.2	\$600.00	\$120.00
20	8/21/2010	STR	Draft Notice of related case insert, email from Medina	0.3	\$600.00	\$180.00
21	8/23/2010	STR	Email to Medina, Emails to client re service	0.4	\$600.00	\$240.00
22	8/25/2010	STR	Email from Cutter, further emails with same re service, email from Kessler	0.3	\$600.00	\$180.00
23	8/26/2010	STR	Email service package to Cutter.	0.1	\$600.00	\$60.00
24	9/20/2010	STR	Review Equilon demurrer papers	3.3	\$600.00	\$1,980.00
25	9/23/2010	STR	Reivew Complex Case minute order	0.4	\$600.00	\$240.00
26	9/28/2010	STR	Draft notice re CMC, commence research re demurrer opposition.	6.8	\$600.00	\$4,080.00
27	9/29/2010	STR	Continue research and drafting opposition to demurrer.	5.9	\$600.00	\$3,540.00
28	9/30/2010	STR	Finalize Opposition to demurrer, email same to Kessler, email from Kessler re M&C. scheduling emails	4.6	\$600.00	\$2,760.00
29	10/4/2010	STR	Participate in M&C Call, review R&M Slapp motion, emails re notice of related cases	3.2	\$600.00	\$1,920.00
30	10/5/2010	STR	Email re status report	0.1	\$600.00	\$60.00
31	10/6/2010	STR	Email to client re Slapp motion	0.1	\$600.00	\$60.00
32	10/7/2010	STR	Draft and cirulate status report, emails re same, review Shell reply papers.	2.9	\$600.00	\$1,740.00
33	10/8/2010	STR	Email from Cutter, review Shell revisions, revise and redline same and futher emails re same	1.4	\$600.00	\$840.00
34	10/9/2010	STR	Further revisions to report and emails	0.6	\$600.00	\$360.00
35	10/10/2010	STR	Further revisions to report and emails	0.7	\$600.00	\$420.00
36	10/11/2010	STR	Further revisions to report and emails	1.9	\$600.00	\$1,140.00
37	10/12/2010	STR	Finalize Status report.	0.4	\$600.00	\$240.00
38	10/14/2010	STR	Review RJNs and emails re same, draft and finalize objections to same, email from client.	2.3	\$600.00	\$1,380.00
39	10/15/2010	STR	Review tentative staying action and submit	0.6	\$600.00	\$360.00
40	11/20/2010	STR	Email from Stoddard	0.1	\$600.00	\$60.00
41	11/24/2010	STR	Respond to Stoddard.	0.1	\$600.00	\$60.00
42	12/23/2010	STR	Draft and Revise detailed status report to clients.	2.6	\$600.00	\$1,560.00
43	1/21/2011	STR	Email from Kessler, review draft report, revise same and redline same and response from Kessler	1.1	\$600.00	\$660.00
44	1/25/2011	STR	Review defendants report, draft and revise report and file same.	2.2	\$600.00	\$1,320.00
45	2/2/2011	STR	Arrange for Courtcall and attend status conference.	1.9	\$600.00	\$1,140.00
46	2/8/2011	STR	Review Notice of Ruling.	0.2	\$600.00	\$120.00

BLEAU FOX TIMESHEETS

	A	B	C	D	E	F
1	DATE	ATTORNEY	DESCRIPTION	TIME	Rate	Fee
47	4/5/2011	STR	Review Defendants status conference report.	0.2	\$600.00	\$120.00
48	4/6/2011	STR	Draft, revise and file plaintiff's status conference report	4.3	\$600.00	\$2,580.00
49	4/12/2011	STR	Commence drafting First Amended Complaint and motion to amend complaint and vacate stay, research re same	6.7	\$600.00	\$4,020.00
50	4/13/2011	STR	Continued work on motion.	7.4	\$600.00	\$4,440.00
51	4/14/2011	STR	Finalize and serve mtoion.	3.8	\$600.00	\$2,280.00
52	5/9/2011	STR	Review Shell opposition, research re same and commence work on Reply	4.7	\$600.00	\$2,820.00
53	5/10/2011	STR	Continued work on Reply	5.1	\$600.00	\$3,060.00
54	5/11/2011	STR	Continued work on Reply	3.3	\$600.00	\$1,980.00
55	5/12/2011	STR	Finalize and serve Reply.	2.2	\$600.00	\$1,320.00
56	5/18/2011	STR	Work with Sam Helmi to appear on 5/20	3.6	\$600.00	\$2,160.00
57	5/19/2011	STR	Review tentative and call to Helmi.	0.4	\$600.00	\$240.00
58	11/8/2011	STR	Review Shell status conference statement.	0.3	\$600.00	\$180.00
59	11/9/2011	STR	Draft, revise and file plaintiff's status conference report	3.1	\$600.00	\$1,860.00
60	11/16/2011	STR	Attend status conference and prepare for same.	1.4	\$600.00	\$840.00
61	11/17/2011	STR	Draft, revise and circulate notice of rulings	1.1	\$600.00	\$660.00
62	11/28/2011	STR	Review Shell Objections	0.9	\$600.00	\$540.00
63	12/9/2011	STR	Review Minute order re objections.	0.3	\$600.00	\$180.00
64	1/19/2012	STR	Review new case	0.3	\$600.00	\$180.00
65	2/1/2012	STR	Draft and revise status report, emails re same.	0.4	\$600.00	\$240.00
66	3/31/2012	STR	Lengthy status report to clients	1.7	\$600.00	\$1,020.00
67	4/2/2012	STR	Emails with Medina	0.3	\$600.00	\$180.00
68	5/2/2012	STR	Review Brinker decision.	0.6	\$600.00	\$360.00
69	6/26/2012	STR	Emails with Kessler re status report.	0.1	\$600.00	\$60.00
70	6/27/2012	STR	Further emails with Kessler re status conference report	1.1	\$600.00	\$660.00
71	7/2/2012	STR	Prepare for and attend status conference.	0.6	\$600.00	\$360.00
72	7/3/2012	STR	Status report to clients and draft notice of rulings, emails re same	1.8	\$600.00	\$1,080.00
73	7/4/2012	STR	Review comments from Kessler, finalize First Amended Complaint	2.6	\$600.00	\$1,560.00
74	7/5/2012	STR	Draft and revise further status conference report, file First Amended Complaint	1.1	\$600.00	\$660.00
75	7/12/2012	STR	Review tenttive and strategy email.	0.9	\$600.00	\$540.00
76	7/13/2012	STR	Coordination email to counsel and responses from same	0.6	\$600.00	\$360.00
77	7/18/2012	STR	Conference call with clients and prepare for same., emails re same	1.7	\$600.00	\$1,020.00
78	7/19/2012	STR	Emails with Kessler and draft status report	2.2	\$600.00	\$1,320.00
79	7/23/2012	STR	Prepare for and attend status conference.	1.1	\$600.00	\$660.00
80	7/24/2012	STR	Review notice of rulings	0.1	\$600.00	\$60.00
81	11/1/2012	STR	Prepare notice of Stay re Coordination	0.4	\$600.00	\$240.00
82	1/21/2013	STR	Status report to clients	1.4	\$600.00	\$840.00
83	5/1/2013	STR	Status report to clients.	1.1	\$600.00	\$660.00
84	9/26/2013	STR	Email to Clerk re denial of Coordination.	0.1	\$600.00	\$60.00
85	12/17/2013	STR	Review notice of reassignment.	0.1	\$600.00	\$60.00
86	1/29/2014	STR	Review Status Conference Order	0.1	\$600.00	\$60.00
87	2/6/2014	STR	Draft Status Conference Report and Notice of Order, emails re same and revise same.	0.6	\$600.00	\$360.00
88	2/14/2014	STR	Emails re service of status report	0.3	\$600.00	\$180.00
89	3/5/2014	STR	Emails re status conference	0.2	\$600.00	\$120.00
90	3/19/2014	STR	Email to Client	0.1	\$600.00	\$60.00
91	8/25/2014	STR	Email to client	0.1	\$600.00	\$60.00
92	9/3/2014	STR	Emails re and draft status conference report, revise same	0.4	\$600.00	\$240.00
93	9/15/2014	STR	Emails re status conference continuance	0.2	\$600.00	\$120.00
94	3/10/2015	STR	Emails re and draft status conference report, revise same and file.	1.1	\$600.00	\$660.00
95	3/17/2015	STR	Call from clerk re continuance of status conference and emails re same.	0.4	\$600.00	\$240.00
96	3/18/2015	STR	Prepare for status conference and emails re same.	0.5	\$600.00	\$300.00

BLEAU FOX TIMESHEETS

	A	B	C	D	E	F
1	DATE	ATTORNEY	DESCRIPTION	TIME	Rate	Fee
97	3/19/2015	STR	Draft Notice of continuance and file.	0.4	\$600.00	\$240.00
98	6/15/2015	STR	Call from clerk re status conference and emails re same	0.6	\$600.00	\$360.00
99	9/4/2015	STR	Review proposed status conference report and emails re same.	0.3	\$600.00	\$180.00
100	9/8/2015	STR	Further emails re status conference	0.2	\$600.00	\$120.00
101	9/14/2015	STR	Review Tentative and prepare notice of continuance	0.5	\$600.00	\$300.00
102	12/22/2015	STR	Review reassignment order	0.1	\$600.00	\$60.00
103	2/1/2016	STR	Review status conference report and emails re same	0.2	\$600.00	\$120.00
104	2/4/2016	STR	Further emails re status report	0.6	\$600.00	\$360.00
105	2/9/2016	STR	Review Minute Order	0.1	\$600.00	\$60.00
106	10/14/2016	STR	Review status conference report and emails re same	0.4	\$600.00	\$240.00
107	10/28/2016	STR	Emails re continuance.	0.1	\$600.00	\$60.00
108	7/29/2017	STR	Review status report and emails re same	0.1	\$600.00	\$60.00
109	8/3/2017	STR	Further emails re status report	0.3	\$600.00	\$180.00
110	1/8/2018	STR	Review minute order and emails re same.	0.2	\$600.00	\$120.00
111	1/25/2018	STR	Review status report and emails re same	0.1	\$600.00	\$60.00
112	2/8/2018	STR	Review minute order and emails re same.	0.1	\$600.00	\$60.00
113	7/25/2018	STR	Emails re status conference	0.2	\$600.00	\$120.00
114	7/26/2018	STR	Further emails re status report	0.3	\$600.00	\$180.00
115	7/27/2018	STR	Draft and circulate status report, email to clients, revise report and emails re same	0.9	\$600.00	\$540.00
116	7/30/2018	STR	Further emails re status report	0.1	\$600.00	\$60.00
117	8/1/2018	STR	Review Kessler draft report and emails re same	0.4	\$600.00	\$240.00
118	8/2/2018	STR	Finalize report and emails.	0.3	\$600.00	\$180.00
119	8/13/2018	STR	Prepare for and attend status conference, prepare Notice of Rulings, emails to counsel and to clients.	2.6	\$600.00	\$1,560.00
120	8/18/2018	STR	Email to client, call to Medina	0.7	\$600.00	\$420.00
121	8/20/2018	STR	Emails with Kessler	0.3	\$600.00	\$180.00
122	8/24/2018	STR	Calls and emails re Stoddard death	0.4	\$600.00	\$240.00
123	9/6/2018	STR	Emails re M&C, conference with Riordan re Dynamex, email to Stoddard brother.	0.8	\$600.00	\$480.00
124	9/7/2018	STR	Commence research and drafting SPROGS to R&M, research re R&M entities	5.1	\$600.00	\$3,060.00
125	9/9/2018	STR	Email from Stoddard brother and respond to same and continue work on SPROGS.	3.4	\$600.00	\$2,040.00
126	9/10/2018	STR	Finalize SPROGS, emails re same	2.9	\$600.00	\$1,740.00
127	9/11/2018	STR	Draft SPROG declaration and circulate same, reserve corrected SPROGS	1.7	\$600.00	\$1,020.00
128	9/12/2018	STR	Emails with Stoddard brother, review Shell answer to FAC	2.6	\$600.00	\$1,560.00
129	9/20/2018	STR	Emails re status report	0.1	\$600.00	\$60.00
130	9/25/2018	STR	Draft and revise status report, emails re same, email from Thompson re mediation, investigate mediators, emails with others re mediator, further emails re mediation.	4.1	\$600.00	\$2,460.00
131	9/26/2018	STR	Further emails re mediation	0.6	\$600.00	\$360.00
132	10/2/2018	STR	Prepare for and attend status conference, emails re same	1.7	\$600.00	\$1,020.00
133	10/4/2018	STR	Emails with Podruski re mediation and discovery needs	0.8	\$600.00	\$480.00
134	10/12/2018	STR	Lengthy call with Podruski re discovery needs, locate documents for Podruski and Dropbox to same, emails	2.6	\$600.00	\$1,560.00
135	10/13/2018	STR	Further pre-mediation communications and research, emails with Medina	1.8	\$600.00	\$1,080.00
136	10/18/2018	STR	Communications with client re defamation claims gather deposition materials for client to review.	3.3	\$600.00	\$1,980.00
137	10/21/2018	STR	Email to counsel re SAC, draft and revise lengthy email to Podruski, response from same, research re same	4.2	\$600.00	\$2,520.00
138	10/24/2018	STR	Emails re mediation	0.2	\$600.00	\$120.00
139	10/26/2018	STR	Emails with client	0.3	\$600.00	\$180.00
140	10/30/2018	STR	Email from JAMS.	0.1	\$600.00	\$60.00
141	10/31/2018	STR	Email with JAMS, emails with Kessler	0.6	\$600.00	\$360.00
142	11/1/2018	STR	Communications with JAMS re mediation.	0.3	\$600.00	\$180.00

BLEAU FOX TIMESHEETS

	A	B	C	D	E	F
1	DATE	ATTORNEY	DESCRIPTION	TIME	Rate	Fee
143	11/3/2018	STR	Further communications with JAMS.	0.1	\$600.00	\$60.00
144	11/8/2018	STR	Email from Podruski re extenstion, response, emails re mediation and SAC.	0.8	\$600.00	\$480.00
145	11/16/2018	STR	Mediation emails.	0.3	\$600.00	\$180.00
146	11/20/2018	STR	Draft and revised motion to amend and supplement complaint.	6.4	\$600.00	\$3,840.00
147	11/21/2018	STR	Lengthy email re SAC, call to client, call to Thompson, emails with Kessler.	2.7	\$600.00	\$1,620.00
148	11/26/2018	STR	Mediation emails.	0.1	\$600.00	\$60.00
149	12/3/2018	STR	Mediation emails.	0.1	\$600.00	\$60.00
150	12/7/2018	STR	Research re joint employer.	1.1	\$600.00	\$660.00
151	12/12/2018	STR	Emails with Thompson re discovery and with Kessler re stipulated facts, review file re same, further emails re mediation	3.4	\$600.00	\$2,040.00
152	12/16/2018	STR	Email from Thompson re discovery, respond to same, commence research and preparation for 1/3 mediation, gather discovery materils from Wales action, gather mediation materials from Wales action.	4.7	\$600.00	\$2,820.00
153	12/17/2018	STR	Continue mediation preparation	2.3	\$600.00	\$1,380.00
154	12/18/2018	STR	Communications with Thompson	0.2	\$600.00	\$120.00
155	12/19/2018	STR	Review Thompson mediation letter, emails re mediation, commence preparation of damages outline.	5.1	\$600.00	\$3,060.00
156	12/20/2018	STR	Call with Riordan to prepare for mediation, further communications with Thompson, further work on damages study.	4.4	\$600.00	\$2,640.00
157	12/21/2018	STR	Further work on damages study.	3.6	\$600.00	\$2,160.00
158	12/22/2018	STR	Further work on damages study and research re labor claims including enforcement manual.	5.5	\$600.00	\$3,300.00
159	12/27/2018	STR	Emails with Thompson re mediation facts, modify damage study.	2.9	\$600.00	\$1,740.00
160	12/29/2018	STR	Email from West, commence work on mediation brief.	3.9	\$600.00	\$2,340.00
161	12/30/2018	STR	Continue mediation preparation and mediation brief.	5.1	\$600.00	\$3,060.00
162	1/2/2019	STR	Emails with JAMS, finalize mediation brief, communications with client, further reseach.	4.7	\$600.00	\$2,820.00
163	1/3/2019	STR	Prepare for and attend mediation, frequent communications with client and mediator, modify damage study based upon new information, additional research of applicable cases.	11.1	\$600.00	\$6,660.00
164	1/7/2019	STR	Additional communications with mediator and client, review and respond to emails from mediator, emails with and call from Kessler.	2.2	\$600.00	\$1,320.00
165	1/8/2019	STR	Additional communications with mediator and client.	0.4	\$600.00	\$240.00
166	1/9/2019	STR	Emails with Stoddard brother.	0.1	\$600.00	\$60.00
167	1/11/2019	STR	Further communicatons with mediator and client.	0.4	\$600.00	\$240.00
168	1/14/2019	STR	Further communications with mediator and client.	0.3	\$600.00	\$180.00
169	1/15/2019	STR	Further communicatons with mediator and client, call from Judge West re agreement in principal.	1.7	\$600.00	\$1,020.00
170	1/16/2019	STR	Commence review of draft settlement agreements from Riordan, emails with mediator.	1.7	\$600.00	\$1,020.00
171	1/18/2019	STR	Draft status report and circulate.	0.3	\$600.00	\$180.00
172	1/21/2019	STR	Further work on status report and numerous emails re same	1.4	\$600.00	\$840.00
173	1/22/2019	STR	Further work on status report and emails re same, finalize same.	0.8	\$600.00	\$480.00
174	1/25/2019	STR	Email from Thompson with breakdown of settlements with labor commissioner.		\$600.00	\$0.00
175	1/29/2019	STR	Prepare for and attend status conference, emails re same, email to Stoddard heirs.	1.2	\$600.00	\$720.00
176	2/4/2019	STR	Draft and revise SAC, Email to Riordan re same.	4.3	\$600.00	\$2,580.00

BLEAU FOX TIMESHEETS

	A	B	C	D	E	F
1	DATE	ATTORNEY	DESCRIPTION	TIME	Rate	Fee
177	2/5/2019	STR	Review Notice of ruling.	0.1	\$600.00	\$60.00
178	2/6/2019	STR	Circulate draft SAC to opposing counsel, prepare and circulate redline	1.7	\$600.00	\$1,020.00
179	2/22/2019	STR	Emails re SAC and Stipulation.	0.8	\$600.00	\$480.00
180	2/24/2019	STR	Draft proposed stipulations.	11.7	\$600.00	\$7,020.00
181	2/25/2019	STR	Modify stipulations and circulate, emails re same	9.2	\$600.00	\$5,520.00
182	2/26/2019	STR	Further communications re stipulations.	0.2	\$600.00	\$120.00
183	2/27/2019	STR	Further communications re stipulations.	0.2	\$600.00	\$120.00
184	3/1/2019	STR	Further communications re stipulations re SAC, modify same and finalize same	1.7	\$600.00	\$1,020.00
185	3/5/2019	STR	Further emails re SAC stipulation, modify same	0.4	\$600.00	\$240.00
186	3/11/2019	STR	Finalize revise stipulation re FAC, lengthy email from Kessler re MSJ stipulation, review same	1.8	\$600.00	\$1,080.00
187	3/14/2019	STR	Further modifications and emails re SAC stipulation, emails re other stipulations	1.3	\$600.00	\$780.00
188	3/15/2019	STR	Further emails and modifications to stipulations, email re status report.	0.9	\$600.00	\$540.00
189	3/25/2019	STR	File SAC and review orders and file other stipulations.	0.6	\$600.00	\$360.00
190	3/30/2019	STR	Draft and circulate status report, emails and finalize same.	0.7	\$600.00	\$420.00
191	4/1/2019	STR	Revise and finalize status report, emails with Kessler	0.4	\$600.00	\$240.00
192	4/3/2019	STR	Further emails re status report	0.2	\$600.00	\$120.00
193	4/10/2019	STR	Revise MSJ Stipulation and emails re same, attend status conference.	3.6	\$600.00	\$2,160.00
194	4/12/2019	STR	Redline changes to MSJ stipulation	0.4	\$600.00	\$240.00
195	4/25/2019	STR	Emails re R&M Settlement	0.6	\$600.00	\$360.00
196	4/26/2019	STR	Call with Kessler.	0.7	\$600.00	\$420.00
197	5/3/2019	STR	Review Jan Pro Case.	0.3	\$600.00	\$180.00
198	5/10/2019	STR	Emails with Thompson re settlement, revise and redline MSJ stipulation and emails re same.	2.9	\$600.00	\$1,740.00
199	5/13/2019	STR	Further MSJ stipulation modifications and emails	1.4	\$600.00	\$840.00
200	5/15/2019	STR	Review Kessler MSJ modifications, emails re same	0.7	\$600.00	\$420.00
201	6/7/2019	STR	Call with Kessler, emails with Thompson, modify MSJ stipulation and emails re same	1.8	\$600.00	\$1,080.00
202	6/14/2019	STR	Review Kessler modifications and email	0.6	\$600.00	\$360.00
203	6/21/2019	STR	Commence reviewing requirements for settlement agreements, research re same, gather sample agreements and commence outline for settlement agreement draft.	6.6	\$600.00	\$3,960.00
204	6/22/2019	STR	Continue work on settlement agreement.	4.8	\$600.00	\$2,880.00
205	6/23/2019	STR	Continue work on settlement agreement.	5.1	\$600.00	\$3,060.00
206	6/26/2019	STR	Emails with Kessler and further modifications and consolidation.	1.9	\$600.00	\$1,140.00
207	6/27/2019	STR	Set up exhibits for MSJ stipulation and emails re same, comments from Fowler	1.8	\$600.00	\$1,080.00
208	6/28/2019	STR	Lengthy email and dropbox material for MSJ Stipulation, emails with Kessler	3.6	\$600.00	\$2,160.00
209	6/29/2019	STR	Continue drafting of settlement agreement.	5.6	\$600.00	\$3,360.00
210	6/30/2019	STR	Continue drafting of settlement agreement.	4.4	\$600.00	\$2,640.00
211	7/1/2019	STR	Complete initial draft of settlement agreement.	3.7	\$600.00	\$2,220.00
212	7/3/2019	STR	Final review of draft settlement agreement and email same to Thompson.	2.9	\$600.00	\$1,740.00
213	7/11/2019	STR	Email from Thompson responding to questions	0.8	\$600.00	\$480.00
214	7/12/2019	STR	Match answers to questions with factual stipulations and emails with Kessler re same	1.4	\$600.00	\$840.00
215	7/17/2019	STR	Email from Thompson with revisions to draft settlement agreement and commence review of same.	2.3	\$600.00	\$1,380.00
216	7/21/2019	STR	Emails with Kessler re stipulation	0.2	\$600.00	\$120.00
217	7/22/2019	STR	Emails with Riordan office re Jan Pro issues.	0.6	\$600.00	\$360.00
218	7/25/2019	STR	Emails with Kessler.	0.3	\$600.00	\$180.00

BLEAU FOX TIMESHEETS

	A	B	C	D	E	F
1	DATE	ATTORNEY	DESCRIPTION	TIME	Rate	Fee
219	7/26/2019	STR	Further modifications to MSJ stipulation and emails re same.	2.7	\$600.00	\$1,620.00
220	7/29/2019	STR	Further work on MSJ stipulation and exhibits and emails re same.	1.3	\$600.00	\$780.00
221	7/30/2019	STR	Work on finalizing stipulation and emails re status report	0.9	\$600.00	\$540.00
222	7/31/2019	STR	Emails with Kessler and Riordan	0.4	\$600.00	\$240.00
223	8/1/2019	STR	Emails with Kessler and Riordan	0.3	\$600.00	\$180.00
224	8/2/2019	STR	Emails with Kessler and Riordan and finalize briefing schedule.	0.8	\$600.00	\$480.00
225	8/5/2019	STR	Continue review of Thompson modifications, make further modifications to settlement agreement, prepare redline and circulate, draft and circulate status conference report, emails re same	5.1	\$600.00	\$3,060.00
226	8/6/2019	STR	Emails re joint status report, email from Thompson re further revisions to draft settlement agreement, emails re Administrators and investigate same.	2.6	\$600.00	\$1,560.00
227	8/7/2019	STR	Finalize status report and circulate, emails re class size	0.6	\$600.00	\$360.00
228	8/13/2019	STR	Emails re MSJ hearing and stipulation re same.	0.4	\$600.00	\$240.00
229	8/19/2019	STR	Emails with Cordozo, email from Polizzi questions	0.5	\$600.00	\$300.00
230	8/26/2019	STR	Review MSJ materials and email to Cordozo re bates stamps	1.6	\$600.00	\$960.00
231	9/13/2019	STR	Call to Riordan office re MSJ opposition.	0.7	\$600.00	\$420.00
232	9/18/2019	STR	Emails re class size	0.1	\$600.00	\$60.00
233	9/19/2019	STR	Prepare Notice of Association and circulate.	0.3	\$600.00	\$180.00
234	10/16/2019	STR	Commence research and drafting of opposition brief.	6.6	\$600.00	\$3,960.00
235	10/17/2019	STR	Continue work on opposition brief, emails re same	5.7	\$600.00	\$3,420.00
236	10/18/2019	STR	Finalize draft brief and circulate for comments, emails re same, review comments and finalize for filing.	7.2	\$600.00	\$4,320.00
237	10/19/2019	STR	Emails with Fowler re brief, emails with Cordozo	0.4	\$600.00	\$240.00
238	10/21/2019	STR	Continue investigation of administrators, call to Phoenix, emails with same and review proposal	1.6	\$600.00	\$960.00
239	10/22/2019	STR	Emails with Cordozo and draft status report	0.9	\$600.00	\$540.00
240	10/23/2019	STR	Finalize status report and file.	0.4	\$600.00	\$240.00
241	10/25/2019	STR	Review Shell Reply brief	2.7	\$600.00	\$1,620.00
242	10/27/2019	STR	Work on further revisions to settlement agreement and review spreadsheets re proration among classes.	4.4	\$600.00	\$2,640.00
243	10/28/2019	STR	Finalize revisions, prepare redline draft lengthy email to Thompson, further emails re same, commence drafting class notice and circulate same.	7.7	\$600.00	\$4,620.00
244	10/29/2019	STR	Emails re settlement and MSJ, prepare for oral argument, further modifications to settlement agreement and class notice, circulate same, emails re same, call to Polizzi	5.3	\$600.00	\$3,180.00
245	10/30/2019	STR	Emails with Phoenix	0.2	\$600.00	\$120.00
246	10/31/2019	STR	Emails with Phoenix, review tentative, emails with Riordan, review Polizzi revisions and redline	1.8	\$600.00	\$1,080.00
247	11/1/2019	STR	Prepare for and attend oral argument on MSJ and status conference, review Medina settlement agreement, modify documents and circulate with redlines, draft claim form.	11.3	\$600.00	\$6,780.00
248	11/4/2019	STR	Emails re settlement documents, further revisions to same	2.7	\$600.00	\$1,620.00
249	11/5/2019	STR	Further revisions to settlement documents and emails re same, review transcript of MSJ hearing	1.4	\$600.00	\$840.00
250	11/6/2019	STR	Draft PAO and circulate, email to Stoddard heirs, email to client of settlement documents for review	3.7	\$600.00	\$2,220.00
251	11/7/2019	STR	Review Notice of entry and emails re same	0.6	\$600.00	\$360.00
252	11/8/2019	STR	Emails re judgment and check website, review proposed judgment	0.2	\$600.00	\$120.00
253	11/9/2019	STR	Emails from client re amended retainer agreement	0.1	\$600.00	\$60.00
254	11/12/2019	STR	Review PAO Changes, circulate all settlement documents for final review, emails re same	1.7	\$600.00	\$1,020.00

BLEAU FOX TIMESHEETS

	A	B	C	D	E	F
1	DATE	ATTORNEY	DESCRIPTION	TIME	Rate	Fee
255	12/3/2019	STR	Emails re finalized documents	0.2	\$600.00	\$120.00
256	12/6/2019	STR	Review Judgment		\$600.00	\$0.00
257	12/7/2019	STR	Organize settlement documents for execution and circulate, emails re same	1.3	\$600.00	\$780.00
258	12/9/2019	STR	Change dates on settlement documents and re-circulate	0.6	\$600.00	\$360.00
259	12/13/2019	STR	Emails re settlement terms	0.7	\$600.00	\$420.00
260	12/16/2019	STR	Further emails re settlement terms		\$600.00	\$0.00
261	12/17/2019	STR	Call to Polizzi, additional emails, draft and revise status report re settlement problems, file status report, review R&M report	3.7	\$600.00	\$2,220.00
262	12/18/2019	STR	Prepare for and attend status conference, email with signature pages from R&M, email to client	1.8	\$600.00	\$1,080.00
263	12/28/2019	STR	Draft and revise lengthy status report to clients	1.4	\$600.00	\$840.00
264	1/31/2020	STR	Commence work on PAO motion, email to Phoenix, set timeline for operative dates	3.6	\$600.00	\$2,160.00
265	2/3/2020	STR	Draft, revise and file Notice of Appeal, continue work on PAO motion	4.7	\$600.00	\$2,820.00
266	2/5/2020	STR	Complete draft of PAO motion, emails re same	2.8	\$600.00	\$1,680.00
267	2/6/2020	STR	Revise PAO motion re privacy issue and research re same, draft and circulate Medina declaration, prepare redline of changes	3.1	\$600.00	\$1,860.00
268	2/7/2020	STR	Call to Polizzi, finalize motion for PAO and draft Rees Declaration re same, emails with Polizzi, draft and finalize proposed PAO draft and revise Notice of Non-Appearance	4.4	\$600.00	\$2,640.00
269	2/12/2020	STR	Status report to clients	0.6	\$600.00	\$360.00
270	2/13/2020	STR	Review minute order	0.1	\$600.00	\$60.00
271	2/19/2020	STR	Emails with court reporter, research draft and revise case information statement, emails re same	2.7	\$600.00	\$1,620.00
272	2/20/2020	STR	Reporter emails	0.2	\$600.00	\$120.00
273	2/21/2020	STR	Draft, revise and circulate Notice of Designation, email from Clerk and research re same, emails with Cardozo re stay, revise case information statement	1.8	\$600.00	\$1,080.00
274	3/13/2020	STR	Review tentative and email from Polizzi, call to clerk	0.4	\$600.00	\$240.00
275	3/14/2020	STR	Draft notice of continuance	0.3	\$600.00	\$180.00
276	3/16/2020	STR	Review court comments and email re resolution of same, emails with Polizzi and Phoenix	2.6	\$600.00	\$1,560.00
277	3/17/2020	STR	Emails with and call to Polizzi, review materials from Phoenix	1.7	\$600.00	\$1,020.00
278	4/7/2020	STR	Emails re stipulation to continue hearing, draft stipulation	0.4	\$600.00	\$240.00
279	4/8/2020	STR	Finalize and file stipulation	0.5	\$600.00	\$300.00
280	4/27/2020	STR	Draft revisions to settlement documents	4.7	\$600.00	\$2,820.00
281	4/28/2020	STR	Continue drafting revisions to settlement documents	3.6	\$600.00	\$2,160.00
282	4/29/2020	STR	Finalize revisions to settlement agreement, prepare redline and circulate for comments, emails re same	4.9	\$600.00	\$2,940.00
283	4/30/2020	STR	Review Polizzi comments	0.8	\$600.00	\$480.00
284	5/8/2020	STR	Email to Polizzi re review, further emails, call to Phoenix	1.1	\$600.00	\$660.00
285	5/10/2020	STR	Draft Phoenix declaration, emails re same	0.3	\$600.00	\$180.00
286	5/11/2020	STR	Review Phoenix changes to declaration	0.4	\$600.00	\$240.00
287	5/19/2020	STR	Review minute order and emails re same.	0.3	\$600.00	\$180.00
288	5/29/2020	STR	Emails with Polizzi	0.2	\$600.00	\$120.00
289	6/5/2020	STR	Review transcript	0.1	\$600.00	\$60.00
290	6/26/2020	STR	Further revisions to settlement documents and emails re same	4.4	\$600.00	\$2,640.00
291	7/15/2020	STR	Review comments from Polizzi	0.7	\$600.00	\$420.00
292	7/16/2020	STR	Further emails re modifications to settlement documents, modifications to same, update drafts and circulate, email to Phoenix, extension emails with Cardozo, draft and circulate Riordan declaration, extension stipulation.	5.6	\$600.00	\$3,360.00
293	7/17/2020	STR	Emails with Riordan office, emails with client	0.3	\$600.00	\$180.00

BLEAU FOX TIMESHEETS

	A	B	C	D	E	F
1	DATE	ATTORNEY	DESCRIPTION	TIME	Rate	Fee
294	7/20/2020	STR	Emails with Polizzi	2.7	\$600.00	\$1,620.00
295	7/21/2020	STR	Finalize revised settlement documents and file, emails re same and supplemental memo and declarations	6.6	\$600.00	\$3,960.00
296	7/24/2020	STR	Emails and submit R&M signature to settlement agreement in declaration	1.7	\$600.00	\$1,020.00
297	7/30/2020	STR	Review Court's tentative, emails re same	0.8	\$600.00	\$480.00
298	8/20/2020	STR	Draft and revise settlement documents	4.7	\$600.00	\$2,820.00
299	8/21/2020	STR	Continue revisions to settlement documents, draft lengthy email to Polizzi re changes, create redlines	5.3	\$600.00	\$3,180.00
300	8/23/2020	STR	Emails with Thompson, further modifications to settlement documents, redlines and emails re same	3.8	\$600.00	\$2,280.00
301	8/25/2020	STR	Call with and emails with Polizzi, further modifications and redlines, email to client, call with Polizzi, finalize documents	4.6	\$600.00	\$2,760.00
302	8/26/2020	STR	Finalize and file documents, including updated declaration	2.9	\$600.00	\$1,740.00
303	9/4/2020	STR	Review tentative, revise and redline PAO, draft and revise declaration	1.9	\$600.00	\$1,140.00
304	9/5/2020	STR	Email to client and Phoenix re approval, create timing chart and circulate	0.8	\$600.00	\$480.00
305	9/6/2020	STR	Email to Lague re billing records, email to Stoddard heirs, email from Phoenix	0.9	\$600.00	\$540.00
306	9/7/2020	STR	Email from Stoddard relatives and response	0.1	\$600.00	\$60.00
307	9/8/2020	STR	Further emails with Phoenix, email from Court and revise PAO, emails re same and redline, revise Class Notice	1.6	\$600.00	\$960.00
308	9/9/2020	STR	Review communication from clerk and emails re same	0.6	\$600.00	\$360.00
309	9/14/2020	STR	Emails re brief extension	0.4	\$600.00	\$240.00
310	9/16/2020	STR	Review signed PAO and emails re same	0.8	\$600.00	\$480.00
311	9/21/2020	STR	Draft and revise ex parte and modified PAO, emails re same	2.9	\$600.00	\$1,740.00
312	9/22/2020	STR	Finalize ex parte and emails re same	1.7	\$600.00	\$1,020.00
313	9/24/2020	STR	Attend ex parte hearing, review amended PAO	1.4	\$600.00	\$840.00
314	9/25/2020	STR	Circulate amended PAO, email register to Fowler	1.1	\$600.00	\$660.00
315	9/30/2020	STR	Highlight register and emails with Cardozo	2.1	\$600.00	\$1,260.00
316	10/6/2020	STR	Start review of Class Data	5.6	\$600.00	\$3,360.00
317	10/7/2020	STR	Continue review of class data, emails re same	5.8	\$600.00	\$3,480.00
318	10/9/2020	STR	Further review of class data and payroll information, further emails re issues with class data and questions	4.9	\$600.00	\$2,940.00
319	10/12/2020	STR	Continued review of class data and missing information	6.2	\$600.00	\$3,720.00
320	10/13/2020	STR	Emails re appeal	0.4	\$600.00	\$240.00
321	10/15/2020	STR	Emails re appeal	0.3	\$600.00	\$180.00
322	10/16/2020	STR	Emails and call with Phoenix re website	0.2	\$600.00	\$120.00
323	10/18/2020	STR	Emails with Polizzi re class data issues, emails with Phoenix re same	1.9	\$600.00	\$1,140.00
324	11/12/2020	STR	Emails with Polizzi,, gather appendix documents and send to Fowler	3.6	\$600.00	\$2,160.00
325	11/13/2020	STR	Work on Appendix tables	1.8	\$600.00	\$1,080.00
326	11/16/2020	STR	Continued work on appendix	2.7	\$600.00	\$1,620.00
327	11/17/2020	STR	Circulate draft appendix	1.4	\$600.00	\$840.00
328	11/19/2020	STR	Message from Court of Appeal and modify appendix	2.9	\$600.00	\$1,740.00
329	11/22/2020	STR	Further modifications to Appendix	3.3	\$600.00	\$1,980.00
330	11/30/2020	STR	Review draft brief and email comments	4.7	\$600.00	\$2,820.00
331	12/2/2020	STR	Further emails re brief issues	1.6	\$600.00	\$960.00
332	12/4/2020	STR	Emails and calls re Class Notice issues	0.9	\$600.00	\$540.00
333	12/8/2020	STR	Further emails re class notice	0.7	\$600.00	\$420.00
334	12/10/2020	STR	Further emails re class notice, email to Thompson re class data issues	0.6	\$600.00	\$360.00
335	12/11/2020	STR	Further emails re class notice	0.2	\$600.00	\$120.00
336	12/14/2020	STR	Call with and email to Thompson re open issues on class data	1.2	\$600.00	\$720.00

BLEAU FOX TIMESHEETS

	A	B	C	D	E	F
1	DATE	ATTORNEY	DESCRIPTION	TIME	Rate	Fee
337	12/15/2020	STR	Further emails re class data issues and notice, emails re appeal extension	1.6	\$600.00	\$960.00
338	12/17/2020	STR	Further emails re class data issues	0.8	\$600.00	\$480.00
339	12/18/2020	STR	Further emails re class data issues	0.1	\$600.00	\$60.00
340	12/21/2020	STR	Class data information provided, modify spreadsheets, emails re same	4.4	\$600.00	\$2,640.00
341	12/22/2020	STR	Further work on spreadsheets and emails re same, call with Phoenix re same	3.9	\$600.00	\$2,340.00
342	12/23/2020	STR	Call with Thompson	0.7	\$600.00	\$420.00
343	12/29/2020	STR	Update spreadsheet	4.6	\$600.00	\$2,760.00
344	1/4/2021	STR	Emails re spreadsheet and ex parte to vacate dates	0.4	\$600.00	\$240.00
345	1/5/2021	STR	Circulate updated spreadsheet, emails re same	0.8	\$600.00	\$480.00
346	1/6/2021	STR	Draft and revise and circulate ex parte application and emails re same	3.8	\$600.00	\$2,280.00
347	1/7/2021	STR	Review reassignment order, emails re same and change ex parte hearing date	2.2	\$600.00	\$1,320.00
348	1/8/2021	STR	Modify spreadsheet and circulate, emails re same	1.7	\$600.00	\$1,020.00
349	1/12/2021	STR	Draft and revise settlement documents, prepare for and attend court hearing, redline changes and emails re same, prepare and file notice	4.2	\$600.00	\$2,520.00
350	1/14/2021	STR	Review Jan Pro Case.	0.7	\$600.00	\$420.00
351	1/15/2021	STR	Emails re calculations	0.1	\$600.00	\$60.00
352	1/21/2021	STR	Call with Phoenix	0.6	\$600.00	\$360.00
353	1/27/2021	STR	Email re status	0.1	\$600.00	\$60.00
354	3/3/2021	STR	Review Shell Brief on Appeal	0.2	\$600.00	\$120.00
355	3/5/2021	STR	Email from Polizzi, modify settlement documents and redline same, further emails re same	3.3	\$600.00	\$1,980.00
356	3/9/2021	STR	Draft papers to modify PAO and additional changes to settlement documents, emails re same, email to client, modify and circulate spreadsheet	2.7	\$600.00	\$1,620.00
357	3/10/2021	STR	Emails, modify and finalize settlement documents and declaration and file same	3.1	\$600.00	\$1,860.00
358	3/18/2021	STR	Emails and stipulation for brief extension, review tentative	0.7	\$600.00	\$420.00
359	3/21/2021	STR	Draft and revise PAO and circulate with emails	1.9	\$600.00	\$1,140.00
360	3/22/2021	STR	Finalize new PAO, prepare and file notice of rulings	2.2	\$600.00	\$1,320.00
361	4/16/2021	STR	Emails re further extension on reply brief	0.3	\$600.00	\$180.00
362	4/18/2021	STR	Emailed signed PAO and emails re same, revise Class Notice and timeline, gather documents for website and upload to Dropbox.	3.9	\$600.00	\$2,340.00
363	4/20/2021	STR	Sign and file stipulation re reply brief	0.2	\$600.00	\$120.00
364	4/21/2021	STR	Emailed spreadsheet from Phoenix	0.1	\$600.00	\$60.00
365	4/23/2021	STR	Review final class notice and spreadsheet, emails re same	1.1	\$600.00	\$660.00
366	4/26/2021	STR	Emails re Class Notice and spreadsheet, call with Phoenix	4.1	\$600.00	\$2,460.00
367	5/4/2021	STR	Review draft reply brief, emails re spreadsheet	0.3	\$600.00	\$180.00
368	5/6/2021	STR	Review oral argument notice and emails re same	0.1	\$600.00	\$60.00
369	5/10/2021	STR	Review spreadsheet and emails re same	2.6	\$600.00	\$1,560.00
370	5/19/2021	STR	Further emails re spreadsheet	0.7	\$600.00	\$420.00
371	5/21/2021	STR	Review spreadsheet and note minor errors, email re same	3.6	\$600.00	\$2,160.00
372	TOTALS			683.7		\$410,220.00

EXHIBIT B

LAFFEY MATRIX

[History](#)
[Case Law](#)
[Expert Opinions](#)
[See the Matrix](#)
[Contact us](#)
[Home](#)
[Links](#)

			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.

EXHIBIT C

Samuel T. Rees

26 Muirfield Place
New Orleans, Louisiana 70131
E-mail: STReesEsq@Earthlink.net

Office: (504) 391-7435
Fax: (504) 391-7435
Cell: (213) 220-9988

PROFESSIONAL EXPERIENCE

Bleau Fox, Los Angeles, CA

2009 – Present

Of Counsel

Joined firm in October 2009. Primary areas of emphasis remain employee rights, products liability, antitrust, wrongful termination, and general civil litigation and transactional matters involving insurance, banking, and manufacturing companies.

Daar & Newman, Los Angeles, CA

1992 – 2009

Of Counsel

For this litigation and international transactional firm, specialized in products liability, antitrust, wrongful termination, and general civil litigation and transactional matters involving insurance, banking, and manufacturing companies.

Former National Litigation Counsel to Amcast Industrial Corporation. Joined Amcast as General Counsel while remaining “of counsel” at Daar & Newman. Returned to Daar & Newman when Amcast’s reduced size no longer justified a employed counsel.

- Appeared before the United States Supreme Court representing former thrift executive seeking recovery from Federal government after being precluded from all employment in the financial institution industry.
- Successfully represented a major insurance broker in a suit against a subsidiary of GE Capital for sales of sub-standard modular housing units for schools in Mexico.
- Secured several seven figure settlements and judgments for clients.
- Secured substantial settlements for irrigation equipment distributors in antitrust litigation.

Amcast Industrial Corporation, Dayton, OH

2001 – 2003

Formerly \$700 million international manufacturer of metal products to automotive, construction industries. (OTC – AICO.OB, Formerly NYSE - AIZ)

Vice President, General Counsel, Secretary

Report to the Chairman/CEO. Principal advisor to the Board. Corporate Secretary to all subsidiaries. Chief Legal Officer, Environmental Compliance Officer and Risk Manager. Advise corporation on all corporate, governance, litigation, risk management, contracts, and employment issues. Focus on product liability, environmental compliance, and antitrust. Manage small in-house legal team and all outside legal resources globally with annual budget of \$3 million.

- Reviewed all legal matters and created strategic litigation plans. Established pragmatic approaches and managed staff, calendar and budget resources to reach objectives.
- Reduced overall litigation expenses by \$1.4 million.
- Risk Manager responsible for purchasing all corporate insurance and managing all claims. Managed self-insured and insured workers’ compensation programs for 4,600 employees including all outside services.
- Negotiated and consummated sale of Italian wheel manufacturer.
- Reduced pending litigation by half.

- Negotiated and documented sale of a \$200 million international piece of the business.
- Restructured corporate governance and reporting caused by Sarbanes Oxley.

Knapp, Petersen & Clarke, Glendale, CA
1990 – 1992**Senior Principal**

Established a new business litigation department for predominantly insurance defense firm. Began relationship with Amcast Industries, successfully trying or resolving all matters assigned.

Leff, Katz, Rees & Mocciano, Los Angeles, CA
1986 – 1990**Leff & Jensen, Beverly Hills, CA****1982 – 1986**

Spin-off firms from Hahn, Crazier & Leff.

Senior Litigation Partner

Ran litigation departments in these two firms, managing 4-15 litigation lawyers. Focus on financial institutions, product liability, and general business litigation.

- Represented two corporations in mass tort and insurance litigation regarding the MGM Grand Las Vegas fire. Counter-sued manufacturers and secured settlements such that clients were kept whole.
- Successfully represented senior executive in FDIC litigation involving collapse of Beverly Hills Savings.
- Represented numerous savings and loan associations, banks and insurance companies for litigation and regulatory issues.

Hahn, Cazier & Leff, Los Angeles, CA
1973 – 1982**Litigation and Assistant Managing Partner**

Initially specialized in real estate and corporate securities. Migrated to litigation and financial institutions, forming numerous thrifts. Gained substantial business litigation trial and appellate experience.

EDUCATION

University of Southern California, Los Angeles, California

- A.B., Political Science, 1970
- J.D., 1973, Co-Chair - Hale Moot Court

LEGAL CREDENTIALS

Admitted to Practice in:

- All California and Louisiana state courts
- The United States Supreme Court
- The United States Court of Appeals for the Ninth Circuit
- Certain California and Louisiana District Courts
- *Pro Hac Vice* in Arizona, Texas, Indiana and Utah

PROFESSIONAL MEMBERSHIPS & ACTIVITIES

- California State Bar Association
- Louisiana Bar Association
- Los Angeles County Bar Association
- Former Judicial Arbitrator – Los Angeles Superior Court
- Former President – Los Angeles County Bar Association Credit Union
- Former Directorships – Pacific Coast Bank and Bank of San Marino

REPORTED DECISIONS

- *Pelletier v. Behrens*, 516 U.S. 299 (1996)
- *Pelletier v. Federal Home Loan*, 968 F.2d 865 (9th Cir. 1992)
- *Pelletier v. Federal Home Loan*, 130 F.3d 429 (9th Cir. 1997)
- *Pelletier v. Federal Home Loan Bank of San Francisco*, 145 F.3d 1094 (9th Cir. 1998)
- *Hydro-Air Equip., Inc v. Hyatt Corp.* 852 F.2d 403 (9th Cir. 1988)
- *In re Beverly Hills Bancorp*, 649 F.2d 1329 (9th Cir. 1981)
- *In re MGM Grand Hotel Fire Litigation*, 570 F.Supp 913 (Nev. 1983)
- *Ribbens Int'l, S.A. de C.V. v. Transport Int'l Pool, Inc.*, 40 F.Supp.2d 1141 (CD Cal. 1999)
- *Ribbens Int'l, S.A. de C.V. v. Transport Int'l Pool, Inc.*, 45 F.Supp.2d 982 (CD Cal. 1999)
- *Ribbens Int'l, S.A. de C.V. v. Transport Int'l Pool, Inc.*, 47 F.Supp.2d 1117 (CD Cal. 1999)
- *Transbay Auto Service, Inc. v. Chevron USA, Inc.*, 807 F.3d 1113 (9th Cir. 2015)
- *Curry v. Equilon Enterprises, LLC*, (2018) 23 Cal. App. 5th 289

PERSONAL INFORMATION

- Married, one daughter.
- Hobbies – Golf, Skiing, Tennis and Flying (Single Engine Instrument)



EXHIBIT D

BLEAU FOX, A P.L.C.
Class QuickReport
All Transactions

Date	Name	Memo	Amount
Stoddard, Raymond vs. Equilon			
09/02/2010	One Legal, Inc.	Complaint Fee	-968.35
09/23/2010	DDS Legal Support Systems	Summons & Complaint	-41.90
09/23/2010	DDS Legal Support Systems	Summons & Complaint	-55.82
09/27/2010	One Legal, Inc.	filing fees	-9.95
10/12/2010	Court Call	Court Call	-50.00
10/12/2010	Court Call	Court Call	-50.00
10/19/2010	Court Call	Court Call	50.00
10/29/2010	Law Offices of Gennady L Lebedev	Parking	-3.00
11/01/2010	LexisNexis	LexisNexis	-36.21
11/01/2010	One Legal, Inc.	filing fees	-9.95
11/01/2010	One Legal, Inc.	filing fees	-9.95
11/08/2010	One Legal, Inc.	filing fees	-9.95
11/15/2010	One Legal, Inc.	filing fees	-9.95
12/05/2010	One Legal, Inc.	filing fees	-9.95
02/02/2011	Court Call	Court Call	-105.00
04/06/2011	DDS Legal Support Systems	Rush Filing	-85.00
04/25/2011	DDS Legal Support Systems	Rush Filing	-114.00
05/18/2011	Court Call	Court Call	-105.00
06/13/2011	One Legal, Inc.	Plaintiffs' Reply Memorandum in Support of Motion t	-9.95
11/09/2011	Court Call	Court Call	-78.00
11/25/2011	One Legal, Inc.	filing fees	-9.95
12/09/2011	One Legal, Inc.	filing fees	-9.95
12/23/2011	One Legal, Inc.	filing fees	-9.95
01/27/2012	Court Call	Court Call	-78.00
02/13/2012	One Legal, Inc.	filing fees	-9.95
03/07/2012	One Legal, Inc.	filing fees	-9.95
06/22/2012	Court Call	Court Call	-78.00
07/23/2012	Court Call	Court Call	-108.00
12/06/2012	One Legal, Inc.	filing fees	-9.95
12/11/2012	One Legal, Inc.	filing fees	-9.95
02/14/2014	One Legal, Inc.	OCSC- Notice of Status Conference, POeS	-19.85
02/20/2014	One Legal, Inc.	OCSC- Joint Status Conference Report, POeS	-19.85
02/26/2014	One Legal, Inc.	OCSC- Joint Status Conference Report, POeS	-19.85
09/05/2014	Court Call	court call	-86.00
09/09/2014	One Legal, Inc.	filing fees	-19.85
09/15/2014	Court Call	court call	86.00
09/16/2014	One Legal, Inc.	Notice of Ruling	-19.85
03/11/2015	One Legal, Inc.	Joint Status Conference Statement	-19.85
03/11/2015	One Legal, Inc.	Joint Status Conference Report	-19.85
03/12/2015	One Legal, Inc.	Declaration	-19.85
03/13/2015	Court Call	court call	-86.00
03/18/2015	Court Call	court call	86.00
03/23/2015	One Legal, Inc.	Notice of Continuance of Status Conference	-19.85

2:09 PM
May 27, 2021
Accrual Basis

BLEAU FOX, A P.L.C.
Class QuickReport

All Transactions

06/15/2015 Court Call	court call	116.00
06/15/2015 Court Call	court call	-116.00
09/09/2015 One Legal, Inc.	Status Conference Statement	-19.85
09/14/2015 Court Call	court call	-116.00
12/24/2015 One Legal, Inc.	Declaration	-19.85
07/30/2018 Court Call	court call	-86.00
08/02/2018 One Legal, Inc.	Filing fees- Status Conference Statement	-12.20
08/14/2018 One Legal, Inc.	Filing fees: Notice of Ruling- Complex	-12.20
09/11/2018 One Legal, Inc.	Filing fees: Interrogatories	-9.00
09/26/2018 One Legal, Inc.	Filing fees: Joint Statement	-12.20
09/28/2018 Court Call	court call	-86.00
12/19/2018 JAMS	Inv #0004617660-220; Stoddard v Equilon	-5,450.00
12/28/2018 FEDEX	fedex	-14.69
01/22/2019 One Legal, Inc.	Filing fees: Status Confernece Statement	-20.20
01/22/2019 Court Call	court call	-94.00
01/31/2019 LexisNexis	LexisNexis	-28.69
02/28/2019 LexisNexis	LexisNexis	-23.79
03/04/2019 One Legal, Inc.	Filing fees: Proposed Stip & Order	-18.20
03/05/2019 One Legal, Inc.	Filing fees: Proposed Stip & Order	-30.75
03/13/2019 One Legal, Inc.	Filing fees: Proposed Stip & Order	-22.20
03/18/2019 One Legal, Inc.	Filing fees: Proposed Stip & Order	-42.86
03/18/2019 Janney & Janney Attorney Service, I	Filing- Santa Ana: Proposed Stip & Order	-42.25
03/25/2019 One Legal, Inc.	Filing fees: Proposed Stip & Order	-42.86
03/27/2019 One Legal, Inc.	Filing fees: Amended Complaint	-22.20
03/31/2019 LexisNexis	LexisNexis	-2.52
04/03/2019 One Legal, Inc.	Filing fees: Status Conference Statement	-22.20
04/03/2019 One Legal, Inc.	Filing fees: Status Conference Statement	-21.20
04/10/2019 Court Call	court call	-124.00
07/31/2019 Court Call	court call	-94.00
08/07/2019 One Legal, Inc.	Filing fees: Status Conference Statement	-12.20
09/20/2019 One Legal, Inc.	Filing fees: Notice	-14.20
09/20/2019 One Legal, Inc.	Filing fees: Association of Attorney	-14.20
09/20/2019 One Legal, Inc.	Filing fees: Association of Attorney	-12.20
10/21/2019 Janney & Janney Attorney Service, I	Filing- Santa Ana: Opposition	-11.75
10/23/2019 One Legal, Inc.	Filing fees: Status Conference Statement	-22.20
11/04/2019 Court Call	court call	-94.00
12/19/2019 Court Call	court call	-94.00
01/22/2020 Truefiling	filing fees	-10.50
01/22/2020 Orange Co Superior Court	copies	-8.76
01/30/2020 Truefiling	filing fees	-10.50
02/03/2020 One Legal, Inc.	Filing fees: Notice of Appeal	-919.08
02/07/2020 One Legal, Inc.	Filing fees: Notice	-22.20
02/07/2020 One Legal, Inc.	Filing fees: Motion	-94.18
02/11/2020 One Legal, Inc.	Filing fees: Notice of Motion, etc	-72.25
02/21/2020 One Legal, Inc.	Filing fees: Notice	-15.20
03/13/2020 One Legal, Inc.	Filing fees: Notice of Continuance	-35.86

2:09 PM
May 27, 2021
Accrual Basis

BLEAU FOX, A P.L.C.
Class QuickReport

All Transactions

04/03/2020 Truefiling	Filing Fees	-10.50
05/27/2020 One Legal, Inc.	Filing fees: Proposed Stip & Order	-15.20
06/22/2020 Truefiling	Filing Fees	-10.50
06/30/2020 Truefiling	Filing Fees	-10.50
07/07/2020 Truefiling	Filing Fees	-10.50
07/22/2020 One Legal, Inc.	Filing fees: Supplemental	-15.20
07/22/2020 One Legal, Inc.	Filing fees: Men of Points & Auth etc	-15.20
07/24/2020 One Legal, Inc.	Filing fees: Supplemental	-15.20
08/27/2020 One Legal, Inc.	Filing fees: Declaration	-15.20
09/04/2020 One Legal, Inc.	Filing fees: Declaration	-15.20
09/08/2020 Court Call	court call	-94.00
09/09/2020 One Legal, Inc.	Filing fees: Declaration	-15.20
09/22/2020 One Legal, Inc.	Filing fees: Ex Parte App	-77.18
09/25/2020 Court Call	court call	-94.00
09/25/2020 One Legal, Inc.	Filing fees: Ex Parte App	-42.25
01/07/2021 One Legal, Inc.	Filing fees: Ex Parte Application	-78.23
01/08/2021 One Legal, Inc.	Filing fees: Ex Parte Application	-40.25
01/11/2021 One Legal, Inc.	Filing fees: Notice of Continuance	-24.25
01/11/2021 One Legal, Inc.	Filing fees: Notice of Continuance	-24.25
01/11/2021 One Legal, Inc.	Filing fees: Notice of Demurrer to First Amended Co	-38.50
01/12/2021 One Legal, Inc.	Filing fees: Notice	-24.25
01/13/2021 Court Call	court call	-94.00
01/15/2021 Truefiling	Filing Fees	-10.50
03/10/2021 One Legal, Inc.	Filing fees: Mem of Points & Auths etc	-17.76
03/12/2021 One Legal, Inc.	Filing fees: Mem of Points & Auths etc	-83.65
03/17/2021 Court Call	court call	-94.00
03/22/2021 One Legal, Inc.	Filing fees: Declaration	-17.76
03/22/2021 One Legal, Inc.	Filing fees: Proposed Order	-3.09
03/22/2021 One Legal, Inc.	Filing fees: Notice	-17.76
03/23/2021 One Legal, Inc.	Filing fees: Declaration	-42.98
03/23/2021 Janney & Janney Attorney Service, I	Courtesy Copy Delivery- Santa Ana: Proposed Orde	-105.00
04/13/2021 One Legal, Inc.	Filing fees: Order	-17.76

Total Stoddard, Raymond vs. Equilon

-11,367.24

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

PROOF OF SERVICE

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is 580 West Empire Avenue, Burbank, California 91504.

On June 1, 2021, I served the foregoing document(s) described as **DECLARATION OF SAMUEL T. REES IN SUPPORT OF MOTION FOR AN AWARD OF ATTORNEYS' FEES, COSTS AND EXPENSES AND A SERVICE AWARD TO THE CLASS REPRESENTATIVE** on the interested parties to this action who are listed on the attached Service List by electronically serving those persons at the electronic addresses noted therein.

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

FEDERAL: I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct of my own personal knowledge, and that I am employed in the office of a member of the Bar of this Court at whose discretion this service was made.

Executed on June 1, 2021, at Burbank, California.

/s/ Nathan Childress

Nathan Childress

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

SERVICE LIST

Raymond A. Cardozo, Esq.
Reed Smith, LLP
355 South Grand Avenue
Suite 2900
Los Angeles, CA 90071-3048
RCardozo@reedsmith.com

Kerri N. Polizzi
Attorney at Law
Kring & Chung, LLP
38 Corporate Park
Irvine, CA 92606
kpolizzi@kringandchung.com