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15 ATTORNEYS FOR PLAINTIFFS AND THE CLASS

16 IN THE UNITED STATES DISTRICT COURT  
 FOR THE NORTHERN DISTRICT OF CALIFORNIA  
 17 SAN JOSE DIVISION

18	RIGOBERTO SARMIENTO, GUSTAVO )	
	LUEVANO-VACA, and others similarly situated, )	CIVIL ACT. NO.: 5:20-cv-7974-BLF
19	)	
	,	)
20	)	DECLARATION OF DAWSON MORTON
	Plaintiffs, )	IN SUPPORT OF PLAINTIFFS' FEE
21	)	PETITION
	vs. )	
22	)	
	)	
23	FRESH HARVEST, INC., et al., )	
	)	
24	)	
	Defendants. )	
25	)	
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**DECLARATION OF DAWSON MORTON**

I, Dawson Morton, do hereby declare:

1. I am one of the lead attorneys for the Plaintiffs and the Class in the above-styled matter. I make these statements based on personal knowledge and would so testify if called as a witness at trial. This Declaration is submitted in support of Plaintiffs’ Motion for Approval of Attorneys’ Fees, Costs, and Service Awards.

2. I am a member in good standing of the State Bars of Georgia and California. I earned my Juris Doctor Degree from New York University School of Law in 1999, and was admitted to practice in the State of Georgia the same year. I was admitted to practice in California, first as a Registered Legal Services Attorney in 2016 and later as a member of the bar in May of 2018.

3. I speak both Spanish and English and have in excess of twenty years of experience representing agricultural workers in employment disputes.

4. I am currently an attorney with the Law Offices of Santos Gomez in Watsonville. I was previously the Litigation Director for the California Rural Legal Assistance Foundation in Sacramento where I worked from 2016 to 2019. Previously I was a Senior Staff Attorney in the Atlanta office of the Farmworker Rights Division of Georgia Legal Services, a nonprofit organization that provided free civil legal services to indigent clients. I served in that position from 2002 through May of 2016. Prior to being Senior Staff Attorney, I was a Staff Attorney at the Tifton office of the Farmworker Division of Georgia Legal Services from 1999 to 2002.

5. I have been litigating employment cases for immigrant laborers since the start of my career in 1999. During my career, I have represented hundreds of immigrant and low-wage worker clients with claims under employment and discrimination statutes. I have served as lead counsel, co-counsel, or intervenor’s counsel in numerous suits asserting class or collective action claims. Among others, I was lead counsel for certified collective actions of farmworker plaintiffs in the following cases: *Reyes-Fuentes v. Shannon Produce Farm, Inc.*, Civ. Act. No. 6:08-cv-59 (S.D. Ga.); *Ojeda-Sanchez v. Bland Farms, LLC*, Civ. Act. No. 6:08-cv-96 (S.D. Ga.); *Garcia-Mancha, et*

1 *al. v. Hendrix Produce, Inc.*, Civ. Act. No. 6:10-cv-36 (BAE) (S.D. Ga.); *Tomason v. Stanley*  
2 *Farms*, Civ. Act. No. 6:13-cv-42 (S.D. Ga.). I was lead counsel for the charging parties/intervenors  
3 in the following pattern and practice discrimination cases: *EEOC v. Hamilton Growers, Inc.*, Civ.  
4 Act. No. 7:11-CV-134 (M.D. Ga.) and *EEOC v. J & R Baker Farms*, Civ. Act. No. 7:14-CV-136  
5 (M.D. Ga.). In California, I have been co-lead counsel in PAGA and class actions including:  
6 *Guzman-Padilla v. G & H Dairy*, 2:17-cv-00196-KJN (E.D. Ca.), *Lopez-Gutierrez v. Foothill*  
7 *Packing, Inc.*, Civ. Act. No. 17CV001629 (Monterey Sup. Ct.), *Gomez-Gasca v Future Ag*  
8 *Management, Inc.*, Civ. Act. No. 4:19-cv-2359-YGR (N.D. Ca.), *Altamirano-Santiago v. Better*  
9 *Produce, Inc.*, 2:19-cv-3964-DDP (C.D. Ca.), and *Miguel-Sanchez v. Mesa Packing, Inc.*, 5:20-cv-  
10 823-VKD (N.D. Ca.).

11 6. In addition to my litigation work, I have served as a panelist or organizer at  
12 numerous conferences concerning the representation of immigrant workers, including conferences  
13 sponsored by the National Employment Lawyers Association, the National Legal Aid & Defenders  
14 Association, and the Georgia Chapter of the National Employment Lawyers Association. I am also  
15 a past board member of NELA-GA.

16 7. I am familiar with the experience of Santos Gomez, the principal of the Law Offices of  
17 Santos Gomez. Mr. Gomez received his Juris Doctor Degree from the University of California at  
18 Davis, King Hall, in 1993, and was admitted to practice law in California in 1994. He speaks, reads  
19 and writes English and Spanish. Mr. Gomez has represented agricultural workers in employment  
20 disputes since 1998. From 1998 through early 2006, he litigated wage and hour claims under  
21 California's unfair competition laws on behalf of agricultural workers. Since 2006, he has been  
22 litigating wage and hour class actions on behalf of California low wage workers, including  
23 agricultural workers.

24 8. As part of Plaintiffs' motion for attorney's fees in this case, I seek approval for 635  
25 hours of my time at an hourly rate of \$760. To date my lodestar for 590.1 hours is \$482,676. A  
26 detailed listing of my time expended in this matter is attached to this declaration as Exhibit 1. I  
27 anticipate that I will spend an additional 45 hours on this matter responding to class members and  
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1 preparing the final approval papers. After final approval, I estimate the lodestar for my time will  
2 rise to \$516,876.

3 9. We seek approval for 95.37 hours of Mr. Gomez’s time, at an hourly rate of \$800. Based on  
4 an \$800 hourly rate, the lodestar value of the time he will have devoted to this case through the final  
5 administration of the settlement is \$76,296. A detailed listing of Mr. Gomez’s time is attached to  
6 this declaration as Exhibit 2.

7 10. Accordingly, the total lodestar for the Law Offices of Santos Gomez will be \$593,172.

8 11. I am familiar with the market rate for attorneys of my and Mr. Gomez’s level of skill  
9 and experience in the San Francisco Bay Area, and I believe that our rates are equivalent to, or  
10 lower than, the market rates for many comparable attorneys, especially given our extensive  
11 experience in representing H-2A and other agricultural and migrant workers. Courts have often  
12 approved my and Mr. Gomez’s then-current rates. For example, two years ago, in *Miguel-Sanchez*  
13 *v. Mesa Packing, LLC*, 2021 U.S. Dist. LEXIS 202330, at \*30 (N.D. Cal. Oct. 20, 2021), the Court  
14 concluded “that Mr. Morton’s requested rate of \$725 and Mr. Gomez’s requested rate of \$750 [in  
15 2021] are both reasonable.” Commercial market rates for attorneys in the Bay Area have increased  
16 considerably in the past two years.

17 12. The total lodestar for the case, combining the lodestars of the Law Offices of Santos  
18 Gomez (\$593,172) and Altshuler Berzon LLP (\$1,704,957.50) is \$2,298,129.50. The \$497,017.20  
19 in attorneys’ fees we are seeking here thus constitutes a negative multiplier of approximately .21 on  
20 our actual lodestar.

21 13. In addition to our fees, our office expended \$40,381.12 in recoverable costs to date.  
22 The costs are detailed in Exhibit 3 to this declaration. Plaintiffs also anticipate close to a thousand  
23 dollars in additional translation costs for translations not yet billed in this matter. The costs detailed  
24 in Exhibit 3 were reasonably necessary for the prosecution of the action and include filing and  
25 service fees, research and copying costs, transcript fees, travel expenses, expert fees, mailing costs,  
26 mediation expenses, translation and interpreter fees.

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# EXHIBIT 1

Total	Hours	Rate	Dollar Amount	
	2020	38.05	760	\$28,918.00
	2021	378.7	760	\$287,812.00
	2022	144.95	760	\$110,162.00
	2023	73.4	760	\$55,784.00

estimated hours for final approval and class member communications	45	760	\$34,200.00
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Totals	635.1		\$516,876.00
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Total less estimated	590.1		\$482,676.00
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Date	Activity	Hours	Case
4/15/2020	review photos and docs from ct re potent a joint employer c a ms	1.75	Sarmiento
5/15/2020	review new c ent case f e; d scuss w/ SG and Esme; ema s re prev. wage	4.5	Sarmiento
5/19/2020	n t a review of c ents' payro records	2.75	Sarmiento
7/9/2020	zoom ca w/ new c ents re truck dr v ng	2	Fresh Harvest
7/9/2020	ema s w/ c ents	0.3	Fresh Harvest
7/9/2020	ca w/ Dave Scarano re reh re	0.4	Fresh Harvest
7/10/2020	ca w/ Dave Scarano re reh re	0.3	Fresh Harvest
7/10/2020	message w/ new c ents	0.4	Fresh Harvest
7/11/2020	ca w/ [REDACTED] re reh re	0.2	Fresh Harvest
7/20/2020	ca w/ DOL nvest gator	0.3	Fresh Harvest
7/23/2020	ca re DOL nvest gat on	0.2	Fresh Harvest
7/27/2020	message w/ [REDACTED] re next steps	0.1	Fresh Harvest
7/28/2020	message w/ [REDACTED] re case status	0.1	Fresh Harvest
7/29/2020	message w/ c ents	0.2	Fresh Harvest
9/3/2020	review pr or SMD su t	0.6	Fresh Harvest
9/21/2020	paystub ana yss of c ent's c a ms	3	Fresh Harvest
9/29/2020	ema from Rob Roy want ng sub c asses	0.2	Fresh Harvest
10/1/2020	ema s w/ Rob Roy about compa nt/ serv e	0.3	Fresh Harvest
10/14/2020	beg n draft ng comp a nt n Fresh Harvest su t; draft part es, h2a and fact sec	3	Fresh Harvest
10/14/2020	message w/ c ents	0.3	Fresh Harvest
10/15/20	work on draft comp a nt	2.5	Fresh Harvest
10/16/2020	nvest gate DOT regu at ons	0.3	Fresh Harvest
10/16/2020	ed ts to draft comp a nt	0.5	Fresh Harvest
10/19/2020	prepare quest ons for Fresh Foods worker	0.2	Fresh Harvest
10/19/2020	ca w/ Labor comm ss oner off ce re FH	0.3	Fresh Harvest
10/22/20	prepare c a ms assessment memo on FF	3.25	Fresh Harvest
10/22/2020	review job orders on truck dr v ng	1.5	Fresh Harvest
10/22/2020	ORR to EDD for FH and FF job orders and assoc ated records	0.4	Fresh Harvest
10/30/2020	ca w/ ct	0.8	Fresh Foods
11/02/2020	ed ts to comp a nt	0.2	Fresh Foods
11/12/2020	f na ze comp a nt w th no paga	4	Fresh Harvest
11/12/2020	prepare quest ona re for add' truckers	1.6	Fresh Harvest
11/13/2020	ema s about serv ce	0.2	Fresh Harvest
11/13/2020	ema s w/ DIR about reta at on towards p a nt ffs	0.3	Fresh Harvest
11/17/2020	ema to Rob Roy	0.2	Fresh Harvest
11/23/2020	review correspondence sent frm Fresh Harvest re payment	0.3	Fresh Harvest
11/24/2020	ema s w/ Ana re representat on	0.1	Fresh Harvest
12/1/2020	ca w/ Ana To edo re extens on	0.2	Fresh Harvest
12/1/2020	ema from C sto re extenton	0.1	Fresh Harvest
12/2/2020	f e mag strate form	0.2	Fresh Harvest

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Date	Activity	Hours	Case
1/28/2021	Speak with other drivers re pay		0.6 Fresh Harvest
2/5/2021	begin drafting FH Rfps		2.6 Fresh Harvest
2/11/2021	prepare initial disclosures	1.75	Fresh Harvest
2/11/2021	prepare draft 26f repor	1.9	Fresh Harvest
2/11/2021	prepare and finalize RFPs to SMD	3.3	Fresh Harvest
2/11/2021	prepare and finalize RFPS to FH	2.5	Fresh Harvest
3/9/2021	draft responses to RFPs from Fresh Foods	2.5	Fresh Harvest
3/25/2021	mesg w Rigo re case developmens	0.3	Fresh Harvest
3/25/2021	review recent Answers	2	Fresh Harvest
3/26/2021	call w/ Jesus and Santos re investigation of links, claims	0.9	Fresh Harvest
3/29/2021	make initial discovery notes	1.5	Fresh Harvest
3/31/2021	mesg and call w/ Rigoberto	0.8	Fresh Harvest
4/1/2021	begin ltr on FH discovery objections	2.5	Fresh Harvest
4/13/2021	finalize ltr to FH atty re Mechanics bank subpoena objections	1.5	Fresh Harvest
4/16/2021	conference call re subpoena	0.8	Fresh Harvest
4/19/2021	email opposing counsel re concerns re answers	0.2	Fresh Harvest
4/22/2021	begin drafting amended complaint	1.9	Fresh Harvest
4/23/2021	legal research to add to discovery statement	1	Fresh Harvest
4/23/2021	revise and finalize pls' statment in joint brief	2.5	Fresh Harvest
4/23/2021	emails w/ cpa firm attorney re subpoena	0.4	Fresh Harvest
4/27/2021	Speak with new clt; provide retainer	2.25	Fresh Harvest
4/30/2021	call w/ attorney for CPAs Farley Neuman	0.4	Fresh Harvest
4/30/2021	edits to proposed discovery stip re time line	0.3	Fresh Harvest
5/3/2021	legal research for summ j opposition; memo pulling case cites	3.5	Fresh Harvest
5/6/2021	further work on opposition to summ j brief	4	Fresh Harvest
5/6/2021	pull public record exhibits re H-2A from DOL database	2.4	Fresh Harvest
5/7/2021	revise and refine draft opposition brief on summ j	2.8	Fresh Harvest
5/7/2021	email w/ SG re draft brief	0.3	Fresh Harvest
5/10/2021	revise and finalize opposition brief	6.5	Fresh Harvest
5/10/2021	finalize exhibits for opposition	1.5	Fresh Harvest
5/11/2021	call w/ Tyler re subpoena to CPA objection	0.5	Fresh Harvest
5/11/2021	draft ltr to Shep Mullin attys re discovery responses	1.4	Fresh Harvest
5/12/2021	finalize letter to opposing counsel re discovery responses	1	Fresh Harvest
5/12/2021	call w Jim Finberg re cocounseling	0.5	Fresh Harvest
5/14/2021	draft brief re bank subpoenas	2	Fresh Harvest
5/14/2021	prepare charts for bank subpoena brief	1.2	Fresh Harvest
5/18/2021	provide verification to FF counsel	0.3	Fresh Harvest
5/18/2021	legal research and revisions to draft joint statement on CPA st	1.5	Fresh Harvest
5/19/2021	email w santos re amended complaint	0.2	Fresh Harvest
5/19/2021	review and refine draft amended complaint	1.6	Fresh Harvest
5/19/2021	finalize Pls' section of brief on CPA subpoena	1	Fresh Harvest
5/19/2021	prepare proposed order re CPA subpoena	0.2	Fresh Harvest
5/26/2021	revisions to ameded complaint	1.5	Fresh Harvest
5/26/2021	work on motion to amend	0.8	Fresh Harvest

5/26/2021	prepare proposed order for amended complaint	0.6	Fresh Harvest
5/26/2021	edit, revise and finalize brief to amend	2.6	Fresh Harvest
5/27/2021	finalize proposed amended complaint for filing	1	Fresh Harvest
6/1/2021	email w/ process server re subpoena	0.1	Fresh Harvest
6/1/2021	call w/ [REDACTED] re calls from defendants	0.3	Fresh Harvest
6/2/2021	call w/ Jim Finberg re case progress/co-counseling	0.4	Fresh Harvest
6/2/2021	prepare co-counseling agreement	0.3	Fresh Harvest
6/2/2021	review email from Derek re solicitation	0.2	Fresh Harvest
6/2/2021	review new client docs and docs from FH	0.6	Fresh Harvest
6/7/2021	revise and finalize motion to extend amendment deadline	1.5	Fresh Harvest
6/8/2021	call w/ potential cocounsel re discovery disputes	0.5	Fresh Harvest
6/8/2021	message worker former driver [REDACTED]	0.2	Fresh Harvest
6/9/2021	call w/ Santos re retaliation strategy	0.2	Fresh Harvest
6/9/2021	review new order from magistrate re subpoenas	0.2	Fresh Harvest
6/9/2021	email to cocounsel re new order	0.1	Fresh Harvest
6/9/2021	draft email re discovery responses from Fresh Harvest	0.3	Fresh Harvest
6/9/2021	review redactions from Fresh Harvest	0.2	Fresh Harvest
6/9/2021	review release language FH obtained	0.5	Fresh Harvest
6/9/2021	call w/ potential plaintiff [REDACTED]	0.4	Fresh Harvest
6/9/2021	prepare vzw subpoena	0.3	Fresh Harvest
6/9/2021	email documents to cocounsel re discovery dispute	0.2	Fresh Harvest
6/9/2021	review ct order on 56d for ltr to opp counsel	0.2	Fresh Harvest
6/9/2021	review whatsapp docs from clients	0.3	Fresh Harvest
6/10/2021	call w/ Tyler Johnson re subpoena objections	0.3	Fresh Harvest
6/10/2021	call w/ Santos re case progress	0.2	Fresh Harvest
6/10/2021	send proposed order (.1); review order re amended complaint	0.2	Fresh Harvest
6/10/2021	finalize and serve vzw subpoena	0.3	Fresh Harvest
6/10/2021	email banks re subpoena order	0.2	Fresh Harvest
6/10/2021	review prior objections by Malitz re subpoena	0.1	Fresh Harvest
6/10/2021	email attorney for cpa re subpoena order	0.1	Fresh Harvest
6/14/2021	make edits to draft joint statement re discovery to SMD and FH	0.4	Fresh Harvest
6/15/2021	edit, revise and send joint statement on discovery re FH and SMD	1.5	Fresh Harvest
6/15/2021	review changes to proposed protective order	0.5	Fresh Harvest
6/16/2021	review fax re Verizon subpoena	0.1	Fresh Harvest
6/16/2021	draft ltr to Verizon re objections	0.7	Fresh Harvest
6/16/2021	review case law on Cal PUC objection	0.5	Fresh Harvest
6/16/2021	review protective order edits from Defs	0.3	Fresh Harvest
6/16/2021	discuss protective order edits and local rule w/ Santos	0.1	Fresh Harvest
6/17/2021	foia to DOL re briefs before OALJ	0.2	Fresh Harvest
6/17/2021	email cocounsel re discovery developments	0.3	Fresh Harvest
6/17/2021	prepare subpoena to AT&T	0.1	Fresh Harvest
6/17/2021	email re protective order w opposing counsel	0.1	Fresh Harvest
6/17/2021	review local rule 79-5 (.1) and email cocounsel re protective or	0.2	Fresh Harvest

6/17/2021	finalize and file proposed protective order	0.3	Fresh Harvest
6/18/2021	call w/ Greg Schell re retaliation issues	0.4	Fresh Harvest
6/18/2021	call w/ Santos re retaliation and next steps in case	0.3	Fresh Harvest
6/18/2021	call w/ client re retaliation	0.4	Fresh Harvest
6/18/2021	email cocounsel re retaliation	0.2	Fresh Harvest
6/18/2021	message client with sample docs re retal	0.3	Fresh Harvest
6/18/2021	draft anti-retaliation letter for Gustavo	2.5	Fresh Harvest
6/18/2021	review memo on retaliation from Altshuler	0.2	Fresh Harvest
6/18/2021	review Shannon Produce case	0.2	Fresh Harvest
6/18/2021	research 2-100 professional rule	0.3	Fresh Harvest
6/18/2021	emails w/ cocounsel	0.3	Fresh Harvest
6/18/2021	add'l message to ████████ re CFR protections	0.2	Fresh Harvest
6/18/2021	serve subpoena to Att	0.2	Fresh Harvest
6/22/2021	call w/ Verizon re subpoena response	0.2	Fresh Harvest
6/22/2021	call w/ ████████ from WHD	0.4	Fresh Harvest
6/22/2021	research privilege duty for 9th cir	0.5	Fresh Harvest
6/22/2021	call w/ Santos re case progress and discovery	0.2	Fresh Harvest
6/22/2021	emails w/ Malitz re subpoena	0.2	Fresh Harvest
6/22/2021	finalize Plaintiff's portion of stip to compel Malitz subpoena	1.5	Fresh Harvest
6/22/2021	review email denying contact with plaintiffs (.2)	0.2	Fresh Harvest
6/22/2021	draft response email to Derek Havel	0.1	Fresh Harvest
6/23/2021	email WHD redacted release	0.2	Fresh Harvest
6/23/2021	message w/ clt re cocounsel	0.1	Fresh Harvest
6/23/2021	draft response re purported release	0.3	Fresh Harvest
6/23/2021	review reg on releases for h2a	0.2	Fresh Harvest
6/23/2021	email cocounsel re discovery issues	0.1	Fresh Harvest
6/23/2021	revise addendum to Verizon	0.1	Fresh Harvest
6/23/2021	prepare FOIA re FH DOL investigation	0.3	Fresh Harvest
6/24/2021	call w/ Isaac G and Jim re retal and discovery	0.8	Fresh Harvest
6/24/2021	review and revise stip re Malitz	0.4	Fresh Harvest
6/24/2021	review CPA subpoena response	1.5	Fresh Harvest
6/24/2021	message w/ FH clients	0.3	Fresh Harvest
6/24/2021	finalize cocounsel agreement w Sarmiento	0.2	Fresh Harvest
6/24/2021	finalize email to opposing counsel re claimed release	0.3	Fresh Harvest
6/24/2021	email opposing counsel re discovery stips	0.2	Fresh Harvest
6/24/2021	email w/ bank re production	0.1	Fresh Harvest
6/24/2021	call w/ Mechanics bank re production	0.2	Fresh Harvest
6/24/2021	email from DOL re FOIA	0.1	Fresh Harvest
6/24/2021	email about compelling Fresh Foods	0.1	Fresh Harvest
6/24/2021	email attorney for CPA firm re production	0.4	Fresh Harvest
6/24/2021	call w/ Santos re doc production from Salinas bank	0.3	Fresh Harvest
6/28/2021	revise SLAPP motion to respond to counterclaim	5	Fresh Harvest
6/29/2021	add'l edits to draft SLAPP brief re counterclaim	2.2	Fresh Harvest
7/3/21	review declaration w/ clt	0.3	Fresh Harvest
7/6/2021	work on chart for motion to compel FH	1.75	Fresh Harvest

7/7/2021	add'l work on chart for motion to compel	0.6	Fresh Harvest
7/7/2021	add legal citations to chart for motion to compel chart	1	Fresh Harvest
7/7/2021	prepare chart for SMD discovery requests	2.5	Fresh Harvest
7/7/2021	email w/ opposing counsel	0.1	Fresh Harvest
7/7/2021	email w/ cocounsel re charts for discovery dispute	0.2	Fresh Harvest
7/12/2021	revise early draft brief to dismiss	2.25	Fresh Harvest
7/12/2021	emails w/ cocounsel on draft brief	0.3	Fresh Harvest
7/19/2021	emails w/ cocounsel re chart for discovery dispute add add'l case citations to joint discovery statment re FH	0.2	Fresh Harvest
7/19/2021	responses; address proportionality issue	0.7	Fresh Harvest
7/19/2021	revise and update brief/joint statement	1.2	Fresh Harvest
7/19/2021	call w/ SG re brief/discovery	0.1	Fresh Harvest
7/19/2021	review DOL BALCA FOIA response; research 9th cir case law on proportionality in employer context	0.6	Fresh Harvest
7/19/2021	email DOL FOIA re BALCA response	0.5	Fresh Harvest
7/20/2021	email re current status of joint stip	0.1	Fresh Harvest
7/20/2021	final revisions and send joint statement	1.2	Fresh Harvest
7/22/2021	work on chart for FF motion to compel	1.5	Fresh Harvest
7/22/2021	draft Plaintiffs' portion of FF motion to compel	2.5	Fresh Harvest
7/22/2021	email banks re subpoena response	0.2	Fresh Harvest
7/22/2021	emails w/ cocounsel	0.1	Fresh Harvest
7/22/2021	email Malitz re subpoena response	0.1	Fresh Harvest
7/22/2021	prepare and email Bates numbers for job orders re FF interrog	0.2	Fresh Harvest
7/22/2021	emails w/ opposing course	0.1	Fresh Harvest
7/23/2021	call w/ cocounsel re discovery plan	1	Fresh Harvest
7/26/2021	prepare Pls' portion of response to Vzw subpoena objections	2.2	Fresh Harvest
7/26/2021	legal research on SCA	0.6	Fresh Harvest
7/26/2021	finalize pls portion of joint statement on Sarmiento discovery	0.7	Fresh Harvest
7/28/2021	review notice and email Mussig re unilateral depo notice	0.2	Fresh Harvest
7/30/2021	call w/ Zoe re theory of case discovery needs	1	Fresh Harvest
7/30/2021	call w/ Isaac re 56d renewal	0.4	Fresh Harvest
8/2/2021	emails to DOL officials re waiver language	0.6	Fresh Harvest
8/2/2021	call w/ zoe on OALJ opinion and reply brief	0.2	Fresh Harvest
8/3/2021	hearing re contact with class members	3	Fresh Harvest
8/3/2021	call w/ Farley Neumann re subpoena response	0.2	Fresh Harvest
8/4/2021	email w/ F Neumann re discovery objections	0.3	Fresh Harvest
8/3/2021	call w/ FH attorneys and cocounsel	0.5	Fresh Harvest
8/4/2021	email mussig re depo dates	0.1	Fresh Harvest
8/5/2021	edits and revisions to reply brief in support of motion to dismiss	3	Fresh Harvest
8/10/21	prepare summary of discovery orders for hearing	1	Fresh Harvest
8/9/21	memo for hearing on discovery matters	1.25	Fresh Harvest
8/16/21	draft discovery to all defendants-- rough versions	3.5	Fresh Harvest
8/18/2021	draft Fresh Foods discovery request	0.9	Fresh Harvest
8/18/2021	call w/ Zoe re discovery drafting	0.5	Fresh Harvest

8/18/2021	prepare RFAs to FF	0.2	Fresh Harvest
8/18/2021	make requests to SMD	1.5	Fresh Harvest
8/18/2021	revise SMD requests	0.8	Fresh Harvest
8/18/2021	revise FF expedited limited requests	1	Fresh Harvest
8/19/2021	call w/ zoe re discovery issues	0.4	Fresh Harvest
8/19/2021	call w/ Gustavo re discovery	0.3	Fresh Harvest
8/19/2021	work on discovery responses for Sarmiento discovery	2.5	Fresh Harvest
8/19/2021	emails re discovery objections re professionalism	0.3	Fresh Harvest
8/23/2021	discovery call w/ opp counsel	0.6	Fresh Harvest
8/27/2021	call w/ Rigo Sarmiento re contacts from Defs	1.25	Fresh Harvest
8/27/2021	email w/ cocounsel	0.1	Fresh Harvest
8/27/2021	review discovery responses; revise objections	1	Fresh Harvest
9/1/2021	finalize and serve discovery response w document production	5.5	Fresh Harvest
9/2/2021	emails responding to Mussig re inperson depo in Yuma	0.8	Fresh Harvest
9/3/2021	talk w/ cocounsel about depo location	0.2	Fresh Harvest
9/4/2021	review angry email from mussig re Yuma depo	0.3	Fresh Harvest
9/5/2021	prepare for depo prep with Rigoberto	1.8	Fresh Harvest
9/5/2021	meet w/ clt for depo prep (including 2 hours travel)	6.5	Fresh Harvest
9/6/2021	review joint statement	1	Fresh Harvest
9/7/2021	review new discovery production from FH	1.5	Fresh Harvest
9/7/2021	call w/ clt re depo arrangements	0.3	Fresh Harvest
9/7/2021	emails w/ Ana about depo for Alfredo Diaz	0.3	Fresh Harvest
9/7/2021	emails about supplemental discovery production	0.5	Fresh Harvest
9/8/2021	travel to LA for depo	3	Fresh Harvest
9/8/2021	depo of Rigoberto	12	Fresh Harvest
9/8/2021	return travel from LA	3	Fresh Harvest
9/9/2021	edit discovery letter re search terms	0.8	Fresh Harvest
9/9/2021	document review of whatsapp production	3.5	Fresh Harvest
9/13/2021	emails w/ interpreter	0.2	Fresh Harvest
9/13/2021	call w cocounsel re discovery status	0.5	Fresh Harvest
9/13/2021	emails w/ paralegal re discovery review	0.2	Fresh Harvest
9/13/2021	emails and calls about calls to clt from FH	1.5	Fresh Harvest
9/21/2021	send verification and message w/ Gustavo	0.5	Fresh Harvest
9/21/2021	work on draft questions for SMD	1.5	Fresh Harvest
9/21/2021	work on RFPs 4th to FH	3	Fresh Harvest
9/22/2021	call w/ client GLV	0.2	Fresh Harvest
9/22/2021	edit 30b6 notice for Fresh Harvest	1.5	Fresh Harvest
9/22/2021	discuss case progress and plans w/ Santos	0.5	Fresh Harvest
9/23/2021	add'l revisions to 4th RFPs to Fres Harvest	1.8	Fresh Harvest
9/23/2021	receive new docs from client	0.5	Fresh Harvest
9/23/2021	review new docs (.3); email cocounsel re same (.1);	0.4	Fresh Harvest
9/23/2021	edits to 30b6 notice version 2	1.2	Fresh Harvest
9/23/21	notes re need for FLAG discovery	0.8	Fresh Harvest
9/26/2021	email w/ co counsel re declarations	0.5	Fresh Harvest
9/27/2021	review ██████████ messages	0.2	Fresh Harvest

9/29/2021	document review	1.75	Fresh Harvest
9/29/21	prepare for hearing	1	Fresh Harvest
9/29/2021	hearing before Magistrate	0.9	Fresh Harvest
9/29/2021	call w/ cocounsel	0.3	Fresh Harvest
9/29/2021	work on outline of depo	1.75	Fresh Harvest
9/30/2021	prep for depo	2.5	Fresh Harvest
9/30/2021	take depo of Alfredo Diaz	6.5	Fresh Harvest
10/1/2021	email exhibits re depo	0.3	Fresh Harvest
10/1/2021	call w/ Connie re doc review issues	1	Fresh Harvest
10/1/2021	call w Eve re norberto depo	0.5	Fresh Harvest
10/4/2021	emails with cocounsel on discovery issues	0.8	Fresh Harvest
10/4/2021	review outline of depo suggest edits	2.2	Fresh Harvest
10/4/2021	review exhibits from earlier depositions	0.8	Fresh Harvest
10/5/2021	assist with depo issues calls w/ Eve	1.2	Fresh Harvest
10/5/2021	review analysis of text messages for depo	0.6	Fresh Harvest
10/5/2021	doc production from FH; emails re same	1.2	Fresh Harvest
10/6/2021	review emails re Montes in Everlaw	1.5	Fresh harvest
10/6/2021	attend Montes dep	6	Fresh Harvest
10/8/2021	preparation for depo	2.2	Fresh Harvest
10/8/2021	take depo of S Rava	7	Fresh Harvest
10/11/2021	review draft letter to opposing counsel	0.2	Fresh Harvest
10/12/2021	email exhibits for Diaz depo	0.2	Fresh Harvest
10/12/2021	email and call w/ ct reporter re exhibits	0.4	Fresh Harvest
10/12/2021	call w/ Connie re next steps	0.2	Fresh Harvest
10/14/2021	finalize outline for deposition	5.2	Fresh Harvest
10/15/2021	emails about load tags for use in depo	0.4	Fresh Harvest
10/15/2021	early morning depo review	1.5	Fresh Harvest
10/15/2021	Oscer Ramos deposition	9.2	Fresh Harvest
10/19/2021	call w/ E Cervantez re their "contact" motion	0.3	Fresh Harvest
10/19/2021	conf call w/ cocounsel re depositions	1	Fresh Harvest
10/19/2021	document review of productions by SMD	8	Fresh Harvest
10/19/2021	emails w Alejandro re check issues	0.4	Fresh Harvest
10/20/2021	review exhibits from S Rava depo	1	Fresh Harvest
10/20/2021	depo of Leticia Ridaura	9.3	Fresh Harvest
10/21/2021	email w/ reporter re exhibits	0.3	Fresh Harvest
10/21/2021	document review of out of court releases	2.5	Fresh Harvest
10/21/2021	preparation for SMD 30b6 depo	4.25	Fresh Harvest
10/22/2021	take depo by zoom of SMD	9.3	Fresh Harvest
10/22/2021	early morning depo prep	1.8	Fresh Harvest
10/22/2021	organize exhibits post depo	0.8	Fresh Harvest
10/25/2021	review Sarmiento depo transcript	3	Fresh Harvest
10/25/2021	prepare draft depo corrections of Sarmiento depo	1.25	Fresh Harvest
10/25/2021	assist with prep for Angel Rincon depo	1.75	Fresh Harvest
10/26/2021	revise declarant depo outline	1.5	Fresh Harvest
11/2/2021	revisions to clt declaration for gustavo	2.8	Fresh Harvest

11/3/2021	emails about prevailing wage data	0.3	Fresh Harvest
11/3/2021	add'l revisions and finalize Gustavo declaration	4	Fresh Harvest
11/3/2021	draft declaration for Sarmiento in support of summ j opp.	3.2	Fresh Harvest
11/4/2021	document review re sarmiento employment records	2.5	Fresh Harvest
11/4/2021	emails w paralegal re Sarmiento records	0.3	Fresh Harvest
11/5/2021	message w/ clt re declaration	0.4	Fresh Harvest
11/5/2021	call w/ Rigoberto	0.3	Fresh Harvest
11/5/2021	emails w/ interpreter re translated exhibits	0.6	Fresh Harvest
11/5/2021	revise draft early morning	2	Fresh Harvest
11/5/2021	work on deposition citations	3.2	Fresh Harvest
11/5/2021	coordinate translated exhibits	1.4	Fresh Harvest
11/5/2021	read through near final	0.9	Fresh Harvest
11/5/2021	incorporate in add'l exhibit/depo citations	1.6	Fresh Harvest
11/8/2021	emails about translation issue w/ cocounsel	0.2	Fresh Harvest
11/8/2021	email w/ interpreter	0.2	Fresh Harvest
11/9/21	prepare filing re translation	0.5	Fresh Harvest
11/11/2021	email w/ cocounsel	0.2	Fresh Harvest
11/11/2021	edit brief in opposition to notice of new authority	0.5	Fresh Harvest
11/15/2021	review audio and text files in Everlaw re Def's sanction motion	3.5	Fresh Harvest
11/15/2021	emails w/ paralegal re audio of david silva	1.1	Fresh Harvest
11/15/2021	review details of transcripts for opp	1.5	Fresh Harvest
11/16/2021	draft declaration for witness	3.5	Fresh Harvest
11/16/2021	revise my declaration	1	Fresh Harvest
11/17/2021	finalize David Silva decl and get translation	2.5	Fresh Harvest
11/18/2021	evaluate whatsapp chat exports	0.3	Fresh Harvest
11/18/2021	work on my declaration re sanctions motion	0.8	Fresh Harvest
1/18/2021	draft sections of sanctions opp	1.5	Fresh Harvest
11/18/2021	emails and calls re David sliva declaration	1	Fresh Harvest
11/19/2021	begin review new production	0.8	Fresh Harvest
11/19/2021	email cocounsel re whatsapp translations; review same	0.6	Fresh Harvest
11/22/2021	review translation issues; discuss internally	0.8	Fresh Harvest
11/22/21	work on brief exhibits	1.5	Fresh Harvest
11/23/21	work on exhibits for filing re whatsapp correspondence	0.8	Fresh Harvest
11/23/21	emails w counsel	0.4	Fresh Harvest
11/23/21	review and finalize translation for filing	1.5	Fresh Harvest
11/23/21	work on and revise declaration in support	2	Fresh Harvest
12/1/2021	call w/ cocounsel re summary judgment argument	1	Fresh Harvest
12/3/2021	review notes re FH worker	0.5	Fresh Harvest
12/8/2021	call w/ Eve re sanctions motion	0.3	Fresh Harvest
12/8/2021	review SGLC opinions for hearing	1.5	Fresh Harvest
12/8/2021	prepare notes for summ j argument	1.5	Fresh Harvest
12/9/2021	appearance in Fresh Harvest hearing	2	Fresh Harvest
12/9/2021	debrief w/ cocounsel	0.5	Fresh Harvest
12/16/21	prehearing doc review	1.25	Fresh Harvest
12/16/2021	hearing with magistrate	1.5	Fresh Harvest

Total

378.7



Date	Activity	Hours	Case
1/6/2022	work on opp to 54b	0.5	Fresh Harvest
1/6/2022	review notes re class member; release issue	0.7	Fresh Harvest
1/7/2022	revisions to opp re 54b	0.8	Fresh Harvest
1/7/2022	prepare notes on opp - points to discuss w cocounsel	1	Fresh Harvest
1/11/2022	call w/ affiant re FH case	0.7	Fresh Harvest
1/26/2022	call w Ana re Fresh Harvest	0.5	Fresh Harvest
2/8/2022	prepare response to petition for appeal	0.6	Fresh Harvest
2/11/2022	prepare notes on extending scheduling deadlines	0.4	Fresh Harvest
2/14/2022	draft stip to extnd mediation and class cert	0.5	Fresh Harvest
2/16/2022	revisions to stip to extend	0.3	Fresh Harvest
2/17/2022	prepare decl in support of stip	0.4	Fresh Harvest
2/18/2022	final versions of stip and decl for filing	0.5	Fresh Harvest
3/4/2022	draft RFPs to Fresh Harvest	3	Fresh Harvest
3/18/2022	revise 5th set RFPs to FH	2	Fresh Harvest
3/21/2022	finalize 5th rfps to Fresh Harvest	1.5	Fresh Harvest
3/21/2022	draft email response to Robert re mediation	0.4	Fresh Harvest
3/24/2022	finalize fourth set of RFPs to SMD	2.5	Fresh Harvest
3/25/2022	finalize and serve RFPs to Fresh Foods	4.25	Fresh Harvest
4/1/2022	call w/ cocounsel	1.1	Fresh Harvest
4/11/22	emails w/ cocounsel re damage estimates and doc rev	0.3	Fresh Harvest
4/21/22	emails w/ paralegal re Whatsapp production	0.4	Fresh Harvest
5/2/2022	prepare stip re filing deadline for discovery	0.5	Fresh Harvest
5/9/2022	prepare 2nd stip for filing deadline extension	0.3	Fresh Harvest
5/10/2022	call w/ Ana re mediation and stay	0.4	Fresh Harvest
5/10/2022	call w/ Connie and Eve C re mediation next steps and discovery needs/stay	0.5	Fresh Harvest
5/11/2022	edits to email to Robert/Ana re mediation	0.5	Fresh Harvest
5/11/2022	call w/ Santos re mediation issues	0.4	Fresh Harvest
5/16/2022	call w/ connie re mediation /stay	0.1	Fresh Harvest
5/16/2022	call w/ opposing counsel on zoom re stay	0.7	Fresh Harvest
5/16/2022	call w/ SG re stay/ dealing with Ana	0.3	Fresh Harvest
6/14/2022	review security files from client	1.5	Fresh Harvest
6/15/2022	prepare declaration for client; send for review	3	Fresh Harvest
6/21/2022	review translation of videos	0.8	Fresh Harvest
6/22/2022	finalize clt's declaration	1.5	Fresh Harvest
6/22/2022	analyze translation issues w defs uncertified version	0.6	Fresh Harvest
6/22/2022	expand draft brief for protection	2.5	Fresh Harvest
6/23/2022	revision to wife decl	0.4	Fresh Harvest
6/23/2022	call w/ Eve re brief for protection	0.5	Fresh Harvest

6/23/2022	work on brief-- add'l case law and ordering	4	Fresh Harvest
6/23/2022	message w/ workers re releases	0.1	Fresh Harvest
6/24/2022	draft add'l declaration for motion for protection	1.2	Fresh Harvest
6/25/2022	email w/ translator	0.3	Fresh Harvest
6/25/2022	final translations of videos	0.6	Fresh Harvest
6/26/2022	finalize declaration for clit and wife	1.8	Fresh Harvest
6/26/2022	email w/ Gustavo's wife re declaration	0.2	Fresh Harvest
6/26/2022	email w/ cocounsel re brief finalizing	0.1	Fresh Harvest
6/27/2022	email w/ interpreter re decls	0.2	Fresh Harvest
6/27/2022	prepare decl in support re protective order exhibits	0.7	Fresh Harvest
6/27/2022	continue drafting brief for protective order	2.6	Fresh Harvest
6/27/2022	gather supporting documents re militia contact prepare motion, decl, and order to shorten time for protective order	2.8	Fresh Harvest
6/27/2022	protective order	3.5	Fresh Harvest
6/28/2022	revise declaration revise motion to shorten briefing time and incorporate opp counsel emails	0.3	Fresh Harvest
6/28/2022	finalize declaration from client and wife	1.5	Fresh Harvest
6/28/2022	work on final draft of brief for protection from militias	2.5	Fresh Harvest
6/28/2022	work on final draft of brief for protection from militias	2.8	Fresh Harvest
6/29/2022	pull case quote re import of case	2.8	Fresh Harvest
6/30/2022	research void contracts	1	Fresh Harvest
7/27/2022	research void contracts	2.9	Fresh Harvest
7/27/2022	revise proposed declaration re protective order	0.8	Fresh Harvest
7/27/2022	revise reply brief review prevailing wage data for truck driving for use in mediation and damages	1.2	Fresh Harvest
8/2/2022	in mediation and damages	3.5	Fresh Harvest
8/3/2022	email w/ J Krivis re mediation records review defendants excel payroll data for damage purposes	0.2	Fresh Harvest
8/4/2022	purposes	6.5	Fresh Harvest
8/5/2022	call w Jim and Eve	0.8	Fresh Harvest
8/5/2022	email w/ Ana about time records	0.2	Fresh Harvest
8/5/2022	emails w/ Aaron about calculations	0.5	Fresh Harvest
8/5/2022	summarize and edit damage calcs memo virtual meeting with prospective expert on damages-- re data analysis for mediation	0.3	Fresh Harvest
8/9/2022	re data analysis for mediation emails about data analysis	1.2	Fresh Harvest
8/11/2022	prep for hearing		Fresh Harvest
8/11/2022	prep for hearing	0.75	Fresh Harvest
8/11/2022	hearing on protective order re contact in Mexico	2.5	Fresh Harvest
8/12/2022	finish mediation brief	8	Fresh Harvest
8/14/2022	work on damage estimate review	1.5	Fresh Harvest
8/16/2022	work w Serge on damage calcs	1.5	Fresh Harvest
8/16/2022	call w/ Serge re SMD damages	0.3	Fresh Harvest
8/16/2022	message w Rigoberto	0.2	Fresh Harvest
8/16/2022	calls w Eve	0.5	Fresh Harvest
8/16/2022	call w/ Jordan re damage calcs	0.2	Fresh Harvest
8/16/2022	emails w/ Serge for further revisions	0.4	Fresh Harvest

8/16/2022	edits to mediation brief	1	Fresh Harvest
8/16/2022	emails w/ Krivis	0.1	Fresh Harvest
8/17/2022	work on damage totals for mediation	1.5	Fresh Harvest
8/17/2022	discuss damages w/ eve	0.2	Fresh Harvest
8/19/2022	drive to mediation in Monterey	2.5	Fresh Harvest
8/19/2022	attend full-day mediation	9	Fresh Harvest
8/19/2022	return travel from mediation	2.75	Fresh Harvest
8/22/2022	call w/ Gustavo re mediation	0.3	Fresh Harvest
8/22/2022	review new order	0.2	Fresh Harvest
8/22/2022	email w/ Krivis	0.2	Fresh Harvest
8/23/2022	message w/ Sarmiento re settlement	0.5	Fresh Harvest
8/24/2022	call w/ Eve re offer	0.3	Fresh Harvest
8/24/2022	review offer from Krivis	0.2	Fresh Harvest
	joint statement deadline extension– prepare		
9/6/2022	pleadings	0.8	Fresh Harvest
9/9/2022	joint statement for discovery dispute drafting	4.5	Fresh Harvest
9/23/2022	call w/ Santos re settlement amounts	0.5	Fresh Harvest
9/23/2022	call w/ Connie and Eve re Krivis' offer	0.5	Fresh Harvest
	draft email to Krivis and additional calcs re mediator		
9/23/2022	proposal	1.2	Fresh Harvest
9/26/2022	emails w/ cocounsel and Krivis	0.3	Fresh Harvest
9/26/2022	call w/ Jeff Krivis	0.5	Fresh Harvest
9/26/2022	draft add'l email for mediator use	1.7	Fresh Harvest
9/26/2022	email w/ expert re wage issue	0.1	Fresh Harvest
9/28/22	call w/ eve	0.2	Fresh Harvest
	email w/ opposing counsel re stip on discovery		
9/29/2022	dispute	0.2	Fresh Harvest
9/29/2022	prepare stip for filing re discovery statement	0.3	Fresh Harvest
10/3/2022	call w/ Ana re credits for class payments	0.2	Fresh Harvest
10/3/2022	edit email of Eve's to mediator	0.3	Fresh Harvest
10/3/2022	add'l emails with cocounsel	0.3	Fresh Harvest
10/12/2022	emails and calls w cocounsel re offer status	0.5	Fresh Harvest
10/13/2022	call re next steps with cocounsel	0.6	Fresh Harvest
	prepare stipulation re joint statement deadline for		
10/14/2022	discovery	0.3	Fresh Harvest
10/20/22	status call w cocounsel	0.2	Fresh Harvest
10/21/22	call w Eve re status	0.5	Fresh Harvest
10/31/22	emails and calls re settlement terms and acceptance	2.4	Fresh Harvest
11/1/22	emails about stip to vacate	0.5	Fresh Harvest
11/18/22	review and edit draft settlement from Mussig	3.5	Fresh Harvest
12/5/2022	emails re administration cost	0.2	Fresh Harvest
12/5/2022	review email re schedule	0.2	Fresh Harvest
12/5/2022	draft PAGA letter for amendment	2	Fresh Harvest
12/5/2022	revise Paga letter	0.5	Fresh Harvest
12/6/2022	draft PAGA allegation for amended complaint	3.2	Fresh Harvest
12/9/2022	email w cocounsel re PAGA complaint	0.2	Fresh Harvest

12/9/2022	review comments to PAGA count	0.3	Fresh Harvest
	prepare continuance for preliminary approval		
12/14/2022	deadline	0.5	Fresh Harvest
12/15/2022	review email from Mussig on agreement	0.6	Fresh Harvest
12/19/2022	call w/ Eve about language	1	Fresh Harvest
12/21/2022	call w/ cocounsel	0.2	Fresh Harvest
12/22/2022	call w/ Eve about agreement status	0.2	Fresh Harvest

TOTAL

144.95

Date	Activity	Hours	Matter
1/6/2023	review emailed comments from R Mussig	0.8	Fresh Harvest
1/6/2023	review allegations re service awards	1	Fresh Harvest
1/9/2023	call w/ Eve about negotiations for agreement language/ service awards	0.5	Fresh Harvest
1/10/2023	email to opposing counsel re admin quotes	0.5	Fresh Harvest
1/10/2023	draft ltr about settlement terms	1.2	Fresh Harvest
1/16/2023	prepare stip to extend deadline for prelim approval	0.7	Fresh Harvest
1/17/2023	call w Eve about current status and probs	0.8	Fresh Harvest
1/17/2023	revisions to stip to extend deadlines	0.5	Fresh Harvest
1/21/2023	revise letter to Mussig	0.9	Fresh Harvest
1/24/2023	call w/ Eve re prelimin approval	0.5	Fresh Harvest
1/24/2023	work on preliminary approval draft brief	1.5	Fresh Harvest
1/27/2023	add'l work on preliminary approval draft	2.3	Fresh Harvest
1/30/2023	emails re preliminary approval	0.2	Fresh Harvest
1/31/2023	emails re extension of prelim deadline	0.4	Fresh Harvest
1/31/2023	call w/ Eve re Robert's addition suggesting no agreement	0.3	Fresh Harvest
2/3/2023	emails about problems with Mussig edits	1.5	Fresh Harvest
2/3/2023	review edits from Ana re draft class notice	0.5	Fresh Harvest
2/3/2023	call w Eve about Mussig edits	0.4	Fresh Harvest
2/6/2023	emails about PAGA reference in long form	0.2	Fresh Harvest
2/8/2023	review latest emails re agreement edits from Mussig	0.5	Fresh Harvest
2/8/2023	prepare response to edits to draft class notice	1.5	Fresh Harvest
2/13/2023	review eve comments on proposed complt	0.3	Fresh Harvest
2/14/2023	edits to PAGA count of amended complaint	0.6	Fresh Harvest
2/14/2023	emails w cocounsel	0.2	Fresh Harvest
2/14/2023	add'l revisions to draft paga amended complaint	1.25	Fresh Harvest
2/15/2023	revision to stip to extend	0.4	Fresh Harvest
2/15/2023	email w Eve re agreement limbo	0.3	Fresh Harvest
2/15/2023	version of proposed amended complaint for defs review	0.6	Fresh Harvest
2/15/2023	email w interpreter about simple spanish for agreement	0.3	Fresh Harvest
2/16/2023	review more edits of agreement emails re edits from R Mussig pull cites and email cocounsel re ethics issue raised by restriction on	1.2	Fresh Harvest
2/16/2023	practice proposed by Mussig	1.5	Fresh Harvest
2/17/2023	call w/ Ana re admin selection	0.2	Fresh Harvest
2/17/2023	emails w cocounsel re admin selection issues	0.3	Fresh Harvest
2/17/2023	call w/ Eve	0.1	Fresh Harvest
2/17/2023	emails w atticus about prior administration for sheppard mullin	0.6	Fresh Harvest
2/21/2023	emails w/ cocounsel about need for employee numbers in class data	0.3	Fresh Harvest
2/22/2023	call w eve on latest edits edit and comment on revisions to settlement by FH/Mussig; email	0.3	Fresh Harvest
2/22/2023	cocounsel	1.5	Fresh Harvest
2/26/2023	update and revise estimated allocation form to send to defendants	1.5	Fresh Harvest
2/27/2023	draft declaration in support	1	Fresh Harvest
2/27/2023	review/comment on latest draft of long form settlement	0.8	Fresh Harvest
2/27/2023	review comments on and further edit proposed amended complaint	0.5	Fresh Harvest
2/28/2023	review / edit prelim approval brief	1.25	Fresh Harvest
2/28/2023	emails w/ cocounsel re brief and current edits	0.3	Fresh Harvest

2/28/2023	draft stipulation for amended complaint	0.3	Fresh Harvest
2/28/2023	update class size memo for inclusion in brief	0.6	Fresh Harvest
3/1/2023	review draft spanish version of long form settlement	1.2	Fresh Harvest
3/1/2023	update declaration in support of prelim approval	1.5	Fresh Harvest
3/1/2023	call w/ Gustavo	0.4	Fresh Harvest
3/1/2023	emails re timing of filing for preliminary approval	0.2	Fresh Harvest
3/2/2023	call w/ clt Rigo	0.6	Fresh Harvest
3/2/2023	prepare stip	0.5	Fresh Harvest
3/2/2023	call w/ A Toledo re signatures	0.2	Fresh Harvest
3/2/2023	emails w/ cocounsel re declarations	0.3	Fresh Harvest
3/2/2023	review declaration revisions	0.4	Fresh Harvest
3/7/2023	email clients re agreement final version	0.2	Fresh Harvest
3/8/2023	call w/ Rigoberto	0.3	Fresh Harvest
3/8/2023	message with Gustavo	0.2	Fresh Harvest
3/8/2023	email w/ Lindsey re final signatures	0.2	Fresh Harvest
3/9/2023	communicate with Gustavo about agreement	0.8	Fresh Harvest
3/9/2023	emails to and from opposing counsel re final agreement	1	Fresh Harvest
3/9/2023	revisions to proposed order	0.7	Fresh Harvest
3/9/2023	finalize PAGA filing	1	Fresh Harvest
3/9/2023	call w/ connie	0.3	Fresh Harvest
3/9/2023	emails w/ cocounsel to finalize documents for filing	1.5	Fresh Harvest
3/9/2023	emails on brief issues w cocounsel	0.7	Fresh Harvest
3/9/2023	emails w/ Lindsey/ana about rava signature	0.3	Fresh Harvest
3/9/2023	emails about details of distribution to class members	0.4	Fresh Harvest
3/9/2023	review distribution calculations for prelim brief	0.8	Fresh Harvest
3/10/2023	paga filing with LWDA	0.6	Fresh Harvest
3/13/2023	paga filing with LWDA	0.4	Fresh Harvest
3/13/2023	emails w/ cocounsel re PAGA filings	0.2	Fresh Harvest
4/6/2023	emails w cocounsel	0.2	Fresh Harvest
4/10/2023	prepare timeline on scheduling class notice and payments	1.2	Fresh Harvest
4/11/2023	email to deputy re hearing; emails re scheduling w opp counsel	0.4	Fresh Harvest
4/12/2023	review pleadings for hearing	1.3	Fresh Harvest
4/13/2023	pre-hearing preparation	0.6	Fresh Harvest
4/13/2023	hearing for preliminary certification	1.25	Fresh Harvest
4/13/2023	update proposed notice for court	0.2	Fresh Harvest
4/14/2023	emails w/ opposing counsel re notice	0.3	Fresh Harvest
4/17/2023	emails w administrator re timeline and notice	0.3	Fresh Harvest
4/17/2023	update timeline document for administrator	0.2	Fresh Harvest
4/19/2023	emails w/ administrator re notice	0.2	Fresh Harvest
4/19/2023	emails re notice in spanish	0.1	Fresh Harvest
4/19/2023	call w/ client Rigo	0.6	Fresh Harvest
4/28/2023	message w/ Gustavo re next steps	0.2	Fresh Harvest
5/11/2023	emails w Ian and Atticus re class list and notice	0.3	Fresh Harvest
5/12/2023	emails re translation issues	0.2	Fresh Harvest
5/23/2023	email w/ interpreter	0.2	Fresh Harvest
5/23/2023	email w/ cocounsel and administrator	0.2	Fresh Harvest

5/25/2023	review class notice drafts	0.5	Fresh Harvest
5/25/2023	call w/ Phil re class notice	0.2	Fresh Harvest
5/25/2023	emails w/ cocounsel	0.1	Fresh Harvest
5/25/2023	review changes from F&P on long form agreement; email w/ Santos	0.5	Fresh Harvest
5/31/2023	emails to opposing counsel and admi	0.25	Fresh Harvest
6/1/2023	emails w/ new interpreter re certifying translation	0.3	Fresh Harvest
6/1/2023	review distributions of class members	0.5	Fresh Harvest
6/1/2023	call w/ Phil re class distributions	0.2	Fresh Harvest
6/6/2023	review website and email about class website	1.2	Fresh Harvest
6/7/2023	call w/ Phil H re class notice and missing data	0.2	Fresh Harvest
6/7/2023	call and emails w co counsel	0.3	Fresh Harvest
6/7/2023	call w Gustavo re website and re errors in data	0.2	Fresh Harvest
6/14/2023	complete review of new data from Fresh Harvest	1	Fresh Harvest
6/14/2023	email to opposing counsel re data irregularities	0.4	Fresh Harvest
6/15/2023	email about continuing error with Gustavo data	0.2	Fresh Harvest
6/16/2023	email Ian and Robert again re data	0.1	Fresh Harvest
6/20/2023	work on draft brief for fee petition; add section on service payments;	2.5	Fresh Harvest
6/20/2023	message Gustavo re case progress	0.1	Fresh Harvest
6/21/2023	continue drafting brief for fee petition	1.5	Fresh Harvest
6/21/2023	communicate w/ interpreters	0.2	Fresh Harvest
6/21/2023	revisions to section of brief discussing service payments	2	Fresh Harvest
6/21/2023	message w/ Rigoberto	0.2	Fresh Harvest
6/21/2023	email about class data continuing issues	0.2	Fresh Harvest
6/22/2023	begin drafting decl for Gustavo	1.4	Fresh Harvest
6/22/2023	add'l revisions to fee brief	0.9	Fresh Harvest
6/22/2023	review response re class data	0.1	Fresh Harvest
6/23/2023	additions to fee brief	0.5	Fresh Harvest
6/24/2023	revise and add to client declarations	0.6	Fresh Harvest
6/25/2023	message w/ Rigoberto	0.3	Fresh Harvest
6/26/2023	call w/ Gustavo and Rigoberto	0.2	Fresh Harvest
6/26/2023	emails w/ interpreter	0.3	Fresh Harvest
6/26/2023	add'l work on fee petition	0.5	Fresh Harvest

Total

73.4

# EXHIBIT 2



<b>Exhibit 2</b>		
<b>Santos Gomez Lodestar Time Records</b>		
<b>Date</b>	<b>Activity</b>	<b>Hours</b>
6/22/20	Initial discussion with Attorney Maria Vizzusi Re Plaintiff Rigoberto Saramiento	0.25
7/7/20	Reviewed Fresh Foods H2A Job Order	0.25
7/8/20	Research Defendant Fresh Harvest and related entities	0.25
7/9/20	Discussed the scope of the Fresh Foods H2A Job Order to include truck drivers	0.25
9/3/20	Reviewed LWDA PAGA letter and discussion of possible wage and hour claims	0.50
9/8/20	Worked on PAGA letter	0.10
9/28/20	Telephone call with Defense Counsel Rob Roy	1.00
9/29/20	Reviewed H2A Job Orders and information regardign Defendant Rancho Nuevo Harvesting	0.33
9/29/20	Communications with Dawson Morton RE Fresh Harvest's arbitration agreements	0.50
10/12/20	Discussions with Dawson Morton RE Defendant Fresh Harvest settling with PAGA Plaintiffs	0.50
10/15/20	Discussions with Dawson Morton RE possible additional claims	0.33
10/15/20	Discussions with Dawson Morton RE possible additional claims	0.25
10/30/20	Discussions with Dawson Morton RE counsel for Defendant Fresh Harvest	0.25
10/30/20	Researched applicability of Wage Order 9 to Plaintiff and the Class Member's work	0.50
10/30/20	Review of Draft Class Complaint	2.50
11/9/20	Discussions with Dawson Morton RE class claims	0.25
11/10/20	Review of EDD records responsive to subpoena	0.50
11/10/20	Discussions with Dawson Morton RE SOL applicable to claims and extension of SOL due to Covid	0.25
11/11/20	Further revisions to class complaint	1.50
11/23/20	Reviewed document received in response to PRA request Re SMD Logistics from EDD.	0.50
11/30/20	Communications with Ana Toledo, Counsel for Rava Ranches et la.	0.10
1/7/21	Discussions with Dawson Morton Re arbitration agreement and waiver by Defendant	0.25
1/8/21	Review of meet and confer letter to Defendants' Re their deficienet/meritless affirmative defenses	0.33
1/11/21	Reviewed stip and proposed order to Extend Time to Strike Answer	0.25
1/27/21	Discussion with Dawson Morton RE implications of International Brotherhood of Teamsters v. Federal Motor Carrier Safety Administration to meal period claim	0.33
2/5/21	Reviewed request for production Fresh Harvest	0.50
2/5/21	Reviewed request for production SMD Logistics	0.33

2/11/21	Reviewed 26f report	0.25
2/15/21	Spoke to Class Member Re employment practices; consistent with allegations	1.25
3/1/21	Reivewed discovery to Defendant Fresh Foods	0.33
3/4/21	Reviewed driver daily longs	0.25
3/26/21	Discussions with Dawson Morton Re Defendants' efforts to get class members to sign general releases	1.00
3/29/21	Reviewed subpoenas to Mechanics Bank and Pacific Valley Bank	0.25
3/30/21	Reivew of Plaintiff's discovery responses	0.50
3/31/21	Reivew of Plaintiff's discovery responses	0.50
4/1/21	Review of Plaintiff's meet and confer letter Re discovery	0.10
4/1/21	Discussion with Dawson Morton RE Plaintiff's meal period claim based on contract and therefore not preempted	0.33
4/12/21	Researched meaning of "drivers of property-carrying commercial motor vehicles" in the January 15, 2021 US Court of Appeals for the Ninth Circuit International Brotherhood of Teamsters, Local 2785 v. Federal Motor Carrier Safety Administration decision	0.50
4/12/21	Reviewed subpoenas to CPA for Fresh Harvest	0.10
4/14/21	Reviewed meet and confer letter to counsel for Defendants RE deficient discovery responses	0.50
4/14/21	Reviewed Defendants' MSJ	0.75
4/21/21	Compiled and reviewed Plaintiffs' documents	2.00
4/20/21	Reivewed FAC	0.75
4/21/21	Discussion with Dawson Morton Re Defendants' deficient discovery responses	0.33
4/23/21	Review of Plaintiff's draft of joint statement re Plaintiff's third party subpoenas	0.25
4/26/21	Reviewed Plaintiffs' opposition to Defendants' MSJ	1.00
5/7/21	Reviewed meet and conver discovery letter	0.50
5/25/21	Reviewed FAC and discuss with Dawson Morton	0.50
6/9/21	Dsicussion with Dawson Morton RE litigation	0.50
6/10/21	Dsicussion with Dawson Morton RE litigation and associating counsel	0.50
6/14/21	Dsicussion with Dawson Morton RE litigation and associating counsel	0.50
6/24/21	Dsicussion with Dawson Morton RE litigation	0.50
6/24/21	Reviewed FH and SMD Logistics' Answer and Counter Claim	1.00
6/29/21	SLAPP Motion	0.50
7/13/21	Worked on getting documents responsive to subpoena from Pacific Valley Bank	0.50
7/14/21	Worked on getting documents responsive to subpoena from Pacific Valley Bank	0.50
7/20/21	Reviewed Plaintiffs' discovery motion	0.75

7/21/21	Worked on getting documents responsive to subpoena from Pacific Valley Bank	0.50
7/28/21	Reviewed Plaintiffs' discovery motion	0.50
8/6/21	Reviewed Plaintiffs' reply brief ISO motion to dismiss Defendants' counter claims	0.50
8/31/21	Reviewed FHI and SMD documents produced on 8/31/21	6.00
9/4/21	Reviewed FHI and SMD documents produced on 8/31/21	2.50
9/7/21	Discussion with Dawson Morton Re options to address Defendants' efforts to pick off class members	1.50
9/9/21	Discussions with Dawson Morton RE Defendants' obligations under the Court's discovery order	0.50
9/14/21	Worked on Plaintiffs' discovery responses	0.75
9/20/21	Communications with class members re the litigation	0.25
10/6/21	Researched other litigation and administrative claims against Defendants	0.75
11/2/21	Drafting Plaintiff Gustavo Luevano-Vaca	0.75
11/3/21	Drafting Plaintiff Gustavo Luevano-Vaca	1.00
11/5/21	Reviewed opposition to MSJ	1.00
11/15/21	Reviewed class member declaration	1.00
11/16/21	Discovery: reviewed documents Defendants produced	1.00
11/17/21	Discussions with Dawson Morton Re class member declaration	0.50
11/18/21	Reviewed Dawson Morton's declaratin ISO Opption to Defendants' motion seeking to sanction Dawson Morton	2.00
1/7/22	Reviewed opposition to D's Rule 54(b) motion	1.50
1/26/22	Discussions with Dawson Morton Re mediation options and possible mediators	0.50
4/29/22	Discussions with Defense Counsel, Ana Toledo, and Dawson Morton re mediation and continuing the class certification motion	0.75
6/13/22	Discussions Re communications Defendants' agents are having with Plaintiff Gustavo Luevano-Vaca	0.50
6/15/22	Discussions with Dawson Morton Re how to address Defendants' communciations with Plaintiff Gustavo Luevano-Vaca	0.50
6/15/22	Drafting Plaintiff Gustavo Luevano-Vaca's declaration	0.50
6/17/22	Drafting Plaintiff Gustavo Luevano-Vaca's declaration	0.33
6/21/22	Drafting declaration from Plaintiff Gustavo Luevano-Vaca's spouse	0.25
6/23/22	Drafting brief to limit Defendants' communications with Plaintiff Gustavo Luevano-Vaca	1.25
6/24/22	Reviewed class member declaration	0.25
7/27/22	Reviewed Plaintiffs' reply brief ISO motion to limit Defendants' comunications with Plaintiff Gustavo Luevano-Vaca	0.75
8/2/22	Worked on damage calculations for mediation	0.50
8/10/22	Reviewed medaition brief	1.50
8/19/22	Attended mediation	8.50
8/24/22	Discussions with Dawson Morton Re mediator's proposal	0.50

11/29/22	Drafting settlement documents	1.25
12/9/22	Drafting settlement documents and notice of class settlement	0.75
1/30/23	Worked on preliminary approval papers	2.00
3/10/23	PAGA Letter	0.25
5/16/23	Reviewing the Spanish version of the Class Notice	0.75
6/2/23	Discussion with Dawson Morton Re problems with the class data	0.25
6/6/23	Review of Atticus Administration Web Page for Settlement	0.25
6/21/23	Drafting the fees, costs and enhancement motion	1.50
6/22/23	Drafting the fees, costs and enhancement motion	1.25
Estimate	Additional time I anticipate spending answering class members' questions regarding the Settlement and updating class member addresses during the administration of the settlement	8.00
Estimate	Working on the final approval motion	5.00
Estimate	Working with the settlement administrator to issue payments to class members and answering questions from class members	5.00
Lodestar Hours through end of administration of settlement		95.37

# EXHIBIT 3

Date	Amount	Vendor	Explanation
9/4/20	\$24.00	USPS	four registered mail letters for PAGA notice
9/4/20	\$75.00	LWDA	PAGA filing fee
11/17/20	\$400.00	US Courts	filing fee
11/17/20	\$112.40	Sayler Legal Service	service costs Fresh Harvest
11/17/20	\$83.40	Sayler Legal Service	Service Rava Ranches, Inc.
11/17/20	\$121.40	Sayler Legal Service	Service Fresh Foods, Inc.
11/17/20	\$83.40	Sayler Legal Service	Service SMD Logistics, Inc.
11/28/20	\$700.00	Carlos Radillo	translation of plaintiff declarations and whatsapp
4/7/21	\$74.00	Sayler Legal Service	Service of Pacific Valley Bank
4/13/21	\$164.50	Sayler Legal Service	Service of Mechanics Bank
4/14/21	\$74.00	Sayler Legal Service	Service of Hayashi Wayland
4/19/21	\$25.96	UPS Store	shipping expenses for discovery docs
4/29/21	\$311.25	Cathy McCabe	translation of interrogatory responses
5/13/21	\$135.30	Cathy McCabe	translation of doc 28-2
6/3/21	\$127.50	Sayler Legal Service	Service Jeanne Malitz Subpoena
6/16/21	\$50.00	Verizon	verizon subpoena response fee
8/17/21	\$70.00	AT&T	Subpoena response expense
9/6/21	\$707.94	Southwest Airlines	travel expense to LA
9/9/21	\$63.46	Hertz	rental car to deposition
9/15/21	\$24.00	LAZ	airport parking for depo travel
8/5/21	39.06	Fedex	Mailing subpoena response documents
8/6/21	\$1,250.00	Dataflow Business Systems	Scanning of Pacific Valley Bank Documents
8/10/21	\$1,512.00	Pacific Valley Bank	Production of Pacific Valley Bank Documents
9/24/21	\$967.75	Abrahams, Mah and Kahn	transcript of Sarmiento depo
9/30/21	\$700.00	Monica Desiderio	Translation at Alfredo Diaz depo
10/5/21	\$450.00	Stepanie Penn	translation of Norberto Mendivil depo
10/9/21	\$229.32	Stepanie Penn	translation of declarations
10/15/21	\$1,450.20	Merit Court Reporting	deposition transcript for Alfredo Diaz depo
10/26/21	\$1,937.55	Merit Court Reporting	deposition transcript for Oscar Montes depo
10/28/21	1,418.60	Merit Court Reporting	Suzie Rava depo Inv. #77311
10/28/21	2,691.30	Merit Court Reporting	Leticia Ridaura depo Inv. #77315
10/28/21	2,830.80	Merit Court Reporting	David Scaroni depo Inv. #77316
10/26/21	1,937.55	Merit Court Reporting	Oscar Montes depo Inv. #77253
12/6/21	\$237.62	Mechanics Bank	invoice for subpoena production
1/18/22	\$1,200.00	Aimee Benavides	translation of depositions of Angel Rincon and Oscar Ramos translation of 13 documents including discovery responses; complaint; and exhibits re Defs' sanction motion
1/24/22	\$4,214.75	Cathy McCabe	mediation fee
5/4/22	\$5,000.00	Jeffrey Krivis	
7/11/22	\$283.85	Cathy McCabe	translation of declarations for protective order
8/30/22	\$636.60	Cathy McCabe	translation of audio recordings for protective order
10/31/22	\$3,333.33	Jeffrey Krivis	2nd mediation fee
3/4/23	\$1,700.00	Benavides Multilingual Consulting	translation of settlement
3/9/23	\$14.58	USPS	certified mail expense
3/9/23	\$75.00	LWDA	PAGA letter expense
6/26/23	2,843.75	Serge Gagne	data analysis of payroll data

Total \$40,381.12