Case 2:19-cv-04132-DSF-JC Document 75-4 Filed 03/04/22 Page 1 of 18 Page ID #:1280

EXHIBIT D

PracticePanther - Anita Trejo | Trejo V. Lyneer Staffing Solutions, ELC, et al. (PAGA) Filed 03/04/22 Page 2 of 18 Page ID #:1281

: ITEM	: STATUS	: DATE ↓	: HRS.	: RATE	: TOTAL	BILLED BY	0 0 0
Analysis/Strategy AUDIT HEARINGS	BILLABLE	4/28/2021	0.1	\$175.00	\$17.50	SC	
Pleadings FOLLOW UP WITH N. PIERSO REGARDING DISMISSAL OF P CLAIM	BILLABLE	4/21/2021	0.1	\$550.00	\$55.00	YAL	
Pleadings FOLLOW UP WITH N. PIERSO REGARDING DISMISSAL OF P ACTION	BILLABLE	4/14/2021	0.1	\$550.00	\$55.00	YAY	
Settlement DRAFT REQUEST FOR DIMSSA WITHOUT PREJUDICE FOR TH PAGA ACTION. EMAIL TO N. PIERSON FOR FILING.		4/7/2021	0.2	\$550.00	\$110.00	JAY	
Settlement REVIEW DOCKET, EMAIL DRA LONG FORM AGREEMENT.	FT BILLABLE	3/8/2021	0.2	\$550.00	\$110.00	YAI	
Court Mandated Conferences REVIEW EMAIL WITH S. MARQUEZ AND DOCKET RE CONTINUED OSC HEARING	BILLABLE	3/1/2021	0.1	\$550.00	\$55.00	JAY	

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0 0 0	ITEM	STATUS	: DATE 🕹	; HRS.	: RATE	: TOTAL	BILLED BY	0 0
	Court Mandated Conferences REVIEW DOCKET AND DRAFT JOINT STIP TO CONTINUE OSC HEARING	BILLABLE	2/16/2021	0.4	\$550.00	\$220.00	JAY	
	• Pleadings REVIEW K. ODENBREIT REVISIONS AND EMAIL PROPOSED STIPULATION TO OPPOSING COUNSEL RE DISMISSAL	BILLABLE	2/15/2021	0.2	\$550.00	\$110.00	JAY	
	• Settlement REVIEW STIPULATION TO DISMISS AND EMAIL TO K. ODENBREIT TO REVIEW.	BILLABLE	2/10/2021	0.1	\$550.00	\$55.00	JAY	
	• Settlement REVIEW MOU FROM DEFENDANT AND REDLINE. SEND TO K. ODENBREIT FOR REVIEW	BILLABLE	2/3/2021	0.4	\$550.00	\$220.00	JAY	
	• Settlement DRAFT INITIAL JOINT STIPULATION TO DISMISS PAGA ACTION	BILLABLE	2/3/2021	0.6	\$550.00	\$330.00	JAY	
	Court Mandated Conferences LOOK THROUGH SHARED DRIVE FOR CLASS CERT MOTION. EMAI N. PIERSON RE CLASS CERT		1/19/2021	0.2	\$550.00	\$110.00	JAY	

PracticePanther - Anita Trejo | Trejo V. Lyneer Staffing Solutions, LLC, et al. (PAGA) Filed 03/04/22 Page 4 of 18 Page ID #:1283

: ITEM	STATUS	: DATE 🕹	: HRS.	: RATE	: TOTAL	BILLED BY
Court Mandated Conferences REVIEW DOCKET RE NEXT HEARING	BILLABLE	1/12/2021	0.1	\$550.00	\$55.00	JAY
• Analysis/Strategy CASE REVIEW WITH J. YOUNG. UPDATE CASE PLAN.	BILLABLE	12/14/2020	0.1	\$750.00	\$75.00	ARS
• Analysis/Strategy REVIEW FILE AND DOCKET. UPDATE CASE PLAN.	BILLABLE	11/5/2020	0.3	\$185.00	\$55.50	GG
♥ Pleadings PREPARE PLAINTIFF ANITA TREJO'S NOTICE OF ORDER TO SHOW CAUSE RE: DISMISSAL. SERVE VIA MAIL AND E-FILE VIA ONE LEGAL.	BILLABLE	11/5/2020	0.5	\$185.00	\$92.50	GG
Court Mandated Conferences ATTEND STATUS CONFERENCE EMAIL N. PIERSON OUTCOME HEARING.		10/20/2020	0.9	\$550.00	\$495.00	JAY
• Analysis/Strategy CASE REVIEW WITH J. YOUNG AND UPDATE CASE PLAN.	BILLABLE	10/20/2020	0.1	\$750.00	\$75.00	ARS

PracticePanther - Anita Trejo | Trejo V. Lyneer Staffing Solutions, LLC, et al. (PAGA) Filed 03/04/22 Page 5 of 18 Page ID #:1284

: ITEM :	STATUS	: DATE ↓	: HRS.	RATE	TOTAL	BILLED BY
Analysis/Strategy DISCUSS CASE STATUS WITH A. SALUSKY	BILLABLE	10/20/2020	0.1	\$550.00	\$55.00	JAY
• Court Mandated Conferences SET UP LACC FOR REMOTE APPEARANCE.	BILLABLE	10/19/2020	0.2	\$180.00	\$36.00	SM
• Analysis/Strategy CASE REVIEW WITH J. YOUNG AND UPDATE CASE PLAN.	BILLABLE	10/13/2020	0.1	\$750.00	\$75.00	ARS
• Written Discovery DISCUSS DISCOVERY RESPONSES WITH CLIENT	BILLABLE	10/8/2020	0.5	\$550.00	\$275.00	JAY
Court Mandated Conferences REVIEW DOCKET AND DRAFT STATUS STATEMENT FOR STATUS CONFERENCE HEARING	BILLABLE	10/5/2020	0.3	\$550.00	\$165.00	JAY
• Analysis/Strategy CASE REVIEW WITH J. YOUNG AND UPDATE CASE PLAN.	BILLABLE	9/30/2020	0.1	\$750.00	\$75.00	ARS
• Analysis/Strategy CASE REVIEW WITH J. YOUNG AND UPDATE CASE PLAN.	BILLABLE	9/18/2020	0.1	\$750.00	\$75.00	ARS

PracticePanther - Anita Trejo | Trejo V. Lyneer Staffing Solutions, ELC, et al. (PAGA) Filed 03/04/22 Page 6 of 18 Page ID #:1285

0 0 0	ITEM	STATUS	: DATE ↓	: HRS.	RATE	: TOTAL	BILLED BY
	• Analysis/Strategy REVIEW CASE DOCKET AND EMAIL NP REGARDING UPDATING CASE FILE	BILLABLE	8/7/2020	0.2	\$550.00	\$110.00	JAY
	Analysis/Strategy TELECONFERENCE FILE REVIEW WITH JAY; UPDATE PP WITH CA STATUS AND NEXT STEPS	BILLARIE	7/29/2020	0.1	\$650.00	\$65.00	GBS
	• Analysis/Strategy EMAIL OPPOSING COUNSEL'S OFFICE REGARDING STATEMEN	BILLABLE	7/10/2020	0.2	\$550.00	\$110.00	JAY
	Document/File Management DOWNLOAD AND SAVE CONFORMED COPY OF JOINT STATUS CONFERENCE. SEND COPY TO GDM.	BILLABLE	7/8/2020	0.2	\$185.00	\$37.00	GG
	Court Mandated Conferences ATTEND STATUS CONFERENCE AND EMAIL N. PIERSON CONTINUED HEARING DATE O 9/9	BILLABLE	7/8/2020	0.5	\$550.00	\$275.00	JAY
	• Trial and Hearing Attendance SETTING UP COURT CALL AND ADDING INFORMATION INTO THE TASK DESCRIPTION	NOT BILLABLE	7/7/2020	0.1	\$0.00	\$0.00	SM

PracticePanther - Anita Trejo | Trejo V: Lyneer Starling Solutions, LLC, et al. (PAGA) Filed 03/04/22 Page 7 of 18 Page ID #:1286

: ITEM	: STATUS	: DATE ↓	: HRS.	RATE	TOTAL	BILLED BY	0 0 0
Analysis/Strategy DISCUSS STATUS HEARING W NP	VITH BILLABLE	7/7/2020	0.1	\$550.00	\$55.00	YAL	
• Pleadings FINALIZE, SERVE, AND E-FILE JOINT STATUS CONFERENCE STATEMENT.	BILLABLE	7/2/2020	0.4	\$185.00	\$74.00	GG	
Pleadings EMAIL CHAIN WITH J. YOUNG JOINT STATUS REPORT.	GRE BILLABLE	7/1/2020	0.1	\$185.00	\$18.50	GDM	
Analysis/Strategy DISCUSS CASE STRATEGY WI K. ODENBREIT	TH BILLABLE	6/30/2020	0.2	\$550.00	\$110.00	YAL	
Court Mandated Conferences REVIEW/RESPOND TO EMAIL FROM JOHN YOUNG REGARE STATUS CONFERENCE STATEMENT.	BILABLE	6/24/2020	0.2	\$750.00	\$150.00	KJO	
Court Mandated Conferences REVIEW DOCKET AND CASE MATERIAL. DRAFT STATUS STATEMENT.	BILLABLE	6/23/2020	0.4	\$550.00	\$220.00	JAY	

PracticePanther - Anita Trejo | Trejo V. Lyneer Staffing Solutions, ELC, et al. (PAGA) Filed 03/04/22 Page 8 of 18 Page ID #:1287

0 0 0	ITEM	STATUS	: DATE ↓	: HRS.	RATE	TOTAL	BILLED BY	0 0 0
	• Analysis/Strategy REVIEW DOCKET FOR UPCOMING HEARING. UPDATE CASE MATERIAL	GBILLABLE	6/5/2020	0.2	\$550.00	\$110.00	JAY	
	Pleadings PREPARE AND SERVE NOTICE OF CONTINUANCE OF STATUS CONFERENCE	BILLABLE	5/4/2020	0.3	\$150.00	\$45.00	RAS	
	• Analysis/Strategy CASE REVIEW WITH J. YOUNG.	BILLABLE	4/1/2020	0.1	\$750.00	\$75.00	ARS	
	 Court Mandated Conferences COURT APPEARANCE: DEFENDANTS' MOTION TO STAY PAGA CASE. 	BILLABLE	12/3/2019	3.4	\$750.00	\$2,550.00	КЈО	
	• Analysis/Strategy DRAFT EMAIL TO ALEXANDER PEREZ AND DANIEL MARTINEZ REGARDING COURT HEARING ON DEFENDANTS' MOTION TO STAY PAGA CASE.	BILLABLE	12/3/2019	0.2	\$750.00	\$150.00	КЈО	
	Dispositive Motions MEET AND CONFER WITH SENIOR ATTORNEY K. ODENBREIT REGARDING STATUS OF HEARING ON MOTION TO STAY PAGA CASE.	BILLABLE	12/3/2019	0.2	\$550.00	\$110.00	AP	

PracticePanther - Anita Trejo | Trejo V. Lyneer Staffing Solutions, LLC, et al. (PAGA) Filed 03/04/22 Page 9 of 18 Page ID #:1288

: ITEM	STATUS	: DATE ↓	HRS.	: RATE	: TOTAL	BILLED BY	0 0
► Pleadings DRAFT CMC STATEMENT.	BILLABLE	11/25/2019	0.5	\$550.00	\$275.00	AP	
Pleadings CALENDAR FOLLOW UP RE DEPOSITION OF PLAINTIFF AN FAC.	DBILLABLE	11/18/2019	0.1	\$175.00	\$17.50	GDM	
Dispositive Motions FINALIZE OPPOSITION TO MOTION TO STAY PAGA ACTIO	BILLABLE	11/18/2019	0.7	\$550.00	\$385.00	AP	
• Dispositive Motions FILE AND SERVE OPPOSITION MOTION TO STAY.	TO BILLABLE	11/18/2019	1.5	\$175.00	\$262.50	GDM	
Dispositive Motions PREPARE TIMELINE OF EVENTS DRAFT INTRO TO OPPOSITION MOTION TO STAY CASE. PREPARE EXHIBITS FOR RJN. DRAFT RJN.		11/17/2019	3.6	\$550.00	\$1,980.00	AP	
Dispositive Motions RESEARCH FOR OPPOSITION T DEFENDANT'S MOTION TO STA PAGA ACTION. DRAFT ARGUMENTS FOR DEFENDANT MOTION TO STAY PAGA ACTIO	AY BILLABLE	11/17/2019	4.7	\$550.00	\$2,585.00	AP	

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	• Dispositive Motions REVIEW OF CASE STATUS. REVIEW OF DEFENDANTS' MOTION TO STAY CASE. ANALYSIS AND STRATEGY FOR DRAFTING OPPOSITION.	BILLABLE	11/16/2019	1.8	\$550.00	\$990.00	AP	
	• Dispositive Motions RESEARCH FOR OPPOSITION TO MOTION TO STAY PAGA CASE.	BILLABLE	11/16/2019	3.5	\$550.00	\$1,925.00	AP	
	• Pleadings SEND EMAIL TO A. PEREZ RE OPP TO MOTION TO STAY.	BILLABLE	11/15/2019	0.1	\$175.00	\$17.50	GDM	
	• Pleadings SPOKE WITH A. PEREZ RE OPPOSITION TO MOTION TO STAY.	BILLABLE	11/13/2019	0.1	\$175.00	\$17.50	GDM	
	• Pleadings SEND EMAIL TO A. PEREZ RE OPPOSITION TO MOTION TO STAY.	BILLABLE	11/8/2019	0.1	\$175.00	\$17.50	GDM	
	• Dispositive Motions CALENDAR DEADLINES RE MOTION TO STAY PAGA CLAIMS.	BILLABLE	10/21/2019	0.1	\$175.00	\$17.50	GDM	

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0 0 0	ITEM	STATUS	: DATE ↓	HRS.	RATE	TOTAL	BILLED BY	
	• Dispositive Motions CONFERENCE CALL WITH COLLEAGUE EMILY DISCUSSING RESEARCH RELATED TO OPPOSITION TO MOTION TO STAY CASE.	BILLABLE	10/11/2019	0.3	\$550.00	\$165.00	AP	
	 Court Mandated Conferences ATTENDANCE AT CASE MANAGEMENT CONFERENCE. 	BILLABLE	10/9/2019	1.3	\$550.00	\$715.00	AP	
	Court Mandated Conferences FOLLOW UP WITH SENIOR ATTORNEY K. ODENBREIT AND K MAHONEY REGARDING CASE MANAGEMENT CONFERENCE.	BILLABLE	10/9/2019	0.3	\$550.00	\$165.00	AP	
	Dispositive Motions MEET AND CONFER WITH SENIOR ATTORNEY K. MAHONEY REGARDING STATUS OF OPPOSITION TO MOTION TO STAY CASE.	BILLABLE	10/9/2019	0.2	\$550.00	\$110.00	AP	
	• Dispositive Motions RESEARCH PERTAINING TO DEFENDANT'S MOTION TO STAY CASE.	BILLABLE	10/9/2019	0.2	\$550.00	\$110.00	AP	

PracticePanther - Anita Trejo | Trejo v. Lyneer Staming Solutions, LLC, et al. (PAGA) #:1291

0 0 0	ITEM	STATUS	: DATE ↓	: HRS.	RATE	TOTAL	BILLED BY	0 0 0
	 Court Mandated Conferences PREPARATION FOR ATTENDANCE AT STATUS CONFERENCE. 	BILLABLE	10/8/2019	0.3	\$550.00	\$165.00	AP	
	Pleadings FILE AND SERVE CASE MANAGEMENT STATEMENT.	BILLABLE	9/25/2019	0.3	\$175.00	\$52.50	GDM	
	• Court Mandated Conferences DRAFT STATUS CONFERENCE STATEMENT AHEAD OF CASE MANAGEMENT CONFERENCE.	BILLABLE	9/24/2019	1.3	\$550.00	\$715.00	AP	
	• Analysis/Strategy MEET AND CONFER REGARDING CASE STATUS WITH SENIOR ATTORNEY A. MAHONEY.	BILLABLE	9/13/2019	0.2	\$550.00	\$110.00	AP	
	• Analysis/Strategy MEET AND CONFER CONFERENCE CALL WITH OPPOSING COUNSEL REGARDING STATUS OF DEFENDANT EMPLOYERS HR IN THIS LITIGATION.	BILLABLE	9/10/2019	0.5	\$550.00	\$275.00	AP	
	• Analysis/Strategy FOLLOW UP WITH OPPOSING COUNSEL TO SCHEDULE MEET AND CONFER CONFERENCE CALL.	BILLABLE	9/9/2019	0.2	\$550.00	\$110.00	AP	

PracticePanther - Anita Trejo | Trejo v. Lyneer Starling Solutions, LLC, et al. (PAGA) Filed 03/04/22 Page 13 of 18 Page ID #:1292

0 0 0	ITEM :	STATUS	: DATE ↓	HRS.	RATE	TOTAL	BILLED BY	
	• Analysis/Strategy REVIEW OF OPPOSING COUNSEL'S CORRESPONDENCE. COMMUNICATION WITH OPPOSING COUNSEL TO SCHEDULE MEET AND CONFER CONFERENCE CALL.	BILLABLE	9/7/2019	0.5	\$550.00	\$275.00	AP	
	Court Mandated Conferences SENT KATIE REMINDER OF HEARING NEXT WEEK.	BILLABLE	9/5/2019	0.1	\$175.00	\$17.50	SMB	
	Pleadings ALL DEFENDANT'S SERVED.	BILLABLE	8/28/2019	0.1	\$175.00	\$17.50	GDM	
	• Analysis/Strategy CALL WITH EMPLOYER'S DEFENSE COUNSEL DISCUSSING STATUS OF REPRESENTATIION.	BILLABLE	8/16/2019	0.3	\$550.00	\$165.00	AP	
	• Pleadings Follow UP WITH COLLEAGUE D. MARTINEZ AND OPPOSING COUNSEL REGARDING STATUS OF PROOF OF SERVICE.	BILLABLE	8/14/2019	0.2	\$550.00	\$110.00	AP	
	• Analysis/Strategy EMAIL CORRESPONDENCE FROM OPPOSING COUNSEL RE RULE 26 F REPORT.	BILLABLE	8/12/2019	0.5	\$450.00	\$225.00	CFA	

PracticePanther - Anita Trejo | Trejo v. Lyneer Stanning Solutions, LLC, et al. (PAGA) Filed 03/04/22 Page 14 of 18 Page ID

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	• Analysis/Strategy MEET AND CONFER WITH OPPOSING COUNSEL REGARDING STATUS OF PLEADINGS.		BILLABLE		8/9/2019		0.1		\$550.00	\$55.00		AP	
	Class Action Certification and Notice REVISE AND DRAFT SECOND AMENDED PAGA NOTICE.		BILLABLE		8/9/2019		2.1		\$550.00	\$1,155.00		AP	
	Class Action Certification and Notice FINALIZE SECOND AMENDED PAGA NOTICE AND FILE WITH THE LWDA.		BILLABLE		8/9/2019		0.3		\$550.00	\$165.00		AP	
	• Pleadings REVIEW EMAIL EXCHANGE BETWEEN ALEX PEREZ AND STACEY COOPER REGARDING PAGA COMPLAINT.		BILLABLE		8/9/2019		0.3		\$750.00	\$225.00		KJO	
	• Pleadings MEET AND CONFER WITH SENIOR ATTORNEY K. ODENBREIT REGARDING FIRST AMENDED COMPLAINT AND AMENDED PAGA NOTICE.		BILLABLE		8/8/2019		0.3		\$550.00	\$165.00		AP	

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0 0 0	ITEM	: STATUS	: DATE ↓	HRS.	RATE	TOTAL	BILLED BY	0 0 0
	• Analysis/Strategy MEETING WITH ALEXANDER PEREZ REGARDING PAGA NOTICE.	BILLABLE	8/8/2019	0.4	\$750.00	\$300.00	KJO	
	• Analysis/Strategy REVIEW CASE FILE.	BILLABLE	8/8/2019	0.8	\$550.00	\$440.00	AP	
	• Trial and Hearing Attendance ATTEND ORDER TO SHOW CAUSE HEARING RE SERVICE.	BILLABLE	8/7/2019	2	\$450.00	\$900.00	CFA	
	• Analysis/Strategy DRAFT EXPENSE REPORT.	BILLABLE	8/7/2019	0.2	\$450.00	\$90.00	CFA	
	• Analysis/Strategy EMAIL CORRESPONDENCE TO AND FROM KATIE, DANIEL AND NICOLE RE CMC AND OSC CALENDARING.	BILLABLE	8/7/2019	0.2	\$450.00	\$90.00	CFA	
	Analysis/Strategy MEET AND CONFER WITH KATIE RE HEARING	BILLABLE	8/6/2019	0.2	\$450.00	\$90.00	CFA	
	• Analysis/Strategy MEET AND CONFER WITH DANIEL RE PEREMPTORY CHALLENGE.	BILLABLE	6/14/2019	0.1	\$450.00	\$45.00	CFA	

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0 0 0	ITEM	STATUS	: DATE ↓	HRS.	RATE	TOTAL	BILLED BY	0 0 0
	• Document/File Management MEET AND CONFER WITH DANIEL RE PEREMPTORY CHALLENGE.	BILLABLE	6/13/2019	0.1	\$450.00	\$45.00	CFA	
	• Pleadings FILE NOTICE OF DEPOSIT OF JURY FEES.	BILLABLE	6/12/2019	0.1	\$175.00	\$17.50	GDM	
	• Pleadings UPLOAD COMPLAINT TO LWDA WEBSITE.	BILLABLE	6/7/2019	0.1	\$175.00	\$17.50	GDM	
	• Communicate (with client) FINALIZE AND SEND A STATUS LETTER IN SPANISH WITH A COPY OF THE COMPLAINT AND ADR PACKAGE.	BILLABLE	6/6/2019	0.3	\$175.00	\$52.50	WR	
	Pleadings CREATE CAPTION PAGE FOR USE.	BILLABLE	6/3/2019	0.1	\$175.00	\$17.50	GDM	
	• Analysis/Strategy STRATEGIZE RE INCLUDING DEFENDANT CIERA STAFFING IN PAGA ONLY COMPLAINT.	BILLABLE	5/23/2019	0.1	\$450.00	\$45.00	SD	
	• Pleadings FINALIZE COMPLAINT FOR FILING.	BILLABLE	5/23/2019	0.2	\$450.00	\$90.00	SD	

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*	ITEM	: STATUS	: DATE ↓	: HRS.	: RATE	: TOTAL	BILLED BY	0 0 0
	• Pleadings FINALIZE PAGA ONLY COMPLAINT FOR FILING.	BILLABLE	5/21/2019	0.4	\$450.00	\$180.00	SD	
	• Fact Investigation/Developme FINALIZE, SEND, AND UPLOAD AMENDED PAGA NOTICE.	BILLABLE	5/21/2019	0.4	\$175.00	\$70.00	WR	
	• Pleadings AMEND THE PAGA NOTICE WITH THE EMPLOYER'S CORRECT ADDRESS.	BILLABLE	5/20/2019	0.6	\$175.00	\$105.00	WR	
	• Analysis/Strategy ANALYSIS RE COMPLAINT.	BILLABLE	5/20/2019	0.1	\$450.00	\$45.00	SD	
	• Pleadings PREPARE DRAFT PRIVATE ATTORNEYS GENERAL ACT COMPLAINT FOR REVIEW BY SENIOR ATTORNEYS.	BILLABLE	5/17/2019	3.5	\$450.00	\$1,575.00	SD	
	• Analysis/Strategy UPDATE CASE DESCRIPTION AN STATUS IN PRACTICE PANTHER.		4/2/2019	0.1	\$450.00	\$45.00	SD	
	• Analysis/Strategy MEETING WITH SHOOKAH DADASHZADEH REGARDING STATUS AND STRATEGY.	BILLABLE	3/21/2019	0.2	\$750.00	\$150.00	KJO	

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0 0 0	ITEM	STATUS	: DATE I	HRS.	RATE	: TOTAL	BILLED BY	0 0 0
	● Fact Investigation/Develop FINALIZE, UPLOAD, SERVE A PAGA LETTER TO ALL FOUR DEFENDANTS.		3/14/2019	2	\$175.00	\$350.00	WR	
				52.10		\$25,833.50 u	JSD	