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12 *Attorneys for Plaintiffs and the Proposed Class*

13
14 IN THE UNITED STATES DISTRICT COURT
15 FOR THE NORTHERN DISTRICT OF CALIFORNIA
16 SAN JOSE DIVISION

17 RIGOBERTO SARMIENTO, GUSTAVO
18 LUEVANO-VACA individually and on behalf
of all others similarly situated,

19 Plaintiffs,

20 v.

21 FRESH HARVEST, INC., et al.,

22 Defendants.
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26
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28

Case No.: 5:20-cv-7974-BLF

**DECLARATION OF EVE H.
CERVANTEZ IN SUPPORT OF CLASS
COUNSEL’S MOTION FOR
APPROVAL OF ATTORNEYS’ FEES,
COSTS, AND SERVICE AWARDS**

Date: October 26, 2023

Time: 9:00 a.m.

Location: Courtroom 3

Judge: Hon. Beth Labson Freeman

1 I, Eve H. Cervantez, declare as follows:

2 1. I am a member in good standing of the bar of the State of California and this Court,
3 and a partner with the law firm Altshuler Berzon LLP, one of the counsel of record and Class
4 Counsel representing Plaintiffs and the Class in this case. I make these statements based on
5 personal knowledge and would so testify if called as a witness at trial.

6 2. This Declaration is submitted in support of Class Counsels' Motion for Approval of
7 Attorneys' Fees, Costs, and Service Awards.

8 **I. Qualifications**

9 3. Altshuler Berzon LLP specializes in complex civil litigation on behalf of plaintiffs,
10 particularly workers and consumers, with a broad range of substantive expertise in class action,
11 labor and employment, civil rights, environmental, constitutional, campaign and election, and
12 consumer law. Altshuler Berzon has been named as one of California's "Top Boutique Law
13 Firms" by the *Daily Journal*. A copy of the firm's resume listing representative cases was
14 attached as Exhibit A to my declaration in support of preliminary approval, ECF 219-8.

15 4. I have been a partner at Altshuler Berzon since 2007, and was formerly a partner at
16 Lief, Cabraser, Heimann, & Bernstein, LLP and Howard, Rice, Nemerovski, Canady, Falk &
17 Rabkin, P.C., and a staff attorney at the Prison Law Office. I am a 1992 *magna cum laude*
18 graduate of Harvard Law School, where I served as an editor of the *Harvard Law Review*. I
19 received my Bachelor of Arts in 1985 with honors from Washington University in St. Louis,
20 Missouri. I clerked for the Honorable Charles A. Legge, United States District Court, Northern
21 District of California. I have been named a Northern California "Super Lawyer" in the area of
22 Plaintiffs' side Employment Litigation every year since 2010. My legal career has been devoted to
23 litigating complex class action lawsuits on behalf of plaintiffs, with a particular emphasis on civil
24 rights and wage and hour litigation on behalf of workers.

25 5. I have served as class counsel and/or plaintiffs' counsel in many wage and hour
26 class and collective actions, including: *Aguiar v. Cintas* (L.A. Superior Court, Case No.
27 BC310696) (\$6.5 million settlement of certified class action alleging violations of Living Wage
28 Ordinance); *Bare v. CDS* (Sacramento Superior Court Case No. 34-2017-00221115) (\$2.65

1 million settlement of PAGA representative action alleging failure to provide suitable seating, plus
2 provision of seating going forward); *Behaein v. Pizza Hut* (L.A. Superior Court, Case No.
3 BC384563) (\$6 million settlement of expense reimbursement and certified meal and rest break
4 class action); *Brooks v. US Bank* (N.D. Cal. Case No. C12-4935) (\$1.9 million settlement of rest
5 break and suitable seating claims); *Danieli v. International Business Machine Corporation*
6 (S.D.N.Y. Case No. 08-cv-3688-SHS) (\$7.5 million settlement of misclassification case); *Hines v.*
7 *KFC* (S.D. Cal. Case No. 09-cv-2422-JM (POR)) (\$3.55 million settlement of certified meal and
8 rest break class); *In Re: Farmers Insurance Exchange Claims Representatives' Overtime Pay*
9 *Litigation* (D. Or. MDL Case No. 1439) (trial of certified class action alleging misclassification);
10 *Rosenburg v. International Business Machines Corp.* (N.D. Cal. Case No. 06-cv-0430 PJH) (\$65
11 million settlement of misclassification case); *Thomas v. California State Automobile Association*
12 (Alameda County Superior Court Case No. CH217752-0) (misclassification); *Tokoshima v. The*
13 *Pep Boys – Manny Moe & Jack of Cal.* (N.D. Cal. Case No. 12-cv-4810-CRB) (\$3.6 settlement of
14 minimum wage certified class action); *Warner v. Fry's Electronics, Inc.*, (Contra Costa Superior
15 Court Case Number MSC14-02052) (\$2.7 million settlement of PAGA representative action) and
16 *Zuckman v. Allied Group, Inc.* (N.D. Cal. Case No. 02-cv-05800-SI) (misclassification). In 2013,
17 I served as one of the primary trial counsel in a class arbitration on behalf of approximately 7,000
18 truck drivers who alleged KBR/Halliburton forced them to work off the clock.

19 6. I have also served as class counsel and/or plaintiffs' counsel in the following
20 employment discrimination class actions: *Ellis v. Google* (San Francisco Superior Court Case No.
21 CGC-17-561299) (settlement of \$118 million plus injunctive relief in certified class action
22 alleging gender discrimination); *Gonzalez v. Abercrombie & Fitch Stores, Inc.* (N.D. Cal. Case
23 No. 03-2817-SI) (settlement of \$40 million plus injunctive relief in case alleging race and gender
24 discrimination against employees and applicants of retail store); *Holloway v. Best Buy* (N.D. Cal,
25 Case No. 05-cv-05056-PJH) (settlement for comprehensive injunctive relief in race and gender
26 class action); *Ries v. McDonald's* (W.D. Mich. Case No 1:20-cv-00002-JTN-RSK) (\$1.2 million
27 settlement of certified class action involving systemic sex harassment); *Satchell v. Federal*
28 *Express Corp.* (N.D. Cal. Case Nos. C03-2659 SI, C 03-2878-SI) (settlement of \$55 million, plus

1 comprehensive injunctive relief, of certified race and national origin discrimination claims); and
2 *Wynne v. McCormick & Schmick's Seafood Restaurants, Inc.* (N.D. Cal. Case No. C-06-3153 CW)
3 (settlement included comprehensive injunctive relief and \$2.1 million in monetary relief in race
4 discrimination case on behalf of applicants and employees).

5 7. I served as court-appointed co-lead counsel for plaintiffs and the proposed class in
6 *In re Anthem, Inc. Data Breach Litigation*, No. 15-MD-02617-LHK (N.D. Cal) (\$115 million
7 settlement of data breach consumer class action), for which I was named a “California Attorney of
8 the Year.” I served as one of class counsel in *Medeiros v. HSBC Card Servs., Inc.* (C.D. Cal. Case
9 No. CV1509093JVSAFMX) (\$13 million settlement of consumer privacy case).

10 8. I have also served as plaintiffs’ counsel in class action cases on behalf of Medicaid
11 beneficiaries, including *Oster v. Lightbourne*, No. 09-cv-04668-CW, 2012 WL 691833 (N.D. Cal.
12 Mar. 2, 2012) (court ordered injunctive relief in certified class action); and *MR. v. Dreyfus*, 697
13 F.3d 706 (9th Cir. 2011).

14 9. I also write about employment law issues on a regular basis. I am on the Board of
15 Editors for the Fair Labor Standards Act (Bloomberg, Fourth and Third Eds., and Supplements). I
16 have also been a chapter editor or contributor to Employment Discrimination Law (Bloomberg,
17 Cumulative Supplements to the Third and Fourth Editions) and Wage and Hour Laws, A State-by-
18 State Survey (Bloomberg, Third and Second Eds. and Supplements). I also frequently lecture
19 about employment class action issues, including wage and hour class actions. In the past several
20 years, I have spoken on these issues at the ABA Section of Labor and Employment Law Annual
21 CLE Conferences, and conferences and seminars sponsored by the California Employment
22 Lawyers Association (“CELA”), the National Employment Lawyers Association (“NELA”), the
23 State Bar of California Labor and Employment Law Section, and the Bar Association of San
24 Francisco Labor and Employment Section Conference. For example, I have presented on the
25 following topics: “Class Certification of Sexual Harassment Claims: A Brief History” (ABA
26 Section of Labor and Employment Law, 2022); “Settlement and Release of Overlapping State and
27 Federal Damages Claims” (ABA Section of Labor and Employment Law, 2021); “Trial of
28 Discrimination Class Action Cases” (ABA Section of Labor and Employment Law, 2018);

1 “Structuring Class Settlements That Will Get Approved” (Bridgeport, 2015); “Structuring Class
2 Settlements That Will Pass Muster in Court, and Minimize Risks of Objections” (Bridgeport,
3 2014); “Class and Collective Action Certification of Independent Contractor Misclassification
4 Cases” (NELA, March 2013); “The More Things Change....Class Action Developments Since
5 Our Last Conference” (BASF, 2013); “Updates on Class Actions and Future Trends in Wage &
6 Hour Class Actions” (Bridgeport, 2012); “Recognizing and Handling Potential Conflicts of
7 Interest in the Prosecution and Settlement of Employment Class Action Lawsuits” (NELA, June
8 2010); “Introduction to Class Actions and Collective Actions” (ABA Section of Labor and
9 Employment Law, August 2008); and “Class Action Trial Plans” (CELA Advanced Wage and
10 Hour Seminar, 2007).

11 10. My other colleagues who worked on this case also have extensive experience
12 representing workers in class action wage and hour litigation, as detailed below:

13 11. James M. Finberg received a Bachelor of Arts degree, with honors in history and
14 environmental studies, from Brown University in 1980. He received a Juris Doctor degree from
15 the University of Chicago Law School in 1983. At the University of Chicago Law School, he
16 was the Executive Editor of the *University of Chicago Law Review*. He served as a law clerk to
17 the Honorable Charles L. Levin, a Justice of the Supreme Court of the State of Michigan. Mr.
18 Finberg joined Altshuler Berzon LLP as a partner in January 2007. From 1992 through 2006, he
19 was a partner at Lieff Cabraser Heimann & Bernstein LLP. Mr. Finberg has been listed by Best
20 Lawyers in America as one of the best lawyers in America in the field of labor and employment
21 law. He was named by Best Lawyers as the 2014 Lawyer of the Year in the field of Litigation-
22 Labor and Employment in the San Francisco Bay Area. He is a fellow of the American College
23 of Labor and Employment Lawyers and of the American Bar Foundation.

24 12. Mr. Finberg has served as lead, or co-lead, counsel in many class actions involving
25 violations of wage and hour laws, including the following: *Rosenburg v. International Business*
26 *Machines Corp.*, No. CV 06-00430 PJH (N.D. Cal.) (\$65 million settlement of wage and hour
27 class and collective action); *Giannetto v. CSC Corp.*, No. CV 03-8201 (C.D. Cal.) (\$24 million
28 settlement of wage and hour case); *Gerlach v. Wells Fargo & Co.*, No. 05-00585 CW (N.D. Cal.)

1 (\$12.8 million settlement of wage and hour class and collective action); *Trotter v. Perdue Farms*,
2 No. 99 893 (RRM) (D. Del.) (\$10 million settlement in wage and hour case); *Fan v. Delta* (Case
3 No. 2:19-cv-04599) (\$4 million settlement of wage and hour class action); *McDonald v. CPOpCo*
4 (Case No. 17-cv-04915) (\$3 million settlement of WARN Act Case); *Lopez v. Delta Air Lines,*
5 *Inc.*, 2:15-cv-07302-SVW-SS (C.D. Cal.) (\$4.25 million settlement of wage-and-hour class
6 action); *Spicher v. Aidells Sausage Co.*, 3:15-cv-05012-WHO (N.D. Cal) (\$2.375 million
7 settlement of wage and hour class action); *Guzman-Padilla, et al. v. Van de Pol, et al.*, 2:17-cv-
8 00196-JAM-KJN (E.D. Cal) (wage-and-hour and discrimination settlement on behalf of class of
9 120 low-wage dairy workers providing monetary and extensive injunctive relief); *Cancilla et al.*
10 *v. Ecolab, Inc.*, No. 12-3001-JD (N.D. Cal) (\$7.5 million settlement of wage and hour case);
11 *Thomas v. CSAA*, No. CH217752 (Alameda County Sup. Ct.) (\$8 million settlement of wage and
12 hour case); *Danieli v. IBM*, No. 08-cv-3688 (S.D.N.Y) (\$7.5 million settlement of class action
13 regarding alleged misclassification of technology support workers in 2010); *In re the Pep Boys*
14 *Overtime Actions*, Case No. 07-cv-01755 (C.D. Cal.) (\$6 million settlement compensating
15 employees who were denied meal and rest breaks and required to work “off the clock” without
16 pay).

17 13. Connie Chan graduated from Yale College in 2005 and from Yale Law School in
18 2010. After clerking for Hon. Lucy H. Koh, United States District Court, Northern District of
19 California, and Hon. Michael Hawkins, United States Court of Appeal, Ninth Circuit, she joined
20 Altshuler Berzon as an associate in 2012. Ms. Chan served as a deputy city attorney in the
21 Affirmative Litigation Division of the Los Angeles City Attorney’s Office from 2018 to 2020,
22 when she returned to Altshuler Berzon as a partner. In 2017, Ms. Chan was named a “California
23 Lawyer of the Year” in the Worker Health and Safety category for her work on *Kilby v. CVS* in the
24 California Supreme Court, establishing workers’ right to “suitable seating” under California’s
25 wage orders. In addition to *Kilby*, representative wage and hour cases on which Ms. Chan has
26 worked include *Spicher v. Aidells Sausage Co.*, 3:15-cv-05012-WHO (N.D. Cal) (meal and rest
27 break class action) and *Cancilla et al. v. Ecolab, Inc.*, No. 12-3001-JD (N.D. Cal)
28 (misclassification class action). Ms. Chan was listed as one of Lawdragon Magazine’s 500 leading

1 plaintiff employment and civil rights lawyers in 2021 and 2022 and was selected to the Northern
2 California Super Lawyers in 2022 and 2023.

3 14. Zoe Palitz graduated from Yale College in 2005 and received her J.D. from
4 Stanford Law School in 2010. She clerked for Hon. Margaret M. Morrow, United States District
5 Court, Central District of California, and Hon. Marsha S. Berzon, United States Court of Appeal,
6 Ninth Circuit. Ms. Palitz worked at Bredhoff & Kaiser, PLLC in Washington, D.C. before joining
7 Altshuler Berzon in 2014. She has been a partner since 2020, and litigates cases in state and
8 federal court on behalf of labor unions and workers and, together with other partners at Altshuler
9 Berzon, negotiated a multi-million dollar wage settlement for hundreds of California teachers. Ms.
10 Palitz serves as an advisor to the Executive Committee of the Labor & Employment Section of the
11 California Lawyers Association.

12 15. Bronwen O’Herin graduated from Harvard College, *magna cum laude*, in 2012, and
13 received her J.D. in 2018, *magna cum laude*, from New York University, where she was Order of
14 the Coif. She clerked for Hon. Joel H. Bolger of the Alaska Supreme Court and Hon. George Z.
15 Singal, United States District Court, District of Maine. Ms. O’Herin has been an associate at
16 Altshuler Berzon since 2020.

17 16. Emanuel Waddell graduated *summa cum laude* from Morehouse College in 2011
18 and received his J.D. from Yale Law School in 2021. He clerked for Hon. Paul Watford, United
19 States Court of Appeal, Ninth Circuit, and joined Altshuler Berzon as an associate in 2022.

20 **II. Extensive Litigation of this Action**

21 17. Altshuler Berzon began working on this case in June 2021, joining attorney
22 Dawson Morton as co-counsel at that time. Since Altshuler Berzon entered the case, we have
23 worked cooperatively with Mr. Morton on all aspects of the case, sometimes with one firm taking
24 the lead, and sometimes another, always trying to avoid duplication of effort.

25 18. In particular, Altshuler Berzon took the lead on briefing and arguing the Motion to
26 Dismiss Counterclaim (and Defendants’ related attempt to appeal the Court’s grant of that
27 motion), Opposition to Fresh Harvest’s Motion for Summary Judgment, and Opposition to Fresh
28 Harvest’s Motion to Preclude Communications with Class Members and for Sanctions. Altshuler

1 Berzon also assisted in drafting discovery and briefing and arguing certain discovery disputes.
2 Altshuler Berzon attorneys took the depositions of Norberto Mendivil, Oscar Montes, Leticia
3 Ridaura, and Angel Rincon. Altshuler Berzon was involved in all aspects of settling the case,
4 including drafting the Mediation Brief, attending the mediation, engaging in extensive negotiations
5 thereafter, and revising the Settlement Agreement.

6 19. Litigation of this case took extraordinary effort on the part of Plaintiffs' attorneys,
7 well beyond that expended in a normal wage and hour class action. For example, Plaintiffs had to
8 continually seek the assistance of the Magistrate Judge with respect to discovery matters, resulting
9 in the Magistrate Judge issuing seven separate orders for Defendants to produce additional
10 documents and/or refusing to quash Plaintiffs' subpoenas to third parties. Defendants filed a
11 Counterclaim against Plaintiff Gustavo Luevano-Vaca, forcing Plaintiffs to file a Motion to
12 Dismiss the Counterclaim; when the Court granted Plaintiffs' Motion to Dismiss, Defendants
13 sought interlocutory appeal to the Ninth Circuit, requiring further briefing. Defendants filed a
14 Motion to Require Plaintiffs and their Counsel to Obtain Approval Before Any Future
15 Communications with Putative Class Members, for Corrective Notice, and for Sanctions Against
16 Plaintiffs' Counsel; in order to respond appropriately, Plaintiffs took two depositions of
17 Defendants' declarants before filing an opposition brief. The Court denied Defendants' Motion.
18 Plaintiffs filed a Motion for Protective Order to prevent Defendants' *ex parte* contacts with
19 Plaintiff in Mexico, which the Court granted.

20 20. Plaintiffs' success in achieving this settlement is notable given the many barriers
21 they and their counsel faced. In addition to the numerous atypical motions described above,
22 Defendants filed two early motions for summary judgment, which Class Counsel successfully
23 defeated. Additionally, Defendants attempted to settle out of court with numerous Class Members,
24 including by attempting to secure "no participation" agreements with those Class Members.

25 **III. Reasonableness of Altshuler Berzon LLP's Lodestar**

26 21. Altshuler Berzon undertook this representation of Plaintiffs and prospective class
27 members to the exclusion of paying work, devoting substantial time and out-of-pocket costs to
28 this litigation during the many years it has taken to litigate and resolve the claims of Plaintiffs and

1 the class. My firm has not received any payment for the time it has devoted to this case, and has
2 taken the risk that it would not be reimbursed for the time it has spent.

3 22. The regular and customary practice at Altshuler Berzon is for all attorneys, law
4 clerks, and paralegals to maintain contemporaneous time records setting forth the amount of time
5 spent (rounded to the nearest one-tenth of an hour) on each task in each case, with explanatory
6 descriptions of each task performed. I and my colleagues followed this practice throughout this
7 litigation. During the course of this litigation, my law firm used a time entry program to record
8 our billable time. At or near the time the work was performed, individual billers' hours were
9 inputted into the system, which recorded and stored the time as individual electronic entries, along
10 with detailed descriptions of the tasks performed. Shortly after the end of each month, each biller
11 electronically released his or her time entries to the accounting department. The accounting
12 department electronically imported all time entries for that month into the accounting system.

13 23. To calculate my firm's lodestar for this case, I asked our accounting department to
14 retrieve all of the time records for this case, including the time records of all attorneys and
15 paralegals at Altshuler Berzon who have worked on this case since Altshuler Berzon entered an
16 appearance in June 2021, through May 31, 2023. I then carefully reviewed all of those records
17 and exercised billing judgment in eliminating any time entries that may have been duplicative or
18 inefficient. I also deleted the time of attorneys and paralegals at Altshuler Berzon who billed
19 fewer than ten hours to the case. Through this effort I wrote off approximately \$75,000 worth of
20 attorney and paralegal time (over 100 hours). Moreover, in addition to the above-described write-
21 offs, I did not include any time for preparing the accompanying Fee Application or any
22 supporting documentation. We expect to continue spending time on this case, supervising the
23 Claims Administrator, and briefing and arguing Plaintiffs' anticipated Motion for Final Approval
24 of Class Action Settlement.

25 24. Using these computerized time records, as reduced through the exercise of my
26 billing judgment, our bookkeeper derived a detailed billing statement of daily time entries
27 through May 31, 2023. The following chart lists each biller, the number of hours expended, their
28

1 commercial billing rate, and total fees (excluding those entries that I deleted in the exercise of
2 billing judgment):

<u>Biller</u>	<u>Position</u>	<u>Graduation Year</u>	<u>Hours</u>	<u>2023 Rate</u>	<u>Fees</u>
Finberg, Jim	Partner	1983	80.70	1,275.00	\$102,892.50
Cervantez, Eve	Partner	1992	608.30	1,200.00	\$729,960.00
Chan, Connie	Partner	2010	461.30	925.00	\$426,702.50
Palitz, Zoe	Partner	2010	140.40	925.00	\$129,870.00
O'Herin, Bronwen	Associate	2018	76.40	675.00	\$51,570.00
Waddell, Emanuel	Associate	2021	12.00	425.00	\$5,100.00
DeGuzman, Tiffany	Law Clerk	n/a	95.50	350.00	\$33,425.00
Green, Isaac	Law Clerk	n/a	74.30	350.00	\$26,005.00
Kelley, Aaron	Law Clerk	n/a	71.50	350.00	\$25,025.00
Le, Amanda	Law Clerk	n/a	19.60	350.00	\$6,860.00
Toney-Noland, Andrew	Law Clerk	n/a	48.90	350.00	\$17,115.00
Vazquez, Kevin	Law Clerk	n/a	10.00	350.00	\$3,500.00
Ashworth, Alejandro	Paralegal	n/a	250.90	325.00	\$81,542.50
Mandani, Léo	Paralegal	n/a	10.60	325.00	\$3,445.00
Smith, Jordan	Paralegal	n/a	78.00	325.00	\$25,350.00
Wenzell, Ray	Paralegal	n/a	112.60	325.00	\$36,595.00
<u>2,151.00</u>					<u>\$1,704,957.50</u>

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18
19 25. As the above chart demonstrates, Altshuler Berzon has expended in excess of 2100
20 hours on this litigation through May 31, 2023, with a commercial lodestar value exceeding \$1.7
21 million. The hours set forth above do not reflect the additional work Altshuler Berzon will have
22 performed by the time of the hearing on Plaintiffs' motion for final settlement approval.

23 26. Attached as Exhibit A hereto are Altshuler Berzon's detailed time records, setting
24 forth, for each biller, on each date, detailed descriptions of the tasks performed. I have redacted
25 those portions of the time entries that reflect privileged and confidential attorney work product or
26 client communication information.

27 27. The billing rates for commercial litigation clients are the hourly rates that Altshuler
28 Berzon bills to full-rate clients who are billed, and pay, for hourly legal services on a monthly

1 basis. \$1200 is the rate that I am charging to a commercial rate client this year. In 2019, I was
2 paid my commercial hourly rate of \$900, and I have been paid my commercial hourly rate by other
3 clients in other years. Jim Finberg's 2023 commercial hourly rate is \$1275, and that is the rate that
4 he is charging to a commercial rate client this year. He has billed and been paid his commercial
5 hourly rate by other clients in other years. Ms. Chan was paid by a commercial rate client at her
6 2021 commercial hourly rate, \$825.

7 28. I regularly litigate attorneys' fees on behalf of my firm. As such, in addition to the
8 commercial hourly rates charged by my firm, I have regular occasion to research and learn the
9 commercial market rates for attorneys handling complex litigation in the Bay Area, including by
10 reviewing court opinions, market research articles, and other sources of attorneys' fee information.
11 Accordingly, I am familiar with market rates charged for complex litigation in the Bay Area.

12 29. I have personal knowledge of the hourly rates charged by other San Francisco Bay
13 Area attorneys with comparable experience to those of the Altshuler Berzon attorneys who worked
14 on this case. Based on that information, I believe that Altshuler Berzon's current commercial
15 rates, including those of the attorneys who worked on this case, are fully consistent with, or lower
16 than, the market rate for attorneys with comparable expertise, experience, and qualifications
17 handling similarly complex litigation.

18 30. In addition, the reasonableness of Altshuler Berzon's rates are supported by our
19 extensive and specialized experience in litigating complex class action lawsuits, as evidenced by
20 numerous court orders approving our rates over the years.

21 31. Altshuler Berzon's commercial hourly rates and their historical equivalents have
22 been repeatedly approved by courts, including in the following cases: *Kim v. Tinder, Inc.*, No. 18-
23 CV-03093 JFW (C.D. Cal) (March 4, 2022) (finding my 2021 commercial rate of \$1,025 per hour
24 to be reasonable for purposes of lodestar cross-check); *Bare v. Club Demonstration Services*, No.
25 34-17-00221115 (Sacramento County Super. Ct.) (Aug. 26, 2020) (approving my 2020
26 commercial rate of \$975 per hour for lodestar cross-check); *McDonald v. CP OPCO, LLC.*, No.
27 4:17-cv-04915-HSG (N.D. Cal.) (May, 13, 2019) (approving Jim Finberg's 2019 commercial rate
28 of \$980 per hour as reasonable, lodestar cross check); *Medeiros v. HSBC Card Servs., Inc.*, No.

1 CV-15-9093-JVS-FMX, 2017 WL 11632870, at *12 (C.D. Cal. Oct. 23, 2017) (approving my
 2 2017 commercial rate of \$860 per hour in using lodestar cross-check for percentage of common
 3 fund, despite objections to reasonableness of attorney rates by objector); *Lopez v. Delta Air Lines,*
 4 *Inc.*, No. 15-cv-07302-SVW-SS (C.D. Cal.) (November 14, 2017) (approving Jim Finberg’s 2017
 5 commercial rate of \$930 per hour, lodestar cross check); *Pioneer Roofing v. Sheet Metal Workers*
 6 *Local 104*, Case No. 15-cv-03544-JD (N.D. Cal.) (approving Zoe Palitz’s 2017 commercial rate as
 7 an associate of \$460 per hour); *Spicher v. Aidells’ Sausage Co.*, No. 3:15-cv-05012-WHO (N.D.
 8 Cal.) (May 31, 2017) (approving Jim Finberg’s 2017 rate of \$930 per hour and Connie Chan’s
 9 2017 rate as an associate of \$460 per hour); *Cancilla v. Ecolab, Inc.*, No. 12- CV-3001 JD (N.D.
 10 Cal) (January 5, 2016) (approving Jim Finberg’s 2015 commercial hourly rate of \$895, my rate of
 11 \$795 per hour, and Connie Chan’s rate as an associate of \$410 per hour, lodestar cross check for
 12 percentage of common fund); *Tokoshima v. The Pep Boys — Manny, Moe & Jack*, No. 12-04810
 13 CRB (N.D. Cal.) (January 26, 2015) (approving my 2014 rate of \$775 per hour and Jim Finberg’s
 14 2014 rate of \$895 per hour, lodestar cross check for percentage of common fund).

15 32. In general, law firms in the San Francisco Bay Area increased their rates in 2023 by
 16 between 5-10% to reflect market conditions and the unusually high rate of inflation in 2022.
 17 Attached hereto as Exhibit B is a recent article from the Bureau of National Affairs, Inc., entitled
 18 “Rising Rates Are Law Firms’ Salve as Layoffs and Pay Cuts Surge” (Jan. 19, 2023), which
 19 includes survey results showing that commercial firms that submitted 2023 hourly rates to courts
 20 in early January 2023 reported an increase in top partner billing rates of nearly 10% on average
 21 and top associate rates of 9% from 2022 rates.

22 **IV. Altshuler Berzon’s Litigation Expenses**

23 33. Altshuler Berzon LLP has also incurred and paid litigation costs and expenses
 24 related to this case. Our firm maintained complete and accurate records of all such expenses, and
 25 based on those records, our bookkeeper has compiled our expenses as of May 31, 2023. These are
 26 costs and expenses that we would normally bill to fee-paying clients. The following chart
 27 summarizes the costs and expenses incurred and paid by Altshuler Berzon:

<u>Category</u>	<u>Cost</u>
-----------------	-------------

1	Mediation Fees	\$5,000.00
2	Court Electronic Records	\$80.30
3	Courier	\$48.24
4	Online Legal Research	\$3,491.45
5	Copies / Printing	\$1,954.40
6	Secretarial Overtime	\$12.92
7	Telephone	\$54.51
8	Postage	\$1.36
9	Travel	\$30.07
10	Filing Service	\$640.00
11	Transcripts	\$2,801.10
12		<u>\$14,114.35</u>

13 34. As the chart demonstrates, altogether Altshuler Berzon expended \$14,114.35 in
14 litigation expenses. Attached as Exhibit C are itemized receipts for the expenses for which
15 itemized receipts are available, along with firm records showing the amounts expended on printing
16 and online legal research.

17 I declare under penalty of perjury, under the laws of the United States of America, that the
18 foregoing is true and correct. Executed at San Francisco, California, June 27, 2023.

19 By: /s/Eve H. Cervantez
20 Eve H. Cervantez

EXHIBIT A

Altshuler Berzon LLP fee records, April 2021 through May 2023

Rigoberto Sarmiento, Gustavo Luevano-Vaca. v. Fresh Harvest, Inc., Fresh Foods, Inc., SMD Logistics, Inc., and Rava Ranches, Inc.

United States District Court for the Northern District of California, San Jose Division, Case No. 5:20-cv-7974-BLF

Page: 1
06/20/2023

Re: Fresh Harvest, Fresh Foods, Rava Ranches, SMD

		HOURS
04/21/2021	JF Email with Dawson Morton and Eve Cervantez (No Charge)	0.70
04/22/2021	JF Read materials from Dawson Morton (No Charge)	1.50
05/12/2021	JF Read case materials, tel call with Dawson Morton, email to partners (No Charge)	3.20
05/13/2021	JF Email with partners re same, email with Dawson Morton re case, read SJ papers (No Charge)	2.20
05/27/2021	JF Email with Dawson Morton (No Charge)	0.40
06/02/2021	JF Tel call with Dawson Morton, review case documents (No Charge)	2.10
06/04/2021	JF Review case documents, email with Eve, tel call with Isaac Green re research	0.60
	EC Exchange email re: logistics (No Charge)	0.10
	EC Exchange email re: legal research issues	0.30
06/07/2021	AAL Law Clerk: Call with Jim re ██████████ assignment	0.30
	AAL Review Fresh Harvest case documents	0.40
	AAL Research retaliation claim	0.70
	JF Tel call with Dawson Morton, tel call with Amanda Le, email re discovery, retaliation and improper communication	1.10
	IMG Law Clerk: Preliminary research on standard for discovery to prove defendants' status as joint employers	2.00
06/08/2021	AAL Law Clerk: Memo on ██████████	4.30
	JF Email Amanda Le re improper communication	

Re: Fresh Harvest, Fresh Foods, Rava Ranches, SMD

		memo, email with Dawson re discovery and retaliation	2.20
	IMG	Law Clerk: Call with Jim and Dawson to discuss discovery issues	0.50
	IMG	Review of federal regulation and state and federal caselaw governing joint employment	1.00
06/09/2021	AAL	Law Clerk: Memo on [REDACTED]	2.20
	AAL	Memo on retaliation claim	5.20
	JF	Email re improper communication and retaliation	1.50
06/10/2021	AAL	Law Clerk: Memo on retaliation claim	6.50
06/11/2021	JF	Prepare discovery letter, email re same	0.80
	IMG	Law Clerk: Drafted joint letter to magistrate for motion to compel discovery	2.50
06/14/2021	IMG	Edits to motion to compel	2.00
06/21/2021	JF	Email with Dawson, prepare notice of association of counsel	0.80
06/24/2021	JF	Read discovery and retaliation materials, tel call with Dawson Morton	1.20
	IMG	Law Clerk: Phone call to discuss current status of case with Jim and Dawson	0.80
06/26/2021	IMG	Law Clerk: Draft letter in discovery dispute; review responses and stipulations of defendants	3.00
06/28/2021	ATN	Law clerk: Strategy conference re: response to reply counterclaim	0.40
	ATN	Review complaint, answer, and related documents	1.60
	ATN	Research re: validity of settlements with putative class members (H-2A)	1.60
06/29/2021	ATN	Law Clerk: Research re: validity of settlements with putative class members (H-2A)	5.60
	ATN	Strategy conference re: response to reply counterclaim	0.10
06/30/2021	ATN	Law Clerk: Draft MTD on Breach of K claim	2.50
	EC	Revise discovery letter	0.40
07/01/2021	ATN	Law Clerk: Draft MTD on Breach of K claim	2.30
07/05/2021	ATN	Law Clerk: Draft MTD on Breach of K claim	1.30

Re: Fresh Harvest, Fresh Foods, Rava Ranches, SMD

07/06/2021	JF	Tel call with Andrew Tony Noland, prepare motion to dismiss counter claim, tel call with Isaac Green re Magistrate Judge ruling, email re same	1.70
	ATN	Law Clerk: Strategy conference re: Draft MTD on Breach of K claim	0.10
	ATN	Draft MTD on Breach of K claim	4.80
	ATN	Memo to Jim Finberg and Eve Cervantez on Breach of K Counterclaim	0.60
07/07/2021	JF	Email re discovery issues	0.60
	ATN	Law Clerk: Memo to Jim Finberg and Eve Cervantez on Breach of K Counterclaim	1.30
	IMG	Law Clerk: Looking into discovery issues and emailing with co-counsel	1.00
07/08/2021	JF	Email re discovery issues and chart for magistrate Judge	1.20
07/10/2021	JF	Prepare motion to dismiss counter claim, email with Eve re same	0.60
07/12/2021	JF	Prepare motion to dismiss, tel call with Eve Cervantez re motion to dismiss, emails re discovery issues	1.20
	ATN	Law Clerk: Research re: H-2A wage claim waivers	2.20
	ATN	Review co-counsel's comments on draft MTD	0.40
	EC	Strategy conference with Jim Finberg re: motion to dismiss	0.20
07/13/2021	JF	Tel call with Eve Cervantez and Andrew Tony Noland re motion to dismiss, email with Dawson Morton re same, prepare motion to dismiss	1.90
	ATN	Law Clerk: Research re: ██████████	1.20
	ATN	Review co-counsel's comments on draft MTD	0.20
	ATN	Strategy conference re: MTD	0.30
	ATN	Email to co-counsel re: MTD	0.20
	ATN	Draft MTD on Breach of K counterclaim version 3	4.00
	EC	Revise Motion to Dismiss	2.30
	EC	Telephone conference with Jim Finberg and Andrew (law clerk) re: revisions needed to Motion to Dismiss	0.30
	IMG	Law Clerk: Research on standard for joint	

Re: Fresh Harvest, Fresh Foods, Rava Ranches, SMD

		employment under AWPA	2.50
07/14/2021	JF	Prepare motion to dismiss, email re same	1.40
	LCN	Paralegal: Cite-check brief (No Charge)	3.00
	ATN	Law Clerk: Strategy conference on draft MTD	0.20
	ATN	Draft MTD on Breach of K counterclaim version 4	4.10
	EC	Telephone conference with Andrew (law clerk) re: revisions needed to Motion to Dismiss	0.10
	EC	Revise Motion to Dismiss, Proposed Order, exchange emails re: same	4.10
	IMG	Law Clerk: Writing memo on various standards for joint employment	2.50
07/15/2021	JF	Prepare motion to dismiss, email re discovery, tel call with Isaac Green, conf with Eve Cervantez	0.80
	LCN	Paralegal: Cite-check brief (No Charge)	4.10
	ATN	Review co-counsel's edits on draft MTD	0.20
	ATN	Law Clerk: Collate sources for MTD citecheck	0.40
	ATN	Review Pre-Final MTD Brief	0.90
	EC	Revise and finalize motion to dismiss and proposed order; exchange emails with Dawson re: same	1.20
	EC	Revise motion to dismiss	0.20
	IMG	Law Clerk: Research on standard for joint employment under California Labor Code	3.00
	IMG	Reviewing magistrate's order in discovery dispute and discussing response with Jim	1.90
07/16/2021	ZP	Review background materials (No Charge)	0.40
	LCN	Paralegal: Cite-check brief (No Charge)	1.20
	LCN	Cite-check proposed order (No Charge)	0.20
	EC	Revise, finalize, and file motion to dismiss	1.60
	EC	Contact clerk to reserve hearing date	0.10
	IMG	Law Clerk: Drafting reorganized joint stipulation	3.00
07/19/2021	JF	Email re discovery issues	0.80
	IMG	Law Clerk: Finalizing reorganized joint stipulation and sending to Dawson for feedback	1.00

Re: Fresh Harvest, Fresh Foods, Rava Ranches, SMD

07/20/2021	JF	Email re discovery	0.80
	IMG	Law Clerk: Edits to joint stipulation	2.50
07/21/2021	ZP	Review amended complaint, summary judgment motion, and other pleadings (No Charge)	0.30
07/22/2021	JF	Email re expert issues	1.40
	ZP	Review amended complaint and motion for summary judgment and other case documents (No Charge)	2.60
	ZP	Strategy conference with Eve Cervantez and Jim Finberg re next steps in discovery and briefing	0.80
	EC	Telephone conference with Jim Finberg and Zoe Palitz re: next steps (No Charge)	0.70
07/23/2021	JF	Tel call with Zoe Palitz and Dawson Morton, email re discovery issues	1.30
	ZP	Conference call with co-counsel and Jim Finberg re next steps in discovery	1.00
	ZP	Review discovery requests and responses (No Charge)	0.90
	ZP	Email correspondence with Jim Finberg and Eve Cervantez and Dawson Morton re discovery requests	0.70
	ZP	Review research re motion for summary judgment and motion to dismiss counterclaim (No Charge)	0.60
	ATN	Law Clerk: Strategy conference re: upcoming litigation tasks	1.00
	ATN	Email to partner re: research on MTD	0.30
	EC	Exchange email with co-counsel re: outstanding discovery issues	0.10
07/26/2021	JF	Tel call re discovery issues, email re discovery issues	0.80
	ZP	Research re joint employment standards and evidence needed to defeat summary judgment	0.70
	ZP	Zoom re joint employer evidence	1.00
	ZP	Email correspondence with Dawson Morton re interrogatory responses	0.10
	ZP	Strategy conference with Jim Finberg re discovery	0.30
	ZP	Review discovery joint statements and communicate with co-counsel re same	1.00

Re: Fresh Harvest, Fresh Foods, Rava Ranches, SMD

	IMG	Law Clerk: Meeting with Zoe to discuss factual issues in joint employment analysis	1.00
07/27/2021	JF	Exchange email re discovery issues	0.60
	ZP	Email correspondence with Dawson re discovery responses and edit draft responses	0.70
	ZP	Strategy conference with Dawson Morton re joint discovery letter	0.90
	ZP	Communication re amended subpoena and production of subpoena responses	0.50
	ZP	Edit joint statement re discovery dispute	1.60
07/28/2021	JF	Email re discovery issues	0.80
	ZP	Edit joint statement re discovery dispute to incorporate Dawson Morton comments	0.40
	ZP	Revise chart of objections and discovery issues and letter re discovery disputes	5.50
	ZP	Revise discovery letter re AT&T subpoena	0.30
07/29/2021	ZP	Communication with law clerk, Jim Finberg, Eve Cervantez, and Dawson Morton re discovery dispute and motion for extension	1.70
	ZP	Revise joint discovery statement	0.50
	EC	Exchange email with co-counsel re: timing of Rule 56(d) motion	0.10
	IMG	Law Clerk: Editing chart for discovery dispute	2.50
	IMG	Editing and cutting joint statement for discovery dispute	3.50
	IMG	Researching caselaw for 56(d) motion and reviewing court's previous order deferring briefing on SJ	1.50
07/30/2021	ZP	Email correspondence with Dawson Morton and Isaac Green re discovery disputes and 56(d) motion	0.80
	ZP	Strategy conference re reply in support of motion to dismiss	0.80
	ZP	Review opposition to motion to dismiss and outline reply	0.90
	ZP	Research re Rule 56(d) motion	0.90
	ZP	Research re reply in support of motion to dismiss	1.20
	ATN	Law Clerk: Review opposition brief	0.30

Re: Fresh Harvest, Fresh Foods, Rava Ranches, SMD

	ATN	Strategy conference re: reply brief	0.80
	EC	Review and analyze Defendants' opposition to motion to dismiss	0.30
	EC	Strategy conference with Jim Finberg, Zoe Palitz, Andrew (law clerk) re: reply brief in support of motion to dismiss	0.70
	IMG	Law Clerk: Draft 56(d) motion	6.50
07/31/2021	ZP	Research and draft reply in support of motion to dismiss	5.00
08/01/2021	ZP	Research and draft reply in support of motion to dismiss	8.30
08/02/2021	ZP	Email correspondence with Dawson Morton re reply in support of motion to dismiss	0.20
	ZP	Strategy conference with Isaac Green re Rule 56(d) motion	0.90
	ZP	Strategy conference with Dawson Morton re Rule 56(d) motion and reply in support of motion to dismiss	0.50
	ZP	Research re 56(d) motion and reply in support of motion to dismiss	1.00
	ZP	Strategy conference with Jim Finberg re reply in support of motion to dismiss and Rule 56(d) motion	0.40
	ZP	Edit reply in support of motion to dismiss	3.00
	ZP	Edit draft 56(d) motion	0.40
	ATN	Law Clerk: Draft Reply Brief on MTD counterclaim	5.70
	IMG	Law Clerk: Drafting renewed 56(d) motion	7.50
	JF	Provide edits on MTD reply brief	1.30
08/03/2021	ZP	Edit reply in support of motion to dismiss	1.00
	ZP	Research and edit Rule 56(d) motion	4.00
	ZP	Edit administrative motion to shorten time	0.50
	ZP	Meet and confer with Tyler Johnson re Rule 56(d) motion	0.20
	ZP	Strategy conference with law clerk re Rule 56(d) motion	0.30
	ZP	Email correspondence with co-counsel re Rule 56(d) motion and reply in support of motion to dismiss	0.50
	ATN	Law Clerk: Review and Edit Draft Reply Brief	

Re: Fresh Harvest, Fresh Foods, Rava Ranches, SMD

		on MTD Counterclaim	2.60
	IMG	Law Clerk: Drafting motion to extend	5.00
08/04/2021	ZP	Revise reply in support of motion to dismiss in accordance with comments	5.00
	ZP	Review notice of appearance (No Charge)	0.10
	ZP	Edit Rule 56(d) motion and declaration	2.40
	ZP	Draft meet and confer email to Tyler Johnson	0.30
	ATN	Law Clerk: Incorporate edits into draft Reply for MTD	0.50
	ATN	Research re: setoff of wages due	0.60
	ATN	Review Opp Counsel's MSJ	0.60
	EC	Revise Reply in support of Motion to Dismiss	2.50
	IMG	Law Clerk: Draft declaration in support of motion to extend	2.50
	IMG	Edit 56(d) motion and motion to extend	6.50
	JF	Provide edits re reply brief, email re same	0.80
08/05/2021	ARA	Litigation Assistant: Complete cite check for DRAFT Reply ISO MTD Counterclaim	3.60
	ZP	Revise declarations and motion in support of Rule 56(d) relief and administrative relief shortening time	5.60
	ZP	Incorporate cite-check and final proofread and edit reply in support of motion to dismiss	1.70
	ZP	Strategy conferences with Jim Finberg and Dawson Morton via phone and email re order consolidating motions for summary judgment	0.50
	EC	Exchange email re: Rule 56(d) strategy and court order re: schedule	0.20
	IMG	Law Clerk: Draft and editing proposed orders	2.50
	IMG	Final edits to 56(d) Motion	2.00
	IMG	Final edits to 56(d) accompanying declaration	1.00
	JF	Review court order re SJ hearing, tel call with Zoe Palitz	0.60
08/06/2021	ZP	Edit reply in support of motion to dismiss with tables for filing, including incorporating edits from co-counsel	2.40
	ZP	Research re [REDACTED] and strategy	

Re: Fresh Harvest, Fresh Foods, Rava Ranches, SMD

		conference with Dawson Morton re same	1.70
	ZP	Strategy conference with co-counsel re edits to reply brief and amicus support from DOL	0.80
	ZP	Telephone call with DOL re amicus	0.40
	IMG	Law Clerk: Read judge's order resetting deadlines for SJ briefing and reevaluating case strategy (No Charge)	1.50
	JF	Review discovery orders, tel call with Zoe Palitz	0.40
08/09/2021	ZP	Review discovery orders	1.00
	ZP	Telephone call with Jim Finberg, Dawson Morton, and Isaac Green re discovery conference	0.10
	ZP	Conference call re discovery order and hearing, major points to address with judge	1.20
	IMG	Law Clerk: Team meeting to plan for discovery conference	1.20
	JF	Tel call with Zoe Palitz and Dawson Morton and Isaac Green to prepare for discovery conference with Magistrate Judge, email re same	1.20
08/10/2021	IMG	Law Clerk: Discovery conference	1.10
	JF	Prepare for and participate in discovery conference with Magistrate Judge, email re discovery issues	1.60
08/11/2021	IMG	Law Clerk: Reviewing and discussing magistrate's follow-up discovery order	0.80
08/12/2021	ZP	Email correspondence with Dawson Morton re responses to Fresh Foods discovery and clarification of discovery order	0.40
	JF	Email with Zoe and Dawson re discovery issues	0.50
08/13/2021	JF	Email re discovery issues, tel call with Zoe Palitz re same	0.60
08/14/2021	ZP	Draft discovery plan and joint statement	1.70
	JF	Email re discovery, prepare discovery plan	0.40
08/15/2021	ZP	Edit discovery plan and joint statement	0.40
08/16/2021	ZP	Meet and confer calls re discovery plan with opposing counsel	0.90
	ZP	Telephone and email communication with Dawson Morton re discovery plan	1.00

Re: Fresh Harvest, Fresh Foods, Rava Ranches, SMD

	ZP	Email correspondence with opposing counsel re discovery plan	0.20
	ZP	Telephone call with Jim Finberg re discovery plan	0.20
	ZP	Revise proposed discovery requests re second motion for summary judgment	0.90
	ZP	Revise proposed discovery plan in accordance with edits from opposing counsel	1.60
	JF	Tel call with Zoe Palitz, read email re discovery plan, prepare discovery plan, email re discovery	2.20
08/17/2021	ZP	Communication via email and phone with Jim Finberg and Dawson Morton re discovery requests and disputes	1.00
	ZP	Edit second and third set of RFPs to Fresh Harvest	2.00
	JF	Prepare RFPs, tel call with Zoe Palitz re discovery, email re discovery	0.90
08/18/2021	ZP	Email correspondence with Dawson Morton and Jim Finberg re discovery to serve	1.20
	ZP	Revise discovery requests	1.30
	JF	Tel call with Zoe re discovery issues, email re discovery issues	0.80
08/19/2021	ARA	Litigation Assistant: Speak with Zoe re document index	0.40
	ARA	Work on Evernote organization of case documents	0.90
	ZP	Zoom with Connie Chan re discovery next steps (No Charge)	0.90
	ZP	Zoom with paralegal re document review for motion for summary judgment	0.50
	ZP	Strategy conference with Jim Finberg re discovery next steps	0.60
	ZP	Telephone call with Dawson Morton re discovery to Fresh Foods	0.30
	ZP	Review discovery request to Fresh Foods	0.30
	CKC	Strategy conference with Zoe Palitz re case background and case management (No Charge)	0.50
	JF	Prepare objections to RFPs, email re discovery	0.90
08/20/2021	ARA	Litigation Assistant: Review documents	4.20

Re: Fresh Harvest, Fresh Foods, Rava Ranches, SMD

	ZP	Draft meet and confer email to opposing counsel re discovery needed for motions for summary judgment and depositions	0.20
	JF	Email re discovery issues	0.60
08/23/2021	ARA	Litigation Assistant: Speak with Connie and Zoe re document organization system	0.80
	ARA	Call with Zoe, Connie, Jim, and Dawson re case documents	1.00
	ZP	Zoom re document review, tagging, and preparation for depositions	0.80
	ZP	Prepare for meet and confer call re discovery	0.50
	ZP	Meet and confer call re discovery conference	0.30
	ZP	Strategy conference with Jim Finberg re discovery conference	0.40
	ZP	Email correspondence with co-counsel re discovery to produce and summary judgment theory	0.80
	ZP	Zoom with co-counsel re discovery and summary judgment theory	1.00
	ZP	Review discovery response from counsel for Fresh Foods	0.10
	ZP	Legal research re [REDACTED]	0.50
	CKC	Strategy conference with Zoe Palitz and Alejandro Ashworth re doc review, opposing summary judgment	0.70
	CKC	Zoom call with Dawson Morton, Zoe Palitz, Jim Finberg re opposing summary judgment	1.00
	JF	Prepare for and participate in meet and confer with opposing counsel re discovery issues, tel call with Zoe Palitz and Connie Chan re discovery issues and SJ opposition	1.80
08/24/2021	ZP	Prepare for Zoom hearing re discovery by reviewing order and statement	0.50
	ZP	Zoom discovery hearing	0.30
	ZP	Email correspondence with co-counsel re response to RFPs and production of documents by plaintiff	0.70
	CKC	Strategy conference with Zoe Palitz re drafting Sarmiento's responses to first set of RFPs	0.20
	CKC	Telephone call with Dawson Morton re	

Re: Fresh Harvest, Fresh Foods, Rava Ranches, SMD

		Sarmiento's objections to Fresh Harvest first set of RFPs	0.30
CKC		Legal research re discovery objections [REDACTED] [REDACTED]	1.80
JF		Call with Zoe Palitz re discovery issues, email re discovery issues	1.10
08/25/2021	ZP	Review motion to preclude communications with class members and email correspondence with co-counsel re same	1.20
	ZP	Telephone call with Jim Finberg re motion to preclude communications with class members	0.20
	CKC	Draft responses to FH's first set of RFPs to Sarmiento	3.90
	EC	Review Defendants' motion re: communication with class members and exchange email re: same	0.20
	JF	Read Fresh Harvest motion re communication with class members, tel call with Zoe re same, email re same	2.20
08/26/2021	CKC	Research and draft responses to Fresh Harvest's first set of RFPs to Sarmiento; emails re same	2.40
	JF	Tel call with Zoe Palitz re re-assignment of motion re Dawson to Magistrate Judge, and application for modified briefing schedule re same, email with Connie re responses and objections to RFPs	1.70
08/27/2021	ZP	Communication with opposing counsel and co-counsel re motion to preclude communications with plaintiffs	0.70
	ZP	Research and draft motion for extension	1.60
	CKC	Strategy conference with Zoe Palitz re MSJ strategy	0.80
	CKC	Review Dawson Morton's edits to responses to Fresh Harvest's first set of RFPs to Sarmiento; emails re same	1.00
	CKC	Review and edit Zoe Palitz's draft motion for extension of time to respond to motion for sanctions	0.50
	EC	Exchange email re: next steps	0.10
	JF	Email re responses and objections to RFPs to Sarmiento	0.90
08/28/2021	ZP	Edit motion for extension in accordance with Connie Chan's comments	0.70

Re: Fresh Harvest, Fresh Foods, Rava Ranches, SMD

	ZP	Email correspondence with Connie Chan, Jim Finberg, and Eve Cervantez re motion for extension	0.30
	EC	Review and revise motion for extension of time to respond to motion to preclude communications with class members	0.50
	JF	Read draft of motion for modification of briefing schedule from Zoe Palitz, email with Eve Cervantez re same	1.30
08/30/2021	ZP	Draft declaration and proposed order	1.80
	ZP	Communication with co-counsel re motion for extension, and edit motion accordingly	1.80
	CKC	Review Dawson Morton's edits to motion for extension re sanctions	0.10
	CKC	Review edits to motion for extension re sanctions; emails re same	0.50
	CKC	Review discovery orders, joint discovery statement	0.50
	EC	Exchange email with co-counsel re: request for extension to oppose motion to preclude class communications	0.20
	JF	Email re motion for extension and discovery issues	0.90
08/31/2021	ARA	Litigation Assistant: Organize discovery related documentation	3.60
	ZP	Communication via phone and email with co-counsel and Connie Chan re discovery productions and responses due and motion to preclude communications with the class	1.80
	ZP	Edit interrogatory responses	1.10
	ZP	Make action item list for discovery	0.60
	CKC	Read briefs on motion to dismiss counterclaim (No Charge)	0.50
	CKC	Telephone call with Dawson Morton re discovery disputes	0.30
	CKC	Strategy conference with Jim Finberg re MJ's order re sanctions motion	0.20
	CKC	Draft objections and responses to Fresh Foods' first set of RFPs to Luevano-Vaca; edit Dawson Morton's supplemental responses; emails re discovery	4.00
	CKC	Revise supplemental responses to Fresh Harvest's first set of RFPs and rogs; emails re same	1.00

Re: Fresh Harvest, Fresh Foods, Rava Ranches, SMD

	JF	Tel call with Connie Chan re hearing re motion for extension on briefing of motion for sanctions, email re same, email re discovery issues	1.10
09/01/2021	ZP	Email correspondence with co-counsel re joint statement and review of discovery responses	1.10
	ZP	Strategy conference with Connie Chan and Eve Cervantez re joint statement and putative class motion	0.70
	ARA	Litigation Assistant: Organize discovery related documentation	3.40
	ARA	Translate text messages with drivers	0.70
	BBO	Strategy conference re: upcoming discovery tasks and motion practice (No Charge)	0.70
	BBO	Research case law re: First Amendment case law restricting judicial authority to preclude attorney communications with putative class members	1.70
	CKC	Strategy conference re hearing on extension of time to oppose motion to preclude class communications, and discovery disputes	0.70
	CKC	Strategy conference with Bronwen O'Herin re background on case, research assignment re motion to preclude class communications, MSJ (No Charge)	0.70
	CKC	Doc review; analyze Fresh Harvest and SMD's compliance with court order; draft joint discovery dispute statement	3.10
	CKC	Strategy emails re discovery, MSJ oppositions, motion to preclude class communications	0.30
	JF	Email re motion for extension on briefing re sanctions , SJ, and discovery issues	0.70
	EC	Telephone conference with Dawson Morton re: hearing preparation	0.50
	EC	Telephone conference with Dawson Morton re: discovery and declarations	0.40
	EC	Strategy conference with Connie Chan and Zoe Palitz re: tasks	0.70
	EC	Prepare for hearing	1.00
	EC	Email opposing counsel re: meet and confer	0.20
	EC	Exchange email with co-counsel re: meet and confer, hearing, discovery	0.80
	EC	Analyze messages between co-counsel and class	

Re: Fresh Harvest, Fresh Foods, Rava Ranches, SMD

	members; exchange email re: same	0.50
EC	Analyze summary judgment motions and exchange email re: discovery and research needed re: same	0.70
09/02/2021 ZP	Draft joint statement portion re form of production	3.70
ZP	Conference call with co-counsel and Connie Chan and Eve Cervantez re hearing and joint statement	0.50
ARA	Litigation Assistant: Resolve Everlaw filing issue (No Charge)	0.70
ARA	Speak with Connie re discovery issues	0.40
ARA	Review documents	3.80
ARA	Translated handwritten messages	0.10
BBO	E-mail exchange re: research questions for hearing on motion for sanctions	0.20
BBO	Research case law re: prior restraints on attorney-client communications and due process protections for attorney sanctions	6.60
BBO	Summarize cases and add citations for oral argument outline	1.20
CKC	Strategy conference with Alejandro Ashworth re finding specific documents in Fresh Harvest and SMD productions	0.40
CKC	Telephone call with Dawson Morton re gaps in Fresh Harvest and SMD's doc production	0.10
CKC	Research for opposition to joint employer MSJ	1.00
CKC	Emails re joint employer MSJ opposition; discovery disputes; motion to preclude class communications	0.50
CKC	Doc review and analysis of Fresh Harvest's 8/31/21 production	1.90
CKC	Telephone call with Dawson Morton, Eve Cervantez, Zoe Palitz re status conference re extension on motion to preclude class communications, discovery joint statement	1.20
CKC	Research and draft joint discovery statement	4.60
CKC	Legal research for opposition to joint employer MSJ	0.90
CKC	Review Eve Cervantez's outline for status conference hearing on motion to preclude class communications (No Charge)	0.10

Re: Fresh Harvest, Fresh Foods, Rava Ranches, SMD

	EC	Legal research and prepare for hearing on Dkt. 88	2.70
	EC	Exchange email with co-counsel re: discovery and summary judgment facts	0.80
	EC	Telephone conference with opposing counsel	0.20
	EC	Telephone conferences with Bronwen re: class communications issues	0.20
	EC	Exchange email with co-counsel re: call with opposing counsel and next steps	0.50
	EC	Telephone conference with Dawson and Connie re: discovery and hearing preparation	1.00
	EC	Prepare for hearing (No Charge)	1.00
09/03/2021	ZP	Edit joint statement to circulate to opposing counsel and in response to counsel's edits	2.50
	ZP	Zoom hearing with the court re sanctions motion and discovery and strategy conference with co-counsel re same	2.10
	ZP	Meet and confer emails with opposing counsel re joint statement	0.90
	ZP	Strategy conferences with co-counsel and Connie Chan re joint statement and deposition of plaintiff	1.60
	ARA	Litigation Assistant: Translate Gustavo declaration	1.00
	ARA	Locate and summary documents for MSJ opposition index	0.80
	ARA	Obtain voice message from Luevano (No Charge)	0.80
	BBO	Research case law on possession, custody, and control	3.50
	BBO	Hearing on motion for protective order, etc. (No Charge)	1.00
	BBO	E-mail exchange re: scheduling hearing and briefing on motion for protective order	0.40
	BBO	Research California joint employer standard	2.90
	CKC	Attend status conference on motion to extend briefing on Def's motion for sanctions	1.00
	CKC	Telephonic meet and confer with Tyler Johnson re discovery disputes and joint statement	0.70
	CKC	Telephone call with Dawson Morton re discovery disputes and joint statement	0.40
	CKC	Research and draft joint discovery statement;	

Re: Fresh Harvest, Fresh Foods, Rava Ranches, SMD

	emails with co-counsel re same; review defendant's edits to statement and respond to same	4.70
CKC	Legal research re joint employment standard for MSJ opposition	0.50
JF	Tel call with Eve, Zoe, and Connie re hearing re briefing on sanctions motion and strategy issues re discovery and SJ, email re discovery, SJ, and briefing on sanctions motions	1.80
EC	Prepare for hearing	1.80
EC	Hearing on Dkt. 88 timing	1.00
EC	Team meeting re: next steps	0.70
EC	Exchange email with co-counsel re: depositions, clients, joint status conference statement	0.90
EC	Draft notice and exchange emails re: dates	1.00
EC	Team call re: depositions	0.50
EC	Call and email opposing counsel re: depositions	0.30
EC	Draft neutral statement and exchange email re: same and dates	0.80
09/04/2021	JF Read email re plaintiff deposition	0.20
EC	Telephone conference with Zoe Palitz re: depositions	0.20
EC	Telephone conference with Dawson re: Rigoberto deposition	0.30
EC	Research deposition location issues and exchange email with opposing counsel re: same	0.50
EC	Further research and emails re: deposition location	0.70
09/05/2021	JF Tel call with Eve re Rigaberto deposition location, tel call with Eve Cervantez and Dawson Morton re same, email re same	0.80
EC	Telephone conference with Robert Mussig re: plaintiff deposition	0.10
EC	Telephone conference with Dawson Morton re: deposition of plaintiff	0.20
EC	Research re: deposition location and exchange email re: same	0.60
EC	Telephone conferences with Jim Finberg and	

Re: Fresh Harvest, Fresh Foods, Rava Ranches, SMD

	Dawson Morton re: deposition	0.20
09/06/2021	ZP Conference call with co-counsel team re next steps in discovery and motion for summary judgment	1.80
	BBO Draft summary of legal research re: attorney communications issues	0.50
	CKC Telephone call with Dawson Morton, Zoe Palitz, Eve Cervantez, Jim Finberg re depositions, discovery hearing, MSJ opposition	2.00
	CKC Legal research re joint employer status	1.60
	JF Tel call with Eve, Dawson, Zoe, and Connie re SJ and discovery, email re same	2.20
	EC Team telephone conference re: discovery and depositions and class communications	1.90
	EC Research summary judgment issues and draft email memos re: same, declarants, class communications, opposing counsel, and task lists	1.50
09/07/2021	ZP Communication with co-counsel re discovery deadlines and productions	1.60
	ZP Strategy conference with Connie Chan re deposition notices and order	0.90
	ZP Review and comment on deposition notice and meet and confer email to opposition counsel	0.50
	ARA Litigation Assistant: Locate and combine bates page ranges into unified PDF for Connie (No Charge)	0.30
	ARA Litigation Assistant: Upload files, look for relevant documents	0.40
	BBO Legal research re: joint employer standards	2.70
	BBO E-mail re: legal research on plaintiff sanctions issues	0.20
	CKC Telephonic meet and confer with Tyler Johnson re WhatsApp, depos schedules	0.50
	CKC Strategy conference with Zoe Palitz and Eve Cervantez re discovery hearing, depositions of Fresh Harvest and SMD	0.80
	CKC Prep for discovery conference	2.90
	CKC Review and analyze defendants' document production, analyze discovery disputes	1.80
	CKC Legal research re joint employer standards	3.00

Re: Fresh Harvest, Fresh Foods, Rava Ranches, SMD

	JF	Email re SJ and discovery issues	0.40
	EC	Exchange email with co-counsel re: tasks, depositions, legal research, discovery, [REDACTED]	1.20
	EC	Telephone conference with Connie Chan, Zoe Palitz re: deposition schedule	0.30
09/08/2021	ZP	Email correspondence with co-counsel re production of logbooks, other documents, deposition schedule, and hearing with the magistrate judge	1.00
	ZP	Strategy conferences with Connie Chan re hearing re discovery disputes	1.30
	ZP	Prepare for and appear at Zoom with court re discovery issues and depositions	1.40
	ZP	Research and draft extension motion, declaration, and proposed order	2.60
	ARA	Litigation Assistant: Search for documents related to emails	1.10
	BBO	Research N.D. Cal case law re: respondent discovery obligations	3.50
	BBO	Hearing on pending discovery issues (No Charge)	1.20
	BBO	Legal research re: joint employment standards and single enterprise case law	1.00
	CKC	Strategy conference with Zoe Palitz re discovery conference	0.60
	CKC	Attend zoom discovery conference	1.20
	CKC	Strategy conference with Zoe Palitz re discovery conference, motion to continue briefing schedule	0.50
	CKC	Strategy conference with Bronwen O'Herin re joint employer/single enterprise legal research	0.80
	CKC	Prep for discovery hearing	4.00
	CKC	Review and edit Zoe Palitz's draft motion for extension of MSJ briefing schedule	0.30
	CKC	Review and analyze discovery responses, document production	3.90
	JF	Email re SJ and discovery issues	0.30
	EC	Exchange email with opposing counsel re: communications	0.10
	EC	Exchange email with co-counsel re:	

Re: Fresh Harvest, Fresh Foods, Rava Ranches, SMD

	depositions, discovery, hearing	0.80
09/09/2021	ZP Email correspondence with co-counsel re 10 deposition limit, motion for extension, payroll discovery issues, including edit meet and confer communications to opposing counsel	3.50
	ZP Edit extension motion and file	1.50
	ZP Strategy conferences with Connie Chan re discovery, depositions, and filing	0.90
	ZP Review and comment on discovery requests re communications and sanctions motion	0.20
	ZP Review supplemental discovery responses and documents produced	0.50
	ARA Litigation Assistant: Attempt to sort out bates assignment permissions in Everlaw (No Charge)	0.20
	ARA Spoke with Dawson about filing issues, Verizon zip problems, and possible interpretation later in the weekend (No Charge)	0.20
	ARA Upload Pacific Bank documents to Everlaw (No Charge)	0.20
	ARA Rectify encryption problem with Verizon production (No Charge)	0.90
	ARA Review WhatsApp messages	1.20
	ARA Download and communicate with Dawson re production documents	0.20
	BBO E-mail exchange re: discovery matters	0.50
	BBO Legal research re: theories of multiple employer liability	0.80
	BBO Review e-mail re: plaintiffs' PAGA notice (No Charge)	0.10
	CKC Strategy conference with Zoe Palitz re motion for extension on MSJ briefing	0.30
	CKC Telephone call with Dawson Morton re briefing extension, joint employer theory	0.20
	CKC Review draft RFPs to Fresh Harvest re communications motion; email edits to same	0.30
	CKC Draft meet and confer emails to opposing counsel re MSJ briefing schedule, deposition schedule	0.70
	CKC Revise motion for extension, declaration in support thereof	1.40

Re: Fresh Harvest, Fresh Foods, Rava Ranches, SMD

CKC	Analyze Fresh Harvest and Fresh Foods documents, identify potential deponents for MSJ	1.70
CKC	Emails with co-counsel re witnesses to depose, deposition scheduling, key documents	0.50
CKC	Revise motion for extension, declaration in support thereof	1.00
CKC	Strategy emails re depositions, evidence in support of MSJ opposition	1.40
JF	Email re discovery and SJ issues	0.30
EC	Review and analyze court order	0.20
EC	Exchange email with co-counsel re: discovery and depositions	0.70
EC	Telephone conference with Jim Finberg re: tasks	0.10
EC	Draft RFPs re: communications with declarants and class members	1.20
09/10/2021 ZP	Email correspondence with co-counsel re depositions, document review, and ECF 88 discovery	1.50
ARA	Litigation Assistant: Upload documents to Everlaw, ProLaw, and SharePoint (No Charge)	0.30
ARA	Create usable file with all Facebook messenger data (No Charge)	1.60
ARA	Find declarant documents and estimate translation time	0.30
ARA	Call with Bronwen, Dawson, and Connie re document organization and tagging	0.50
ARA	Translate WhatsApp messages	0.20
BBO	E-mail exchange re: RFPs for attorney communications motion	1.00
BBO	Legal research re: joint employer standards and theories of liability	2.60
CKC	Zoom conference with Dawson Morton, Alejandro Ashworth, Bronwen O'Herin re joint employer and doc review	0.70
CKC	Review draft RFPs	0.20
CKC	Legal research for MSJ oppositions	1.80
CKC	Strategy emails re discovery disputes, evidence in support of MSJ opposition	0.40
JF	Tel call with Connie Chan re strategy, email	

Re: Fresh Harvest, Fresh Foods, Rava Ranches, SMD

	re same	0.30
EC	Draft RFPs; exchange email re: same	2.70
EC	Review produced documents; exchange email re: same and depositions	0.40
09/11/2021	CKC Legal research for MSJ opposition	1.20
09/12/2021	BBO Research and draft memorandum re: joint employer liability standards	7.80
	CKC Legal research re joint employer issues for MSJ opposition	3.40
09/13/2021	ZP Strategy conferences with Connie Chan, Eve Cervantez, Dawson Morton re discovery deadlines	1.50
	ZP Email correspondence with co-counsel re discovery work to be conducted, recording, documents to be produced	1.80
	ZP Review memo from Bronwen O'Herin re joint employer standard and evidence needed (No Charge)	0.60
	ZP Review draft discovery responses	0.20
ARA	Litigation Assistant: Upload requests for production to ProLaw/SharePoint (No Charge)	0.20
ARA	Work on bates numbering issue (No Charge)	0.20
ARA	Translate SMD messages for Eve	2.30
ARA	Review Bronwen's case research to improve document sort	0.30
BBO	Research and draft memorandum on multi-entity liability theories	7.60
CKC	Review Fresh Harvest and SMD's attorney declaration, supplemental production	0.80
CKC	Strategy conference with Eve Cervantez, Zoe Palitz re discovery responses, joint employer theories, depositions	1.00
CKC	Emails re discovery responses, deposition scheduling, joint employer theories	0.40
CKC	Legal research re joint employer theories	1.70
CKC	Review Bronwen O'Herin's memo re joint employer liability	0.20
EC	Telephone conference with Zoe Palitz re: Dkt 88 issues	0.10
EC	Exchange email with opposing counsel and co-counsel re: harassment of plaintiff	0.50

Re: Fresh Harvest, Fresh Foods, Rava Ranches, SMD

	EC	Exchange email re: single enterprise theory of liability	0.10
	EC	Strategy conference with Dawson Morton, Zoe Palitz, Connie Chan re: discovery, depositions	1.10
	EC	Research UCL unfair claim	0.80
09/14/2021	ZP	Email correspondence with Connie Chan re discovery declaration of counsel	0.50
	ARA	Litigation Assistant: Upload documents to Everlaw, SharePoint (No Charge)	0.50
	ARA	Confirm ordering system for WhatsApp message production	0.50
	ARA	Respond to production issues on Everlaw (No Charge)	0.40
	BBO	Draft 30(b)(6) notice for Fresh Harvest on joint employer topics	5.50
	CKC	Review and edit Luevano-Vaca's RFP responses	1.00
	CKC	Review and edit Luevano-Vaca's interrogatory responses	1.00
	CKC	Review and analyze Fresh Harvest supplemental document production	2.50
	EC	Research issues related to Dkt 88, [REDACTED]	0.40
	EC	Review and analyze new joint employer case	0.30
	EC	Telephone conference with Connie Chan re: staffing and summary judgment discovery	0.70
	EC	Exchange email with Jim Finberg re: staffing (No Charge)	0.20
09/15/2021	ARA	Litigation Assistant: Communicate with Everlaw support re document production issues (No Charge)	0.30
	BBO	Draft PMQ deposition notices for SMD and Fresh Foods	2.70
	BBO	E-mail re: deposition schedule	0.10
	BBO	Review and analyze rules re: summary judgment for Judge Freeman's court	0.40
	EC	Exchange email with co-counsel re: depositions and discovery	0.50
	EC	Review and analyze legal research re: ten deposition limit	0.80
	EC	Review Court order re: summary judgment	

Re: Fresh Harvest, Fresh Foods, Rava Ranches, SMD

		briefing and exchange email re: same	0.10
	EC	Revise 30(b)(6) notice	0.50
	EC	Review and analyze legal research memos on [REDACTED]	0.30
	CKC	Review and analyze Fresh Harvest and SMD supplemental productions	4.60
	CKC	Draft meet and confer letter re deficiencies in Fresh Harvest and SMD supplemental productions; emails re same	6.30
09/16/2021	BBO	Review edits to 30(b)(6) deposition notice	0.60
	BBO	Strategy conference re: deposition schedule	0.80
	CKC	Telephone call with Dawson Morton, Eve Cervantez, Bronwen O'Herin	0.80
	CKC	Telephone call with Dawson Morton re depositions, joint employer theory	0.30
	CKC	Draft joint discovery statement; emails re same	3.50
	EC	Exchange email with co-counsel re: depositions and class communications	0.30
	EC	Team conference call re: deposition planning	0.80
	EC	Telephone conference with Tiffany re: 10 depo limitation	0.20
	EC	Research rules of professional responsibility and representations to non-clients and draft email to opposing counsel re: same	0.60
	TDG	Law Clerk: Call with Eve to receive research assignment on requesting to take more than 10 depositions	0.20
	TDG	Research what is required for a court to grant request to take more than 10 depositions	4.70
09/17/2021	ARA	Litigation Assistant: Look into Everlaw uploading problem (No Charge)	0.40
	ARA	Upload documents to SharePoint (No Charge)	0.10
	ARA	Work on [REDACTED]	3.10
	BBO	Edit 30(b)(6) deposition notice	1.40
	CKC	Review defendants' portions of joint discovery statement; draft edits to joint statement	0.40
	CKC	Strategy emails re depositions	0.40

Re: Fresh Harvest, Fresh Foods, Rava Ranches, SMD

	EC	Exchange email with co-counsel re: discovery	0.20
	TDG	Law Clerk: Research the requirements for a court to grant request to take more than 10 depositions	5.40
09/19/2021	EC	Exchange email re: depositions and discovery; research re: same	0.40
09/20/2021	ARA	Litigation Assistant: Upload production to Everlaw (No Charge)	0.40
	ARA	Organize list of productions	1.80
	BBO	Draft PMQ topics re: settlement/release agreements	1.80
	CKC	Telephone call with Ana Toledo re deposition scheduling	0.10
	CKC	Telephone call with Dawson Morton re deposition scheduling, motion to compel RFP set 3 to Fresh Harvest	0.60
	CKC	Legal research re joint employer status	1.50
	CKC	Review and edit Bronwen O'Herin's draft 30(b)(6) notice	2.40
	CKC	Review Fresh Harvest and SMD's responses to RFP set three	0.30
	CKC	Emails re discovery responses, doc review, deposition limits, deposition scheduling, 30(b)(6) designees, motions to compel	0.50
	CKC	Emails with staff re filing and indexing discovery, document productions (No Charge)	0.20
	EC	Draft email to opposing counsel and stipulation re: depositions and briefing schedule re: Dkt. No. 88	0.40
	EC	Exchange email with co-counsel re: new discovery to SMD; check to Gustavo, discovery, Silva; research depositions of individuals not in US and exchange email with co-counsel re: same	0.50
	EC	Telephone conference with Connie Chan and Dawson Morton re: depositions	0.20
09/21/2021	ZP	Email correspondence with Connie Chan re motion to compel	0.10
	ARA	Litigation Assistant: Build production timeline while reviewing documents	4.30
	ARA	Attempt to resolve bates number issue on Everlaw (No Charge)	0.60
	ARA	Update known phone number list	0.10

Re: Fresh Harvest, Fresh Foods, Rava Ranches, SMD

	BBO	E-mail exchange re: deposition schedule	0.10
	BBO	Legal research re: release or waiver of statutory rights in California	0.50
	BBO	Draft 30(b)(6) deposition notice attachment	0.20
	BBO	E-mail re: FH/SMD liability research	0.80
	CKC	Review order (ECF 108) re defendants document production; emails re same	0.30
	CKC	Review and edit draft 30(b)(6) depo notice to Fresh Harvest; emails re same	0.50
	CKC	Emails with staff re case and file management (No Charge)	0.10
	CKC	Draft meet and confer email to Fresh Harvest/SMD re objections to RFP set three	0.50
	CKC	Review documents for MSJ opposition	0.90
	EC	Revise 30b6 notice; exchange email re: same and court order	0.40
09/22/2021	ARA	Litigation Assistant: Organize dates of production in production log	1.70
	BBO	Review e-mail exchange re: UCL claim (No Charge)	0.10
	BBO	Review edits to 30(b)(6) deposition notice (No Charge)	0.10
	CKC	Legal research re joint employer standard and H-2A program	5.60
	CKC	Read case background materials (Rule 56 motion, discovery briefs and orders)	1.50
	CKC	Draft meet and confer email response to Tyler Johnson re RFP set 3	0.60
	CKC	Draft plaintiffs' statement re FLAG discovery	1.00
	CKC	Draft joint statement and chart re discovery dispute re RFP set 3	0.50
	EC	Exchange email with co-counsel re: motion to compel discovery, discovery, 30(b)(6) deposition notice and revisions needed to same	0.50
	EC	Research issues relating to Docket 88/communications with class members and exchange email with opposing counsel re: same, including neutral case statement, declarant depositions	1.30
	EC	Exchange email with opposing counsel and	

Re: Fresh Harvest, Fresh Foods, Rava Ranches, SMD

		co-counsel re: deposition scheduling and outstanding discovery	0.50
09/23/2021	ARA	Litigation Assistant: Work on production log	2.50
	ARA	Log new production and upload to Everlaw	0.60
	BBO	Edit 30(b)(6) deposition notice	0.30
	BBO	Draft and revise 30(b)(6) notices and RFP attachments for Fresh Harvest, SMD, and Fresh Foods	3.00
	CKC	Strategy conference with Tiffany Deguzman re summary judgment, UCL research	0.50
	CKC	Telephone call with Dawson Morton re meet and confer emails	0.10
	CKC	Revise 30(b)(6) depo notices to Fresh Harvest, SMD; edit subpoenas to Scaroni and Ridaura	1.40
	CKC	Draft joint discovery statement re RFP set 3 and chart; draft email response to opposing counsel	1.20
	CKC	Revise 30(b)(6) depo notice to Fresh Harvest; review draft depo notices	0.40
	CKC	Revise 30(b)(6) depo notice to SMD, Fresh Foods	0.50
	CKC	Review Tiffany DeGuzman's research memo re summary judgment standard for failure to address all theories; legal research re same	0.90
	CKC	Research for summary judgment opposition	2.00
	CKC	Emails re discovery, depositions	0.30
	TDG	Law Clerk: Call with Connie to receive research assignments on issues not addressed in Defendants' MSJ, seeking leave to amend complaint, and viability of UCL theory	0.60
	TDG	Law Clerk: Researching how federal courts approach claims raised in Plaintiff's Complaint but not addressed in Defendants' MSJ	6.50
09/24/2021	ARA	Litigation Assistant: Attempt to solve attachment viewing issue on Everlaw (No Charge)	0.20
	ARA	Add relevant numbers to list and cross check against Verizon subpoena records	0.20
	ARA	Uploaded responses to RFP and response to production log to SharePoint (No Charge)	0.20
	BBO	Legal research re: UCL claim	0.20

Re: Fresh Harvest, Fresh Foods, Rava Ranches, SMD

	BBO	Draft deposition notice RFP attachment and subpoena for Alfredo Diaz	0.70
	CKC	Telephone call with Dawson Morton re 30(b)(6) deposition notices, joint discovery statement, Fresh Foods doc production	0.20
	CKC	Supervise filing of joint statement (No Charge)	0.50
	CKC	Review and analyze supplemental search declarations of Fresh Harvest, SMD	0.20
	CKC	Revise joint statement and chart re RFP set 3 to Fresh Harvest and SMD	0.20
	CKC	Draft deposition notices and subpoena doc requests; emails re same	1.00
	CKC	Review Fresh Harvest/SMD's responses to RFP set 4	0.10
	CKC	Review documents for SJ opposition; emails re same	0.50
	EC	Exchange email with co-counsel re: depositions and discovery; review documents to be filed	0.20
	EC	Exchange email with opposing counsel re: call to discuss depositions of declarants	0.10
	EC	Telephone conference with Robert Mussig re: declarant depositions	0.50
	EC	Strategy conference with Zoe Palitz re: hearing on motion to dismiss	0.30
	TDG	Law Clerk: Researching how federal courts approach claims raised in Plaintiff's Complaint but not addressed in Defendants' MSJ	3.30
	TDG	Law Clerk: researching good case law to meet FRCP Rule 16(b)'s 'good cause' standard when seeking leave to amend complaint	3.10
09/25/2021	BBO	E-mail re: discovery schedule	0.10
	EC	Telephone conference with Connie Chan re: legal theories, summary judgment, deposition preparation	1.00
09/26/2021	CKC	Review Eve Cervantez's draft meet and confer letter re ECF 88 discovery; emails re same	0.40
	EC	Analyze Defendants' Responses to Plaintiffs' 4th set of RFPs and draft meet and confer letter re: same	1.30
	EC	Draft email to opposing counsel re: declarant issues and exchange email with co-counsel re:	

Re: Fresh Harvest, Fresh Foods, Rava Ranches, SMD

		same and prior conversation with opposing counsel	0.80
09/27/2021	ARA	Litigation Assistant: Review WhatsApp messages for deposition prep	4.90
	ARA	Look into WhatsApp message parsing for declarants	0.10
	ARA	Upload deposition documents to SharePoint (No Charge)	0.10
	CKC	Telephone call with Dawson Morton re depositions, doc review	0.50
	CKC	Review defendant's portion of joint discovery statement re 3d set of RFPs; edits re same; draft proposed order	0.50
	CKC	Telephone call with Ana Toledo re depo notice RFPs to Fresh Foods	0.10
	CKC	Review Eve Cervantez's draft meet and confer letter re RFP set 4	0.20
	CKC	Draft 30(b)(6) depo notices, subpoena RFPs	1.00
	CKC	Emails re depositions, doc review, discovery, meet and confer	0.50
	EC	Telephone conference with Alejandro re: review of declarant WhatsApp messages	0.10
	EC	Exchange email with co-counsel and legal assistant re: declarant depositions and document review; meet and confer re; missing documents; other depositions; other discovery disputes	0.60
	EC	Draft meet and confer letter re: fourth set of RFPs	1.20
	EC	Draft email to opposing counsel re: declarant depos	0.50
09/28/2021	ARA	Litigation Assistant: Upload production to Everlaw and log in production log (No Charge)	0.50
	ARA	Review new production from Fresh Harvest	1.10
	ARA	Review WhatsApp messages for [REDACTED]	5.10
	BBO	Strategy conference re: theories of liability	0.10
	CKC	Review Fresh Harvest document production	0.40
	CKC	Review Fresh Harvest document production	0.50
	EC	Prepare for hearing on discovery motions	2.70

Re: Fresh Harvest, Fresh Foods, Rava Ranches, SMD

	EC	Prepare for Norberto Mendivil deposition	1.00
	EC	Exchange email with co-counsel re: depositions, discovery, privilege	0.20
	EC	Telephone conference with Dawson Morton re: depositions and hearing preparation	0.40
	EC	Telephone conference with Dawson Morton and Connie Chan re: hearing preparation	0.30
09/29/2021	ARA	Litigation Assistant: Upload and review documents from new production	0.30
	ARA	Continue analysis of Mendivil WhatsApp messages	2.70
	ARA	Compile [REDACTED]	2.10
	ARA	Speak with Eve re Mendivil phone number, follow up on to do list	0.50
	CKC	Review order re discovery conference	0.10
	CKC	Review Dawson Morton's Alfredo Diaz depo outline	0.30
	EC	Draft internal memoranda and exchange email with co-counsel re: tasks, hearing preparation, document review, deposition preparation, summary judgment	1.20
	EC	Argue at hearing on discovery matters	0.80
	EC	Telephone conference with Dawson Morton re: next steps	0.30
	EC	Prepare for hearing on motion to dismiss	0.10
	EC	Prepare for Norberto Mendivil deposition	0.70
	EC	Review Court order on discovery	0.10
	EC	Telephone conference with Alejandro re: Norberto Mendivil messages and deposition preparation	0.30
	EC	Revise Diaz deposition outline	0.70
	EC	Research and draft opposition to Dkt. 88	0.40
09/30/2021	ARA	Litigation Assistant: Search through Everlaw for deposition related documents	1.20
	ARA	Search for and log 3rd party production	3.40
	CKC	Email to defense counsel re deposition schedule and document production	0.20
	CKC	Review and provide feedback on Tiffany Deguzman's memos re MSJ standard and Rule 16	

Re: Fresh Harvest, Fresh Foods, Rava Ranches, SMD

	leave to amend	0.20
CKC	Attend deposition of Alfredo Diaz	4.50
CKC	Draft meet and confer letter re RFP set 3, Nos 3-4	0.50
CKC	Emails re meet and confer letter, depositions	0.10
EC	Research UCL unfair claim	0.10
EC	Exchange email with co-counsel re: depositions and next steps	0.20
EC	Exchange email with opposing counsel re: Norberto Mendivil deposition	0.10
TDG	Law Clerk: UCL unfair prong research	6.30
10/01/2021	ARA Litigation Assistant: Respond to and clarify upload issues with Everlaw support (No Charge)	0.50
ARA	Call with Connie and Dawson re Everlaw organization and general to-do list	0.60
ARA	Reformat and upload documents to Everlaw (No Charge)	3.10
ARA	Search for and log 3rd party production	2.00
EC	Exchange email with co-counsel re: deposition preparation, discovery, tasks	0.10
EC	Prepare for hearing on motion to dismiss (No Charge)	1.00
EC	Telephone conference with Connie Chan and Dawson Morton re: depositions	0.20
EC	Telephone conference with Dawson Morton re: factual and legal theories of case; deposition preparation	0.50
EC	Exchange email with opposing counsel re: declarant depositions and communications with class members	0.10
EC	Prepare for Norberto Mendivil deposition; legal research re: waiver of attorney client privilege for deposition; prepare deposition notice	0.40
EC	Finalize and file stipulation re: briefing schedule re: communications with putative class members	0.10
TDG	Law Clerk: Research whether [REDACTED] [REDACTED] [REDACTED]	0.40

Re: Fresh Harvest, Fresh Foods, Rava Ranches, SMD

	TDG	Research UCL unfair prong	4.50
10/02/2021	EC	Prepare for Norberto Mendivil deposition	0.30
	EC	Prepare for hearing on Motion to Dismiss	0.10
10/03/2021	EC	Prepare for Norberto Mendivil deposition	4.50
	EC	Prepare for hearing on Motion to Dismiss (No Charge)	1.40
	TDG	Law Clerk: Research whether [REDACTED] [REDACTED] [REDACTED]	3.00
10/04/2021	ARA	Litigation Assistant: Send requested productions from Everlaw for Mendivil deposition to Eve	2.80
	ARA	Address upload issue with Everlaw support (No Charge)	1.30
	ARA	Prepare folders for document set reupload (No Charge)	0.50
	ARA	Remove privileged documents from Everlaw production	0.20
	ARA	Review 3rd party production documents	0.40
	ARA	Speak with Dawson re Everlaw upload progress and Mendivil text message analysis	0.20
	ARA	Speak with Bella re WhatsApp production organization system	0.20
	CKC	Doc review; prepare for Oscar Montes depo	8.50
	EC	Prepare for hearing on MTD:	0.10
	EC	Prepare for Norberto Mendivil deposition	9.30
	EC	Mendivil deposition preparation	0.50
10/05/2021	ARA	Litigation Assistant: Prepare deposition exhibits for Oscar Montes and Suzie Rava	5.20
	ARA	Speak with Everlaw support re unitization problem (No Charge)	0.30
	ARA	Parse and upload production to Everlaw (No Charge)	0.50
	ARA	Attempt to resolve unitization issue (No Charge)	0.20
	ARA	Build Fresh Harvest drivers list	1.30
	CKC	Telephone call with Dawson Morton re Oscar Montes, Suzie Rava depos	0.70
	CKC	Doc review; prep for Oscar Montes deposition	5.00

Re: Fresh Harvest, Fresh Foods, Rava Ranches, SMD

	CKC	Prep for Oscar Montes deposition	8.40
	EC	Prepare for Mendivil deposition	1.20
	EC	Take Mendivil deposition	4.40
	EC	Telephone conferences with Dawson Morton re: Mendivil deposition	0.50
	EC	Prepare Mendivil deposition exhibits for court reporter	0.20
	EC	Prepare for Motion to Dismiss hearing	0.80
	EC	Exchange emails with co-counsel re: new document production and deposition preparation	0.20
	EC	Exchange email with opposing counsel re: discovery disputes	0.20
	LCN	Paralegal: Find and Print cases from Westlaw (No Charge)	1.20
10/06/2021	ARA	Litigation Assistant: Deposition exhibit support for Montes and Suzie Rava	1.90
	ARA	Prepare production produced without bates stamps	4.00
	CKC	Take deposition of Oscar Montes	7.00
	EC	Exchange email with co-counsel re: depositions	0.20
	EC	Prepare Mendivil deposition exhibits for court reporter; exchange email re: same	0.20
	EC	Exchange email with opposing counsel re: meet and confer re: document production	0.10
	EC	Prepare for hearing on Motion to Dismiss	10.40
	EC	Telephone conference with Connie Chan re: summary judgment and case tasks	0.70
10/07/2021	ARA	Litigation Assistant: Finish bates number FHI001985-3588 set of emails	1.50
	ARA	Upload productions included revised productions to Everlaw (No Charge)	0.20
	ARA	Follow up on general document inquiries	0.10
	ARA	Reunitize document FHI1011 on Everlaw (No Charge)	0.60
	ARA	Compare employee numbers between Fresh Harvest and Fresh Foods	0.80
	ARA	Review relevant documents linking Fresh Harvest drivers with Fresh Foods drivers	0.80

Re: Fresh Harvest, Fresh Foods, Rava Ranches, SMD

	JF	Listen to hearing on motion to dismiss, tel call with Eve, Connie, and Dawson re strategy (No Charge)	2.10
	ZP	Attend hearing on motion to dismiss counterclaim (No Charge)	3.10
	CKC	Observe motion to dismiss hearing	0.80
	CKC	Telephone call with Dawson Morton re MSJ oppositions, discovery	0.40
	CKC	Prepare for deposition of Suzie Rava	3.00
	EC	Prepare for hearing on Motion to Dismiss	0.50
	EC	Hearing on Motion to Dismiss (including waiting to be called)	1.90
	EC	Team conference call re: next steps	0.70
	EC	Research re: obligation to repay consideration for voided release	0.20
	EC	Draft emails to opposing counsel re: summary judgment, declarant depositions	0.50
	EC	Exchange email with co-counsel re: research, call with Ian re: discovery	0.60
	EC	Prepare for meet and confer call with Ian	0.40
	EC	Telephone conference with opposing counsel Ian re: deficient document production	0.50
	TDG	Law Clerk: Research UCL unfair prong	7.20
	TDG	Call with Connie to receive assignment on joint employer research	0.30
10/08/2021	ARA	Litigation Assistant: Pull documents for depo prep and convert to pdf when necessary	1.60
	ARA	Locate and bates stamp documents to be turned in for Oscar Montes depo	1.90
	ARA	Address ongoing Everlaw bates numbering problem (No Charge)	0.40
	ARA	Find instances of domestic workers driving trucks also used by H2A workers	0.60
	CKC	Second-chair deposition of Suzie Rava	6.00
	EC	Exchange email with co-counsel re: summary judgment, depositions	0.20
	EC	Review and analyze UCL 'unfair' research	0.20
	TDG	Law Clerk: Finish drafting UCL unfair prong research	3.10

Re: Fresh Harvest, Fresh Foods, Rava Ranches, SMD

	TDG	Joint employer research	4.00
10/10/2021	EC	Research and draft meet and confer letter to opposing counsel re: discovery related to Communications Motion	1.60
10/11/2021	ARA	Litigation Assistant: Fix error with exhibit creation from Friday (No Charge)	0.20
	ARA	Find instances of domestic workers driving trucks also used by H2A workers	4.10
	CKC	Review Eve Cervantez's discovery meet and confer letter (No Charge)	0.10
	CKC	Review deposition exhibits for Oscar Montes deposition; emails with court reporter re same	0.40
	EC	Finalize letter to opposing counsel re: declarant discovery	0.20
10/12/2021	ARA	Litigation Assistant: Produce exhibits for Diaz depo	1.30
	ARA	Speak with Everlaw support re chronic uploading issues (No Charge)	1.00
	CKC	Telephone call with Dawson Morton re depositions, document productions	0.20
10/13/2021	ARA	Litigation Assistant: Address reoccurring Everlaw upload issue (No Charge)	0.40
	ARA	Work of truck number comparison project	3.90
	ARA	Analyze Ridaura documents	0.40
	ARA	Search for Oscar Ramos depo materials, specifically WhatsApp messages in which he is [REDACTED]	1.80
	ARA	Respond to question re Mendivil phone numbers	0.30
	CKC	Review Fresh Harvest/SMD's responses to RFP set 5	0.10
	CKC	Review Fresh Harvest, SMD document production	0.40
	EC	Review Defendants' discovery responses; exchange email with co-counsel re: same	0.20
	EC	Assist preparation for Ramos deposition; draft questions	0.80
	EC	Summarize Mendivil deposition	1.00
10/14/2021	ARA	Litigation Assistant: Continue search for Oscar Ramos depo materials, specifically WhatsApp messages in which he is [REDACTED]	

Re: Fresh Harvest, Fresh Foods, Rava Ranches, SMD

	CKC	Prepare for deposition of Leticia Ridaura	5.10
	EC	Strategy conference with Alejandro re: Everlaw (No Charge)	0.50
	EC	Review/respond to letter from Fresh Harvest re: discovery	0.10
	EC	Exchange email with co-counsel re: declarants, research	0.20
10/19/2021	ARA	Litigation Assistant: Locate and combine documents to send to Connie	0.40
	ARA	Respond to translation question re WhatsApp messages	0.10
	ARA	Compile and index settlement agreements and claims releases	3.30
	CKC	Telephone call with Eve Cervantez, Dawson Morton re Fresh Harvest and SMD 30(b)(6) depositions, MSJ opposition brief	1.00
	CKC	Prepare for deposition of Leticia Ridaura	10.40
	EC	Exchange email with co-counsel re: depositions, summary judgment opposition, discovery	0.50
	EC	Telephone conference with Dawson Morton & Connie Chan (partial) re: summary judgment opposition and sanctions motion	1.40
	EC	Review and analyze checks and release dates	0.50
	EC	Telephone conference with Jim Finberg re: sanctions motion	0.30
	EC	Draft letter to defendants re: declarant depositions	0.50
	EC	Draft meet and confer letter to defendants re: 5th Set of Requests for Production	2.00
10/20/2021	ARA	Litigation Assistant: Locate, bates stamp, and combine document for deposition today	0.90
	ARA	Check that the potential deposition documents folder in SharePoint actually has the documents that could potentially be used (No Charge)	0.70
	ARA	Update Discovery Requests and Responses Log with 10.13.21 defendant responses	0.10
	ARA	Upload Diaz, Mendivil, and Montes deposition transcripts to SharePoint (No Charge)	0.20
	ARA	Pull additional truck numbers from SMD Dispatch WhatsApp messages with H2A drivers	0.70

Re: Fresh Harvest, Fresh Foods, Rava Ranches, SMD

	JF	Tel call with Eve Cervantez re strategy (No Charge)	0.30
	CKC	Prepare for deposition of Leticia Ridaura	0.70
	CKC	Take deposition of Leticia Ridaura	9.30
	EC	Exchange email with co-counsel re: declarant depositions	0.40
	EC	Telephone conference with Jim Finberg re: strategy (No Charge)	0.20
	EC	Revise Leticia Ridaura deposition outline	0.40
	EC	Finalize two letters to Defendants re: 5th set of Requests for Production and declarant issues	0.50
	EC	Draft Joint Discovery Letter re: neutral statement and number of depositions	3.50
10/21/2021	ARA	Litigation Assistant: Locate documents on Everlaw	0.10
	ARA	Compile truck numbers from SMD Dispatch conversations and communicate preliminary results to Connie and Dawson	2.10
	ARA	Look into splitting up FHI3606 (No Charge)	0.40
	ARA	Search for examples of action logs	1.40
	JF	Tel call with Connie Chan, email with Dawson Morton	0.60
	CKC	Pull exhibits used in Leticia Ridaura deposition for court reporter	0.20
	EC	Review Sarmiento deposition, draft memo re: same	3.10
10/22/2021	ARA	Litigation Assistant: Send requested documents to Dawson	0.10
	ARA	Unitize FHI3606 (No Charge)	0.20
	CKC	Second-chair deposition of David Scaroni	6.00
10/24/2021	CKC	Review and edit Eve Cervantez's draft joint discovery statement	0.40
	EC	Exchange email with opposing counsel and co-counsel re: Rincon deposition	0.40
	EC	Revise Joint Statement re: Discovery Dispute and send to Defendants	0.50
10/25/2021	ARA	Litigation Assistant: Prepare documents for potential Rincon deposition tomorrow	3.20
	ARA	Search for Angel Rincon's phone number	1.20

Re: Fresh Harvest, Fresh Foods, Rava Ranches, SMD

	ARA	Upload deposition transcripts to SharePoint (No Charge)	0.10
	EC	Telephone conference with Dawson Morton re: Rincon deposition	0.40
	EC	Prepare for Rincon deposition	7.50
	EC	Exchange email with co-counsel re: Sarmiento deposition corrections	0.20
10/26/2021	EC	Prepare for Rincon deposition	0.70
	EC	Rincon deposition (including preparation and telephone conferences with Dawson Morton during breaks)	5.00
	EC	Telephone conference with Dawson Morton re: follow up to Rincon deposition	0.30
	EC	Exchange email re: follow up on missing documents, research topics, opposition to summary judgment	0.70
10/27/2021	ARA	Litigation Assistant: Download Ridaura and Scaroni deposition transcripts, upload to SharePoint, and print for Eve (No Charge)	0.20
	CKC	Research and draft MSJ opposition	2.30
	EC	Legal research re: attorney solicitation issues	0.40
	EC	Telephone conference with Jim Finberg re: next steps; No Charge (No Charge)	0.20
10/28/2021	ARA	Review and annotate as of yet unmarked production	1.10
	CKC	Review draft joint discovery statement	0.10
	CKC	Research and draft MSJ opposition	3.50
	EC	Exchange email with opposing counsel re: documents that should have been produced	0.10
	EC	Exchange email with co-counsel re: research, summary judgment	0.30
	EC	Revise Joint Discovery Statement	1.80
	TDG	Law Clerk: Joint employer research	8.30
10/29/2021	ARA	Litigation Assistant: Review and annotate as of yet unmarked production	1.70
	CKC	Strategy conference with Tiffany Deguzman re joint employer research	0.20
	CKC	Draft opposition to MSJ	3.50
	EC	Draft summary judgment opposition, exchange	

Re: Fresh Harvest, Fresh Foods, Rava Ranches, SMD

		emails re: research needed for same	1.40
	EC	Finalize and file Joint Stipulation re: neutral statement and 10 depositions	0.80
	EC	Telephone conference with Dawson Morton re: summary judgment opposition	0.10
	TDG	Law Clerk: Joint employer research	7.20
10/30/2021	CKC	Research and draft MSJ opposition	3.50
	EC	Draft summary judgment opposition; emails re: same	0.80
	EC	Telephone conference with Connie Chan re: summary judgment opposition	0.50
10/31/2021	CKC	Research and draft MSJ opposition	1.30
	EC	Draft summary judgment opposition	5.00
	EC	Review Leticia Ridaura deposition	1.00
	EC	Exchange email with co-counsel re: summary judgment opposition	0.30
11/01/2021	BBO	Legal research re: H-2A program regulatory history	4.30
	CKC	Research and draft MSJ opposition	10.00
	EC	Draft opposition to summary judgment re: Gustavo	7.00
11/02/2021	ARA	Litigation Assistant: Review and code WhatsApp messages	4.40
	ARA	Work on truck number comparison project	2.10
	BBO	Legal research re: H-2A regulatory history and interpretation	5.40
	BBO	Strategy conference re: H-2A regulations legal research	0.20
	BBO	Legal research re: H-2B regulations and third-party beneficiary theories	0.90
	CKC	Research and draft MSJ opposition	11.00
	EC	Draft opposition to summary judgment re: Gustavo; exchange email re: same	5.20
	EC	Review court order re: declarant issues and exchange email re: same	0.20
	EC	Draft email to opposing counsel re: declarant depositions	0.10
11/03/2021	ARA	Litigation Assistant: Look up prevailing wage rates in Everlaw documentation	0.40

Re: Fresh Harvest, Fresh Foods, Rava Ranches, SMD

	ARA	Complete write up of truck number comparison project	1.50
	ARA	Investigate prevailing wage rates for workers in the region	1.00
	ARA	Read over decl of Luevano for Spanish errors	0.50
	ARA	Pull documents for Chan declaration exhibits	0.80
	ARA	List all deposition citations from background citations for Ayeesha's use	0.40
	ARA	Translate Luevano Declaration	1.60
	ARA	Translate Sarmiento declaration	0.40
	ARA	Create Ashworth Decl. and compile relevant documents	1.30
	ARA	Update Chan declaration with brief exhibit descriptions	1.20
	MOB	Law Clerk: Call re: standard for monetary sanctions for improper communications (No Charge)	0.40
	MOB	Research re: when are sanctions appropriate for improper communications (No Charge)	1.40
	BBO	Legal research re: third party beneficiary theory of liability	0.40
	CKC	Research and draft MSJ opposition, supporting declarations	12.40
	EC	Draft and revise summary judgment opposition and Gustavo declaration	3.10
	EC	Research and draft opposition to ECF 88 and phone calls and email with Mattie (law clerk) re: same	0.90
	EC	Draft email to opposing counsel re: declarant depositions	0.10
11/04/2021	ARA	Litigation Assistant: Locate document for Dawson	0.50
	ARA	Clean up documents for Ashworth decl.	0.80
	ARA	Review and annotate WhatsApp messages	0.10
	ARA	Work on cite check for Opp to Fresh Harvest MSJ_v2	11.90
	BBO	Strategy conference re: Summary Judgment Opposition filing	0.20
	BBO	Review and edit summary judgment opposition brief	0.90

Re: Fresh Harvest, Fresh Foods, Rava Ranches, SMD

	CKC	Research and draft MSJ opposition, supporting declaration	12.80
	LM	Paralegal: Legal cite check Opp. to MSJ	3.70
	EC	Revise summary judgment opposition	10.20
	JF	Prepare opposition to SJ motion, email re same	2.30
11/05/2021	ARA	Litigation Assistant: Compare Chan decl. exhibits with actual used exhibits	1.40
	ARA	Attempt to remove watermark from SMD8835 translation (No Charge)	0.20
	ARA	Edit Luevano decl citations in Opp to Fresh Harvest MSJ	0.40
	ARA	Edit highlighting for Diaz Decl.	0.20
	ARA	Highlight Montes deposition	0.40
	ARA	Compare recent version of Opp to FH MSJ to previous cite checks to ensure accuracy	1.90
	ARA	Call with Connie to discuss next steps	0.10
	ARA	Check that all exhibits in brief are in Chan Decl.	1.10
	ARA	Input exhibit letter for depositions into brief	0.80
	ARA	Call with Connie to discuss document format for FHI 1708	0.20
	ARA	Input bates numbers into new exhibits	0.30
	ARA	Add coversheet to Exhibits X and Y	0.20
	ARA	Confirm that all documents are ready to be filed for Opp to FH MSJ	0.60
	ARA	Update tables in Opp to FH MSJ	1.20
	ARA	Finalize Ashworth Decl documents and sign decl,	0.60
	ARA	Reformat master brief paragraph settings	0.10
	TDG	Law Clerk: researching improper communications and unethical solicitation	7.00
	MOB	Law Clerk: Research re: imposition of sanctions for improper communications (No Charge)	4.00
	CKC	Research and draft MSJ opposition, supporting declaration; oversee filing	15.20
	EC	Telephone conference with Tiffany (law clerk)	

Re: Fresh Harvest, Fresh Foods, Rava Ranches, SMD

		re: research needed for ECF 88 opposition; exchange email re: same	0.30
	EC	Draft proposed order denying summary judgment	1.70
	EC	Revise summary judgment opposition and supporting documents, exchange email re: same, telephone conference with Connie Chan re: same	2.50
11/06/2021	CKC	Oversee preparation of chambers copy of MSJ opposition (No Charge)	0.80
11/07/2021	EC	Review deposition transcripts	0.70
11/08/2021	BBO	E-mail exchange re: internal strategy questions	0.10
	EC	Exchange email re: summary judgment exhibits	0.10
	EC	Review new filing re: Elkhorn Packing and exchange email with co-counsel re: same	0.50
	EC	Telephone conference with Jim Finberg re: defendants' administrative motion	0.10
	EC	Draft opposition to administrative motion	2.20
11/09/2021	ARA	Litigation Assistant: Pull declarant documents from Everlaw	3.40
	ARA	Locate document for Dawson	0.10
	CKC	Emails re discovery for sanctions motion opposition	0.10
	EC	Research and follow up on all outstanding discovery re: ECF 88, draft email to opposing counsel summarizing same	1.60
	EC	Research and draft opposition to ECF 88 and supporting documents	1.10
11/10/2021	ARA	Litigation Assistant: Translate and analyze WhatsApp communications	1.20
	ARA	Pull and highlight documents for Eve	0.20
	EC	Draft opposition to administrative motion	1.10
	EC	Research and draft opposition to ECF 88 and supporting documents, exchange email with co-counsel re: same	2.30
	EC	Telephone conference with Dawson Morton re: administrative motion and ECF 88 responses	0.30
11/11/2021	TDG	Law Clerk: researching improper communications and unethical solicitation	7.20
	CKC	Review Eve Cervantez's draft opposition to	

Re: Fresh Harvest, Fresh Foods, Rava Ranches, SMD

		administrative motion for leave to file supplemental brief	0.20
	EC	Revise and finalize opposition to administrative motion	0.50
11/12/2021	TDG	Law Clerk: researching improper communications and unethical solicitation	7.70
	EC	Review Ramos deposition	1.10
11/13/2021	EC	Follow up with opposing counsel on outstanding discovery	0.20
	EC	Draft opposition to ECF 88 and supporting declarations	3.20
11/14/2021	TDG	Law Clerk: researching improper communications and unethical solicitation	5.50
	EC	Draft opposition to ECF 88	3.00
11/15/2021	ARA	Litigation Assistant: Translate potential Silva decl. for Eve	0.60
	ARA	Pull document for Eve	0.10
	ARA	Search for linked documents for FHI003584	0.20
	ARA	Locate and listen to documents for Dawson	0.30
	EC	Meet and confer call with Ian re: outstanding documents re: declarants	0.30
	EC	Draft opposition to ECF 88 and supporting documents and exchange email with co-counsel re: same and related discovery and supporting documents	2.30
	EC	Exchange email with opposing counsel re: declarant discovery	0.10
	EC	Research and draft opposition to ECF 88	0.20
	JF	Review and comment on Morton declaration	0.80
11/16/2021	ARA	Litigation Assistant: Review and edit Silva declaration	0.80
	ARA	Translate document for Eve	0.70
	CKC	Strategy conference with Eve Cervantez re depositions, opposition to sanctions motion	0.40
	CKC	Review and edit opposition to sanctions motion, WhatsApp messages produced	0.80
	EC	Research and draft opposition to ECF 88 and supporting documents; exchange email re: same and related discovery	3.20
	EC	Telephone conference with Bronwen O'Herin re:	

Re: Fresh Harvest, Fresh Foods, Rava Ranches, SMD

	discovery, settlement	0.30
EC	Telephone conference with Connie Chan re: ECF 88 and offer to produce Garcia for deposition	0.40
EC	Telephone conference with Dawson Morton re: ECF 88 and Garcia deposition	0.20
EC	Exchange email with opposing counsel re: declarant depositions	0.30
EC	Review new document production and exchange email re: same	0.60
EC	Draft email to opposing counsel re: document production	0.20
EC	Telephone conference with Alejandro Ashworth re: ECF 88 issues	0.10
11/17/2021	ARA Litigation Assistant: Translate Silva decl. for Eve	0.90
	CKC Draft supplemental brief re Elkhorn Packing	2.20
	CKC Draft opposition to sanctions motion	1.00
	EC Review Defendants' brief re: Elkhorn Packing	0.10
	EC Research and draft opposition to ECF 88 and supporting documents	0.60
11/18/2021	MOB Law Clerk: Research re: new argument's effect on stare decisis (No Charge)	2.00
	MOB Call discussing new argument and stare decisis (No Charge)	0.40
	CKC Review local rules, Van Keulen standing order re sanctions opposition filing	0.30
	CKC Strategy conference with law clerk Mattie re Elkhorn Packing research	0.40
	EC Research and draft opposition to ECF 88 and supporting documents	2.20
	EC Telephone conference with Dawson Morton re: Morton declaration and ECF opposition	0.30
11/19/2021	ARA Litigation Assistant: Review and upload new productions to Everlaw	0.40
	CKC Review summary judgment reply	0.40
	EC Review Defendants' reply in support of summary judgment	0.30
	EC Draft opposition to ECF 88 and supporting documents; exchange email re: same	5.00

Re: Fresh Harvest, Fresh Foods, Rava Ranches, SMD

11/20/2021	EC	Draft opposition to ECF 88 and supporting documents; exchange email re: same	6.00
11/21/2021	EC	Draft opposition to ECF 88 and supporting documents; exchange email re: same	15.00
11/22/2021	ARA	Litigation Assistant: Highlighted, excerpted, and checked deposition transcript citations	2.50
	ARA	Call re Fresh Harvest filing next steps	0.30
	ARA	Solve for Everlaw upload issue (No Charge)	0.30
	ARA	Answer translation question for Dawson	0.10
	ARA	Work on Cervantez Decl.	0.30
	ARA	Cite check Brief in Opposition to Motion re contact ecf 88 opposition	3.90
	ARA	Work on cite check for PL's supp brief re Elkhorn Packing_v2	0.70
	ARA	Add changes from fact cite check to main Opp to ECF 88 document	0.40
	BBO	Review e-mail re: legal research (No Charge)	0.10
	CKC	Strategy conference re opposition to sanctions motion filing	0.20
	CKC	Research and draft supplemental brief re Elkhorn Packing	2.80
	LM	Paralegal: EC check-in call re filing	0.40
	LM	Legal cite check Brief in Opp. to Mot. re Contact	4.80
	EC	Team meeting to prepare for filing re: ECF 88	0.20
	EC	Telephone conference with Connie Chan re: ECF 88 filing	0.20
	EC	Research and draft opposition brief and supporting documents re: ECF 88	8.90
	EC	Revise Elkhorn Packing brief	0.70
	JF	Review and edit brief in opposition to motion for sanctions	2.20
11/23/2021	ARA	Litigation Assistant: Reformat translation document (No Charge)	0.10
	ARA	Review Cervantez declaration	0.70
	ARA	Update opp to ecf 88 with exhibit titles	1.20
	ARA	Redact signed version of Silva Decl.	0.10

Re: Fresh Harvest, Fresh Foods, Rava Ranches, SMD

ARA	Review Morton declaration	0.20
ARA	Check in meeting re today's filing	0.40
ARA	Collect and update exhibits to Morton Decl.	0.50
ARA	Locate Ex 128	0.10
ARA	Build exhibits for Morton Decl.	1.10
ARA	Locate documents for Ayeesha (No Charge)	0.40
ARA	Input Morton Decl. paragraph citations into main brief for the opp to ECF 88	0.90
ARA	Call with Eve re next steps in filing	0.20
ARA	Review and collect Silva Declaration and exhibits	0.30
ARA	Add missing pages from highlighted deposition excerpts to SharePoint	0.70
ARA	Add additional message screenshots to Morton Decl. Ex. A	0.40
ARA	Confirm document origin for Cervantez declaration	0.20
ARA	Review final brief in opp to ecf 88 for Morton Decl. Exs. accuracy	0.10
ARA	Final review of Morton Decl. citations in opp to ecf 88	0.30
CKC	Review and finalize supplemental brief re Elkhorn Packing	0.20
CKC	Draft proposed order denying sanctions motion	0.40
CKC	Supervise filing of opposition to sanctions motion	1.80
CKC	Review and proof opposition to sanctions motion	0.50
CKC	Edit opposition to sanctions motion	2.30
LM	EC, CC check-in call re filing	0.40
LM	Cite check Pls' Supp. Brief re Elkhorn Packing	1.30
EC	Team Meeting re: ECF 88 filing	0.40
EC	Finalize and file opposition to ECF 88 and all supporting documents	7.80
11/24/2021 EC	Exchange email with co-counsel re: Silva deposition	0.10

Re: Fresh Harvest, Fresh Foods, Rava Ranches, SMD

11/28/2021	EC	Exchange email re: Silva deposition	0.10
11/29/2021	CKC	Telephone call with Eve Cervantez, Dawson Morton re producing David Silva for deposition, MSJ hearing	0.90
	CKC	Prepare for MSJ argument	0.80
	EC	Review Chambers copies for production (No Charge)	0.70
	EC	Telephone conference with Connie Chan and Dawson Morton re: Silva deposition and summary judgment hearing preparation and legal theories for prevailing wage	0.80
11/30/2021	CKC	Read cases cited in summary judgment reply; prepare for argument	0.40
	CKC	Read cases cited in MSJ reply	0.50
	EC	Prepare for hearings	0.30
	EC	Exchange email with opposing counsel and co-counsel re: potential Silva deposition	0.30
12/01/2021	ARA	Litigation Assistant: Code WhatsApp attachments	1.50
	CKC	Read and analyze order on motion to dismiss counterclaim	0.50
	CKC	Zoom conference with Eve Cervantez and Dawson Morton re MSJ argument and David Silva deposition	1.80
	CKC	Prepare for MSJ argument	3.50
	EC	Exchange email with co-counsel re: Silva	0.20
	EC	Review Court order on Motion to Dismiss	0.20
	EC	Review summary judgment reply	0.60
	EC	Strategy conference with Connie Chan and Dawson Morton re: summary judgment hearing preparation	1.80
12/02/2021	ARA	Litigation Assistant: Index MSJ Opp exhibits	1.00
	CKC	Prepare for MSJ argument	3.70
	EC	Exchange email with co-counsel re: Silva and summary judgment hearing preparation	0.20
12/03/2021	CKC	Prepare for MSJ argument	3.10
12/04/2021	CKC	Prepare for MSJ argument	1.50
12/05/2021	CKC	Prepare for MSJ argument	0.50
12/06/2021	ARA	Litigation Assistant: Answer quick research	

Re: Fresh Harvest, Fresh Foods, Rava Ranches, SMD

		question for Connie about 20 CFR 655.120	0.30
	CKC	Prepare for MSJ argument	8.80
	EC	Exchange email re: hearing preparation	0.10
12/07/2021	CKC	Strategy conference re MSJ argument	1.00
	CKC	Prepare for MSJ argument	2.00
	EC	Strategy conference with Connie Chan re: preparation for summary judgment hearing	1.00
12/08/2021	CKC	Prepare for MSJ argument	13.00
	EC	Telephone conference with Dawson Morton re: sanctions motion	0.40
	EC	Review Defendants' reply brief in support of sanctions motion; research same; exchange email with co-counsel re: same	1.10
12/09/2021	CKC	Argue Fresh Harvest/SMD's motion for summary judgment	2.00
	CKC	Zoom debrief of SJ hearing with Dawson Morton, Jim Finberg	0.70
	CKC	Prepare for MSJ argument	1.60
	JF	Listen to hearing re SJ schedule	2.00
	EC	Hearing on summary judgment (No Charge)	2.00
	EC	Telephone conference with Jim Finberg, Dawson Morton, Connie Chan re: summary judgment hearing (partial)	0.30
	EC	Telephone conference with Connie Chan re: summary judgment hearing (No Charge)	0.70
12/10/2021	ARA	Litigation Assistant: Code WhatsApp productions in Everlaw	0.50
	CKC	Read and analyze reply in support of sanctions motion	0.60
12/12/2021	EC	Research and draft objections to evidence in reply brief on sanctions hearing and review Defendants' reply brief to prepare for hearing	3.50
12/13/2021	ARA	Litigation Assistant: Search for missing documents related to Angel Silva	1.40
	ARA	Cite check for PL's Evidentiary Objections to D's Reply	1.50
	CKC	Strategy conference with Eve Cervantez re hearing on motion for sanctions and evidentiary objections	0.70

Re: Fresh Harvest, Fresh Foods, Rava Ranches, SMD

	CKC	Review and edit draft objections to Fresh Harvest reply evidence on sanctions motion	0.80
	CKC	Review opposition to summary judgment and supporting evidence based on hearing (No Charge)	2.00
	EC	Revise evidentiary objections; exchange email with co-counsel re: same	1.70
	EC	Telephone conference with Dawson Morton re: evidentiary objections	0.10
	EC	Telephone conference with Connie Chan re: evidentiary objections and hearing preparation	0.60
12/14/2021	EC	Prepare for sanctions hearing	4.80
12/15/2021	CKC	Review briefs for argument on motion for sanctions	0.50
	EC	Prepare for sanctions hearing	7.80
12/16/2021	ARA	Litigation Assistant: Pull urgent documents for Connie/Dawson	0.20
	CKC	Attend hearing on motion for sanctions; travel to and from	3.80
	EC	Travel to San Jose; argue at sanctions hearing; meet with Dawson Morton and Connie Chan to discuss next steps; return to San Francisco	5.00
12/27/2021	EC	Review Defendants' motion re: interlocutory appeal and exchange email with co-counsel re: same	0.50
12/28/2021	JF	Tel call with Eve re opposing 54(b) certification	0.60
	EC	Telephone conference with Jim Finberg re: strategy on Defendants' motion for interlocutory appeal	0.10
	EC	Exchange email with co-counsel re: strategy on Defendants' motion for interlocutory appeal	0.10
01/03/2022	CKC	Legal research re Rule 54(b) motion	2.40
01/04/2022	CKC	Legal research re Rule 54(b) motion	1.20
01/05/2022	CKC	Legal research re Rule 54(b) and 1292(b); draft opposition to motion	1.40
01/07/2022	ARA	Litigation Assistant: Convert Lexis citations to WL for the Opp to Rule 54(b) mot.	0.90
	CKC	Strategy conference with Eve Cervantez re opp to Rule 54(b) motion	0.30

Re: Fresh Harvest, Fresh Foods, Rava Ranches, SMD

	CKC	Telephone call with Dawson Morton re opp to Rule 54(b) motion	0.20
	CKC	Research and draft opposition to Rule 54(b) motion	4.00
	EC	Telephone conferences with Connie Chan re: responding to Defendants' Motion re: Rule 54(b) and 1292	0.30
	EC	Revise Rule 54(b) brief	1.50
01/08/2022	CKC	Draft opposition to Rule 54(b) motion	1.30
01/09/2022	EC	Draft opposition to Rule 54(b) motion	4.20
01/10/2022	ARA	Litigation Assistant: Cite check Opp to Rule 54(b) motion	2.90
	CKC	Draft proposed order denying Rule 54(b) motion	0.30
	CKC	Review legal cite check; edit and finalize opp to Rule 54(b) motion	1.20
	EC	Finalize brief and supporting documents in opposition to Rule 54(b) motion	1.50
01/13/2022	CKC	Prepare for motion to dismiss argument	3.00
	CKC	Emails re mediation, class cert deadline, discovery	0.20
01/18/2022	CKC	Read Fresh Harvest's reply in support of Rule 54(b) motion	0.20
	EC	Review Defendants' reply brief in support of 54(b) judgment	0.20
01/19/2022	EC	Exchange email with co-counsel re: settlement and class certification issues	0.10
01/20/2022	CKC	Read order denying rule 54(b) motion, granting 1292(b) certification	0.10
	EC	Review Court order granting 1292 review; research same; exchange email with co-counsel re: same; strategy conference re: same	0.90
	EC	Exchange email with co-counsel re: class certification, discovery	0.20
01/25/2022	ARA	Follow up on intake	0.30
01/26/2022	CKC	Emails re mediation	0.20
	EC	Exchange email with co-counsel re: mediation, class certification deadline	0.40
01/27/2022	EC	Exchange email with co-counsel re: mediation	0.10
01/28/2022	EC	Exchange email with co-counsel re: mediation,	

Re: Fresh Harvest, Fresh Foods, Rava Ranches, SMD

		class certification, extension of time; research re: same	0.50
01/31/2022	EC	Telephone conference with Dawson Morton re: mediation and continuance	0.40
	EC	Strategy conference with Jim Finberg and Connie Chan re: status	0.20
	EC	Review Defendant's 9th Circuit brief; research same; exchange email with co-counsel re: same	0.50
02/01/2022	CKC	Read Fresh Harvest's 1292 petition	0.30
	EC	Research and draft opposition to Defendants' Section 1292 appeal; telephone conference with Jim Finberg and Connie Chan re: same	1.00
02/03/2022	EC	Draft opposition to Section 1292 Motion	1.20
02/05/2022	EC	Draft opposition to Section 1292 Motion	6.00
02/06/2022	EC	Draft opposition to Section 1292 Motion	9.20
02/07/2022	EC	Revise Opposition to Section 1292 Motion; exchange email re: same	0.60
	EC	Exchange email with co-counsel re: mediation and extension of time	0.10
02/08/2022	ARA	Litigation Assistant: Cite check Response to Petition for Permission to Appeal Order	3.10
	CKC	Review and edit Eve Cervantez's draft response to Fresh Harvest 9th Circuit petition	0.60
	EC	Revise Opposition to Section 1292 Motion; exchange emails re: same	1.10
	EC	Exchange email with co-counsel re: stipulation and extended dates	0.10
02/09/2022	ARA	Litigation Assistant: Double check cite check for page number mistakes (No Charge)	0.50
	EC	Draft Opposition to Section 1292 Motion	1.80
02/10/2022	EC	Finalize Opposition to Section 1292 Motion	1.60
02/11/2022	EC	Revise Motion to extend deadlines for mediation and class certification	0.80
	EC	Telephone conference with Dawson Morton re: extending deadlines	0.30
	EC	Exchange email re: potential stipulation to extend time	0.20
02/14/2022	CKC	Emails re stipulation for extension of mediation, class cert deadlines	0.10

Re: Fresh Harvest, Fresh Foods, Rava Ranches, SMD

	EC	Exchange email with Dawson Morton re: mediation and extending deadlines	0.50
02/15/2022	EC	Exchange email with co-counsel re: extension of deadlines	0.40
02/16/2022	EC	Exchange email with co-counsel re: stipulation to extend time	0.20
02/17/2022	EC	Revise declaration and exchange email re: stipulation to extend time	0.90
02/19/2022	EC	Review Defendants' reply brief in support of their Section 1292 Motion	0.20
02/22/2022	CKC	Review Fresh Harvest's 9th Circuit reply in support of 1292(b) certification	0.20
	EC	Exchange email with co-counsel re: case schedule and Ninth Circuit	0.10
02/23/2022	EC	Exchange email with Ninth Circuit clerk re: bar admission (No Charge)	0.20
03/09/2022	EC	Revise discovery	0.50
	EC	Review and revise corrective notice motion and exchange email re: same	0.40
	EC	Exchange email with co-counsel re: schedule, mediation	0.30
03/10/2022	JF	Read order denying SJ	0.40
	CKC	Read order denying summary judgment	0.50
	EC	Review Court opinion denying summary judgment and draft summary of same	0.60
	EC	Exchange email with co-counsel re: discovery and next steps	0.10
03/11/2022	CKC	Email re MSJ order and class cert, mediation strategy	0.20
	EC	Exchange email re: potential 28(j) letter	0.30
03/14/2022	EC	Exchange email with co-counsel re: next steps	0.10
03/15/2022	EC	Exchange email with co-counsel re: mediation and mediators	0.30
	EC	Telephone conference with Dawson re: mediation and discovery	0.30
03/16/2022	EC	Exchange email with co-counsel re: summary judgment, mediation	0.10
03/18/2022	EC	Exchange email with co-counsel re: discovery, mediation	0.50

Re: Fresh Harvest, Fresh Foods, Rava Ranches, SMD

	EC	Telephone conference with Jim Finberg re: discovery, amending complaint	0.20
03/21/2022	CKC	Review and analyze class definition; emails with Eve Cervantez re same	0.30
	EC	Exchange email with co-counsel re: ██████████, discovery, next steps for mediation; exchange email and voice mail with opposing counsel re: mediation	0.50
03/23/2022	EC	Exchange email with co-counsel re: mediation and discovery	0.20
03/24/2022	JF	Email with Eve Cervantez and Dawson Morton re mediation, email with Hunter Hughes	0.50
	CKC	Emails re RFPs	0.10
	EC	Exchange email with co-counsel re: mediation and discovery	0.30
03/25/2022	CKC	Review draft request for deferred discovery ruling, emails re same	0.10
	EC	Revise discovery motion and exchange email re: same	0.30
	EC	Telephone conferences with Robert Mussig re: mediation	0.60
	EC	Telephone conference with Dawson Morton re: mediation and discovery	0.60
	EC	Draft email to opposing counsel re: discovery	0.40
	EC	Exchange email with co-counsel and opposing counsel re: discovery and mediation	0.80
03/29/2022	JF	Tel call with Eve Cervantez re strategy	0.20
	EC	Telephone conference with Jim Finberg re: mediation and discovery	0.20
	EC	Exchange email with co-counsel re: discovery and mediation	0.20
03/30/2022	CKC	Emails re mediation, discovery	0.20
	EC	Telephone conference with Robert Mussig	0.20
	EC	Telephone conference with Dawson Morton re: mediation	0.30
	EC	Draft email memo re: telephone conference with Robert Mussig; exchange email re: same	0.60
03/31/2022	ARA	Litigation Assistant: Check into Fresh Harvest payroll records	0.30
	CKC	Review discovery requests, strategize	

Re: Fresh Harvest, Fresh Foods, Rava Ranches, SMD

	discovery needed for mediation	0.90
CKC	Emails re conversation with Robert Mussig, mediation, outstanding discovery; review RFP set 6	0.10
CKC	Strategy conference with Eve Cervantez re status of discovery, mediation	0.50
EC	Exchange email with co-counsel re: mediation and discovery	0.50
EC	Telephone conference with Jim Finberg re: discovery and mediation	0.10
EC	Analyze pending discovery requests to determine what discovery is necessary for mediation	0.50
EC	Telephone conference with Connie Chan re: discovery needed for mediation	0.40
04/01/2022	ARA Litigation Assistant: Sort through Everlaw spreadsheet to find and pull relevant payroll documents	1.40
CKC	Review and analyze discovery needed for mediation	1.40
CKC	Telephone conference w/Eve Cervantez and Dawson Morton re mediation, outstanding discovery requests	1.20
CKC	Emails re response to Robert Mussig re mediation and discovery stay	0.20
EC	Research discovery issues	0.30
EC	Exchange email with co-counsel re: discovery and mediation	0.50
EC	Revise email to Robert Mussig	0.30
EC	Research affirmative defenses	0.20
EC	Telephone conference with Dawson Morton and Connie Chan re: mediation and discovery	1.10
04/02/2022	EC Exchange email with co-counsel re: mediation	0.10
04/04/2022	CKC Review and analyze outstanding discovery requests and responses	0.70
EC	Exchange email with opposing counsel and co-counsel re: mediation	0.40
EC	Telephone conference with Jim Finberg re: attorneys' fees, discovery (No Charge)	0.20
04/05/2022	CKC Read emails with Robert Mussig, Eve Cervantez re mediation, discovery	0.10

Re: Fresh Harvest, Fresh Foods, Rava Ranches, SMD

	CKC	Strategy conference re discovery, mediation, class cert strategy	1.00
	CKC	Review and edit motion for ruling on deferred discovery	1.00
	EC	Exchange email with opposing counsel re: mediation	0.20
	EC	Exchange email with co-counsel re: mediation, discovery	0.30
	EC	Telephone conference with Connie Chan re: mediation and discovery	0.70
	EC	Research potential mediators	0.10
04/06/2022	ARA	Litigation Assistant: Call with Connie re WhatsApp review	0.70
	ARA	Analyze payroll from Fresh Harvest [REDACTED]	3.10
	JF	Email with Eve re mediation issues	0.20
	CKC	Strategy conference with Alejandro Ashworth re reviewing documents related to meal and rest break claims	0.30
	CKC	Strategy conference with Alejandro Ashworth re estimating damage calculations	0.30
	CKC	Review Eve Cervantez's edits to motion for ruling on deferred discovery, email re scheduling mediation	0.10
	EC	Exchange email with co-counsel re: mediation and discovery needed therefore	0.10
	EC	Revise motion seeking ruling on deferred discovery	0.20
04/07/2022	ARA	Litigation Assistant: Continue compiling payroll information	5.90
	CKC	Research prevailing wage rates for damages calculations; email Alejandro Ashworth re same	0.20
	CKC	Review Alejandro Ashworth's analysis of wage rate damages calculations; emails re same	0.30
	EC	Draft email to Robert Mussig re: mediation	0.10
	EC	Strategy conference with Jim Finberg re: mediation and discovery	0.10
04/08/2022	ARA	Litigation Assistant: Reformat payroll summaries excel sheet	2.00
	ARA	Review WhatsApp messages for comments about time keeping	0.40

Re: Fresh Harvest, Fresh Foods, Rava Ranches, SMD

	CKC	Review Alejandro Ashworth's damages calculation analysis; emails re same	0.20
	EC	Analyze potential damages calculations and exchange email re: same	0.20
04/11/2022	ARA	Litigation Assistant: Review WhatsApp messages for references to time-keeping protocol/instruction	2.70
	ARA	Calculate seasons worked for each worker	0.90
	CKC	Review edits to draft request for discovery ruling, emails re same	0.20
	CKC	Review paralegal's damages analysis; emails re same	0.20
	EC	Exchange email with co-counsel re: discovery and mediation	0.20
	EC	Exchange email with co-counsel re: discovery briefing	0.20
04/13/2022	ARA	Litigation Assistant: Review WhatsApp messages for break recording instructions	2.30
04/15/2022	ARA	Litigation Assistant: Update Connie re WhatsApp review	0.20
	CKC	Strategy conference with paralegal re documents re meal and rest breaks	0.20
04/20/2022	ARA	Litigation Assistant: Review WhatsApp messages for break policies/information	3.20
	EC	Review Defendants' discovery responses and exchange email with co-counsel re: same	0.20
04/21/2022	ARA	Litigation Assistant: Review WhatsApp messages for lunch break information	3.90
	JF	read Ninth Circuit order, email re same	0.30
04/22/2022	ARA	Litigation Assistant: Review WhatsApp messages for lunch break information	3.80
04/25/2022	ARA	Litigation Assistant: Review WhatsApp messages for lunch break information	2.20
	CKC	Read Van Kerulen's order on request for discovery ruling	0.10
	CKC	Emails re Van Keulen order, mediation, discovery meet and confer	0.10
04/26/2022	EC	Review discovery responses and exchange email with co-counsel re: meet and confer needed re: same	0.20
	EC	Exchange email with co-counsel re: mediation	0.20

Re: Fresh Harvest, Fresh Foods, Rava Ranches, SMD

04/28/2022	CKC	Review Fresh Foods' response to RFP set 3	0.10
04/29/2022	CKC	Telephone call with Dawson Morton re preparing for discovery meet and confer with Fresh Harvest	0.90
	CKC	Zoom meet and confer with Robert Mussig, Ian Michalak, Dawson Morton re outstanding discovery	0.70
	CKC	Telephone call with Dawson Morton re follow-up to discovery meet and confer	0.30
	CKC	Review ECF 77-1, emails to prepare for discovery meet and confer	0.40
	CKC	Review and edit discovery meet and confer letter	0.80
05/02/2022	ARA	Litigation Assistant: Review WhatsApp audio files for references to break policy	3.10
	CKC	Draft stipulation and proposed order re joint discovery statements; emails re same	0.70
	EC	Exchange email with co-counsel re: discovery, mediation	0.10
05/03/2022	ARA	Litigation Assistant: Review WhatsApp audio files for scheduling/break policies	1.30
05/04/2022	ARA	Litigation Assistant: Review WhatsApp audio files for scheduling and break policies/instructions	0.90
	EC	Review mediator requirements	0.10
05/05/2022	CKC	Emails re discovery, mediation strategy	0.20
	EC	Exchange email with co-counsel re: discovery, mediation	0.20
05/06/2022	CKC	Emails re discovery disputes and preparing joint discovery statement	0.40
	EC	Exchange email with co-counsel re: discovery	0.20
05/09/2022	CKC	Telephone call with Dawson Morton, Eve Cervantez re Fresh Harvest discovery statement	0.50
	CKC	Edit stipulated request for extension to file discovery statement; emails re same	0.50
	EC	Review opposing counsel email, exchange email with co-counsel re: same	0.70
	EC	Telephone conference with Connie Chan and Dawson Morton re: discovery, mediation	0.40
05/10/2022	CKC	Telephone call with Dawson Morton and Eve Cervantez re discovery and mediation	0.60

Re: Fresh Harvest, Fresh Foods, Rava Ranches, SMD

	CKC	Edit Dawson Morton's draft meet and confer letter	1.00
	CKC	Emails re mediation	0.10
	EC	Exchange email with co-counsel re: discovery stay	0.40
	EC	Team call	0.60
	EC	Draft email to opposing counsel re: mediation	0.40
05/11/2022	CKC	Emails re mediation and possible stipulation to stay discovery pending mediation	0.10
	EC	Revise and draft email to opposing counsel	0.30
05/12/2022	EC	Revise email to opposing counsel; exchange email with co-counsel	0.10
05/13/2022	ARA	Upload FHI documents to Everlaw (No Charge)	0.10
	ARA	Review WhatsApp audio files for discussion of break (policy)	0.90
	CKC	Review document production from Fresh Harvest	0.10
	EC	Telephone conference with Connie Chan re: next steps	0.20
05/16/2022	CKC	Zoom call w/Robert Mussig, Ana Toledo, Dawson Morton re mediation and discovery stay	0.70
05/18/2022	EC	Exchange email with co-counsel re: discovery, mediation	0.50
05/19/2022	ARA	Litigation Assistant: Review WhatsApp audio files	1.20
	CKC	Review Ana Toledo's draft stipulation to extend class cert briefing schedule; emails re same	0.10
	EC	Exchange email with co-counsel re: stipulation to extend dates and stay discovery	0.10
05/20/2022	CKC	Emails re stipulation, discovery, mediation	0.20
	EC	Review draft stipulation to extend class cert and stay discovery and exchange email with co-counsel re: same	0.20
05/23/2022	CKC	Emails re joint filing on motion to compel	0.10
	EC	Draft stipulation to postpone discovery	0.70
05/24/2022	EC	Exchange email with co-counsel re: mediation	0.10
05/25/2022	EC	Email with co-counsel re: mediation and fee	

Re: Fresh Harvest, Fresh Foods, Rava Ranches, SMD

		split	0.10
05/29/2022	EC	Exchange email with co-counsel re: mediation	0.10
06/09/2022	ARA	Litigation Assistant: Reformat SMD WhatsApp index	0.20
06/13/2022	EC	Exchange email with co-counsel re: ex parte contact with Gustavo	0.10
06/14/2022	EC	Exchange email re: retaliation, release	0.20
06/16/2022	CJS	Litigation Assistant: Review translation from Spanish to English re: DECLARATION OF GUSTAVO LUEVANO VACA (No Charge)	0.50
	EC	Exchange email re: defendants' contact with Gustavo	0.10
	REW	Litigation Assistant: Emails exchanged with Connie Chan regarding translation of Gustavo Luevano declaration into English	0.40
	REW	Translation of Gustavo Luevano declaration from Spanish to English	2.60
	CKC	Review draft Luevano-Vaca declaration re agents	0.10
06/17/2022	EC	Exchange email re: motion for protective order	0.30
	REW	Litigation Assistant: Translation of new reviewed version of Gustavo Luevana declaration from Spanish into English	2.10
06/18/2022	EC	Exchange email re: motion for protective order	0.10
06/20/2022	EC	Review draft motion for protective order and exchange email re: same	0.30
06/21/2022	EC	Telephone conferences with Dawson Morton re: motion for protective order	0.50
06/22/2022	EC	Exchange email re: motion for protective order	0.10
06/23/2022	EC	Strategy conference with Connie Chan re: motion for protective order	0.20
	EC	Revise motion for protective order	0.20
	EC	Telephone conference with Dawson Morton re: motion to protect class	0.50
	CKC	Review Dawson Morton's draft motion for protective order	0.20
06/24/2022	EC	Telephone conference with Annie Kors re: legal research needed for motion for protective order	0.10

Re: Fresh Harvest, Fresh Foods, Rava Ranches, SMD

	EC	Revise motion for protective order	4.50
	AHK	Law Clerk: Research cases showing courts' inherent authority to enforce ethical rules for attorney conduct and to enforce its own orders (No Charge)	3.50
06/25/2022	EC	Revise motion for protective order	3.00
06/26/2022	EC	Revise motion for protective order; exchange email re: same; check rules re: same	0.60
06/27/2022	EC	Revise Motion for Protective Order and supporting documents	4.90
	EC	Strategy conference with Ray and Bella re: cite check (No Charge)	0.20
	EC	Telephone conference with Dawson Morton re: Motion for Protective Order	0.10
	EC	Telephone conference with Ray re: cite check (No Charge)	0.20
	REW	Litigation Assistant: Strategy meeting with Eve Cervantez re: cite check of motion for protective order	0.30
	REW	Cite check of motion for protective order	6.50
	JKS	Check citations for Mot. for Protection	6.50
	CKC	Review draft motion for protective order; email re same	0.40
06/28/2022	EC	Draft and Revise Motion for Protective Order and all supporting documents	8.80
	EC	Telephone conferences with Connie Chan re: Motion for Protective Order and need to seal	0.50
	EC	Telephone conference with Dawson Morton re: Motion for Protective Order and need to seal	0.40
	REW	Litigation Assistant: Cite check of motion for protective order	1.30
	JKS	Paralegal: Check cites for revised Mot. for Protection	1.60
	JKS	Highlight exhibits and declarations for redaction	1.00
	CKC	Review draft motion for protective order, oversee filing	1.20
	CKC	Research and draft sealing motion for motion for protective order, oversee redactions	2.20
06/29/2022	EC	Oversee preparation of courtesy copies (No Charge)	0.50

Re: Fresh Harvest, Fresh Foods, Rava Ranches, SMD

	EC	Review Defendants' demand letter re: consideration pay back and evidence; exchange email with co-counsel re: same	0.50
	CKC	Read letter demanding repayment	0.10
06/30/2022	EC	Exchange email re: research, consideration, review research memo	1.20
	EC	Telephone conference with Kevin Vazquez re: legal research needed re: repayment of consideration	0.40
	EC	Strategy conference re: repayment of consideration	0.30
	EC	Telephone conference with Connie Chan and Dawson Morton re: evidence in support of protective order	0.50
	REW	Litigation Assistant: Strategy meeting with Connie Chan re: video translations	0.40
	REW	Video translations from Spanish to English	1.00
	CKC	Emails re Fresh Harvest demand for repayment, resulting research	0.20
	CKC	Strategy conference with Ray Wenzell re case background, translation project for protective order motion	0.40
	KRV	Law Clerk: Research/memo returning consideration for illegal contract	7.20
07/01/2022	CKC	Edit email response to Ian Michalak re: documents supporting motion for protective order	0.50
	CKC	Emails re: motion for protective order documents	0.20
	REW	Litigation Assistant: Gustavo Luevano video translation and write up of transcript	4.50
	KRV	Law Clerk: Drafting response to demand letter	2.80
07/02/2022	CKC	Review and edit Kevin Vasquez's letter responding to demand for repayment	0.20
07/03/2022	EC	Revise letter re: return of consideration	0.40
07/04/2022	EC	Revise letter re: return of consideration	0.50
07/05/2022	CKC	Read Fresh Harvest opposition to motion to shorten time	0.10
	CKC	Emails re: responding to false statements in Fresh Harvest's opposition to motion to shorten time	0.10

Re: Fresh Harvest, Fresh Foods, Rava Ranches, SMD

	CKC	Review Ray Wenzell's transcription notes of video re: Palomo visit to Gustavo	0.10
	EC	Review Order on protective order, exchange email with co-counsel re: same; timing	0.70
	EC	Review Defendants' response re: extension of time; revise emails; exchange email re: same	0.60
	EC	Strategy conference with Kevin Vasquez re: letter re: return of consideration (No Charge)	0.10
	EC	Finalize return of consideration letter	0.30
	REW	Litigation Assistant: Email re: Gustavo Luevano video translations, with attached translations, to Eve Cervantez and Connie Chan	0.20
07/06/2022	EC	Revise emails to opposing counsel; exchange email with Dawson Morton re: protective order and evidence	0.90
07/07/2022	EC	Exchange email with co-counsel re: video, protective order, mediation discovery	0.20
07/12/2022	CKC	Emails re: motion for protective order informal discovery	0.10
07/15/2022	CKC	Strategy conference with Aaron Kelley re: case background, reply in support of motion for protective order, mediation brief	0.50
	CKC	Organize background materials for Aaron Kelley, email re: same	0.30
	AMK	Law Clerk: Call with attorneys to discuss background and necessary prep work for helping draft reply brief	0.70
07/18/2022	EC	Exchange email with co-counsel re: reply in support of protective order	0.40
	EC	Review arbitration agreements; exchange email with co-counsel re: same	0.40
	EC	Review discovery and damages analysis; follow up re: missing discovery	0.60
	REW	Litigation Assistant: Research on Judge Freeman rules on briefs (No Charge)	0.20
	CKC	Review Fresh Foods payroll data production	0.20
	AMK	Law Clerk: Read through docket entries to orient to case and prepare for drafting reply brief (No Charge)	3.60
07/19/2022	EC	Prepare to draft reply in support of protective order	0.30

Re: Fresh Harvest, Fresh Foods, Rava Ranches, SMD

	EC	Telephone conference with Aaron Kelly re: reply brief in support of protective order	0.30
	REW	Litigation Assistant: Distribute finished translations of Gustavo Luevano's videos	0.40
	AMK	Law Clerk: Continue reviewing docket entries and discovery in preparation for drafting reply brief (No Charge)	2.00
07/20/2022	EC	Exchange email with co-counsel re: mediation, discovery, mediation brief	0.40
	EC	Draft email to opposing counsel re: mediation discovery needed	0.20
	EC	Review and analyze arbitration agreements	0.20
	REW	Litigation Assistant: Search for Gustavo Luevano's arbitration agreement and translate it	1.50
	AMK	Law Clerk: Continue reviewing docket entries to prepare for drafting reply brief on motion for protective order (No Charge)	0.40
07/21/2022	EC	Exchange email re: translation of video, arbitration agreements	0.10
	EC	Telephone conference with Aaron Kelly re: reply brief in support of motion for protective order	0.40
	EC	Review defendants' opposition brief, exchange email re: responding to same; draft reply brief	2.30
	REW	Litigation Assistant: Translate Gustavo Luevano's video transcripts into Spanish and distribute	1.00
	AMK	Law Clerk: Read through opposition to motion for protective order, call to discuss reply brief, begin drafting reply brief	4.70
07/22/2022	EC	Telephone conferences with Ray Wenzell re: videos	0.30
	EC	Telephone conference with Aaron Kelly re: reply brief in support of protective order	0.70
	EC	Draft reply brief in support of protective order; exchange email re: same	2.80
	EC	Telephone conference with Dawson Morton re: reply in support of protective order	0.60
	REW	Litigation Assistant: Gathering and distribution of videos and documents for identification of man in Gustavo Luevano videos	1.40

Re: Fresh Harvest, Fresh Foods, Rava Ranches, SMD

	REW	Updated translation of Gustavo Luevano videos and comparison of translations with that of defendants	6.10
	AMK	Law Clerk: Drafting reply brief ISO motion for protective order	9.40
07/23/2022	EC	Draft reply brief in support of motion for protective order	3.70
07/24/2022	EC	Draft reply brief in support of motion for protective order; exchange email re: same	0.60
	EC	Exchange email with opposing counsel and co-counsel re: outstanding discovery needed for mediation	0.10
	AMK	Law Clerk: Continuing to draft reply brief ISO motion for protective order	3.00
07/25/2022	EC	Draft reply brief in support of protective order; emails re: same	2.60
	EC	Telephone conference with Ray re: deposition evidence for reply brief in support of protective order	0.10
	EC	Draft reply brief in support of motion for protective order	0.50
	REW	Litigation Assistant: Research for brief. Look through Ridaura, Ramos, and Mendivil depositions for relevant information	6.50
	REW	Compare defendant's translations of plaintiff's videos with ours	0.50
	AMK	Law Clerk: Continue drafting/revising reply brief ISO motion for protective order, and perform related research for legal authority to cite on applicability of ethical rules	8.20
07/26/2022	EC	Draft reply brief in support of protective order and supporting documents; exchange email re: same	3.70
	REW	Litigation Assistant: Translation of distorted audio in Gustavo Luevano videos	0.20
	AMK	Law Clerk: Continuing to revise reply brief ISO motion for protective order and begin compiling related exhibits	5.00
07/27/2022	EC	Draft and finalize reply brief in support of motion for protective order and all supporting documents; exchange email re: same	7.30
	EC	Telephone conference with Ray Wenzell re: reply brief and declarations	0.10
	EC	Telephone conference with Dawson Morton re:	

Re: Fresh Harvest, Fresh Foods, Rava Ranches, SMD

		reply brief	0.10
	REW	Litigation Assistant: Calls with Eve Cervantez, Aaron Kelley, and staff to coordinate for brief filing (No Charge)	0.30
	REW	Research and compiling documents for brief	2.00
	REW	Brief cite check	5.10
	AMK	Law Clerk: Finish revising reply brief ISO motion for protective order and coordinate with team re: related exhibits	4.60
07/28/2022	JF	Read motion for protective order papers (No Charge)	2.30
	EC	Telephone conference with Aaron Kelly re: mediation brief	0.30
	EC	Exchange email with co-counsel re: mediation brief	0.20
	REW	Gather, distribute, and examine truck driver pay roll and paper time records	0.70
	AMK	Law Clerk: Continuing to read through docket entries to prepare to draft reply brief ISO motion for protective order (No Charge)	0.30
	AMK	Review sample mediation briefs and call (.3) with Eve to discuss work process	1.10
	AMK	Reviewing recent pay-data discovery produced by Defendants after email about production	0.20
07/30/2022	EC	Exchange email re: discovery, mediation	0.10
08/01/2022	CKC	Review Fresh Harvest opposition to motion for protective order	0.30
	CKC	Review reply in support of motion for protective order	0.20
	CKC	Strategy conference re: mediation brief	0.50
	AMK	Law Clerk: Compiling general outline of mediation brief, team call with Eve and Connie to discuss (.6), and drafting body of brief	6.10
	EC	Telephone conference with Aaron Kelly, Connie Chan re: mediation brief	0.30
	EC	Exchange email with co-counsel re: discovery, damages, mediation	0.20
	EC	Revise mediation brief outline	0.50
	REW	Litigation Assistant: Look through and compare truck driver pay records and time records	2.10

Re: Fresh Harvest, Fresh Foods, Rava Ranches, SMD

08/02/2022	CKC	Review Aaron Kelley's outline of mediation brief; emails re: same	0.20
	AMK	Law Clerk: Drafting mediation brief	5.10
	EC	Exchange email with co-counsel re: outstanding discovery and mediation	0.40
08/03/2022	CKC	Telephone call with Dawson Morton re: mediation brief and expert calculations	0.50
	AMK	Law Clerk: Drafting mediation brief	4.40
	EC	Exchange email with co-counsel re: mediation and discovery	0.10
08/04/2022	CKC	Review and analyze damages calculations for mediation brief	0.50
	CKC	Review and edit Aaron Kelley's draft mediation brief	0.50
	AMK	Law Clerk: Continue drafting mediation brief	5.80
	EC	Exchange email with co-counsel re: damages, mediation	0.30
	EC	Revise mediation brief; exchange email re: same	0.60
	REW	Litigation Assistant: Download pay records sent by opposing counsel and save in SharePoint (No Charge)	0.50
08/05/2022	CKC	Strategy conference with Aaron Kelley, Eve Cervantez re: mediation brief	0.40
	AMK	Law Clerk: Call to discuss edits to mediation brief draft	0.30
	AMK	Revising mediation brief draft	6.00
	EC	Telephone conference with Jim Finberg and Dawson Morton re: mediation strategy	0.80
	EC	Draft mediation brief	0.20
	EC	Telephone conference with Aaron Kelly and Connie Chan re: mediation brief	0.40
	EC	Telephone conference with Jim Finberg re: mediation strategy	0.10
	EC	Telephone conference with Connie Chan re: mediation	0.10
	EC	Exchange email with co-counsel re: mediation, fees, discovery	0.10
	JF	Tel call with Eve and Dawson Morton re damages, strategy, and mediation	0.60

Re: Fresh Harvest, Fresh Foods, Rava Ranches, SMD

08/06/2022	EC	Draft mediation brief	4.00
08/08/2022	AMK	Law Clerk: Revising and adding to draft of mediation brief	6.90
08/09/2022	EC	Exchange email with co-counsel and opposing counsel re: mediation	0.30
	EC	Draft mediation brief	3.70
	EC	Prepare for hearing on motion for protective order	2.50
08/10/2022	EC	Draft mediation brief	0.20
	EC	Prepare for hearing on motion for protective order	3.50
	CKC	Review Aaron Kelley's draft mediation brief	0.30
08/11/2022	EC	Prepare for hearing on motion for protective order	0.60
	EC	Hearing on motion for protective order	1.40
	EC	Telephone conference with Dawson Morton and Connie Chan re: protective order and mediation	0.50
	EC	Research and draft mediation brief and exchange email	3.80
	JF	Listen to hearing on motion for protective order (No Charge)	1.70
	REW	Litigation Assistant: Document analysis of SMD truck driver time records	5.30
	CKC	Attend hearing on motion for protective order	0.70
	JKS	Paralegal: Call with Dawson Morton re: data analysis needs	0.30
	JKS	Develop SMD data analysis	6.10
08/12/2022	EC	Revise mediation brief	0.70
	EC	Exchange email re: mediation brief and damages	0.70
	EC	Telephone conference with Connie Chan re: mediation brief	0.10
	EC	Telephone conference with Dawson Morton re: mediation	0.20
	REW	Litigation Assistant: SMD truck driver time records document analysis	6.50
	CKC	Draft mediation brief; emails re same	4.00

Re: Fresh Harvest, Fresh Foods, Rava Ranches, SMD

	JKS	Paralegal: Call with Rodolphe Camsat re: SMD data analysis (troubleshooting pivot table) (No Charge)	0.60
	JKS	Call with Dawson Morton re: SMD data analysis (No Charge)	0.30
	JKS	SMD Data analysis	9.20
	JKS	Exchange emails with Dawson Morton re: SMD data analysis	1.50
08/13/2022	EC	Draft mediation brief	4.50
	JKS	Paralegal: Draft email to Dawson Morton responding to thoughts and questions re: SMD Data analysis	1.40
	JKS	Review Fresh Harvest data set	0.90
	JKS	Exchange em. with Eve Cervantez re: timing and needs for analyses and plan for weekend work/Monday deadline (No Charge)	0.50
	JKS	Exchange emails with Eve Cervantez re: data analysis project	0.40
	JKS	Develop SMD 2018 pay data analysis	3.60
	JKS	Develop FH pay data analysis	0.70
08/14/2022	EC	Review damages analysis and exchange email with co-counsel re: same	0.70
	CKC	Review draft mediation brief; emails re same	0.20
	JKS	Paralegal: Develop Fresh Harvest pay data analysis	5.10
	JKS	Exchange emails with Dawson Morton	1.00
	JKS	Draft and send email to Fresh Harvest team with updates re: analysis	0.80
	JKS	Email Rodolphe Camsat re; questions re: SMD analysis (No Charge)	0.40
08/15/2022	EC	Draft mediation brief and exchange email re: same and damages	4.20
	REW	Litigation Assistant: Mediation Brief cite check	6.00
	CKC	Edit draft mediation brief	0.70
	JKS	Paralegal: Develop SMD analysis for pay data from 2016-2022	11.90
	JKS	Exchange emails with Dawson Morton re: SMD data analyses	0.70
08/16/2022	EC	Draft mediation brief and exchange email re:	

Re: Fresh Harvest, Fresh Foods, Rava Ranches, SMD

		same and damages	3.10
	EC	Exchange email re: agenda, intakes, joint discovery statement	0.40
	EC	Telephone conferences with Dawson Morton re: mediation brief and damages	0.20
	JF	Email with Eve Cervantez re mediation strategy	0.30
	REW	Litigation Assistant: Mediation Brief cite check	10.40
	JKS	Paralegal: Develop SMD and Fresh Harvest pay data analyses	9.10
	JKS	Call with Dawson Morton re: Fresh Harvest and SMD analyses	0.30
	JKS	Call with Rodolphe Camsat re: data analysis (No Charge)	1.40
08/17/2022	EC	Finalize mediation brief and exchange email re: same	2.70
	EC	Telephone conference with Dawson re: mediation	0.10
	EC	Review Fresh Foods mediation brief and exchange email re: same	0.70
	EC	Revise confidential side letter to mediator and exchange email re: same	0.40
	JF	Email with Eve Cervantez re mediation issues, read mediation statements	1.40
	JKS	Paralegal: Develop SMD and Fresh Harvest analyses	9.70
	JKS	Call with Rodolphe Camsat re: data analysis (No Charge)	0.40
	JKS	Phone call with Dawson Morton re: data analysis	0.20
	JKS	Exchange em. with Dawson Morton re: Fresh Harvest data	0.40
08/18/2022	EC	Prepare for mediation	1.40
	EC	Exchange email re: side letter, damages	0.50
	EC	Prepare draft MOU	1.70
	EC	Telephone conference with Jim Finberg re: mediation	0.10
	JF	Email and calls with Eve Cervantez re mediation positions and strategy	1.10

Re: Fresh Harvest, Fresh Foods, Rava Ranches, SMD

	CKC	Read Fresh Foods' mediation brief	0.20
	CKC	Emails re: mediation brief and exposure analysis	0.10
	CKC	Emails re: mediation and opening demand; prepare for mediation	0.40
	CKC	Analyze Fresh Foods' mediation brief	0.30
	JKS	Paralegal: Call with Dawson re: analysis	0.10
	JKS	Develop Fresh Harvest data analysis	3.20
	JKS	Meet w Rodolphe Camsat re: simple interest calculations for Fresh Harvest data analysis (No Charge)	0.40
08/19/2022	EC	Travel to and participate in mediation	13.00
	JF	Telephone calls with Eve Cervantez and Connie Chan re mediation strategy	1.30
	CKC	Attend mediation; travel to and from	12.50
	JKS	Paralegal: Develop Fresh Harvest analysis	1.00
	JKS	Exchange email with Dawson Morton re: simple interest calculations for SMD analyses	0.40
08/22/2022	EC	Review and analyze Court Order on protective order	0.20
	EC	Exchange email with co-counsel re: protective order	0.30
	EC	Draft protective order	0.90
	EC	Telephone conference with Jim Finberg re: potential settlement	0.20
	EC	Exchange email with defense counsel re: protective order	0.50
08/23/2022	EC	Telephone conference with Dawson Morton re: protective order	0.10
	EC	Exchange email with defense counsel re: protective order	0.20
	EC	Exchange email with and telephone conference with Law 360 reporter (No Charge)	0.20
	EC	Analyze mediator proposal and exchange email re: same	0.60
	JF	Email re mediator's proposal	0.80
	JKS	Paralegal: Review and reply to email from Eve Cervantez re: Fresh Harvest victory	0.30
08/24/2022	EC	Telephone conference with Dawson Morton re:	

Re: Fresh Harvest, Fresh Foods, Rava Ranches, SMD

		mediator's proposal	0.40
	EC	Exchange email with defense counsel re: protective order	0.20
	EC	Exchange email with co-counsel re: mediator's proposal	0.70
	EC	Zoom with Dawson Morton, Santos Gomez, Connie Chan re: mediator's proposal	0.50
	EC	Revise and file Protective Order	0.30
	JF	Email re settlement terms	0.60
	CKC	Video conference with co-counsel re mediator's proposal	0.60
	CKC	Analyze mediator's proposal; emails re same	0.20
08/25/2022	EC	Exchange email with co-counsel re: mediator's proposal and email to mediator	0.50
08/26/2022	EC	Telephone conferences with Jeff Krivis and Dawson Morton (.3), then Dawson Morton (.2), then draft email re: same (.2)	0.70
	EC	Exchange email re: mediation, case schedule	0.10
08/29/2022	EC	Review information from mediator and exchange email with co-counsel re: same	0.20
08/30/2022	CKC	Emails re: mediator's proposal and revised workweek and employee numbers	0.20
09/01/2022	EC	Exchange email with co-counsel re: discovery dispute and next steps	0.20
09/02/2022	EC	Exchange email re: stipulation to extend time to file discovery dispute letter	0.10
09/06/2022	CKC	Review draft stip re: joint discovery statement extension	0.10
09/07/2022	CKC	Review order on stipulation to extend time to file discovery statement	0.10
09/08/2022	EC	Exchange email with co-counsel re: mediation timing	0.10
	CKC	Emails re following up with Krivis on defendants' workweek data	0.10
09/14/2022	EC	Analyze data and exchange email with co-counsel re: mediation and response to mediator	1.10
	CKC	Telephone call with Dawson Morton re email to mediator re additional data needed	0.10
	CKC	Review mediator's proposal, emails re same, analysis of settlement workweek data	0.80

Re: Fresh Harvest, Fresh Foods, Rava Ranches, SMD

09/19/2022	EC	Analyze new data and mediator's proposal	0.60
	JKS	Paralegal: Send Eve requested information re: total workweek calculations	0.20
09/20/2022	EC	Review new information and exchange email re: same	0.30
09/21/2022	EC	Exchange email re: mediator proposal	0.20
	EC	Strategy conference with Connie Chan re: settlement and approach to mediator's proposal	0.30
	EC	Telephone conference with Dawson, Santos, Connie re: mediator's proposal	0.50
	EC	Exchange email with Jim Finberg re: settlement	0.10
	JF	Email with Eve Cervantez about settlement talks	0.50
	CKC	Strategy conference with Eve Cervantez re mediator's proposal and new data from defendants	0.40
	CKC	TC w/co-counsel re mediator's proposal	0.50
09/22/2022	EC	Research and analyze settlement scenarios; Exchange email with co-counsel re: settlement	1.20
	EC	Telephone conference with Dawson Morton re: preparation for call with Krivis	0.20
	EC	Telephone conference with Mediator Krivis, Dawson Morton, Connie Chan	0.30
	EC	Telephone conference with Dawson Morton and Connie Chan re: mediation	0.30
	EC	Analyze numbers and exchange email re: same	0.20
	CKC	TC w/Jeff Krivis re mediator's proposal	0.30
	CKC	TC w/Dawson Morton re mediator's proposal	0.30
	CKC	SC w/Eve Cervantez re mediator's proposal	0.40
09/23/2022	EC	Telephone conference with Dawson Morton and Connie Chan re: email to mediator's proposal	0.40
	CKC	TC w/Eve Cervantez and Dawson Morton re mediator's proposal	0.40
	CKC	Analyze payroll data, damages calculation, evaluate mediator's proposal and what additional information needed	1.00
	JKS	Paralegal: Exchange email with and send data analyses to Connie Chan	0.40

Re: Fresh Harvest, Fresh Foods, Rava Ranches, SMD

09/26/2022	EC	Telephone conference with Mediator Krivis, Dawson Morton, Connie Chan	0.30
	EC	Telephone conference with Dawson Morton re: next steps	0.10
	EC	Revise settlement email	1.30
	CKC	Telephone call with mediator Krivis, Dawson Morton, Eve Cervantez re revisions to mediator's proposal	0.40
	CKC	Emails re email to Krivis to share with defendants re modified mediator's proposal	0.30
09/28/2022	EC	Draft email to mediator and exchange email with co-counsel	0.50
	EC	Telephone conference with Dawson Morton and Connie Chan	0.20
	JF	Email re mediation strategy	0.30
	CKC	Telephone call with Eve Cervantez, Dawson Morton re mediator's proposal	0.20
09/29/2022	EC	Exchange email with Dawson re: stipulation to continue discovery dispute	0.10
10/01/2022	EC	Zoom mediation and post-mediation telephone conference with Dawson Morton	2.50
	CKC	Zoom mediation with Jeff Krivis	2.20
10/02/2022	EC	Research and draft email to Mediator Krivis	1.80
10/03/2022	EC	Exchange email with co-counsel re: response to mediator and revise response to mediator	2.20
	EC	Telephone conference with Mediator Krivis	0.30
	JF	Email re settlement talks	0.40
	CKC	Review draft email to Jeff Krivis re: modifying mediator's proposal; emails re: same	0.20
	CKC	Review draft email to Jeff Krivis re modifying mediator's proposal; emails re same	0.20
10/04/2022	EC	Exchange email with co-counsel and opposing counsel re: settlement issues	0.90
	EC	Telephone conference with Mediator Krivis	0.10
	EC	Telephone conference with Rob Mussig re: settlement	0.20
	CKC	Emails with Eve and Dawson re communications to Ana Toledo, Jeff Krivis re offset	0.10

Re: Fresh Harvest, Fresh Foods, Rava Ranches, SMD

		██████████ ██████████	0.30
10/12/2022	EC	Research credit for attorneys' fees and exchange email re: same	0.10
	EC	Telephone conference with Mediator Krivis	0.20
	EC	Telephone conference with Connie Chan and Dawson Morton	0.30
	EC	Exchange email with co-counsel re: next steps	0.30
	EC	Telephone conference with Jim Finberg re: settlement	0.10
	CKC	Telephone call with Eve Cervantez and Dawson Morton re revised mediator's proposal	0.40
10/13/2022	EC	Telephone conference with Connie Chan re: mediator's proposal	0.10
	EC	Telephone conference with Jeff Krivis re: mediator's proposal	0.10
	EC	Telephone conference with Dawson Morton re: mediator's proposal	0.50
	EC	Exchange email and texts with co-counsel and mediator re: mediator's proposal and PAGA release	0.80
	CKC	Emails re mediator's proposal, PAGA release	0.30
	CKC	SC re PAGA release	0.10
10/14/2022	EC	Draft stipulation to continue discovery deadlines	0.70
	EC	Research PAGA release issues and exchange email with Dawson Morton re: same	1.20
	EC	Exchange email with opposing counsel re: stipulation to continue	0.10
	EC	Prepare for telephone conference with opposing counsel	0.20
	EC	Telephone conference with Rob Mussig re: settlement	0.50
10/17/2022	EC	Exchange email with mediator re: PAGA release	0.10
	EC	Telephone conference with mediator re: PAGA release	0.20
	EC	Research and draft email to Rob Mussig re: PAGA release	1.50
	CKC	Emails re PAGA settlement	0.20

Re: Fresh Harvest, Fresh Foods, Rava Ranches, SMD

	CKC	Read Eve Cervantez's draft email to Rob re PAGA release	0.10
10/18/2022	EC	Review court order extending discovery cut-off	0.10
	EC	Exchange email with mediator re: PAGA release problem	0.10
10/19/2022	EC	Text with mediator and email with co-counsel re: PAGA issue	0.10
	EC	Review and analyze email from Mussig re: PAGA release and exchange email with co-counsel re: same	0.70
	EC	Review defendants' cases and exchange email re: same	0.70
10/20/2022	EC	Telephone conference with Jim Finberg re: PAGA issue	0.10
	EC	Telephone conference with Dawson Morton re: PAGA issues	0.20
	JF	Tel call with Eve Cervantez re settlement issues, email re same	0.40
10/21/2022	EC	Telephone conference with Dawson Morton re: settlement	0.40
	EC	Research and draft email to opposing counsel re: PAGA settlement	1.30
10/22/2022	EC	Draft email to opposing counsel	0.20
10/25/2022	EC	Exchange email with co-counsel re: settlement	0.10
10/26/2022	EC	Exchange email with mediator	0.10
10/27/2022	EC	Exchange email with mediator and co-counsel	0.20
10/31/2022	EC	Exchange email with opposing counsel and co-counsel re: settlement and PAGA release; draft stipulation and order vacating dates and setting dates for preliminary approval	1.50
	JF	Email re settlement	0.60
	CKC	Emails re PAGA agreement on settlement	0.10
11/01/2022	EC	Exchange email with co-counsel re: mediator invoice	0.10
	CKC	Review draft stipulation re: settlement; email defense counsel re: same	0.20
11/03/2022	EC	Review Fresh Harvest revisions to proposed stip and order vacating dates; revise stip and order; exchange email with co-counsel and opposing counsel re: same	0.40

Re: Fresh Harvest, Fresh Foods, Rava Ranches, SMD

	CKC	Review Robert Mussig's edits to draft stipulation and proposed order re: settlement	0.60
11/04/2022	EC	Revise and file stipulation re: settlement; exchange email with opposing counsel and co-counsel re: same	0.40
11/15/2022	EC	Exchange email with opposing counsel re: long form settlement agreement	0.10
	EC	Exchange email with co-counsel re plan of allocation and preliminary approval brief	0.10
11/17/2022	EC	Exchange email with opposing counsel re: settlement agreement	0.10
	EC	Exchange email with co-counsel re: settlement agreement and mediator fees	0.10
11/18/2022	EC	Revise settlement agreement	3.00
11/19/2022	EC	Revise settlement agreement and exchange email with co-counsel re: same	2.00
11/20/2022	EC	Revise settlement agreement and exchange email with co-counsel re: same	1.70
11/21/2022	EC	Revise settlement agreement; exchange email re: same and costs	1.00
	CKC	Review draft long-form settlement, emails with Eve Cervantez re: areas in dispute, analysis of released parties language	0.50
	CKC	Analyze payroll data for proposed plan of allocation	1.00
11/22/2022	EC	Exchange email with co-counsel re: settlement agreement	0.40
11/28/2022	EC	Revise Settlement Agreement; exchange email with co-counsel re: same	2.20
11/29/2022	EC	Exchange email re: Settlement Agreement	0.40
	EC	Exchange email with potential claims administrator	0.10
	EC	Telephone conferences with Dawson Morton re: settlement	1.10
	EC	Revise Settlement Agreement	0.50
	CKC	Emails re: plan of [REDACTED]	0.10
	CKC	Emails re: disputed terms of long-form settlement	0.10
11/30/2022	EC	Revise settlement agreement and exchange email with co-counsel re: same	2.90

Re: Fresh Harvest, Fresh Foods, Rava Ranches, SMD

	EC	Telephone conference with Emanuel Waddell re: research needed	0.40
	CKC	Review draft settlement and settlement allocation plan; analyze payroll data	1.50
	EAW	Strategy conference re: settlement agreement	0.50
12/01/2022	CKC	Emails with Eve Cervantez and Dawson Morton re: allocation plan and AWPA payments; analysis of payroll data and release payment data	0.70
	EC	Revise settlement agreement and exchange email with co-counsel re: same	0.30
	EC	Telephone conference with Dawson Morton re: settlement	0.10
	EC	Revise settlement and exchange email with co-counsel re: same	2.30
	EAW	Legal research re: ██████████	2.10
12/02/2022	CKC	Emails re: schedule for moving for preliminary approval	0.10
	EC	Revise settlement agreement and exchange email with co-counsel re: same	3.00
	EAW	Legal research re: ██████████	2.20
12/03/2022	JF	Review settlement agreement, email with Eve Cervantez	0.80
	EC	Revise settlement agreement and exchange email with opposing counsel and co-counsel re: same	1.60
	EC	Review bid from claims administrator and exchange email re: same	0.20
12/04/2022	EAW	Legal research re: ██████████	0.50
12/05/2022	EC	Exchange email with co-counsel re: settlement	0.10
	EC	Review legal research re: ██████████ and exchange email with Emanuel Waddell re: same	0.20
	EC	Telephone conference with Emanuel Waddell re: legal research re: ██████████	0.20
	EC	Review and revise PAGA letter; exchange email with co-counsel re: same and timing for filing; 14	1.10
	EAW	Strategy conference re: ██████████ research	0.20

Re: Fresh Harvest, Fresh Foods, Rava Ranches, SMD

	EAW	Legal research re: Fresh Harvest [REDACTED] [REDACTED]	1.60
12/06/2022	EC	Review settlement memo and exchange email re: same	0.20
	EAW	Legal research re: Fresh Harvest [REDACTED] [REDACTED]	1.80
12/07/2022	EAW	Legal research re: Fresh Harvest [REDACTED] [REDACTED]	0.40
12/09/2022	EC	Revise Notice and complaint; exchange email with co-counsel re: same, settlement agreement, and timing	1.30
12/12/2022	EC	Draft email to opposing counsel re: time for finalizing settlement agreement	0.10
	EC	Exchange email with co-counsel re: notice	0.20
12/13/2022	EC	Exchange email with opposing counsel re: timing and claims administrators	0.20
	EC	Exchange email with co-counsel re: timing, settlement, notice	0.30
12/14/2022	CKC	Review draft stipulation to extend time to file motion for preliminary approval	0.10
	EC	Revise Notice and exchange email with Dawson re: timing stipulation and notice	0.90
12/15/2022	CKC	Read email from Rob Mussig re changes to long-form settlement agreement	0.10
	JF	Read settlement agreement, tel call with EHC re issues	1.20
	EC	Review email from opposing counsel re: settlement and exchange email re: same with co-counsel	0.30
12/16/2022	CKC	Emails re Fresh Foods edits to long-form settlement agreement	0.10
12/17/2022	EC	Analyze Defendants' revisions to settlement agreement and draft lengthy email memo re: same	2.10
12/18/2022	EC	Exchange email with co-counsel re: Notice and Ana's edits thereto	0.30
12/19/2022	EC	Telephone conference with Dawson Morton re: settlement revisions	1.00
	EC	Telephone conference with Jim Finberg re: settlement issues	0.30
	EC	Review defendants' proposed revisions to settlement agreement and exchange email re: same; review claims administrator bids and	

Re: Fresh Harvest, Fresh Foods, Rava Ranches, SMD

		exchange email re: same	1.40
	EC	Exchange email with opposing counsel re: settlement agreement	0.10
	EC	Draft notes on issues to discuss with Fresh Harvest counsel re: settlement	1.00
12/20/2022	EC	Exchange email with opposing counsel re: settlement	0.10
12/21/2022	EC	Exchange email with co-counsel re: settlement	0.10
	EC	Telephone conference with Dawson Morton re: settlement	0.10
	EC	Telephone conference with Rob Mussig re: settlement agreement	1.40
	EC	Telephone conference with Jim Finberg re: settlement	0.10
	EC	Revise settlement agreement	4.30
12/22/2022	EC	Telephone conference with Dawson Morton re: revisions to settlement agreement and exchange email re: same	0.30
01/06/2023	CKC	Read email from Robert Mussig re revisions to long-form settlement	0.10
	CKC	Emails re responding to Robert Mussig's latest comments on long-form settlement; emails re [REDACTED]	0.20
	EC	Review email from Rob Mussig and exchange email with co-counsel analyzing same	1.10
01/09/2023	CKC	Emails re responses to Robert Mussig's long-form settlement changes	0.10
	EAW	Legal research re: [REDACTED]	1.80
	EC	Exchange email with Dawson Morton re: settlement	0.50
	EC	Telephone conference with Dawson Morton re: settlement	0.50
	EC	Draft letter to opposing counsel re: settlement	1.10
01/10/2023	CKC	Review Dawson Morton's edits to response to Robert Mussig's edits on long-form settlement (No Charge)	0.10
	EC	Revise letter to opposing counsel re: settlement	0.50
01/12/2023	EC	Exchange email with co-counsel re: settlement	

Re: Fresh Harvest, Fresh Foods, Rava Ranches, SMD

		and briefs	0.20
01/13/2023	EC	Exchange email with opposing counsel	0.10
	EC	Draft stipulation to extend time for filing preliminary approval motion	0.50
	EC	Telephone conference with Ana Toledo re: settlement	0.30
01/14/2023	EC	Exchange email re: reaction to Rob Mussig email	0.40
01/15/2023	EC	Exchange email re: settlement	0.30
	JF	Email with Eve Cervantez re settlement terms	0.90
01/17/2023	CKC	Emails re responding to Robert Mussig's changes to long-form settlement; edits to stipulation to extend filing time	0.30
	EC	Telephone conference with Dawson Morton re: settlement	0.60
	EC	Revise and file stipulation for extension of time; exchange email with opposing counsel re: same	0.50
	EC	Research settlement issues and exchange email with co-counsel re: same	0.20
	JF	Email with Eve Cervantez re settlement terms	0.80
01/19/2023	EC	Exchange email with co-counsel re: settlement	0.10
01/20/2023	EC	Research settlement issues; draft letter to defendant re: settlement; exchange email with mediator; exchange email with co-counsel re: settlement	2.60
01/21/2023	EC	Telephone conference with mediator	0.20
	EC	Revise letter to Rob Mussig re: settlement and exchange email with co-counsel re: same	0.60
	JF	Email re settlement terms	0.60
01/23/2023	CKC	Review draft letter response to Robert Mussig re long-form settlement terms	0.10
	EC	Draft letter to Rob Mussig re: settlement; exchange email with co-counsel re: same and preliminary approval briefing	0.70
	JF	Email re settlement issues	0.70
01/24/2023	EC	Telephone conference with Dawson Morton re: preliminary approval brief	0.40
01/26/2023	EC	Exchange email with Dawson Morton re: preliminary approval papers	0.20

Re: Fresh Harvest, Fresh Foods, Rava Ranches, SMD

01/27/2023	EC	Revise motion for preliminary approval and exchange email re: settlement issues	0.70
01/30/2023	EC	Draft stipulation to extend time for preliminary approval brief	0.10
	EC	Exchange email with opposing counsel re: timing to finalize settlement	0.10
01/31/2023	CKC	Emails re negotiations on long-form settlement	0.10
	EC	Telephone conference with Ana Toledo re: settlement	0.20
	EC	Review emails from opposing counsel and exchange email with co-counsel and opposing counsel re: same; revise stipulation to extend time accordingly	0.90
	EC	Telephone conference with Dawson Morton re: settlement and extension of time	0.30
	JF	Emails re settlement terms	0.80
02/01/2023	EC	Exchange email with opposing counsel re: settlement and stipulation to extend time; finalize and file stipulation	0.30
	CKC	Review draft stipulation re motion for preliminary approval schedule; emails re same	0.10
02/02/2023	EC	Review Rob Mussig email re: settlement and exchange email with co-counsel re: same; research re: same; draft response to Rob	1.30
	EC	Telephone conference with Jim Finberg re: settlement	0.20
02/03/2023	EC	Prepare response to opposing counsel on settlement and exchange email with co-counsel and opposing counsel re: same; research re: same	0.90
	EC	Telephone conference with Dawson Morton re: settlement	0.30
02/05/2023	EC	Revise Settlement Agreement	2.80
02/06/2023	EC	Review opposing counsel comments to draft notice; exchange email with opposing counsel and co-counsel re: same	0.40
	CKC	Review Rob Mussig's edits to draft settlement notice and estimated allocation	0.10
	REW	Litigation Assistant: Email Eve Cervantez re: Fresh Harvest filing update (No Charge)	0.10
02/07/2023	EC	Exchange email with co-counsel re: revisions to Notice packet; review email from opposing	

Re: Fresh Harvest, Fresh Foods, Rava Ranches, SMD

		counsel and exchange email with co-counsel re: same	0.20
02/08/2023	EC	Exchange email with opposing counsel and co-counsel re: settlement, notice, PAGA letter; revise settlement agreement and notice	2.40
	CKC	Review emails re final agreement on outstanding items in long-form settlement agreement (No Charge)	0.10
02/09/2023	EC	Revise Notice and Exhibit B; exchange email with co-counsel and opposing counsel re: same and settlement agreement; review Defendants' edits to PAGA letter and exchange email re: same	1.20
	EC	Strategy conference with Ray Wenzell re: internal citations in settlement agreement (No Charge)	0.20
	REW	Litigation Assistant: Settlement Agreement references cross-check project	4.10
02/10/2023	EC	Exchange email with Dawson re: issues with PAGA letter and settlement	0.20
	REW	Litigation Assistant: Settlement Agreement references cross-check project	2.20
02/13/2023	EC	Revise Settlement Agreement; exchange email with co-counsel about settlement and PAGA letter	0.90
02/14/2023	EC	Revise PAGA letter and Second Amended complaint; Exchange email with Dawson Morton re: same	0.60
02/15/2023	EC	Draft stipulation to extend time; exchange email with opposing counsel and co-counsel re: same	0.80
	CKC	Emails re stipulating to further extension of time to file preliminary approval motion	0.10
02/16/2023	EC	Review defendants' revisions to settlement agreement and exchange email re: same	0.20
02/17/2023	EC	Follow up on references for ILYM Group; telephone conferences and emails re: same	0.50
	EC	Analyze Rob's response to settlement agreement, notice, amended complaint; exchange email with co-counsel; and draft response	1.40
	EC	Telephone conference with Dawson Morton re: Fresh Harvest proposed revisions to settlement agreement	0.10
02/19/2023	EC	Exchange email with co-counsel re: revisions	

Re: Fresh Harvest, Fresh Foods, Rava Ranches, SMD

		to notice	0.10
	EC	Revise Preliminary Approval Brief	2.00
02/20/2023	EC	Revise preliminary approval brief	1.40
	EC	Review email from opposing counsel re: settlement agreement and exchange email with co-counsel re: same	0.20
02/21/2023	EC	Exchange email with opposing counsel and co-counsel re: finalizing settlement and all supporting documents; revise documents	0.80
	EC	Revise preliminary approval brief and exchange email re: same	0.10
	CKC	Review Rob Mussig's edits to draft class notice; emails re same	0.20
02/22/2023	EC	Telephone conference with Dawson Morton re: finalizing settlement agreement and supporting documents	0.30
	EC	Revise Notice and draft emails to opposing counsel re: Settlement Agreement, Amended Complaint, Notice	0.50
	EC	Revise and draft motion for preliminary approval and all supporting documents	0.30
	CKC	Emails re employee ID numbers, PAGA notice changes	0.10
02/24/2023	EC	Review opposing counsel emails re: settlement; exchange email with co-counsel re: same	0.20
02/27/2023	EC	Prepare near final versions of Settlement Agreement and supporting documents	0.60
	EC	Finalize settlement and supporting documents; exchange email with co-counsel and opposing counsel re: same	0.20
	CKC	Review draft final settlement agreement, second amended complaint, PAGA notice	0.20
	CKC	Review and edit draft stipulation for second amended complaint	0.20
02/28/2023	EC	Draft preliminary approval brief and finalize settlement agreement and supporting documents; exchange email re: same	2.30
	CKC	Review draft motion for preliminary approval	0.40
	REW	Litigation Assistant: Preliminary Approval of Settlement Agreement brief cite-check	8.00
03/01/2023	EC	Prepare Motion for Preliminary Approval and all supporting documents; exchange email re:	

Re: Fresh Harvest, Fresh Foods, Rava Ranches, SMD

		same	2.20
	CKC	Review draft Morton and Cervantez declarations in support of preliminary approval	0.30
	REW	Litigation Assistant: Cite check Preliminary Approval of Settlement brief	7.90
03/02/2023	EC	Telephone conference with Dawson Morton re: Defendants' request for more time on settlement	0.10
	EC	Exchange email with staff and co-counsel re: final steps to prepare brief; defendants' request to extend time	0.60
	REW	Litigation Assistant: Cite check Preliminary Approval of Settlement brief	7.60
03/07/2023	EC	Exchange email re: filing	0.10
	CKC	Review Ray Wenzell's edits on Morton Declaration; emails re same	0.20
	REW	Litigation Assistant: Strategy emails to Eve Cervantez and Connie Chan re: cite check of Preliminary Approval of Settlement brief	0.20
03/08/2023	EC	Prepare preliminary approval papers	0.40
	CKC	Emails re getting signatures on settlement agreement and finalizing motion for preliminary approval	0.10
	CKC	Emails re finalizing motion for preliminary approval	0.20
	CKC	Review and edit paralegal cite check on Morton Decl iso motion for preliminary approval; emails re same	1.00
	REW	Litigation Assistant: Email correspondence with Connie Chan re: Preliminary Approval of Settlement brief documents and timeline	0.30
03/09/2023	CKC	Telephone call with Dawson Morton re average payment calculations for his declaration in support of preliminary approval	0.30
	CKC	Supervise filing of motion for preliminary approval (No Charge)	1.00
	CKC	Review and edit draft brief iso motion for preliminary approval; review and edit paralegal cite check revisions	4.50
	CKC	Draft notice of motion for preliminary approval	1.00
	CKC	Revise draft proposed order; emails re same	0.50

Re: Fresh Harvest, Fresh Foods, Rava Ranches, SMD

	CKC	Review and edit Morton Decl iso preliminary approval; cross-check against terms of Settlement Agreement; review exhibits to Morton Decl	3.00
	CKC	Review Judge Freeman's standing order, local rules re filing (No Charge)	0.30
	REW	Litigation Assistant: Cite check Preliminary Approval of Settlement brief	7.30
	EAW	Legal research re: motion for preliminary approval	0.90
03/10/2023	CKC	Review order granting stipulation to file Second Amended Complaint; emails re: same	0.10
03/13/2023	EC	Exchange email with co-counsel re: press	0.10
04/01/2023	EC	Exchange email with co-counsel re: preliminary hearing preparation and order	0.20
04/05/2023	EC	Email correspondence with co-counsel re: hearing dates and lodestar	0.20
04/10/2023	EC	Email correspondence with co-counsel re: dates for briefing and hearing	0.20
04/11/2023	EC	Revise proposed order on preliminary approval; calculate dates; email correspondence with co-counsel re: same	0.40
	CKC	Review draft proposed order granting preliminary approval	0.10
04/12/2023	EC	Prepare for hearing; email correspondence with co-counsel re: same	0.80
	EC	Telephone conference with Dawson Morton re: hearing preparation	0.30
04/13/2023	EC	Prepare for and attend hearing on preliminary approval	0.70
	EC	Telephone conference with Dawson Morton re: next steps	0.10
	EC	Revise Notice and exchange email with co-counsel re: same	0.20
04/14/2023	EC	Email correspondence with co-counsel re: revised notice	0.20
05/03/2023	EC	Email correspondence with co-counsel re: attorney fee motion and following up with defendant and claims administrator (No Charge)	0.20
05/05/2023	EC	Email correspondence with Dawson re: fee motion (No Charge)	0.10
05/25/2023	EC	Email correspondence with co-counsel re:	

Re: Fresh Harvest, Fresh Foods, Rava Ranches, SMD

	settlement administration	0.10
05/26/2023 EC	Email correspondence with Dawson Morton re: claims administration issues	0.20
05/30/2023 EC	Email correspondence with co-counsel re: administration of settlement	0.10
05/31/2023 EC	Email correspondence with co-counsel re: translator certificate	0.10

	Total Hours	2,256.40

RECAPITULATION

ATTORNEY	HOURS	RATE	TOTAL DUE
James M. Finberg	16.50	\$0.00	\$0.00
James M. Finberg	80.70	1,275.00	102,892.50
Eve Cervantez	10.80	0.00	0.00
Eve Cervantez	608.30	1,200.00	729,960.00
Emanuel Waddell	12.00	425.00	5,100.00
Bronwen O'Herin	3.30	0.00	0.00
Bronwen O'Herin	76.40	675.00	51,570.00
Zoe L. Palitz	9.50	0.00	0.00
Zoe L. Palitz	140.40	925.00	129,870.00
Law Clerk (Aaron Kelley)	6.30	0.00	0.00
Law Clerk (Aaron Kelley)	71.50	350.00	25,025.00
Law Clerk (Annie Kors)	3.50	0.00	0.00
Law Clerk (Kevin Vazquez)	10.00	350.00	3,500.00
Connie Chan	7.00	0.00	0.00
Connie Chan	461.30	925.00	426,702.50
Law Clerk (M. O'Kelley-Bangsberg)	8.20	0.00	0.00
Law Clerk (T. Deguzman)	95.50	350.00	33,425.00
Law Clerk (Amanda Le)	19.60	350.00	6,860.00
Law Clerk (Isaac Green)	1.50	0.00	0.00
Law Clerk (Isaac Green)	74.30	350.00	26,005.00
Law Clerk (Andrew Toney-Noland)	48.90	350.00	17,115.00
Paralegal (L. Mandani)	10.60	325.00	3,445.00
Paralegal (L. Nelson)	9.70	0.00	0.00
Paralegal (J. Smith)	4.00	0.00	0.00
Paralegal (J. Smith)	78.00	325.00	25,350.00
Litigation Assistant (A. Ashworth)	23.50	0.00	0.00
Litigation Assistant (A. Ashworth)	250.90	325.00	81,542.50
Litigation Assistant (R. Wenzell)	1.10	0.00	0.00
Litigation Assistant (R. Wenzell)	112.60	325.00	36,595.00
Paralegal (C. Shively)	0.50	0.00	0.00

TOTAL Fees:

\$1,704,957.50
=====

EXHIBIT B

Bloomberg Law News 2023-01-19T10:21:11887193214-05:00

Rising Rates Are Law Firms' Salve as Layoffs and Pay Cuts Surge

By Roy Strom 2023-01-19T05:30:06000-05:00

Welcome back to the [Big Law Business column](#) on the changing legal marketplace written by me, [Roy Strom](#). Today, we look at how much law firms are raising rates in 2023. [Sign up](#) to receive this column in your Inbox on Thursday mornings.

Headlines about the law firm business seem gloomy.

Some firms are laying off associates. Many are set to pay partners significantly less than they did a year ago. Most expect another year of depressed transactional and capital markets work—a huge driver of profits.

But cheer up, law firm managing partners. It looks like your business is still great at an extremely important thing—raising billing rates.

A handful of Big Law firms and mid-size firms have raised their highest partner billing rates nearly 10% on average this year, a search of bankruptcy dockets shows. And top-paid associates are being billed out at 9% higher than last year's rates, the search showed.

The data lines up with an earlier report showing that law firms expect to raise rates by 8% this year, the largest figure in 15 years, according to Wells Fargo's Legal Specialty Group.

At the time of the Wells report, [I wrote](#) it was another example of Big Law's ability to defy basic economics. The number of lawyers at Big Law firms shot up last year, while demand for their time has fallen. And yet, the price for "top legal talent" is on the rise.

When supply increases and demand falls, prices typically decline—at least in normal markets.

Longtime followers of the business of law won't be surprised the firms are following through with rate hikes. It's an annual pastime. Law firms, in this respect and others, largely act as one.

The firms don't readily advertise their billing rates. But bankruptcy courts provide a source of transparency. Firms are required to disclose how much they bill, and they notify courts—and bankruptcy watchdogs at the U.S. Trustees' offices—when they plan to raise rates.

This year, at least 11 law firms have notified courts they are charging more for their services.

No Sale

Law firms were expected to raise rates around 8% on average this year, and many appear to be following through.

Firm	Top-Paid Partner New	Top-Paid Partner Old	% Change
Mayer Brown	\$1,940	\$1,635	18.7%
Cole Schotz	\$1,200	\$1,050	14.3%
Ice Miller	\$1,110	\$975	13.8%
Kirkland & Ellis	\$2,245	\$1,995	12.5%
Akin Gump	\$2,145	\$1,995	7.5%
Latham & Watkins	\$2,230	\$2,075	7.5%
Weil Gotshal	\$2,095	\$1,950	7.4%
Paul Weiss	\$2,175	\$2,025	7.4%
Paul Hastings	\$2,075	\$1,935	7.2%
Brown Rudnick	\$2,250	\$2,100	7.1%
Freshfields	\$1,995	\$1,925	3.6%
Average			9.7%

Source: Bloomberg Law analysis of bankruptcy dockets.

Note: Some rates are "firm-wide," while others pertain only to an individual bankruptcy matter.

Bloomberg Law

There is some noise in the data.

For instance, some firms appear to present firm-wide billing rates—telling us how much their highest and lowest-paid partners, counsel and associates charge. Other firms report a range that only includes the lawyers they expect to work on an individual Chapter 11 case.

Still, the year-over-year changes are a good look at how much firms are raising rates for similar

lawyers.

Associate Rates Rising

Law firms have told bankruptcy courts their associates will cost 9% more on average in 2023.

Firm	Top-Paid Associate New	Top-Paid Associate Old	% Change
Akin Gump	\$1,250	\$1,045	19.6%
Weil Gotshal	\$1,345	\$1,200	12.1%
Kirkland & Ellis	\$1,395	\$1,245	12.0%
Mayer Brown	\$1,075	\$970	10.8%
Ice Miller	\$665	\$610	9.0%
Cole Schotz	\$730	\$670	9.0%
Paul Weiss	\$1,380	\$1,280	7.8%
Latham & Watkins	\$1,400	\$1,300	7.7%
Paul Hastings	\$1,320	\$1,230	7.3%
Freshfields	\$1,375	\$1,325	3.8%
Brown Rudnick	\$975	\$975	0.0%
Average			9.0%

Source: Bloomberg Law analysis of bankruptcy dockets

Note: Some rates are "firm-wide," while others pertain only to an individual bankruptcy matter.

Bloomberg Law

While it was [still somewhat rare](#) for firms to report a partner billing \$2,000 an hour last year, that threshold seems likely to be broken by most large firms this year. Four of the 11 firms broke that barrier this year—Kirkland & Ellis, Akin Gump, Weil Gotshal, and Paul Hastings. Freshfields was just \$5 shy.

Most firms—six of the 11—rose partner rates in the 7% range.

There was less consistency in the hikes for associates—only three of the firms were in the 7% range, and two firms rose rates 9%.

One interesting nugget from the data was that the two smallest firms on the list—Ice Miller and Cole

Schotz—had some of the highest percentage increases from last year.

One simple explanation: They have a long way to go before they bump up against the highest end of the market.

And that top end of the market is sure to go higher from here.

Worth Your Time

On FTX: Removing Sullivan & Cromwell from the FTX bankruptcy would “severely, if not irreparably” harm customers and creditors, the crypto exchange’s CEO John Ray told a judge. Justin Wise [reports](#) on the “army” of the firm’s lawyers that have worked around the clock for the past two months—and why they say they have no conflict despite advising the company before its downfall.

On IPOs: It was a dismal year for US initial public offerings, with just \$18 billion raised compared to \$275 billion in 2021. [I wrote about](#) Big Law’s busiest capital markets firms, which suffered a decline of 90% or more in deal value.

On Weil: Weil Gotshal has hired nearly 20 lawyers in Washington since 2021, indicative of a “strategic investment” the firm is making in the nation’s capital, Justin [reports](#).

That’s it for this week! Thanks for reading and please [send me](#) your thoughts, critiques, and tips.

To contact the reporter on this story: Roy Strom in Chicago at rstrom@bloomberglaw.com

To contact the editors responsible for this story: Chris Opfer at copfer@bloomberglaw.com; John Hughes at jhughes@bloombergindustry.com

Related Articles

[Big Law Defies Economics as Firms Prepare Record Rate Increases](#)

[Big Law Rates Topping \\$2,000 Leave Value 'In Eye of Beholder'](#)

[Never Underestimate Big Law's Ability to Raise Billing Rates](#)

EXHIBIT C



First Mediation Corporation

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1564.001

INVOICE

BILL TO
Altshuler Berzon

INVOICE # 24288
DATE 05/04/2022

TERMS Due on receipt

CASE NAME
Saramiento v. Fresh Harvest

MEDIATION DATE
08/19/2022

DESCRIPTION	AMOUNT
Your Share of the Mediation Services--Jeffrey Krivis.	5,000.00

Saramiento v. Fresh Harvest
FMC Case #: 22-0352
Mediation Date: 08/19/2022

The fee is due immediately upon booking your mediation date and receipt of invoice.

Fees can be paid via:

* Echeck or Credit Card online using this link:
<https://secure.lawpay.com/pages/firstmediationcorp/operating>

* US Mail to:
First Mediation Corp.
(c/o Farmers & Merchants Bank)
P.O. Box 2548
Seal Beach, CA 90740

*Federal Express or USPS Overnight to:
16501 Ventura Blvd, Suite 606, Encino, CA 91436

Tax I.D.Number: 95-4300330

BALANCE DUE **\$5,000.00**

Payment Link: <https://secure.lawpay.com/pages/firstmediationcorp/operating>

Tax I.D.Number: 95-4300330

<u>Client</u>	<u>Trans Date</u>	<u>Atty</u>	<u>H P</u>	<u>Tcode/ Task Code</u>	<u>Rate</u>	<u>Amount</u>		<u>Ref #</u>
Tcode 29 Court Electronic Records								
1564.001	09/30/2021	21	P	29	0.100	68.80	Court Electronic Records Fresh Harvest, Inc.	15
1564.001	12/31/2021	21	P	29	0.100	1.80	Court Electronic Records Fresh Harvest, Inc. Re: Fresh Harvest, Fresh Foods, Rava Ranches, SMD	248
1564.001	03/31/2022	21	P	29	0.100	2.20	Court Electronic Records Fresh Harvest, Inc. Re: Fresh Harvest, Fresh Foods, Rava Ranches, SMD	259
1564.001	06/30/2022	21	P	29	0.100	4.80	Court Electronic Records Fresh Harvest, Inc. Re: Fresh Harvest, Fresh Foods, Rava Ranches, SMD	268
1564.001	09/30/2022	21	P	29	0.100	2.20	Court Electronic Records Fresh Harvest, Inc. Re: Fresh Harvest, Fresh Foods, Rava Ranches, SMD	278
1564.001	03/31/2023	21	P	29	0.100	0.50	Court Electronic Records Fresh Harvest, Inc. Re: Fresh Harvest, Fresh Foods, Rava Ranches, SMD	291
Total for Tcode 29					Billable	80.30	Court Electronic Records	

<u>Client</u>	<u>Trans Date</u>	<u>Atty</u>	<u>H P</u>	<u>Tcode/ Task Code</u>	<u>Rate</u>	<u>Amount</u>	<u>Ref #</u>
Tcode 100 Courier							
1564.001	08/06/2021	21	P	100	9.04	Courier (UPS) 31498331 Fresh Harvest, Inc.	7
1564.001	09/10/2021	21	P	100	10.32	Courier (UPS) 31498381 Fresh Harvest, Inc. Re: Fresh Harvest, Fresh Foods, Rava Ranches, SMD	13
1564.001	11/11/2021	21	P	100	12.35	Courier (UPS) 31498461 Fresh Harvest, Inc. Re: Fresh Harvest, Fresh Foods, Rava Ranches, SMD	120
1564.001	07/28/2022	21	P	100	16.53	Courier (UPS) 31498312 Fresh Harvest, Inc. Re: Fresh Harvest, Fresh Foods, Rava Ranches, SMD	272
Total for Tcode 100					Billable	48.24	Courier

Account Group:	ALTSHULER BERZON LLP, SAN FRANCISCO CA (1000544719)					
Date Range:	June 01, 2021 - June 30, 2021					
Report Format:	Summary-Account by Client					
Products:	Westlaw, Westlaw Retired					
Content Families:	All Content Families					
Account by Client	Database Time	Transactions	Docs/Lines	Connect Time	Standard Charge	Cost
Account: 1000544719						
Client 1564.001						
Totals for Included		382			32,605.00	
Totals for Client 1564.001		382			32,605.00	172.29
Client 1564.001						
Totals for Included		74			5,174.00	
Totals for Client 1564.001		74			5,174.00	27.34

Account Group:	ALTSHULER BERZON LLP, SAN FRANCISCO CA (1000544719)					
Date Range:	July 01, 2021 - July 31, 2021					
Report Format:	Summary-Account by Client					
Products:	Westlaw, Westlaw Retired					
Content Families:	All Content Families					
Account by Client	Database Time	Transactions	Docs/Lines	Connect Time	Standard Charge	Cost
Account: 1000544719						
Client 1564.001						
Totals for Included		600			52,292.00	253.92
Totals for Excluded		1			259.00	259.00
Totals for Client 1564.001		602			52,697.00	

Account Group:	ALTSHULER BERZON LLP, SAN FRANCISCO CA (1000544719)					
Date Range:	August 01, 2021 - August 31, 2021					
Report Format:	Summary-Account by Client					
Products:	Westlaw, Westlaw Retired					
Content Families:	All Content Families					
Account by Client	Database Time	Transactions	Docs/Lines	Connect Time	Standard Charge	Cost
Account: 1000544719						
Client 1564.001						
Totals for Included		456			35,472.00	228.85
Totals for Excluded		8			1,168.00	1,168.00
Totals for Client 1564.001		464			36,640.00	

Account Group:	ALTSHULER BERZON LLP, SAN FRANCISCO CA (1000544719)					
Date Range:	September 01, 2021 - September 30, 2021					
Report Format:	Summary-Account by Client					
Products:	Westlaw, Westlaw Retired					
Content Families:	All Content Families					
Account by Client	Database Time	Transactions	Docs/Lines	Connect Time	Standard Charge	Cost
Account: 1000544719						
Client 1564.001						
Totals for Included		529			33,711.00	
Totals for Client 1564.001		529			33,711.00	404.12

Account Group:	ALTSHULER BERZON LLP, SAN FRANCISCO CA (1000544719)					
Date Range:	October 01, 2021 - October 31, 2021					
Report Format:	Summary-Account by Client					
Products:	Westlaw, Westlaw Retired					
Content Families:	All Content Families					
Account by Client	Database Time	Transactions	Docs/Lines	Connect Time	Standard Charge	Cost
Account: 1000544719						
Client 1564.001						
Totals for Included		26			1,952.00	
Totals for Client 1564.001		26			1,952.00	12.73
Client 1564.001						
Totals for Included		166			11,008.00	
Totals for Client 1564.001		166			11,008.00	71.81

Account Group:	ALTSHULER BERZON LLP, SAN FRANCISCO CA (1000544719)					
Date Range:	November 01, 2021 - November 30, 2021					
Report Format:	Summary-Account by Client					
Products:	Westlaw, Westlaw Retired					
Content Families:	All Content Families					
Account by Client	Database Time	Transactions	Docs/Lines	Connect Time	Standard Charge	Cost
Account: 1000544719						
Client 1564.001						
Totals for Included		67			3,980.00	
Totals for Client 1564.001		67			3,980.00	26.26
Client 1564.001						
Totals for Included		494			30,958.00	
Totals for Client 1564.001		494			30,958.00	204.30

Account Group:	ALTSHULER BERZON LLP, SAN FRANCISCO CA (1000544719)					
Date Range:	December 01, 2021 - December 31, 2021					
Report Format:	Summary-Account by Client					
Products:	Westlaw, Westlaw Retired					
Content Families:	All Content Families					
Account by Client	Database Time	Transactions	Docs/Lines	Connect Time	Standard Charge	Cost
Account: 1000544719						
Client 1564.001						
Totals for Included		101			6,954.00	
Totals for Client 1564.001		101			6,954.00	70.29

Account Group:	ALTSHULER BERZON LLP, SAN FRANCISCO CA (1000544719)					
Date Range:	January 01, 2022 - January 31, 2022					
Report Format:	Summary-Account by Client					
Products:	Westlaw, Westlaw Retired					
Content Families:	All Content Families					
Account by Client	Database Time	Transactions	Docs/Lines	Connect Time	Standard Charge	Cost
Account: 1000544719						
Client 1564.001						
Totals for Included		2			104.00	
Totals for Client 1564.001		2			104.00	0.67
Client 1564.001						
Totals for Included		180			13,024.00	
Totals for Client 1564.001		180			13,024.00	83.99

Account Group:	ALTSHULER BERZON LLP, SAN FRANCISCO CA (1000544719)					
Date Range:	February 01, 2022 - February 28, 2022					
Report Format:	Summary-Account by Client					
Products:	Westlaw, Westlaw Retired					
Content Families:	All Content Families					
Account by Client	Database Time	Transactions	Docs/Lines	Connect Time	Standard Charge	Cost
Account: 1000544719						
Client 1564.001						
Totals for Included		9			536.00	
Totals for Client 1564.001		9			536.00	4.63
Client 1564.001						
Totals for Included		24			1,728.00	
Totals for Client 1564.001		24			1,728.00	14.92

Account Group:	ALTSHULER BERZON LLP, SAN FRANCISCO CA (1000544719)					
Date Range:	April 01, 2022 - April 30, 2022					
Report Format:	Summary-Account by Client					
Products:	Westlaw, Westlaw Retired					
Content Families:	All Content Families					
Account by Client	Database Time	Transactions	Docs/Lines	Connect Time	Standard Charge	Cost
Client 1564.001						
Totals for Included		2			280.00	
Totals for Client 1564.001		2			280.00	1.57

Account Group:	ALTSHULER BERZON LLP, SAN FRANCISCO CA (1000544719)					
Date Range:	May 01, 2022 - May 31, 2022					
Report Format:	Summary-Account by Client					
Products:	Westlaw, Westlaw Retired					
Content Families:	All Content Families					
Account by Client	Database Time	Transactions	Docs/Lines	Connect Time	Standard Charge	Cost
Client 1564.001						
Totals for Included		4			710.00	
Totals for Client 1564.001		4			710.00	4.09

Account Group:	ALTSHULER BERZON LLP, SAN FRANCISCO CA (1000544719)					
Date Range:	June 01, 2022 - June 30, 2022					
Report Format:	Summary-Account by Client					
Products:	Westlaw, Westlaw Retired					
Content Families:	All Content Families					
Account by Client	Database Time	Transactions	Docs/Lines	Connect Time	Standard Charge	Cost
Account: 1000544719						
Client 1564.001						
Totals for Included		1			65.00	
Totals for Client 1564.001		1			65.00	0.41
Client 1564.001						
Totals for Included		129			11,400.00	
Totals for Client 1564.001		129			11,400.00	71.57

Account Group:	ALTSHULER BERZON LLP, SAN FRANCISCO CA (1000544719)					
Date Range:	July 01, 2022 - July 31, 2022					
Report Format:	Summary-Account by Client					
Products:	Westlaw, Westlaw Retired					
Content Families:	All Content Families					
Account by Client	Database Time	Transactions	Docs/Lines	Connect Time	Standard Charge	Cost
Account: 1000544719						
Client 1564.001						
Totals for Included		5			325.00	
Totals for Client 1564.001		5			325.00	2.31
Client 1564.001						
Totals for Included		25			3,165.00	
Totals for Client 1564.001		25			3,165.00	22.48

Account Group:	ALTSHULER BERZON LLP, SAN FRANCISCO CA (1000544719)					
Date Range:	August 01, 2022 - August 31, 2022					
Report Format:	Summary-Account by Client					
Products:	Westlaw, Westlaw Retired					
Content Families:	All Content Families					
Account by Client	Database Time	Transactions	Docs/Lines	Connect Time	Standard Charge	Cost
Account: 1000544719						
Client 1564.001						
Totals for Included		16			1,490.00	
Totals for Client 1564.001		16			1,490.00	9.09
Client 1564.001						
Totals for Included		173			19,320.00	
Totals for Client 1564.001		173			19,320.00	117.82

Account Group:	ALTSHULER BERZON LLP, SAN FRANCISCO CA (1000544719)					
Date Range:	October 01, 2022 - October 31, 2022					
Report Format:	Summary-Account by Client					
Products:	Westlaw, Westlaw Retired					
Content Families:	All Content Families					
Account by Client	Database Time	Transactions	Docs/Lines	Connect Time	Standard Charge	Cost
Account: 1000544719						
Client 1564.001						
Totals for Included		1			65.00	
Totals for Client 1564.001		1			65.00	0.30
Client 1564.001						
Totals for Included		32			2,530.00	
Totals for Client 1564.001		32			2,530.00	11.80

Account Group:	ALTSHULER BERZON LLP, SAN FRANCISCO CA (1000544719)					
Date Range:	November 01, 2022 - November 30, 2022					
Report Format:	Summary-Account by Client					
Products:	Westlaw, Westlaw Retired					
Content Families:	All Content Families					
Account by Client	Database Time	Transactions	Docs/Lines	Connect Time	Standard Charge	Cost
Account: 1000544719						
Client 1564.001						
Totals for Included		3			195.00	
Totals for Client 1564.001		3			195.00	1.09

Account Group:	ALTSHULER BERZON LLP, SAN FRANCISCO CA (1000544719)					
Date Range:	December 01, 2022 - December 31, 2022					
Report Format:	Summary-Account by Client					
Products:	Westlaw, Westlaw Retired					
Content Families:	All Content Families					
Account by Client	Database Time	Transactions	Docs/Lines	Connect Time	Standard Charge	Cost
Account: 1000544719						
Client 1564.001						
Totals for Included		4			860.00	
Totals for Client 1564.001		4			860.00	4.88
Client 1564.001						
Totals for Included		93			6,795.00	
Totals for Client 1564.001		93			6,795.00	38.54

Account Group:	ALTSHULER BERZON LLP, SAN FRANCISCO CA (1000544719)					
Date Range:	January 01, 2023 - January 31, 2023					
Report Format:	Summary-Account by Client					
Products:	Westlaw, Westlaw Retired					
Content Families:	All Content Families					
Account by Client	Database Time	Transactions	Docs/Lines	Connect Time	Standard Charge	Cost
Account: 1000544719						
Client 1564.001						
Totals for Included		55			3,875.00	
Totals for Client 1564.001		55			3,875.00	25.60

Account Group:	ALTSHULER BERZON LLP, SAN FRANCISCO CA (1000544719)					
Date Range:	February 01, 2023 - February 28, 2023					
Report Format:	Summary-Account by Client					
Products:	Westlaw, Westlaw Retired					
Content Families:	All Content Families					
Account by Client	Database Time	Transactions	Docs/Lines	Connect Time	Standard Charge	Cost
Account: 1000544719						
Client 1564.001						
Totals for Included		1			78.00	
Totals for Client 1564.001		1			78.00	0.43
Client 1564.001						
Totals for Included		22			2,640.00	
Totals for Client 1564.001		22			2,640.00	14.51

Account Group:	ALTSHULER BERZON LLP, SAN FRANCISCO CA (1000544719)					
Date Range:	March 01, 2023 - March 31, 2023					
Report Format:	Summary-Account by Client					
Products:	Westlaw, Westlaw Retired					
Content Families:	All Content Families					
Account by Client	Database Time	Transactions	Docs/Lines	Connect Time	Standard Charge	Cost
Account: 1000544719						
Client 1564.001						
Totals for Included		253			35,220.00	
Totals for Client 1564.001		253			35,220.00	161.84

<u>Date</u>	<u>Category</u>	<u>Cost</u>	<u>Description</u>
08/05/21	Copies / Printing	\$2.00	Photocopy/Printing offsite, JZ, brief for tables
08/06/21	Copies / Printing	\$3.20	Photocopy/Printing, 16 pages, 79 - PLAINTIFFS'
09/01/21	Copies / Printing	\$2.20	Photocopy/Printing, 11 pages, 28-1 - BRIEF FOR
09/01/21	Copies / Printing	\$3.20	Photocopy/Printing, 16 pages, 72-1 - BRIEF ISO
09/01/21	Copies / Printing	\$6.20	Photocopy/Printing, 31 pages, 53 - AMENDED COM
09/01/21	Copies / Printing	\$3.40	Photocopy/Printing, 17 pages, 88-1 - MPA ISO M
09/01/21	Copies / Printing	\$9.20	Photocopy/Printing, 46 pages, 88-2 - APPENDIX
09/02/21	Copies / Printing	\$12.20	Photocopy/Printing, 61 pages, MICROSOFT WORD -
09/02/21	Copies / Printing	\$2.40	Photocopy/Printing, 12 pages, MICROSOFT WORD -
09/02/21	Copies / Printing	\$2.00	Photocopy/Printing, 10 pages, MICROSOFT WORD -
09/27/21	Copies / Printing	\$18.20	Photocopy/Printing, 91 pages, RIGOBERTO SARMIE
09/27/21	Copies / Printing	\$18.20	Photocopy/Printing, 91 pages, RIGOBERTO SARMIE
09/29/21	Copies / Printing	\$13.40	Photocopy/Printing, 67 pages, 06 - CONSTRUCTIO
09/29/21	Copies / Printing	\$2.00	Photocopy/Printing, 10 pages, 03 - GULF OIL CO
09/29/21	Copies / Printing	\$2.00	Photocopy/Printing, 10 pages, 04 - DE LA CERDA
09/29/21	Copies / Printing	\$5.20	Photocopy/Printing, 26 pages, 07 - DE LEON-GRA
09/29/21	Copies / Printing	\$2.40	Photocopy/Printing, 12 pages, 09 - RECINOS-REC
09/29/21	Copies / Printing	\$6.80	Photocopy/Printing, 34 pages, 16 - HR REP 97-8
09/29/21	Copies / Printing	\$2.80	Photocopy/Printing, 14 pages, 18 - MALDONADO V
09/29/21	Copies / Printing	\$23.20	Photocopy/Printing, 116 pages, 19 - CONSTRUCTIO
09/29/21	Copies / Printing	\$3.40	Photocopy/Printing, 17 pages, 21 - NEN THIO V
09/29/21	Copies / Printing	\$4.20	Photocopy/Printing, 21 pages, 20 - MCKINNON V
09/29/21	Copies / Printing	\$6.60	Photocopy/Printing, 33 pages, 25 - VILLALOBOS
09/29/21	Copies / Printing	\$12.00	Photocopy/Printing, 60 pages, 26 - CASTILLO V
09/29/21	Copies / Printing	\$4.40	Photocopy/Printing, 22 pages, 41 - SCHAEFER-LA
09/29/21	Copies / Printing	\$2.40	Photocopy/Printing, 12 pages, 42 - HEATH V PER
09/29/21	Copies / Printing	\$7.80	Photocopy/Printing, 39 pages, 37 - REYES-TRUJI
09/29/21	Copies / Printing	\$2.40	Photocopy/Printing, 12 pages, 35 - MIGUEL-SANC
09/29/21	Copies / Printing	\$5.60	Photocopy/Printing, 28 pages, 31 - MEI XING YU
09/29/21	Copies / Printing	\$2.60	Photocopy/Printing, 13 pages, 30 - WALTON V UN
09/29/21	Copies / Printing	\$4.20	Photocopy/Printing, 21 pages, 29 - MARTINEZ V
09/29/21	Copies / Printing	\$3.40	Photocopy/Printing, 17 pages, 27 - KRAUS V PA
09/29/21	Copies / Printing	\$4.60	Photocopy/Printing, 23 pages, 46 - ENDING THE
09/29/21	Copies / Printing	\$2.60	Photocopy/Printing, 13 pages, 48 - IN THE MATT
09/29/21	Copies / Printing	\$28.40	Photocopy/Printing, 142 pages, 49 - TEMPORARY N
09/29/21	Copies / Printing	\$12.60	Photocopy/Printing, 63 pages, 52 - TEMPORARY E
09/29/21	Copies / Printing	\$47.20	Photocopy/Printing, 236 pages, 50 - TEMPORARY A
09/29/21	Copies / Printing	\$4.20	Photocopy/Printing, 21 pages, 51 - ENFORCEMENT
09/29/21	Copies / Printing	\$36.40	Photocopy/Printing, 182 pages, 53 - TEMPORARY N
09/29/21	Copies / Printing	\$22.40	Photocopy/Printing, 112 pages, 55 - TEMPORARY A
09/29/21	Copies / Printing	\$49.80	Photocopy/Printing, 249 pages, 54 - TEMPORARY N
09/29/21	Copies / Printing	\$16.20	Photocopy/Printing, 81 pages, 56 - TEMPORARY E
09/29/21	Copies / Printing	\$2.00	Photocopy/Printing, 10 pages, 65 - SECTION 97
09/29/21	Copies / Printing	\$2.20	Photocopy/Printing, 11 pages, 62 - DEVLIN V SC
09/29/21	Copies / Printing	\$2.20	Photocopy/Printing, 11 pages, 61 - CABRERA V B
09/29/21	Copies / Printing	\$6.60	Photocopy/Printing, 33 pages, 59 - PIERCE V CO
09/29/21	Copies / Printing	\$37.40	Photocopy/Printing, 187 pages, 57 - TEMPORARY A
09/29/21	Copies / Printing	\$10.00	Photocopy/Printing, 50 pages, 75 - WHEN ARE SE
09/29/21	Copies / Printing	\$3.60	Photocopy/Printing, 18 pages, 76 - H-2A MIGRAN
09/29/21	Copies / Printing	\$4.00	Photocopy/Printing, 20 pages, 77 - ENFORCEMENT
09/29/21	Copies / Printing	\$2.80	Photocopy/Printing, 14 pages, 79 - DAVID OJEDA
09/29/21	Copies / Printing	\$47.60	Photocopy/Printing, 238 pages, 78 - TEMPORARY A
09/29/21	Copies / Printing	\$3.80	Photocopy/Printing, 19 pages, 88 - BACON V REY
09/29/21	Copies / Printing	\$4.00	Photocopy/Printing, 20 pages, 87 - NELSON V CI
09/29/21	Copies / Printing	\$17.00	Photocopy/Printing, 85 pages, 80 - TEMPORARY A
09/29/21	Copies / Printing	\$8.60	Photocopy/Printing, 43 pages, 81 - IMPOSING IN
09/29/21	Copies / Printing	\$8.80	Photocopy/Printing, 44 pages, 59 - ANSWER AND

09/29/21	Copies / Printing	\$3.00	Photocopy/Printing, 15 pages, 69 - FRESH HARVE
09/29/21	Copies / Printing	\$3.80	Photocopy/Printing, 19 pages, 66 - PLS' MOTION
09/29/21	Copies / Printing	\$3.20	Photocopy/Printing, 16 pages, 79 - PLAINTIFFS'
10/04/21	Copies / Printing	\$3.00	Photocopy/Printing, 15 pages, MICROSOFT WORD -
10/05/21	Copies / Printing	\$2.80	Photocopy/Printing, 14 pages, 02 - BROOKLYN SA
10/05/21	Copies / Printing	\$3.00	Photocopy/Printing, 15 pages, 19 - GUTIERREZ V
10/05/21	Copies / Printing	\$2.00	Photocopy/Printing, 10 pages, 05 - RIVERA V PE
10/05/21	Copies / Printing	\$5.40	Photocopy/Printing, 27 pages, 11 - SECTION 110
10/05/21	Copies / Printing	\$2.40	Photocopy/Printing, 12 pages, 10 - TRI-Q INC V
10/05/21	Copies / Printing	\$5.20	Photocopy/Printing, 26 pages, 07 - ARMENDARIZ
10/05/21	Copies / Printing	\$3.00	Photocopy/Printing, 15 pages, 08 - DUFFENS V V
10/05/21	Copies / Printing	\$60.20	Photocopy/Printing, 301 pages, 23 - THE FAMILY
10/25/21	Copies / Printing	\$7.60	Photocopy/Printing, 38 pages, FHI000527 EXCERP
10/25/21	Copies / Printing	\$4.00	Photocopy/Printing, 20 pages, FHI003644.PDF
10/25/21	Copies / Printing	\$2.20	Photocopy/Printing, 11 pages, SMD009354.PDF
10/26/21	Copies / Printing	\$6.40	Photocopy/Printing, 32 pages, 09-30-21 MINI-AL
10/26/21	Copies / Printing	\$3.60	Photocopy/Printing, 18 pages, EXHIBIT 6.PDF
10/26/21	Copies / Printing	\$6.40	Photocopy/Printing, 32 pages, EXHIBIT 7.PDF
10/26/21	Copies / Printing	\$2.00	Photocopy/Printing, 10 pages, EXHIBIT 11.PDF
10/26/21	Copies / Printing	\$4.60	Photocopy/Printing, 23 pages, 10-05-21 MINI-NO
10/26/21	Copies / Printing	\$3.80	Photocopy/Printing, 19 pages, EXHIBIT 20.PDF
10/26/21	Copies / Printing	\$10.40	Photocopy/Printing, 52 pages, 10-06-21 MINI-OS
10/26/21	Copies / Printing	\$3.20	Photocopy/Printing, 16 pages, EXHIBIT 29.PDF
10/26/21	Copies / Printing	\$2.20	Photocopy/Printing, 11 pages, EXHIBIT 35.PDF
10/26/21	Copies / Printing	\$9.60	Photocopy/Printing, 48 pages, EXHIBIT 40.PDF
10/26/21	Copies / Printing	\$8.00	Photocopy/Printing, 40 pages, EXHIBIT 41.PDF
10/26/21	Copies / Printing	\$8.40	Photocopy/Printing, 42 pages, EXHIBIT 51 (1).P
10/26/21	Copies / Printing	\$7.80	Photocopy/Printing, 39 pages, EXHIBIT 55.PDF
10/26/21	Copies / Printing	\$7.20	Photocopy/Printing, 36 pages, 10-08-21 MINI-SU
10/26/21	Copies / Printing	\$6.60	Photocopy/Printing, 33 pages, EXHIBIT 56.PDF
10/26/21	Copies / Printing	\$2.00	Photocopy/Printing, 10 pages, EXHIBIT 58.PDF
10/26/21	Copies / Printing	\$9.00	Photocopy/Printing, 45 pages, 10-15-21 MINI-OS
10/26/21	Copies / Printing	\$8.40	Photocopy/Printing, 42 pages, EXHIBIT 51 (1).P
10/26/21	Copies / Printing	\$20.00	Photocopy/Printing, 100 pages, EXHIBIT 53 (1).P
10/26/21	Copies / Printing	\$8.00	Photocopy/Printing, 40 pages, EXHIBIT 56 (1).P
10/26/21	Copies / Printing	\$4.80	Photocopy/Printing, 24 pages, EXHIBIT 60 (1).P
10/26/21	Copies / Printing	\$2.00	Photocopy/Printing, 10 pages, EXHIBIT 63 (1).P
10/26/21	Copies / Printing	\$3.40	Photocopy/Printing, 17 pages, EX 100_10.14.21_
10/26/21	Copies / Printing	\$3.80	Photocopy/Printing, 19 pages, EX 102_PLS000527
10/26/21	Copies / Printing	\$3.40	Photocopy/Printing, 17 pages, EX 101_30(B)(6)
10/26/21	Copies / Printing	\$6.60	Photocopy/Printing, 33 pages, EX 105_PLS00527-
10/26/21	Copies / Printing	\$10.80	Photocopy/Printing, 54 pages, EX 109_FF1004720
10/27/21	Copies / Printing	\$3.00	Photocopy/Printing, 15 pages, RODRIGUEZ - MCDO
11/06/21	Copies / Printing	\$6.80	Photocopy/Printing, 34 pages, 125.PDF
11/06/21	Copies / Printing	\$2.20	Photocopy/Printing, 11 pages, 126.PDF
11/06/21	Copies / Printing	\$4.20	Photocopy/Printing, 21 pages, 126-1.PDF
11/06/21	Copies / Printing	\$6.00	Photocopy/Printing, 30 pages, 126-2.PDF
11/06/21	Copies / Printing	\$8.60	Photocopy/Printing, 43 pages, 126-13.PDF
11/06/21	Copies / Printing	\$11.00	Photocopy/Printing, 55 pages, 127-10.PDF
11/06/21	Copies / Printing	\$6.80	Photocopy/Printing, 34 pages, 127-6.PDF
11/06/21	Copies / Printing	\$4.00	Photocopy/Printing, 20 pages, 127-4.PDF
11/06/21	Copies / Printing	\$13.60	Photocopy/Printing, 68 pages, 127-3.PDF
11/06/21	Copies / Printing	\$3.60	Photocopy/Printing, 18 pages, 127-2.PDF
11/06/21	Copies / Printing	\$3.60	Photocopy/Printing, 18 pages, 127-1.PDF
11/06/21	Copies / Printing	\$3.40	Photocopy/Printing, 17 pages, 126-21.PDF
11/06/21	Copies / Printing	\$6.40	Photocopy/Printing, 32 pages, 126-14.PDF
11/06/21	Copies / Printing	\$8.20	Photocopy/Printing, 41 pages, 126-10.PDF
11/06/21	Copies / Printing	\$9.00	Photocopy/Printing, 45 pages, 126-9.PDF

11/06/21	Copies / Printing	\$2.40	Photocopy/Printing, 12 pages, 126-5.PDF
11/06/21	Copies / Printing	\$3.20	Photocopy/Printing, 16 pages, 126-4.PDF
11/06/21	Copies / Printing	\$6.80	Photocopy/Printing, 34 pages, 126-16.PDF
11/06/21	Copies / Printing	\$24.00	Photocopy/Printing, 120 pages, 127-25.PDF
11/06/21	Copies / Printing	\$21.00	Photocopy/Printing, 105 pages, 127-27.PDF
11/06/21	Copies / Printing	\$13.40	Photocopy/Printing, 67 pages, 127-26.PDF
11/06/21	Copies / Printing	\$6.80	Photocopy/Printing, 34 pages, 127-23.PDF
11/06/21	Copies / Printing	\$2.20	Photocopy/Printing, 11 pages, 127-18.PDF
11/06/21	Copies / Printing	\$5.20	Photocopy/Printing, 26 pages, 127-17.PDF
11/06/21	Copies / Printing	\$6.60	Photocopy/Printing, 33 pages, 127-24.PDF
11/06/21	Copies / Printing	\$2.00	Photocopy/Printing, 10 pages, 130.PDF
11/06/21	Copies / Printing	\$3.20	Photocopy/Printing, 16 pages, 127-36.PDF
11/06/21	Copies / Printing	\$17.20	Photocopy/Printing, 86 pages, 128-2.PDF
11/06/21	Copies / Printing	\$2.00	Photocopy/Printing, 10 pages, 127-32.PDF
11/06/21	Copies / Printing	\$6.80	Photocopy/Printing, 34 pages, 125.PDF
11/06/21	Copies / Printing	\$2.20	Photocopy/Printing, 11 pages, 126.PDF
11/06/21	Copies / Printing	\$4.20	Photocopy/Printing, 21 pages, 126-1.PDF
11/06/21	Copies / Printing	\$6.00	Photocopy/Printing, 30 pages, 126-2.PDF
11/06/21	Copies / Printing	\$6.40	Photocopy/Printing, 32 pages, 126-14.PDF
11/06/21	Copies / Printing	\$3.20	Photocopy/Printing, 16 pages, 126-4.PDF
11/06/21	Copies / Printing	\$2.40	Photocopy/Printing, 12 pages, 126-5.PDF
11/06/21	Copies / Printing	\$9.00	Photocopy/Printing, 45 pages, 126-9.PDF
11/06/21	Copies / Printing	\$8.20	Photocopy/Printing, 41 pages, 126-10.PDF
11/06/21	Copies / Printing	\$4.00	Photocopy/Printing, 20 pages, 127-4.PDF
11/06/21	Copies / Printing	\$8.60	Photocopy/Printing, 43 pages, 126-13.PDF
11/06/21	Copies / Printing	\$6.80	Photocopy/Printing, 34 pages, 126-16.PDF
11/06/21	Copies / Printing	\$3.40	Photocopy/Printing, 17 pages, 126-21.PDF
11/06/21	Copies / Printing	\$3.60	Photocopy/Printing, 18 pages, 127-1.PDF
11/06/21	Copies / Printing	\$13.60	Photocopy/Printing, 68 pages, 127-3.PDF
11/06/21	Copies / Printing	\$6.80	Photocopy/Printing, 34 pages, 127-6.PDF
11/06/21	Copies / Printing	\$11.00	Photocopy/Printing, 55 pages, 127-10.PDF
11/06/21	Copies / Printing	\$5.20	Photocopy/Printing, 26 pages, 127-17.PDF
11/06/21	Copies / Printing	\$2.20	Photocopy/Printing, 11 pages, 127-18.PDF
11/06/21	Copies / Printing	\$6.80	Photocopy/Printing, 34 pages, 127-23.PDF
11/06/21	Copies / Printing	\$6.60	Photocopy/Printing, 33 pages, 127-24.PDF
11/06/21	Copies / Printing	\$3.60	Photocopy/Printing, 18 pages, 127-2.PDF
11/06/21	Copies / Printing	\$3.20	Photocopy/Printing, 16 pages, 127-36.PDF
11/06/21	Copies / Printing	\$13.40	Photocopy/Printing, 67 pages, 127-26.PDF
11/06/21	Copies / Printing	\$2.00	Photocopy/Printing, 10 pages, 127-32.PDF
11/06/21	Copies / Printing	\$17.20	Photocopy/Printing, 86 pages, 128-2.PDF
11/06/21	Copies / Printing	\$2.00	Photocopy/Printing, 10 pages, 130.PDF
11/06/21	Copies / Printing	\$24.00	Photocopy/Printing, 120 pages, 127-25.PDF
11/06/21	Copies / Printing	\$21.00	Photocopy/Printing, 105 pages, 127-27.PDF
11/06/21	Copies / Printing	\$21.00	Photocopy/Printing, 105 pages, 127-27.PDF
11/06/21	Copies / Printing	\$13.40	Photocopy/Printing, 67 pages, 127-26.PDF
11/06/21	Copies / Printing	\$6.80	Photocopy/Printing, 34 pages, 127-23.PDF
11/06/21	Copies / Printing	\$6.60	Photocopy/Printing, 33 pages, 127-24.PDF
11/06/21	Copies / Printing	\$24.00	Photocopy/Printing, 120 pages, 127-25.PDF
11/06/21	Copies / Printing	\$2.00	Photocopy/Printing, 10 pages, 127-32.PDF
11/06/21	Copies / Printing	\$4.60	Photocopy/Printing, 23 pages, 128-2.PDF
11/06/21	Copies / Printing	\$5.20	Photocopy/Printing, 26 pages, 128-2.PDF
11/06/21	Copies / Printing	\$5.20	Photocopy/Printing, 26 pages, 128-2.PDF
11/06/21	Copies / Printing	\$8.20	Photocopy/Printing, 41 pages, 126-10.PDF
11/06/21	Copies / Printing	\$9.80	Photocopy/Printing, 49 pages, 126-9.PDF
11/06/21	Copies / Printing	\$24.00	Photocopy/Printing, 120 pages, 127-25.PDF
11/06/21	Copies / Printing	\$6.60	Photocopy/Printing, 33 pages, 127-24.PDF
11/06/21	Copies / Printing	\$6.80	Photocopy/Printing, 34 pages, 127-23.PDF
11/06/21	Copies / Printing	\$2.40	Photocopy/Printing, 12 pages, 126-5.PDF

11/06/21	Copies / Printing	\$9.80	Photocopy/Printing, 49 pages, 126-9.PDF
11/06/21	Copies / Printing	\$8.60	Photocopy/Printing, 43 pages, 126-13.PDF
11/06/21	Copies / Printing	\$6.40	Photocopy/Printing, 32 pages, 126-14.PDF
11/06/21	Copies / Printing	\$6.80	Photocopy/Printing, 34 pages, 126-16.PDF
11/06/21	Copies / Printing	\$3.20	Photocopy/Printing, 16 pages, 127-36.PDF
11/06/21	Copies / Printing	\$6.00	Photocopy/Printing, 30 pages, 126-2.PDF
11/06/21	Copies / Printing	\$3.20	Photocopy/Printing, 16 pages, 126-4.PDF
11/06/21	Copies / Printing	\$6.40	Photocopy/Printing, 32 pages, 126-14.PDF
11/06/21	Copies / Printing	\$3.40	Photocopy/Printing, 17 pages, 126-21.PDF
11/06/21	Copies / Printing	\$13.60	Photocopy/Printing, 68 pages, 127-3.PDF
11/06/21	Copies / Printing	\$5.20	Photocopy/Printing, 26 pages, 127-17.PDF
11/09/21	Copies / Printing	\$4.00	Photocopy/Printing, 20 pages, EXHIBIT 130.PDF
11/09/21	Copies / Printing	\$4.80	Photocopy/Printing, 24 pages, 10-26-21 MINI-AN
11/09/21	Copies / Printing	\$3.80	Photocopy/Printing, 19 pages, FHI003589-003605
11/09/21	Copies / Printing	\$17.00	Photocopy/Printing, 85 pages, FHI003606-003688
11/09/21	Copies / Printing	\$3.80	Photocopy/Printing, 19 pages, EXHIBIT 20.PDF
11/16/21	Copies / Printing	\$4.20	Photocopy/Printing offsite, CKC, Elkhorn Packing 9th Circuit decision
11/19/21	Copies / Printing	\$2.20	Photocopy/Printing, 11 pages, 28-1 - BRIEF FOR
11/19/21	Copies / Printing	\$5.80	Photocopy/Printing, 29 pages, 28-2 - EX DECL M
11/19/21	Copies / Printing	\$2.60	Photocopy/Printing, 13 pages, ECF 139-2 EXHIBI
11/19/21	Copies / Printing	\$11.40	Photocopy/Printing, 57 pages, ECF 139-4 EXHIBI
11/19/21	Copies / Printing	\$4.00	Photocopy/Printing, 20 pages, ECF 139 REPLY (R
11/19/21	Copies / Printing	\$4.00	Photocopy/Printing, 20 pages, ECF 139 REPLY (R
11/19/21	Copies / Printing	\$11.40	Photocopy/Printing, 57 pages, ECF 139-4 EXHIBI
11/19/21	Copies / Printing	\$2.60	Photocopy/Printing, 13 pages, ECF 139-2 EXHIBI
11/22/21	Copies / Printing	\$5.80	Photocopy/Printing, 29 pages, MICROSOFT WORD -
11/22/21	Copies / Printing	\$5.80	Photocopy/Printing, 29 pages, MICROSOFT WORD -
11/23/21	Copies / Printing	\$5.80	Photocopy/Printing, 29 pages, MICROSOFT WORD -
11/30/21	Copies / Printing	\$10.40	Photocopy/Printing, 52 pages, ECF 132-2.PDF
11/30/21	Copies / Printing	\$7.20	Photocopy/Printing, 36 pages, MICROSOFT WORD -
11/30/21	Copies / Printing	\$7.20	Photocopy/Printing, 36 pages, MICROSOFT WORD -
12/01/21	Copies / Printing	\$4.80	Photocopy/Printing offsite, CKC, cases and materials for MSJ argument
12/07/21	Copies / Printing	\$60.00	Photocopy/Printing CKC in-office, Regulatory history for Summary judgment hearing
12/08/21	Copies / Printing	\$9.60	Photocopy/Printing offsite, CKC, cases and materials for MSJ argument
12/14/21	Copies / Printing	\$7.20	Photocopy/Printing, 36 pages, MICROSOFT WORD -
12/14/21	Copies / Printing	\$3.00	Photocopy/Printing, 15 pages, MICROSOFT WORD -
12/14/21	Copies / Printing	\$2.00	Photocopy/Printing, 10 pages, MICROSOFT WORD -
12/14/21	Copies / Printing	\$2.80	Photocopy/Printing, 14 pages, MICROSOFT WORD -
12/14/21	Copies / Printing	\$2.20	Photocopy/Printing, 11 pages, MICROSOFT WORD -
12/14/21	Copies / Printing	\$2.20	Photocopy/Printing, 11 pages, MICROSOFT WORD -
12/14/21	Copies / Printing	\$2.00	Photocopy/Printing, 10 pages, MICROSOFT WORD -
12/14/21	Copies / Printing	\$3.20	Photocopy/Printing, 16 pages, ECF 147 ORDER GR
12/14/21	Copies / Printing	\$4.60	Photocopy/Printing, 23 pages, 02 - CHAMBERS V
12/14/21	Copies / Printing	\$5.20	Photocopy/Printing, 26 pages, 03 - TERREBONNE
12/14/21	Copies / Printing	\$2.00	Photocopy/Printing, 10 pages, 09 - PARRIS V SU
12/14/21	Copies / Printing	\$3.00	Photocopy/Printing, 15 pages, 10 - ROSSINI V O
01/03/22	Copies / Printing	\$2.80	Photocopy/Printing offsite, CKC, motion for judgment
01/10/22	Copies / Printing	\$3.00	Photocopy/Printing, 15 pages, MICROSOFT WORD -
02/01/22	Copies / Printing	\$2.40	Photocopy/Printing, 12 pages, 2022-01-31 RJN I
02/01/22	Copies / Printing	\$14.40	Photocopy/Printing, 72 pages, 2022-01-31 PETIT
07/28/22	Copies / Printing	\$11.20	Photocopy/Printing, 56 pages, 191-1 - DECL. OF
08/17/22	Copies / Printing	\$112.00	Photocopy/Printing in-office, CID, binder project
08/18/22	Copies / Printing	\$18.40	Photocopy/Printing in-office, binder project, CID
12/06/22	Copies / Printing	\$19.60	Photocopy/Printing offsite, CKC, cases and materials for MSJ argument
03/14/23	Copies / Printing	\$16.60	Photocopy/Printing in-office, BCF, attorney binder

\$1,954.40

<u>Client</u>	<u>Trans Date</u>	<u>Atty</u>	<u>H P</u>	<u>Tcode/ Task Code</u>	<u>Rate</u>	<u>Amount</u>	<u>Ref #</u>
---------------	-------------------	-------------	------------	-------------------------	-------------	---------------	--------------

Tcode 105 Secretarial Overtime

1564.001	08/16/2021	21	P	105	12.92	Secretarial Overtime - Bella Fresh Harvest, Inc. Re: Fresh Harvest, Fresh Foods, Rava Ranches, SMD	8
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Total for Tcode 105					Billable	12.92	Secretarial Overtime
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<u>Client</u>	<u>Trans Date</u>	<u>Atty</u>	<u>H P</u>	<u>Tcode/ Task Code</u>	<u>Rate</u>	<u>Amount</u>	<u>Ref #</u>
---------------	-------------------	-------------	------------	-------------------------	-------------	---------------	--------------

Tcode 106 Telephone

1564.001	06/30/2021	21	P	106	1.000	9.30 Telephone - Intrado Conference Calls Fresh Harvest, Inc.	3
1564.001	10/31/2021	21	P	106	1.000	45.21 Re: Fresh Harvest, Fresh Foods, Rava Ranches, SMD Telephone Conference Calls Fresh Harvest, Inc. Re: Fresh Harvest, Fresh Foods, Rava Ranches, SMD	117

Total for Tcode 106					Billable	54.51 Telephone	
----------------------------	--	--	--	--	----------	-----------------	--

<u>Client</u>	<u>Trans Date</u>	<u>Atty</u>	<u>H P</u>	<u>Tcode/ Task Code</u>	<u>Rate</u>	<u>Amount</u>	<u>Ref #</u>
---------------	-------------------	-------------	------------	-------------------------	-------------	---------------	--------------

Tcode 107 Postage

1564.001	11/23/2021	21	P	107		1.36 Postage	121
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<u>Client</u>	<u>Trans Date</u>	<u>Atty</u>	<u>H P</u>	<u>Tcode/ Task Code</u>	<u>Rate</u>	<u>Amount</u>	<u>Ref #</u>
Tcode 107 Postage							
						Fresh Harvest, Inc. Re: Fresh Harvest, Fresh Foods, Rava Ranches, SMD	
Total for Tcode 107					Billable	1.36 Postage	

ALTSHULER BERZON LLP

EXPENSE REPORT

Effective January 1, 2019

Please use a separate sheet for **each case** and attach pertinent receipts for personal reimbursement and AMEX OR VISA charges. Please submit timely after expenses have been incurred. Thanks for your help.

Name: Chan, Connie	Case Name: 1564.001 / Fresh Harvest	Date(s) of Expense(s): 12/16/21
--------------------	-------------------------------------	------------------------------------

PERSONAL CASH AND CREDIT CARD REIMBURSEMENTS	TOTAL	Firm AMERICAN EXPRESS OR VISA CHARGES	TOTAL
		Parking at court for hearing on motion for sanctions (no receipt given)	\$18.00
TOTAL	\$0.00	TOTAL	\$18.00



Prepared For: ALTSHULER BERZON LLP

Account Number

Posting Date

Page 11 of 21

01/04/22

Activity Continued

Card Number XXXX-XXXXX0-51766

Reference Code

Amount \$

12/17/21	BLOCK 8 PARKING LOT SAN JOSE	CA	74760621351	18.00
	REF# 74760621351 408-446-0700	12/16/21	1564.001 Fresh Harvest (parking at hearing) (no receipt)	
Total for CONNIE CHAN			New Charges/Other Debits	
			Payments/Other Credits	0.00

ALTSHULER BERZON LLP

EXPENSE REPORT

Effective January 1, 2020

Please use a separate sheet for **each case** and attach pertinent receipts for personal reimbursement and AMEX OR VISA charges. Please submit timely after expenses have been incurred.
 Thanks for your help!

Name: Caroline Drysdale	Case Name: Fresh Harvest (1564.001)	Date(s) of Expense(s): 03/09/2023
-------------------------	-------------------------------------	-----------------------------------

PERSONAL CASH AND CREDIT CARD REIMBURSEMENTS	TOTAL	Firm AMERICAN EXPRESS OR VISA CHARGES (Indicate AMEX or VISA)	TOTAL
Uber from AB to Home (██████████) after OT Settlement Filing on 3/9/23 at 10:36 PM	\$12.07		
Personal Credit Card Reimbursement			
Mileage Total Miles @ .55/mile =			
TOTALS:	\$ 12.07		\$



March 9, 2023

Here's your receipt for your ride, Caroline

We hope you enjoyed your ride this afternoon.

Total **\$12.07**

Trip fare \$20.88

Subtotal **\$20.88**

Membership Benefit -\$1.06

Promotion -\$8.05

CA Driver Benefits \$0.30

Payments



Discover ****
3/9/23 10:44 PM

\$12.07

A temporary hold of \$12.07 was placed on your payment method ****. This is not a charge and will be removed. It should disappear from your bank statement shortly.

[Visit the trip page](#) for more information, including invoices (where available)

You rode with Boris (BM)

Issued on behalf of Boris (BM)

Black 1.37 miles | 7
min

10:36 PM | 177 Post St, San Francisco, CA 94108-4701, US

10:44 PM |

Fare does not include fees that may be charged by your bank. Please contact your bank directly for inquiries.

Fresh Harvest
1564.00
T✓
A✓

TOSHI'S LEGAL CONNECTION

3701 Sacramento Street, #269
 San Francisco, California 94118

INVOICE

Date: December 8, 2021
Invoice Number: 64-1324
Client's Billing Code:
Client: Altshuler, Berzon, LLP
 177 Post Street, Suite 300
 San Francisco, CA 94108
 Attention: Bella

Case Name:	
Court:	San Jose United State District Court
Case Number:	5:20-cv-7974-BLF

JOB INFORMATION/DETAILS

Delivery to Clerks office
Date/Time of Service: November 8, 2021 & November 30, 2021

Fees

Court Service 2 at \$200 per	\$400.00
Hand Delivery	
Dept. Delivery	
Court/Time	
Box Charges	
Advance Fees	
Advanced Check Fees	
TOTAL DUE	\$400.00

T ✓
A ✓

TOSHI'S LEGAL CONNECTION

3701 Sacramento Street, #269
San Francisco, California 94118

INVOICE

Date: July 6, 2022
Invoice Number: 64-1328
Client's Billing Code:
Client: Altshuler, Berzon, LLP
 177 Post Street, Suite 300
 San Francisco, CA 94108
 Attention: Bella

Case Name:	15 64. 001
Court:	San Jose United State District Court
Case Number:	5:20-cv-7974-BLF

JOB INFORMATION/DETAILS

Rush delivery to Clerks office
Date/Time of Service: June 29, 2022

Fees

Court Service	\$200.00
Hand Delivery	
Dept. Delivery	
Rush Charges	\$40.00
Box Charges	
Advance Fees	
Advanced Check Fees	
TOTAL DUE	\$240.00

1567.00
TX
A ✓
~~Hold~~
ER will let
me know
when to
PAY.
PAY

INVOICE



Jeri Cain, CSR, Inc.
A Professional Corporation

Eve H. Cervantez
ALTSHULER BERZON LLP
177 Post Street, Suite 300
San Francisco, CA 94108

Invoice No.	Invoice Date	Job No.
77213	10/15/2021	222356
Job Date	Case No.	
10/5/2021	5:20-CV-7974-BLF	
Case Name		
RIGOBERTO SARMIENTO and GUSTAVO LUEVANO-VACA v FRESH HARVEST, INC.		
Payment Terms		
Payable upon receipt		

ORIGINAL & CERTIFIED COPY OF THE DEPOSITION OF:

NORBERTO MENDIVIL	92.00	@	6.000	552.00
APPEARANCE FEE	1.00	@	250.000	250.00
VIDEOCONFERENCE	1.00	@	150.000	150.00
INTERPRETER PER PAGE	92.00	@	1.000	92.00
ORIGINAL TRANS DELIVERY	1.00	@	55.000	55.00
EXHIBITS	36.00	@	0.550	19.80
WORD INDEX	1.00	@	10.000	10.00
E-TRANSCRIPT (SEARCHABLE .PTX-.PTZ/.PDF w/LINKED EXHIBITS)	1.00	@	50.000	50.00

TOTAL DUE >>> \$1,178.80

AFTER 11/20/2021 PAY \$1,296.68

Payment is due upon receipt of invoice. Merit Reporting, Merit Reporting & Videoconferencing and Merit Court Reporting & Video are dba's. Make checks payable to Jeri Cain, CSR, Inc. Add 2.15% to the invoice when paying by credit card. Thank you for choosing Merit! We appreciate your business!

Tax ID: 20-3438808

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Eve H. Cervantez
ALTSHULER BERZON LLP
177 Post Street, Suite 300
San Francisco, CA 94108

Job No. : 222356 BU ID : 1-MAIN
Case No. : 5:20-CV-7974-BLF
Case Name : RIGOBERTO SARMIENTO and GUSTAVO LUEVANO-VACA v FRESH HARVEST, INC.
Invoice No. : 77213 Invoice Date : 10/15/2021

Total Due : \$1,178.80
AFTER 11/20/2021 PAY \$1,296.68

PAYMENT WITH CREDIT CARD



Cardholder's Name: _____
 Card Number: _____
 Exp. Date: _____ Phone#: _____
 Billing Address: _____
 Zip: _____ Card Security Code: _____
 Amount to Charge: _____
 Cardholder's Signature: _____
 Email: _____

Remit To: **JERI CAIN, CSR, INC.**
dba MERIT COURT REPORTING & VIDEO
3220 S. Higuera St, Ste 323
info@MeritReporting.com Ph 805.541.0333
San Luis Obispo, CA 93401-6987

INVOICE

1 of 1



1564-001
TV
AV
PAY

Invoice No.	Invoice Date	Job No.
77395	11/10/2021	222486
Job Date	Case No.	
10/26/2021	5:20-CV-7974-BLF	
Case Name		
RIGOBERTO SARMIENTO and GUSTAVO LUEVANO-VACA v FRESH HARVEST, INC.		
Payment Terms		
Payable upon receipt		

Eve H. Cervantez
 ALTSHULER BERZON LLP
 177 Post Street, Suite 300
 San Francisco, CA 94108

ORIGINAL & CERTIFIED COPY OF THE DEPOSITION OF:
 ANGEL RINCON

1,180.00
TOTAL DUE >>> \$1,180.00

AFTER 12/16/2021 PAY \$1,298.00

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 ALTSHULER BERZON LLP
 177 Post Street, Suite 300
 San Francisco, CA 94108

Job No. : 222486 BU ID : 1-MAIN
 Case No. : 5:20-CV-7974-BLF
 Case Name : RIGOBERTO SARMIENTO and GUSTAVO LUEVANO-VACA v FRESH HARVEST, INC.
 Invoice No. : 77395 Invoice Date : 11/10/2021
Total Due : \$1,180.00

AFTER 12/16/2021 PAY \$1,298.00

PAYMENT WITH CREDIT CARD



Cardholder's Name: _____
 Card Number: _____
 Exp. Date: _____ Phone#: _____
 Billing Address: _____
 Zip: _____ Card Security Code: _____
 Amount to Charge: _____
 Cardholder's Signature: _____
 Email: _____

Remit To: **JERI CAIN, CSR, INC.**
dba MERIT COURT REPORTING & VIDEO
3220 S. Higuera St, Ste 323
info@MeritReporting.com Ph 805.541.0333
San Luis Obispo, CA 93401-6987

ACT FROM
BSE

ST44 Rev. 04/18
Derived from AO44 Rev. 04/18

**UNITED STATES DISTRICT COURT
For the Northern District of California**

INVOICE 20210298

MAKE CHECKS PAYABLE TO:

Eve Cervantez, Esq.
ALTSHULER BERZON, LLP
177 Post Street
Suite 300
San Francisco, CA 94108

Belle Ball, CSR,CRR,RDR
Official Reporter, USDC
450 Golden Gate Avenue
16th Floor
San Francisco, CA 94102
(415) 373-2529
belle_ball@cand.uscourts.gov

CRIMINAL CIVIL

DATE ORDERED:
11-10-2021

DATE DELIVERED:
11-10-2021

In the matter of: 20-CV-07974-BLF(SVK), Sarmiento, et al. v Fresh Harvest, et al.

Transcript of recording of hearing held before Hon. Susan Van Keulen on September 3, 2021
(O/PDF, one-day delivery, deposit in progress)

CATEGORY	ORIGINAL			1 ST COPY			2 ND COPY			TOTAL CHARGES
	PAGES	PRICE	SUBTOTAL	PAGES	PRICE	SUBTOTAL	PAGES	PRICE	SUBTOTAL	
Ordinary										
14-Day										
Expedited										
3-Day										
Daily	40	6.05	242.00							242.00
Hourly										
Realtime										
Misc.	Misc. Charges									
Subtotal									242.00	
Less Discount for Late Delivery										
Tax (If Applicable)										
Less Amount of Deposit										
Total Refund										
Total Due									242.00	

ADDITIONAL INFORMATION

Full price may be charged only if the transcript is delivered within the required time frame. For example, if an order for expedited transcript is not completed and delivered within (7) calendar days, payment would be at the 14-day delivery rate, and if not completed and delivered within 14 days, payment would be at the ordinary delivery rate.

CERTIFICATION

I certify that the transcript fees charged and page format used comply with the requirements of this court and the Judicial Conference of the United States.

SIGNATURE:
/s/ Belle Ball, CSR 8785

DATE:
11-10-2021

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**UNITED STATES DISTRICT COURT
For the Northern California**

INVOICE 20222992

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Eve Cervantez
Altshuler Berzon, LLP
177 Post Street, STE 300
San Francisco, CA 94108
(415) 421-7151
ecervantez@altber.com

SUMMER A. FISHER
Official Court Reporter
280 S. First Street
Room 2112
San Jose, CA 95113
(408) 763-0563
summer_fisher@cand.uscourts.gov

CRIMINAL CIVIL DATE ORDERED: 04-15-2022 DATE DELIVERED: 04-19-2022

In the matter of: CV-20-7974-BLF, Sarmiento v Fresh Harvest, et al
Thank you for your business! Please send payment within 21 days of receiving this invoice.
12/9/21 Judge Freeman

CATEGORY	ORIGINAL			1 ST COPY			2 ND COPY			TOTAL CHARGES
	PAGES	PRICE	SUBTOTAL	PAGES	PRICE	SUBTOTAL	PAGES	PRICE	SUBTOTAL	
Ordinary				53	0.90	47.70				47.70
14-Day										
Expedited										
3-Day										
Daily										
Hourly										
Realtime										
Misc.									Misc. Charges	
									Subtotal	47.70
									Less Discount for Late Delivery	
									Tax (If Applicable)	
									Less Amount of Deposit	
									Total Refund	
									Total Due	47.70

ADDITIONAL INFORMATION

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CERTIFICATION

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SIGNATURE: **Summer A. Fisher** DATE: **04-19-2022**

ST44 Rev. 04/18
Derived from AO44 Rev. 04/18

**UNITED STATES DISTRICT COURT
For the Northern California**

INVOICE 20223051

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Eve Cervantez
Altshuler Berzon, LLP
177 Post Street, STE 300
San Francisco, CA 94108
(415) 421-7151
ecervantez@altber.com

SUMMER A. FISHER
Official Court Reporter
280 S. First Street
Room 2112
San Jose, CA 95113
(408) 763-0563
summer_fisher@cand.uscourts.gov

CRIMINAL CIVIL

DATE ORDERED: 08-11-2022

DATE DELIVERED: 08-12-2022

In the matter of: CV-20-7974-BLF, Sarmiento v Fresh Harvest, Inc., et al

Thank you for your business! Please send payment within 21 days of receiving this invoice.

8/11/22 Judge Freeman

*TV ✓
AP ✓
#17 //*

CATEGORY	ORIGINAL			1 ST COPY			2 ND COPY			TOTAL CHARGES
	PAGES	PRICE	SUBTOTAL	PAGES	PRICE	SUBTOTAL	PAGES	PRICE	SUBTOTAL	
Ordinary										
14-Day										
Expedited										
3-Day	28	5.45	152.60							152.60
Daily										
Hourly										
Realtime										
Misc.	Misc. Charges									
Subtotal										152.60
Less Discount for Late Delivery										
Tax (If Applicable)										
Less Amount of Deposit										
Total Refund										
Total Due										152.60

ADDITIONAL INFORMATION

Full price may be charged only if the transcript is delivered within the required time frame. For example, if an order for expedited transcript is not completed and delivered within (7) calendar days, payment would be at the 14-day delivery rate, and if not completed and delivered within 14 days, payment would be at the ordinary delivery rate.

CERTIFICATION

I certify that the transcript fees charged and page format used comply with the requirements of this court and the Judicial Conference of the United States.

SIGNATURE:
Summer A. Fisher

DATE:
08-12-2022

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