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8 Attorneys for Plaintiff and the Putative Class  
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11 **UNITED STATES DISTRICT COURT**  
12 **NORTHERN DISTRICT OF CALIFORNIA**  
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15 CHRISTINE CRUMP, individually,  
16 and on behalf of other members of the  
17 general public similarly situated and on  
18 behalf of other aggrieved employees  
pursuant to the California Private  
Attorneys General Act;

19 Plaintiff,

20 v.

21 HYATT CORPORATION, an unknown  
22 business entity; and DOES 1 through  
23 100, inclusive,

24 Defendants.  
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Case No. 4:20-cv-00295-HSG

**CLASS ACTION**

**DECLARATION OF KITTY K. SZETO IN  
SUPPORT OF PLAINTIFF CHRISTINE  
CRUMP'S UNOPPOSED MOTION FOR  
ATTORNEYS' FEES, COSTS, AND  
INCENTIVE AWARD**

Date: November 3, 2022  
Time: 2:00 p.m.  
Courtroom: 2

1 I, Kitty K. Szeto, declare as follows:

2 I am an attorney duly licensed to practice before all courts of the State of  
3 California and I am a Partner at the Parris Law Firm, attorneys for Plaintiff  
4 Christine Crump (“Plaintiff”) in the above-entitled case. The facts set forth in this  
5 declaration are within my personal knowledge and, if called as a witness, I could  
6 and would competently testify as follows.

7 1. I have been actively engaged in this litigation from its inception. The  
8 Parris Law Firm has fully and actively participated in every aspect of the litigation  
9 process including, but not limited to, attending telephonic and in person client  
10 meetings; propounding written discovery; conducting legal research; conducting  
11 case investigation; preparing for and taking and defending class member and  
12 expert depositions; moving for class certification; participating in case strategy and  
13 analysis; speaking with class members; obtaining declarations from class members;  
14 drafting, reviewing, and revising pleadings and motions; responding to written  
15 discovery; reviewing hundreds of pages of documents; preparing for mediation and  
16 settlement negotiations; traveling for depositions; negotiating the settlement;  
17 participating in court appearances; working with the experts; and preparing the  
18 preliminary approval papers and supporting documents. Before filing this lawsuit,  
19 Class Counsel investigated and researched the facts and circumstances underlying  
20 the pertinent issues and applicable law. This required thorough discussions and  
21 interviews between Class Counsel and Plaintiff and research into the various legal  
22 issues involved in the case, namely, the current state of the law as it applied to  
23 various defenses. Class Counsel also engaged in extensive factual investigation  
24 into the organization and operations of Defendant’s business in California. After  
25 conducting their initial investigation, Class Counsel determined that Plaintiff’s  
26 claims were well suited for class action adjudication owing to what appeared to be  
27 a common course of conduct affecting a similarly situated group of employees.  
28 Class Counsel has conducted formal and informal investigation into the facts of

1 this case, including propounding written discovery, conducting an extensive review  
2 of the documents and data produced by Defendant, and speaking with various  
3 current and former employees. In particular, Class Counsel spoke with class  
4 members, reviewed and analyzed hundreds of pages of documents and route sheets  
5 produced in this case, as well as policy documentation and other pertinent  
6 information. Class Counsel scrutinized and analyzed the documents to determine  
7 Defendant's degree of liability and amounts due in damages.

8         2. We conducted significant investigation and discovery into the facts of  
9 this case, including extensive interviews of the Class Representative and absent  
10 class members; analyzed Defendant's written policies applicable to members of the  
11 Settlement Class; and analyzed all of the documents Defendant produced.

12         3. At many times during the course of this litigation, members of our  
13 firm and I interacted and met on the case to strategize about the case and were  
14 actively involved in preparing the case for certification, mediation negotiations,  
15 and trial. Depending upon the activity taking place on any given day, there were  
16 times that we communicated on a daily basis.

17         4. During the course of the litigation, the parties have conducted  
18 substantial formal discovery. We analyzed documents and time records either  
19 produced by Defendant or obtained by Class Counsel through other sources. These  
20 documents provided counsel with a critical understanding of the nature of the work  
21 performed by Class Members, Defendant's policies and procedures, and were used  
22 in analyzing liability and damage issues in connection with all phases of the  
23 litigation, and ultimately with the mediation process.

24         5. As set forth more fully in the accompanying motion, Class Counsel  
25 seeks attorneys' fees in an amount of 35% of the \$990,000.00 settlement  
26 (\$346,500). Class Counsel has vigorously litigated this case for more than two  
27 years, devoting a total of **908** hours with a total lodestar of **\$499,400** which well  
28 exceeds the \$346,500 fee request. Attached hereto as **Exhibit "A"** is a summary

1 chart of the hours worked. I have been the lead attorney working on this case,  
2 from taking and defending all depositions to preparing for class certification.  
3 Applying the \$550.00 hourly rate I was approved at by Central District of  
4 California a little over two years ago in 2020, that yields a lodestar of \$499,400 for  
5 the 908 hours worked by the Parris Law Firm.

6 6. I have reviewed the Parris Law Firm's records, the work performed by  
7 me and others at our firm and the attached charts, and hereby attests that the **908**  
8 hours attributed to the Parris Law Firm are an accurate representation of the actual  
9 time we spent working on the case over the course of this litigation.

10 7. I have practiced law in Southern California since December of 2008,  
11 and have handled, as class counsel, numerous and significant wage-and-hour class  
12 action cases. Additionally, the Parris Law Firm also has trial experience in class  
13 actions. In August 2014, our firm obtained a \$4,335,000.00 jury verdict with  
14 punitive damages in a consumer fraud class action in the San Bernardino Superior  
15 Court, which was ranked in The Recorder's Top California Verdicts of 2014 as the  
16 second largest million dollar fraud verdict in California in 2014. I first chaired the  
17 entire trial. I am aware that the common and acceptable rate for contingency  
18 representation in wage-and-hour class action litigation is normally 40% before  
19 trial, with the range being from 33.3% up to 50%.

20 8. The Parris Law Firm is actively involved in both class action and  
21 complex litigation matters on an ongoing basis and has certified numerous wage-  
22 and-hour class actions in the Superior Courts of Los Angeles County, San  
23 Francisco County, Orange County, and Kern County Superior Courts, as well as  
24 the United States District Court for the Central and Northern Districts of  
25 California. Our firm also has experience in appellate practice and has settled  
26 numerous class actions worth hundreds of millions of dollars on behalf of tens of  
27 thousands of California employees. The Parris Law Firm has been court-appointed  
28 class counsel in multiple cases in California state and federal courts. Our firm

1 resume, a true and correct copy of which is attached hereto as **Exhibit “B”**  
2 accurately describes the firm’s wage-and-hour class action experience.

3 9. The Settlement also provides that Plaintiff requests approval by the  
4 Court for a Class Representative Incentive Payment in the amount of \$10,000 for  
5 her time and effort serving as the Class Representative. Ms. Crump spent a  
6 substantial amount of time and effort in producing relevant documents and past  
7 employment records and providing the facts and evidence to prove the allegations  
8 in the complaint. She was available to Class Counsel as needed. The information  
9 and aid that she provided to Class Counsel was invaluable and ensured the  
10 successful resolution of this case. Furthermore, Ms. Crump has taken a substantial  
11 risk by electing to have her unique name as part of the public record in this lawsuit.  
12 Any time she attempts to seek new employment or is under investigation by a  
13 prospective employer, any search for lawsuits brought by her will be disclosed and  
14 she will have to deal with the possible stigma of bringing a class action lawsuit  
15 against her former employer. As such, the Class Representative Incentive Payment  
16 she seeks is fully deserved and well justified.

17 10. The Parris Law Firm will have incurred \$97,158.56 in costs and  
18 litigation expenses at the conclusion of final approval as reflected in **Exhibit “C.”**  
19 This amount includes costs for filing fees and costs to serve all pleadings and  
20 motions, mediation costs with a reputable wage-and-hour class action mediator for  
21 a full-day session, costs to take and defend and travel across the state for 10 non-  
22 expert and expert depositions, expert costs, as well as costs relating to Class  
23 Counsel’s travel between Southern and Northern California for in-person court  
24 appearances. Importantly, this is \$2,841.44 *less than* the \$100,000 allocated in the  
25 Settlement Agreement, meaning \$2,841.44 will be added back to the Net

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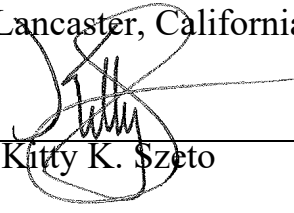
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1 Settlement Amount to be distributed to the Settlement Class. As such, the Parris  
2 Law Firm seeks to recover costs up to **\$97,158.56**.

3 I declare under penalty of perjury under the laws of the United States of  
4 America that the foregoing is true and correct to the best of my personal  
5 knowledge.

6 Executed this 22nd day of July 2022, at Lancaster, California.

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10 Kitty K. Szeto  
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**EXHIBIT "A"**

<b>TASKS</b>	<b>Hours</b>
<b>Investigation</b>	
Preparation of Intake, New Case File and Retainers	<b>17.00</b>
Research and Investigation of Defendant's Industry	<b>12.00</b>
Legal Research Regarding Claims Pled in the Complaint	<b>34.00</b>
Case Review/Research/Misc. Tasks	<b>68.60</b>
<b>Appearances</b>	
Preparation and Attendance to Rule 26(f) Conference (April 3, 2020)	<b>1.30</b>
Preparation and Attendance to Case Management Conference (April 21, 2020)	<b>1.90</b>
Preparation and Attendance to Case Management Conference (June 9, 2020)	<b>1.00</b>
Case Management Conference in <i>Reeves v. Hyatt Corporation</i> (October 20, 2020)	<b>0.50</b>
Preparation and Attendance to Telephonic Case Management Conference (October 20, 2020)	<b>2.50</b>
Preparation and Attendance to Plaintiff's Deposition of Defendant Hyatt Corporation's Person Most Knowledgeable (February 25, 2021)	<b>34.20</b>
Deposition Preparation with Christine Crump	<b>10.00</b>
Defendant's Deposition of Plaintiff Christine Crump (March 2, 2021)	<b>7.00</b>
Preparation and Attendance to Case Management Conference (March 16, 2021)	<b>1.20</b>
Case Management Conference in <i>Reeves v. Hyatt Corporation</i> (March 23, 2021)	<b>0.10</b>
Case Management Conference in <i>Reeves v. Hyatt Corporation</i> (May 25, 2021)	<b>0.90</b>
Deposition Preparation for Brian Kriegler	<b>16.50</b>
Defendant's Deposition of Brian Kriegler (June 15, 2021)	<b>6.10</b>
Deposition Preparation for Jeffrey S. Petersen	<b>1.60</b>
Defendant's Deposition of Jeffrey S. Petersen (June 18, 2021)	<b>3.80</b>
Travel and Deposition Preparation for Thomas Flint	<b>10.10</b>
Defendant's Deposition of Thomas Flint (June 21, 2021)	<b>1.20</b>



Travel and Deposition Preparation for Kimberly Sousa	8.20
Defendant's Deposition of Kimberly Sousa (June 22, 2021)	1.70
Travel and Deposition Preparation for James Coleman	5.25
Defendant's Deposition of James Coleman (June 23, 2021)	2.65
Travel and Deposition Preparation for Krystal Rose Higdon	10.80
Defendant's Deposition of Krystal Rose Higdon (June 25, 2021)	1.50
Travel and Deposition Preparation for Oscar Recinos	5.10
Defendant's Deposition of Oscar Recinos (June 29, 2021)	0.70
Travel and Deposition Preparation for Nicholas Leon	9.50
Defendant's Deposition of Nicholas Leon (July 1, 2021)	1.10
Mediation (July 20, 2021)	27.50
Case Management Conference in <i>Reeves v. Hyatt Corporation</i> (September 28, 2021)	0.50
Preparation and Attendance to Case Management Conference (October 19, 2021)	1.50
Case Management Conference in <i>Reeves v. Hyatt Corporation</i> (February 8, 2022)	1.50
Motion for Summary Judgment in <i>Reeves v. Hyatt Corporation</i> (April 22, 2022)	3.00
Preparation, Travel and Attendance to Motion for Preliminary Approval of Settlement (June 2, 2022)	8.30
Motion for Final Approval of Settlement (November 3, 2022)	8.30
<b>Pleadings and Filings</b>	
Drafting, Filing and Serving of Notice of Association of Counsel (March 6, 2020)	0.30
Review of Judge Haywood S. Gilliam, Jr. Standing Order (March 9, 2020)	0.50
Drafting, Filing and Serving of Notice of Appearance or Withdrawal of Counsel and Joint Case Management Conference Statement (April 14, 2020)	0.20
Review of Court's ADR Certification by Parties and Counsel (April 14, 2020)	0.30
Review of Minutes for Proceedings Held on April 21, 2020 - Telephonic Initial Case Management Conference (April 22, 2020)	0.40
Drafting and Filing of Stipulation and [Proposed] Order Selecting ADR Process (May 12, 2020)	0.30

Review of Stipulation and Order Selecting ADR Process (May 13, 2020)	<b>0.10</b>
Drafting and Service of Plaintiff's Initial Disclosures (May 18, 2020)	<b>5.30</b>
Review of Defendant's Initial Disclosures (May 18, 2020)	<b>0.30</b>
Drafting, Filing and Serving of Notice of Appearance of Ryan A. Crist (June 1, 2020)	<b>0.90</b>
Review of Clerk's Notice re Case Management Conference to be Held on June 9, 2020 (June 2, 2020)	<b>0.40</b>
Review of Minute Entry for Proceedings Held re Further Case Management Conference on June 9, 2020 (June 10, 2020)	<b>0.30</b>
Drafting, Filing and Serving of Joint Stipulation Setting Case Schedule Through Class Certification (June 15, 2020)	<b>2.00</b>
Review of Scheduling Order (June 16, 2020)	<b>0.70</b>
Drafting, Filing and Serving of Joint Stipulation to File First Amended Complaint (August 4, 2020)	<b>2.70</b>
Review of Order Granting Joint Stipulation to File First Amended Complaint (August 5, 2020)	<b>0.60</b>
Drafting, Filing and Serving of First Amended Class Action Complaint for Damages & Enforcement Under the Private Attorneys General Act, California Labor Code § 2698, Et Seq. (August 5, 2020)	<b>7.30</b>
Review of Defendant's Notice of Appearance of Romtin Parvaresh for Defendant Hyatt Corporation (August 17, 2020)	<b>0.10</b>
Review of Defendant's Answer to Plaintiff's First Amended Class Action Complaint (August 19, 2020)	<b>0.40</b>
Review of Court's Tentative Case Management Order (Alameda Superior Court) (September 14, 2020)	<b>0.20</b>
Review of Court's Case Management Order (Alameda Superior Court) (September 15, 2020)	<b>0.10</b>
Review of Order Continuing Hearing on Motion for Class Certification (September 22, 2020)	<b>0.30</b>
Review of Order Finding as Moot docket 33 (October 20, 2020)	<b>0.10</b>
Review of Minute Entry for Proceedings Held re Telephonic Initial Case Management Conference on October 20, 2020 (October 21, 2020)	<b>0.30</b>
Drafting and Review of Stipulated Protective Order (February 16, 2021)	<b>1.10</b>
Review of Signed Stipulated Protective Order (February 17, 2021)	<b>0.10</b>
Review of Order Directing Defendant to Respond to Plaintiff's Motion for Discovery (March 10, 2021)	<b>0.10</b>
Drafting, Filing and Serving of Stipulation to Amend Class Certification Briefing Schedule and Hearing Date (March 16, 2021)	<b>1.40</b>
Review of Court Order Amending Class Certification Briefing Schedule and Hearing Date (March 17, 2021)	<b>0.50</b>

Drafting, Filing and Serving of Joint Case Management Statement (Alameda Superior Court) (March 23, 2021)	1.40
Review of Court's Case Management Order (Alameda Superior Court) (March 29, 2021)	0.30
Drafting, Filing and Serving of Plaintiff's Supplemental Disclosures Pursuant to Federal Rules of Civil Procedure, Rule 26(a)(1) (May 6, 2021)	0.90
Review of Defendant's Supplemental Disclosures (July 15, 2021)	0.20
Drafting, Filing and Serving of Joint Case Management Statement and Joint Status Report Regarding Settlement Approval (Alameda Superior Court) (September 28, 2021)	2.35
Drafting and Review of Joint Status Report Regarding Settlement Approval (September 28, 2021)	1.20
Review of Court's Minutes Regarding Case Management Conference & Case Management Order (Alameda Superior Court) (October 5, 2021)	0.10
Drafting, Filing and Serving of Joint Case Management Statement (October 12, 2021)	0.50
Review of Plaintiff's Janice Insixiengmay's Notice of Related Actions (October 26, 2021)	0.20
Review Order Directing Parties to File Joint Status Report re Filing of Motion for Preliminary Approval of Settlement (December 21, 2021)	0.20
Drafting, Filing and Serving of Joint Status Report (December 28, 2021)	0.20
Review of Order Directing Parties to File Joint Status Report re Filing of Motion for Preliminary Approval of Settlement (February 1, 2022)	0.50
Review of Order Terminating as Moot docket 39, Motion for Discovery and docket 46, Motion to Certify the Class (February 9, 2022)	0.10
Review Court's Referral for Purpose of Determining Relationship (April 14, 2022)	0.20
Review Court's Related Case Order re Related Cases (April 28, 2022)	0.10
Review of Scheduling Order (June 27, 2022)	0.40
Drafting and Filing of Second Amended Complaint (June 27, 2022)	1.40
<b>Law &amp; Motion</b>	
Drafting, Filing and Service of Plaintiff's Request for Intervention Regarding a Discovery Event Pursuant to Local Rule 37-1 (B) (October 14, 2020)	6.30
Review of Clerk's Notice Setting Telephonic Case Management Conference re Docket 33 (October 15, 2020)	1.00
Drafting, Filing and Service of Plaintiff's Request for Intervention Regarding a Discovery Event Pursuant to Local Rule 37-1(B) and Request for Continuance of Class Certification Filing Deadline (March 9, 2021)	2.90

Review of Defendant's Response to Plaintiff Christine Crump's Request for Intervention Regarding a Discovery Event (March 12, 2021)	<b>1.60</b>
Review of Minute Entry re Further Case Management Conference held on March 16, 2021 (March 16, 2021)	<b>0.10</b>
Drafting, Filing and Service of Plaintiff's Motion for Class Certification (May 6, 2021)	<b>234.60</b>
Drafting and Review of Stipulation to Amend Class Certification Briefing Schedule and Hearing Date (May 28, 2021)	<b>0.10</b>
Review Court's Order Granting Stipulation to Amend Class Certification Briefing Schedule and Hearing Date (docket 48) (June 1, 2021)	<b>0.20</b>
Review of Defendant's Opposition to Plaintiff's Motion for Class Certification (July 15, 2021)	<b>4.60</b>
Drafting, Filing and Service of Stipulation to Amend Class Certification Reply and Hearing Date (August 6, 2021)	<b>12.40</b>
Review of Court's Order Granting Stipulation to Amend Class Certification Reply and Hearing Date (August 9, 2021)	<b>0.20</b>
Drafting, Filing and Service of Stipulation to Vacate Class Certification Reply and Hearing Date (September 20, 2021)	<b>0.70</b>
Review of Order (As Modified) Granting Stipulation to Vacate Class Certification Reply and Hearing Date (September 21, 2021)	<b>0.30</b>
Drafting, Filing and Service of Plaintiff's Unopposed Motion for Preliminary Approval of Class Action Settlement (February 8, 2022)	<b>7.00</b>
Drafting, Filing and Service of Supplemental Declaration of Kitty K. Szeto In Support Of Plaintiff's Motion for Preliminary Approval of Class Action Settlement and Declaration of Michael E. Moore In Support Of Plaintiff Christine Crump's Unopposed Motion for Preliminary Approval of Class Action Settlement (June 8, 2022)	<b>10.40</b>
Review of Minute Entry re Proceedings held for Granting Motion for Preliminary Approval on June 2, 2022 (June 15, 2022)	<b>0.10</b>
Review of Order Granting Motion for Preliminary Approval (June 17, 2022)	<b>0.50</b>
Drafting, Filing and Service of Motion for Attorney Fees and Costs; and Motion for Incentive Payment (July 22, 2022)	<b>21.70</b>
Drafting, Filing, and Service of Motion for Final Approval of Settlement (October 10, 2022)	<b>23.00</b>
<b>Discovery</b>	
Drafting and Service of Plaintiff's Notice of Deposition of Hyatt Corporation; Plaintiff's Special Interrogatories (Set One) to Defendant and Request for Production of Documents (Set One) (April 14, 2020)	<b>13.30</b>
Review of Defendant's Notice of Deposition of Plaintiff Christine Crump with Request for Production of Documents and Defendant's Request for Production of Documents (Set One) to Plaintiff (April 14, 2020)	<b>0.50</b>
Drafting and Service of Plaintiff's Objections and Responses to Defendant's Requests for Production of Documents (Set One) (May 28, 2020)	<b>21.70</b>

Review of Defendant's Responses to Plaintiff's Requests for Production of Documents (Set One) and Defendant's Responses to Plaintiff's Special Interrogatories (Set One) (May 28, 2020)	<b>2.30</b>
Review of Defendant's Supplemental Response to Plaintiff's Requests for Production of Documents (Set One) (October 21, 2020)	<b>2.40</b>
Drafting and Service of Plaintiff's Amended Notice of Deposition of Defendant Hyatt Corporation (December 3, 2020)	<b>5.90</b>
Review of Defendant's First Amended Notice of Deposition of Plaintiff Christine Crump with Request for Production of Documents (December 7, 2020)	<b>1.30</b>
Drafting and Service of Plaintiff's Second Amended Notice of Deposition of Hyatt Corporation (February 10, 2021)	<b>1.50</b>
Review of Defendant's Objections and Responses to Plaintiff's Second Amended Notice of the Deposition of Defendant Hyatt Corporation Under Fed. R. Civ. P. 30(b)(6) (February 23, 2021)	<b>0.10</b>
Review of Defendant's Second Amended Notice of Deposition of Plaintiff Christine Crump with Request for Production of Documents (February 26, 2021)	<b>0.50</b>
Drafting and Service of Plaintiff's Objections and Responses to Defendant's Second Amended Notice of Deposition with Requests for Production of Documents (February 26, 2021)	<b>2.00</b>
Review of Defendant's Notice of Issuance of Deposition Subpoena Pursuant to Federal Rule of Civil Procedure 45 to Oscar Recinos and Defendant's Notice of Issuance of Deposition Subpoena Pursuant to Federal Rule of Civil Procedure 45 to Thomas Flint (May 25, 2021)	<b>0.55</b>
Drafting and Service of Plaintiff's Objections to Defendant's Notice of Issuance of Deposition Subpoena Pursuant to Federal Rule of Civil Procedure 45 to Oscar Recinos and Plaintiff's Objections to Defendant's Notice of Issuance of Deposition Subpoena Pursuant to Federal Rule of Civil Procedure 45 to Thomas Flint (May 26, 2021)	<b>2.60</b>
Review of Defendant's Notice of Issuance of Deposition Subpoena Pursuant to Federal Rule of Civil Procedure 45 to Krystal Rose Higdon; Defendant's Notice of Issuance of Deposition Subpoena Pursuant to Federal Rule of Civil Procedure 45 to Thomas Flint; Defendant's Notice of Issuance of Deposition Subpoena Pursuant to Federal Rule of Civil Procedure 45 to Jeffrey S. Petersen; Defendant's Notice of Issuance of Deposition Subpoena Pursuant to Federal Rule of Civil Procedure 45 to Brian Kriegler; Defendant's Notice of Issuance of Deposition Subpoena Pursuant to Federal Rule of Civil Procedure 45 to James Coleman; and Defendant's Notice of Issuance of Deposition Subpoena Pursuant to Federal Rule of Civil Procedure 45 to Kimberly Sousa (June 2, 2021)	<b>1.50</b>
Drafting and Service of Plaintiff's Objections to Defendant's Notice of Issuance of Deposition Subpoena Pursuant to Federal Rule of Civil Procedure 45 to Jeffrey S. Petersen; Plaintiff's Objections to Defendant's Notice of Issuance of Deposition Subpoena Pursuant to Federal Rule of Civil Procedure 45 to Brian Kriegler (June 9, 2021)	<b>2.30</b>
Drafting and Service of Plaintiff's Objections to Defendant's Notice of Issuance of Deposition Subpoena Pursuant to Federal Rule of Civil Procedure 45 to Krystal Rose Higdon (June 16, 2021)	<b>1.00</b>
Drafting and Service of Plaintiff's Requests for Production of Documents (Set Two) to Defendant and Plaintiff's Special Interrogatories (Set Two) to Defendant (June 21, 2021)	<b>0.90</b>

Review of Defendant's Subpoena to Testify at a Deposition in a Civil Action for Krystal Rose Higdon; and Defendant's Subpoena to Testify at a Deposition in a Civil Action for Kimberly Sousa (June 22, 2021)	<b>0.30</b>
Review of Defendant's Notice of Issuance of Deposition Subpoena Pursuant to Federal Rule of Civil Procedure 45 to Oscar Recinos (June 24, 2021)	<b>0.40</b>
Review of Defendant's Notice of Issuance of Deposition Subpoena Pursuant to Federal Rule of Civil Procedure 45 to Nicholas Leon (June 28, 2021)	<b>1.30</b>
Review of Defendant's Responses to Plaintiff's Requests for Production of Documents (Set Two) and Defendant's Responses to Plaintiff's Special Interrogatories (Set Two) (July 26, 2021)	<b>0.30</b>
Drafting and Service of Plaintiff's Notice of Deposition of Dale Kimball; Plaintiff's Notice of Deposition of Richard Sanchez; Plaintiff's Notice of Deposition of Hari Ram; Plaintiff's Notice of Deposition of Jesus Verdugo; Plaintiff's Notice of Deposition of Walter Chavez; Plaintiff's Notice of Deposition of Michelle Ye; Plaintiff's Notice of Deposition of Ivan Deleon Cuellar; and Plaintiff's Notice of Deposition of Andy Chan (August 4, 2021)	<b>6.50</b>
Drafting and Service of Plaintiff's Amended Notice of Deposition of Richard Sanchez and Plaintiff's Amended Notice of Deposition of Dale Kimball (August 5, 2021)	<b>2.90</b>
Drafting and Service of Plaintiff's Amended Notice of Deposition of Jesus Verdugo; Plaintiff's Amended Notice of Deposition of Walter Chavez; Plaintiff's Amended Notice of Deposition of Andy Chan; Plaintiff's Amended Notice of Deposition of Michelle Ye; Plaintiff's Amended Notice of Deposition of Ivan Deleon Cuellar; and Plaintiff's Amended Notice of Deposition of Dale Kimball (August 6, 2021)	<b>1.80</b>
Drafting and Service of Plaintiff's Notice of Videotaped Deposition of Robert Crandall (August 12, 2021)	<b>2.50</b>
Review Deposition Transcript of Krystal Higdon	<b>0.20</b>
Review Deposition Transcript of Jeffrey Peterson	<b>0.40</b>
Review Deposition Transcript of James Coleman	<b>0.10</b>
Review Deposition Transcript of Kimberly Sousa	<b>0.20</b>
Review Deposition Transcript of Christine Crump	<b>0.70</b>
Review Deposition Transcript of Greg Cornwell	<b>0.30</b>
Review Deposition Transcript of Nicholas Leon	<b>0.30</b>
Review Deposition Transcript of Brian Kriegler	<b>0.40</b>
Review Deposition Transcript of Thomas Flint	<b>0.30</b>
Review Deposition Transcript of Oscar Recinos	<b>0.30</b>
<b>Review and Analysis of Documents</b>	

Review and Analysis of 968 Documents and Data Produced by Defendant Hyatt Corporation	15.10
<b>Meet &amp; Confer Conference Calls</b>	
Meet and Confer Conference Call with Opposing Counsel Regarding Depositions (April 17, 2020)	0.20
Meet and Confer Conference Call with Opposing Counsel Regarding Discovery and Amending Pleadings (June 12, 2020)	3.90
Meet and Confer Conference Call with Opposing Counsel Regarding Depositions (June 23, 2020)	1.00
Meet and Confer Conference Call with Galen Shimoda (August 17, 2020)	1.10
Meet and Confer Conference Call with Opposing Counsel Regarding Discovery (August 24, 2020)	0.30
Meet and Confer Conference Call with Galen Shimoda (August 26, 2020)	0.40
Meet and Confer Conference Call with Opposing Counsel and Expert Regarding Time Records (October 27, 2020)	2.30
Meet and Confer Conference Call with Opposing Counsel Regarding Discovery (December 16, 2020)	3.50
Meet and Confer Conference Call with Opposing Counsel Regarding Supplemental Discovery Responses (January 29, 2021)	1.70
Court Ordered Meet and Confer Conference Call with Opposing Counsel Regarding Discovery Dispute (March 15, 2021)	3.10
Follow-Up Meet and Conference Call with Opposing Counsel Regarding Discovery Dispute (March 16, 2021)	0.60
Meet and Confer Conference Call with Galen Shimoda (June 23, 2021)	0.40
<b>Meet &amp; Confer Via E-mail</b>	
Meet and Confer with Opposing Counsel Regarding Discovery	3.30
Meet and Confer with Opposing Counsel Regarding Document Production	1.10
Meet and Confer with Opposing Counsel Regarding Depositions	1.30
<b>Client and Class Member Calls</b>	
Calls with Plaintiff and Class Members Throughout Duration of Case	53.00
<b>Letters</b>	
Drafting and Service of Plaintiff's Meet and Confer Letter Regarding Defendant's Responses to Requests for Production of Documents, Sets One and Special Interrogatories, Set One and Deposition of 30(b)(6) Witness (June 1, 2020)	6.10
Review Defendant's Response Letter to Plaintiff's Meet and Confer Letter Regarding Defendant's Responses to Requests for Production of Documents, Sets One and Special Interrogatories, Set One and Deposition of 30(b)(6) Witness (June 8, 2020)	2.40
Drafting and Service of Letter to Kimberly Sousa Regarding Witness Fee Check (June 23, 2021)	0.60
Draft Letter to Krystal Higdon Regarding Witness Fee Check (June 25, 2021)	0.50

<b>Mediation/Settlement</b>	
Mediation Scheduling & Preparation	<b>13.60</b>
Review Mediator's Letter for July 20, 2021 Mediation (June 2, 2021)	<b>0.40</b>
Drafting and Service of Plaintiff's Confidential Mediation Brief (July 13, 2021)	<b>5.70</b>
Review Confidentiality Agreement for July 20, 2021 Mediation (July 19, 2021)	<b>0.10</b>
Conference Call with Mediation (August 3, 2021)	<b>2.20</b>
Drafting and Filing of Stipulation Regarding Settlement Administration Dates (docket 67) (June 24, 2022)	<b>1.70</b>
Discussion & Drafting Settlement Documents	<b>26.00</b>
<b>TOTAL</b>	
	<b>Total Hours</b>
	<b>908.00</b>
	<b>Total Lodestar</b>
	<b>\$499,400.00</b>



**EXHIBIT "B"**

## PARRIS LAW FIRM – SELECTED LITIGATION EXPERIENCE

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### JURY TRIAL VERDICTS

***Choi et al., vs. Marciano, et al.*** Los Angeles County Superior Court Case No. BC 375824

- Lead plaintiffs' counsel in defamation case. Jury trial in Department 48. A verdict was returned in favor of five individual plaintiffs in the amount of **\$370,000,000.00**. PARRIS represented two out of five plaintiffs. Judgment was entered on July 28, 2009.

***Equihua vs. Chausse, et al.*** Los Angeles County Superior Court Case No. 19AVCV00071

- Plaintiffs' counsel in T-bone crash case. Seriously injured plaintiff and LOC claim. Jury trial in Department A15. A verdict was returned in favor of plaintiffs: **\$117,000,000.00**. Spouse (LOC) was represented by James Burrata at trial. The Honorable Wendy Change reduced the verdicts upon remitter to **\$58,871,113.00** (\$8,256,084.89 prejudgment interest added). Judgment was entered on December 2, 2021. Case pending resolution.

***Bejar vs. Lopez, et al.*** Los Angeles County Superior Court Case No. BC 675339

- Plaintiffs' counsel in CHP motor officer and auto crash case. Seriously injured plaintiff and LOC claim. Liability denied. Jury trial in Department 200. A verdict was returned in favor of plaintiffs in the amount of **\$60,411,314.40**. Spouse (LOC) was represented by Ibiere Seck at trial. Judgment was entered November 16, 2021. Case pending resolution.

***Lennig vs. Contreras, et al.*** Los Angeles County Superior Court Case No. MC025288

- Plaintiffs' counsel in automobile vs. semi-truck crash case. Seriously injured plaintiffs. Jury trial in Department 3. A verdict was returned in favor of plaintiffs in the amount of **\$52,708,374.00**. Panish, Shea & Boyle represented one plaintiff at trial. Judgment was entered on March 9, 2018.

***Taylor vs. Shilling, et al.*** Los Angeles County Superior Court Case No. MC026518

- Plaintiff's counsel in T-bone crash case. Seriously injured plaintiff. Jury trial in Department A14. A verdict was returned in favor of plaintiff in the amount of **\$41,634,170.00**. Judgment was entered on April 16, 2018.

***Cardona v. Cortes,*** Los Angeles County Superior Court Case No. MC023925

- Plaintiffs' counsel in automobile crash case. Seriously injured plaintiffs. Jury trial in Department 316. A verdict was returned in favor of plaintiffs in the amount of **\$20,974,903.00**. Judgment was entered on July 7, 2015.

***Marroquin vs. Lopez, et al.*** Los Angeles County Superior Court Case No. MC013260 c/w MC013740

- Plaintiff's counsel in automobile crash case. Seriously injured plaintiff. Liability denied. Jury trial in Department A15. A verdict was returned in favor of plaintiff in the amount of **\$15,267,531.00**. Judgment was entered on July 12, 2006.

**Hubbard vs. Wright, et al.** Los Angeles County Superior Court Case No. BC 703219

- Plaintiffs' counsel in automobile crash case. Wrongful deaths. Jury trial in Department M. A verdict was returned in favor of plaintiffs in the amount of **\$10,600,000.00**. Judgment was entered on November 4, 2021. Case pending resolution.

**Donhue vs. Youkhan, et al.** Los Angeles County Superior Court Case No. MC016741

- Plaintiffs' counsel in automobile crash case. Seriously injured plaintiff and LOC claim. Liability denied. Jury trial in Department A16. A verdict was returned in favor of plaintiffs in the amount of **\$10,205,711.00**. Judgment was entered on July 12, 2006.

**Jewett vs. Johnson, et al.** Los Angeles County Superior Court Case No. MC013478

- Plaintiffs' counsel in automobile crash case. Seriously injured plaintiff and LOC claim. Disputed liability. Jury trial in Department A12. A verdict was returned in favor of plaintiffs in the amount of **\$7,363,068.00**. Judgment was entered June 2, 2003.

**McDonald v. Biggs, et al.** Kern County Superior Court Case No. CV-261306 WDP

- Plaintiff's counsel in automobile crash case. Seriously injured plaintiff. Disputed liability. Jury trial in Department 15. A verdict was returned in favor of plaintiff in the amount of **\$6,158,083.40**. Judgment entered on January 28, 2013. Defendant filed for bankruptcy protection.

### **SETTLEMENTS**

**Confidential Settlement.** Los Angeles County Superior Court

- Plaintiff's counsel in solo automobile crash case. Seriously injured plaintiff. Plaintiff settled for **\$23,000,000.00** on December 10, 2020.

**Alfaro vs. Weyerhaeuser, et al.** Los Angeles County Superior Court Case No. BC646685

- Plaintiffs' counsel in work injury case caused by 3<sup>rd</sup> party. Seriously injured plaintiff. Plaintiff settled for **\$17,500,000.00** on June 25, 2020.

**Confidential Settlement** Los Angeles County Superior Court

- Plaintiffs' counsel in automobile crash case. Wrongful death and three seriously injured minors. Plaintiffs settled case for **\$17,500,000.00** on September 17, 2021.

**Tapia vs. Tesla, et al.** Alameda County Superior Court Case No. HG16825977

- Plaintiff's counsel in work injury case. Seriously injured plaintiff. Plaintiff settled for **\$13,000,000.00** on July 12, 2019.

**Kiaie vs. Hubble, et al.** Kern County Superior Court Case No. S-1500-CV-283432SDS

- Plaintiff's counsel in dangerous condition of public property case. Pedestrian struck by vehicle in a midblock crosswalk. Plaintiff settled for **\$10,500,000.00** on December 12, 2019.

***Paul vs. City of Palmdale, et al.*** Los Angeles Superior Court Case No. MC01990

- Plaintiff's counsel in dangerous condition case. Minor pedestrian was seriously injured as a result of being struck by a vehicle while walking in poorly lit crosswalk in the evening. Plaintiff settled for **\$10,500,000.00** on July 11, 2007.

***Confidential Settlement.*** Los Angeles Superior Court

- Plaintiff's counsel in automobile crash case. Plaintiff was seriously injured. Plaintiff settled for **\$10,500,000.00** on January 3, 2012.

***Matias vs. Green Tree Nursery, et al.*** Stanislaus County Superior Court Case No. 9000049

- Plaintiff's counsel in work injury case. Seriously injured at work while patrolling in unsafe ATV at night. Plaintiff settled for **\$8,000,000.00** on March 19, 2020.

### **ENVIRONMENTAL LAW EXPERIENCE**

***Southern California Gas Leak Cases.*** Los Angeles County Superior Court JCCP and other related cases; JCCP4861 and other related cases.

- Plaintiffs' (8000+) counsel in mass action stemming from the largest natural gas leak from underground natural gas reservoir managed by Sempra Energy and their subsidiary Southern California Gas Company. Seriously injured plaintiffs and wrongful deaths. Co-Counsel Panish, Shea & Boyle/Morgan & Morgan/Kenneth Hahn. Total Plaintiffs 35,717. Global settlement for all Plaintiffs up to **\$1,800,000,000.00**. Parris Law Firm held numerous leadership roles. Case pending distribution.

### **VOTING RIGHT ACT CASES**

***Jauregui vs City of Palmdale*** Los Angeles County Superior Court Case No. BC483039. Bench trial Department 68. Judgment entered against defendant December 19, 2013.

***Soliz vs. City of Santa Clarita*** Los Angeles County Superior Court Case No. BC512735. Settlement Agreement January 13, 2016.

***Garrett vs. City of Highland*** San Bernardino County Superior Court Case No. CIVDS-1410696. Settlement Agreement October 6, 2016

***Jaramillo vs. City of Fullerton*** Orange County Superior Court Case No. 30-2014-00737578-CU-CR-CJC. Settlement Agreement June 8, 2015

***Montoya vs. City of Garden Grove*** Orange County Superior Court Case No. 30-2015-00799522. Settlement Agreement September 23, 2015.

***Sanchez vs. Sulphur Springs School District*** Los Angeles County Superior Court Case No. BC512739. Settlement Agreement March 12, 2014.

***Soliz vs. Santa Clarita Community College District*** Los Angeles County Superior Court Case No. BC512736. Stipulation and Judgment entered July 7, 2014.

**Jaramillo vs. Fullerton Elementary School District** Orange County Superior Court Case No. 30-2014-00737610-CU-CR-CJC. Settlement Agreement August 20, 2015

**Soliz vs. Saugus Union Elementary School District** Los Angeles County Superior Court Case No. BC580046 . Settlement Agreement September 6, 2015

**Linden vs. City of San Marcos Unified School District** San Diego County Superior Court Case No. 37-2016-00034645-CU-CR-NC. Settlement Agreement January 30, 2017.

**Southwest Voter Registration Education Project vs. City of Orange** Orange County Superior Court Case No. 30-2019-01051924-CU-CR-CJC. Settlement Agreement September 5, 2019

**Southwest Voter Registration Education Project vs. City of Mission Viejo** Orange County Superior Court Case No. 30-2018-00981588-CU-CR-CJC. Settlement Agreement March 20, 2019

**Southwest Voter Registration Education Project vs. City of Rancho Cucamonga** San Bernardino County Superior Court Case No. CIVDS1603632. Settlement Agreement December 1, 2017.

**Southwest Voter Registration Education Project vs. City of San Juan Capistrano** Orange County Superior Court Case No. 30-2016-00832243-CU-CR-CJC. Settlement Agreement April 23, 2016

**Pico Neighborhood Association vs. City of Santa Monica** Los Angeles County Superior Court Case No. BC616804. Bench trial Department 28. Judgment entered in favor of plaintiff February 13, 2019. Defendant appealed.

### **CLASS ACTION LITIGATION EXPERIENCE**

**Gutierrez vs. State Farm**, Los Angeles County Superior Court Case No. BC 236552

- Plaintiffs' counsel in class action seeking overtime compensation for insurance claims adjusters employed by defendant in the State of California. Certification granted, and then summary adjudication as to liability granted in favor of the class. Case settled in 2004 for **\$135,000,000.00**, with Final Approval granted in Department 309 and no objections filed.

**Sekly vs. Allstate Insurance Company**, Los Angeles County Superior Court Case No. BC240813

- Plaintiffs' counsel in class action seeking overtime compensation for insurance claims adjusters employed by defendant in the State of California. Certification granted, and then summary adjudication as to liability granted in favor of the class. Case settled in 2005 for **\$120,000,000.00**, with Final Approval granted in Department 309 and no objections filed.

**CNA Class Action Litigation**, Los Angeles County Superior Court Case No. BC242487, Orange County Superior Court Case No. 01CC08868

- Plaintiffs' counsel in class action misclassification case seeking overtime compensation for insurance claims adjusters employed by defendant in the State of California. Case settled in 2005 for **\$33,000,000.00**, with Final Approval granted and no objections filed.

***Parris vs. Lowe's Home Improvement***, Los Angeles County Superior Court Case No. BC260702

- Plaintiffs' counsel in class action seeking payment of "off the clock" hours worked by all hourly employees of Lowe's in the State of California. Class certification ordered by the Court of Appeal. Case settled in 2009 for **\$29,500,000.00**, with Final Approval granted and no objections filed.

***Chavoya vs. Southern California Edison Company***, Los Angeles County Superior Court Case Nos. BC366032 and BC425358

- Plaintiffs' counsel in class action seeking overtime compensation for employees that were reclassified in February 2006 that were not employed at Edison's San Onofre Nuclear Generator facility. Class certification granted, in part, by the trial court. Case settled in 2010 for **\$29,000,000.00**, with Final Approval granted and no objections filed.

***Roberts vs. Coast National Insurance***, Orange County Superior Court Case No 01CC08478

- Plaintiffs' counsel in class action seeking overtime compensation for insurance claims adjusters employed by defendant in the State of California. Certification granted, and then the matter was tried in binding arbitration. Case settled for in excess of **\$18,000,000.00** during arbitration.

***Cerkoney vs. Verizon California, Inc.*** Los Angeles County Superior Court Case No. BC442358.

- Plaintiff's counsel in a certified class action seeking penalties for wage statement violations. Case settled in 2014 for **\$15,000,000.00** with final approval granted and no objections filed.

***Dotson vs. Royal Sun Alliance***, Orange County Superior Court Case No. 02CC01787

- Plaintiffs' counsel in class action seeking overtime compensation for insurance claims adjusters employed by defendant in the State of California. Case settled in 2005 for **\$12,300,000.00** with Final Approval granted and no objections filed.

***Neutron Holdings Wage and Hour Cases*** San Francisco County Superior Court Case No. JCCP 5044.

- Plaintiff's counsel in gig-economy PAGA action seeking penalties on behalf of the State of California and over 15,000 Aggrieved Employees against Lime for its alleged misclassification of Juicers as independent contractors. Case settled in 2021 for **\$8,500,000.00** with final approval granted and no objections filed.

***Coonce vs. Ferguson Enterprises, Inc.*** Sacramento County Superior Court Case No. 34-2012-00136285

- Plaintiff's counsel in a PAGA action seeking recovery of unpaid wages, premiums, and penalties based on Defendant's misclassification of its salaried employees. Case settled in 2013 for **\$7,000,000.00** with final approval granted and no objections filed.

***Jimenez vs. Allstate Insurance Company***. Central District of California Case No. 2:10-cv-08486-JAK-FFM

- Plaintiff's counsel in a certified wage-and-hour class action seeking unpaid wages, premiums, and penalties for Allstate's hourly-paid, non-exempt claims adjusters. Case resolved in 2021 for **\$7,000,000.00** with final approval granted.

***Ingalls vs. Hallmark***, Central District of California Case Nos. CV08-04342-VBF (Ex) C/W; CV08-05330-VBF (FFMx)

- Plaintiffs' counsel in class action seeking payment of "off the clock" hours worked by all hourly employees of Hallmark in the State of California. Class was provisionally certified. Case settled in 2009 for **\$5,625,000.00**, with Final Approval granted and no objections filed.

***Rodriguez vs. Pacific Bell Telephone Company***, Los Angeles County Superior Court Case No. BC415309

- Plaintiffs' counsel in class action seeking overtime compensation for employees employed by defendant in the State of California that were reclassified in May 2009. Class was provisionally certified. Case settled in 2010 for **\$5,500,000.00**, with Final Approval granted and no objections filed.

***Kim vs. Jamison Services, Inc.***, Los Angeles County Superior Court Case No. BC400414

- Plaintiffs' counsel in misclassification class action seeking overtime compensation for all salaried, exempt employees (except for high-level management and Receptionists) employed by defendant in the State of California. Class was provisionally certified. Case settled in 2009 for **\$2,797,861.24**, with Final Approval granted and no objections filed.

***Lippold vs. Godiva Chocolatier, Inc.***, Northern District of California Case No. CV-10-00421-SI

- Plaintiffs' counsel in misclassification class action seeking overtime compensation for all salaried, exempt Store Managers employed by Godiva in the State of California. Class was provisionally certified. Case settled in 2010 for **\$1,000,000.00**, with Final Approval granted and no objections filed.

1/25/2022

**EXHIBIT “C”**



**Client Cost Account**  
**Class QuickReport**  
**All Transactions**

**Crump v. Hyatt Corp 201826**

Type	Date	Num	Name	Memo	Amount
Check	05/21/2020	33365	R. Rex Parris Law Firm	KKS PACER - Crump	-0.30
Check	12/06/2019	LFJ	Alameda County Superior Court	Filing Fee	-435.00
Check	12/06/2019	LFJ	Alameda County Superior Court	Complex Fee	-1,000.00
Check	12/06/2019	LFJ	Legal Document Server, Inc.	Attorney Service	-180.22
Check	12/13/2019	LFJ	Legal Document Server, Inc.	Attorney Service	-110.00
Check	12/20/2019	LFJ	Legal Document Server, Inc.	Attorney Service	-185.00
Check	12/24/2019	LFJ	Legal Document Server, Inc.	Attorney Service	-150.00
Check	01/23/2020	LFJ	CourtCall, LLC	Attorney Service	-94.00
Check	01/31/2020	LFJ	Legal Document Server, Inc.	Attorney Service	-130.00
Check	03/05/2020	LFJ	General Logistics Sytems US, Inc.	Courier Service	-22.49
Check	03/05/2020	LFJ	FedEx Express	Courier Service	-33.21
Check	06/11/2020	33416	Thomson West	Hyatt	-233.65
Check	06/17/2020	33523	R. Rex Parris Law Firm	KKS LASC - Crump	-6.20
Check	07/08/2020	33596	Thomson West	Crump	-10.05
Check	07/08/2020	33596	Thomson West	Crump	-5.03
Check	07/08/2020	33596	Thomson West	Crump	-115.63
Check	08/17/2020	33878	R. Rex Parris Law Firm	KKS PACER - Crump	-4.60
Check	08/17/2020	33878	R. Rex Parris Law Firm	KKS PACER - Crump	-2.20
Check	11/05/2020	34283	Thomson West	Crump	-93.72
Credit Card Charge	11/06/2020	KKS 1120	PACER	Crump	-0.40
Credit Card Charge	02/11/2021	KKS 0221	PACER	Crump	-18.90
Check	03/15/2021	35058	TSG Reporting, Inc.	2041926 - Crump	-728.25
Check	03/17/2021	35097	Veritext Corp	4881710 - Crump	-3,490.10
Credit Card Charge	03/25/2021	KKS 0421	Alameda County Superior Court	969774 - Crump	-5.00
Check	04/07/2021	35246	Thomson West	Crump	-2.92
Check	04/09/2021	35277	Veritext Corp	4942482 - Crump	-2,201.00
Check	04/14/2021	35305	Allman & Petersen Economics, LLC	Retainer - Crump	-5,000.00
Check	04/14/2021	35306	Econ One Research Inc.	19740 - Crump	-394.25
Credit Card Charge	05/05/2021	KKS 0521	PACER	Crump	-0.90
Check	05/07/2021	35511	Econ One Research Inc.	19907 - Crump	-16,148.10
Credit Card Charge	05/07/2021	LPR 0521	USPS	532983213 - Crump	-15.50
Check	05/12/2021	35544	Thomson West	Crump	-222.06
Check	05/21/2021	35603	Allman & Petersen Economics, LLC	8135 - Crump	-9,900.00
Check	05/21/2021	35603	Allman & Petersen Economics, LLC	8135 - Less Retainer - Crump	5,000.00
Check	06/08/2021	35730	Paul Hastings LLP	93398 - Crump	-14,000.00
Check	06/09/2021	35733	Econ One Research Inc.	20077 - Crump	-19,825.08
Check	06/10/2021	35756	Golden State Overnight	Crump	-28.80
Check	06/10/2021	35756	Golden State Overnight	Crump	-28.80
Check	06/10/2021	35756	Golden State Overnight	Crump	-29.94
Check	06/10/2021	35756	Golden State Overnight	Crump	-30.30
Check	06/11/2021	35796	Thomson West	Crump	-450.02
Credit Card Charge	06/20/2021	KKS 0721	Chevron	Crump	-36.49
Credit Card Charge	06/20/2021	KKS 0721	Speedway	Crump	-31.82
Credit Card Charge	06/20/2021	KKS 0721	Misc. Depo	Crump	-5.20

Client Cost Account  
Class QuickReport  
All Transactions

Credit Card Charge	06/20/2021	KKS 0721	Lalla	Crump	-23.00
Credit Card Charge	06/21/2021	KKS 0721	Portola Hotel	Parking - Crump	-2.00
Credit Card Charge	06/21/2021	KKS 0721	United Airlines	Crump	-128.40
Credit Card Charge	06/21/2021	KKS 0721	Stamp	Crump	-35.00
Credit Card Charge	06/22/2021	KKS 0721	Misc. Depo	Crump	-5.75
Credit Card Charge	06/22/2021	KKS 0721	Marriott Hotel	Hotel - Crump	-346.84
Credit Card Charge	06/22/2021	KKS 0721	Alta	Crump	-14.00
Credit Card Charge	06/22/2021	KKS 0721	Woodland Fuel Stop	Crump	-10.00
Credit Card Charge	06/22/2021	KKS 0721	Palette	Crump	-43.19
Credit Card Charge	06/22/2021	KKS 0721	Pullman San Francisco	Parking - Crump	-28.00
Credit Card Charge	06/23/2021	KKS 0721	Misc. Depo	Crump	-2.65
Credit Card Charge	06/23/2021	KKS 0721	Regus	131-37132 - Crump	-125.10
Credit Card Charge	06/23/2021	KKS 0721	Mendocino	Crump	-18.17
Credit Card Charge	06/23/2021	KKS 0721	Hotel Tonight	Crump	-187.00
Credit Card Charge	06/23/2021	KKS 0721	Mountain Workspace	626502 - Crump	-90.00
Credit Card Charge	06/24/2021	KKS 0721	Misc. Depo	Crump	-6.50
Credit Card Charge	06/24/2021	KKS 0721	Regus	2881-14785 - Crump	-71.10
Credit Card Charge	06/24/2021	KKS 0721	Morgan's Mill	Crump	-9.50
Credit Card Charge	06/24/2021	KKS 0721	Woodland Fuel Stop	Crump	-12.01
Credit Card Charge	06/24/2021	KKS 0721	Fast Lane	Crump	-10.07
Credit Card Charge	06/24/2021	KKS 0721	Old Town	Crump	-21.00
Credit Card Charge	06/25/2021	KKS 0721	Misc. Depo	Crump	-5.96
Credit Card Charge	06/25/2021	KKS 0721	Misc. Depo	Crump	-11.86
Credit Card Charge	06/25/2021	KKS 0721	Hampton Inn	Hotel - Crump	-352.82
Credit Card Charge	06/29/2021	KKS 0721	Valley Office Plaza	Crump	-25.00
Credit Card Charge	06/30/2021	KKS 0721	Regus	4072-8049 - Crump	-125.10
Credit Card Charge	06/30/2021	KKS 0721	Local	Crump	-24.73
Credit Card Charge	07/01/2021	KKS 0721	Enterprise Rent-A-Car	Crump	-120.65
Credit Card Charge	07/01/2021	KKS 0721	Lofty	Crump	-8.50
Credit Card Charge	07/01/2021	KKS 0721	Hilton Garden Inn	Parking - Crump	-21.00
Credit Card Charge	07/01/2021	KKS 0721	Enterprise Rent-A-Car	Crump	-432.54
Credit Card Charge	07/01/2021	KKS 0721	Hotel Tonight	Crump	-197.00
Credit Card Charge	07/01/2021	KKS 0721	Lofty	Crump	-15.93
Credit Card Charge	07/01/2021	KKS 0721	Shell Oil	Crump	-74.99
Credit Card Charge	07/02/2021	KKS 0721	Regus	3689-6581 - Crump	-80.33
Credit Card Charge	07/03/2021	KKS 0721	Erac Toll	Crump	-9.95
Check	07/08/2021	35966	Allman & Petersen Economics, LLC	8197 - Crump	-1,650.00
Check	07/09/2021	35970	Thomson West	Crump	-25.04
Check	07/09/2021	35970	Thomson West	Crump	-26.65
Check	07/13/2021	36001	Allman & Petersen Economics, LLC	8210 - Crump	-825.00
Check	07/14/2021	36006	TSG Reporting, Inc.	2052201 - Crump	-625.05
Check	07/14/2021	36006	TSG Reporting, Inc.	2052642 - Crump	-768.05
Check	07/14/2021	36006	TSG Reporting, Inc.	2052783 - Crump	-244.80
Check	07/14/2021	36006	TSG Reporting, Inc.	2052940 - Crump	-338.25
Check	07/14/2021	36006	TSG Reporting, Inc.	2053077 - Crump	-445.20
Check	07/14/2021	36006	TSG Reporting, Inc.	2053316 - Crump	-231.30
Check	07/14/2021	36006	TSG Reporting, Inc.	2053915 - Crump	-248.25

Client Cost Account  
**Class QuickReport**

All Transactions

Check	07/15/2021	36028	Econ One Research Inc.	20263 - Crump	-2,580.68
Credit Card Charge	08/12/2021	KKS 0821	PACER	Crump	-22.90
Check	08/17/2021	36279	Team Legal, Inc.	295109 - Crump	-213.47
Check	08/17/2021	36279	Team Legal, Inc.	295108 - Crump	-193.26
Check	08/17/2021	36279	Team Legal, Inc.	295106 - Crump	-106.00
Check	08/17/2021	36279	Team Legal, Inc.	295104 - Crump	-170.00
Check	08/17/2021	36279	Team Legal, Inc.	295097 - Crump	-159.66
Check	08/17/2021	36279	Team Legal, Inc.	295096 - Crump	-156.86
Check	08/17/2021	36279	Team Legal, Inc.	295095 - Crump	-106.00
Check	08/17/2021	36279	Team Legal, Inc.	295111 - Crump	-211.00
Check	08/17/2021	36288	Econ One Research Inc.	20398 - Crump	-788.50
Check	08/25/2021	36352	Team Legal, Inc.	295415 - Crump	-147.00
Check	08/25/2021	36352	Team Legal, Inc.	295411 - Crump	-204.57
Check	08/25/2021	36352	Team Legal, Inc.	295407 - Crump	-106.00
Check	08/25/2021	36352	Team Legal, Inc.	295405 - Crump	-150.48
Check	08/25/2021	36352	Team Legal, Inc.	295286 - Crump	-106.00
Check	08/25/2021	36352	Team Legal, Inc.	295285 - Crump	-106.00
Check	08/25/2021	36352	Team Legal, Inc.	295169 - Crump	-106.00
Check	08/26/2021	36373	Golden State Overnight	Crump	-17.74
Check	08/26/2021	36373	Golden State Overnight	Crump	-17.74
Check	08/26/2021	36373	Golden State Overnight	Crump	-25.26
Check	08/26/2021	36373	Golden State Overnight	Crump	-25.26
Check	08/26/2021	36373	Golden State Overnight	Crump	-28.86
Check	08/26/2021	36373	Golden State Overnight	Crump	-26.15
Check	09/01/2021	36401	Team Legal, Inc.	295409 - Crump	-106.00
Check	09/10/2021	36480	Absolute Court Reporters	9443 - Crump	-250.00
Check	09/14/2021	36488	Paul Hastings LLP	08/31/21 - Crump	-2,100.00
Check	09/15/2021	36579	Thomson West	Crump	-11.26
Check	09/16/2021	36505	Allman & Petersen Economics, LLC	8249 - Crump	-825.00
Check	09/16/2021	36506	Econ One Research Inc.	20514 - Crump	-2,759.75
Check	09/28/2021	36610	TSG Reporting, Inc.	2054723 - Crump	-214.05
Credit Card Charge	10/12/2021	KKS 1121	LA Court EFile	21AA00002044 - Crump	-10.09
Check	12/28/2021	37305	R. Rex Parris Law Firm	Copies - Crump v. Hyatt - 201826	-502.40
Check	12/28/2021	37305	R. Rex Parris Law Firm	Int - Crump	-5,001.39
Check	01/17/2022	37444	Team Legal, Inc.	295413 - Crump	-170.00
Credit Card Charge	06/01/2022	KKS 0622	Southwest Air	Crump	-358.36
Credit Card Charge	06/02/2022	KKS 0622	MCS Burbank	Crump	-5.73
Credit Card Charge	06/02/2022	KKS 0622	Lyft	Crump	-22.29
Credit Card Charge	06/30/2022	KKS 0622	Southwest Air	Crump	-162.36
Credit Card Charge	11/03/2022	KKS 0622	Lyft	Crump	-300.00
Credit Card Charge	06/03/2022	KKS 0622	Lyft	Crump	-56.13
Total Crump v. Hyatt Corp 201826					-97,158.56
Total CLASS					-97,158.56
<b>TOTAL</b>					<b>-97,158.56</b>