

1 Stanley Saltzman (State Bar No. 90058)
 ssaltzman@marlinsaltzman.com
 2 Marcus Bradley (State Bar No. 174156)
 mbradley@marlinsaltzman.com
 3 Christina A. Humphrey (State Bar No. 226326)
 chumphrey@marlinsaltzman.com
 4 Kiley Grombacher (State Bar No. 245960)
 kgrombacher@marlinsaltzman.com
 5 **MARLIN & SALTZMAN, LLP**
 29229 Canwood Street, Suite 208
 6 Agoura Hills, California 91301
 (818) 991-8080
 7 (818) 991-8081 (facsimile)
 8

9 Attorneys for Plaintiff Alicia Harris
 10 * *Additional Plaintiff's Counsel Listed on Following Page*

11 **UNITED STATES DISTRICT COURT**
 12 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

13 ALICIA HARRIS, as an individual and on
 14 behalf of all others similarly situated,

15 Plaintiff,

16 vs.

17 VECTOR MARKETING CORPORATION, A
 PENNSYLVANIA CORPORATION; AND
 18 DOES 1 THROUGH 20, INCLUSIVE,

19 Defendants.

Case No.: CV 08 5198 EMC

**DECLARATION OF LARRY W. LEE IN
 SUPPORT OF MOTION FOR APPROVAL
 OF ATTORNEYS' FEES**

Date: August 10, 2011
 Time: 10:30 a.m.
 Ctrm.: C, 15th Floor
 JUDGE: Hon. Edward M. Chen

ADDITIONAL PLAINTIFF'S COUNSEL

1
2
3 Louis Marlin (State Bar No. 54053)
4 louis.marlin@marlinsaltzman.com
5 **MARLIN & SALTZMAN, P.C.**
6 3200 El Camino Real, Suite 100
7 Irvine, CA 92602
8 (714) 669-4900
9 (714) 669-4750 (facsimile)

10 Daniel H. Chang (State Bar No. 183803)
11 dchang@diversitylaw.com
12 Larry W. Lee (State Bar No. 228175)
13 lwlee@diversitylaw.com

14 **DIVERSITY LAW GROUP, A Professional Corporation**
15 444 S. Flower Street
16 Citigroup Center · Suite 1370
17 Los Angeles, California 90071
18 (213) 488-6555
19 (213) 488-6554 facsimile

20 Sherry Jung, Esq. (State Bar No. 234406)
21 sherryj23@hotmail.com
22 **LAW OFFICES OF SHERRY JUNG**
23 444 S. Flower Street
24 Citigroup Center · Suite 1370
25 Los Angeles, California 90071
26 (213) 488-6555
27 (213) 488-6554 facsimile
28

DECLARATION OF LARRY W. LEE

I, Larry W. Lee, declare as follows:

1. I am an individual over the age of 18. I am one of the attorneys of record for Plaintiff Alicia Harris and the certified class (hereinafter referred to as "Plaintiff"). I have personal knowledge of the facts set forth below and if called to testify I could and would do so competently.

2. I have reviewed the settlement, the facts of this case, the risks of years-long appeals, and the total damages versus the fair Settlement Sum of \$13,000,000-based on all of these factors, I believe that the Settlement is fair, adequate and reasonable and that it should be granted final approval by this Court.

3. With my co-counsels in this action, Class Counsel litigated this action vigorously and thoroughly and engaged in extensive discovery, motion practice, investigation and analysis. For example, there have been 3 different class certification motions, 1 motion to decertify, and 3 summary judgment motions, all of which were highly contested during nearly 3 years of intense litigation.

4. In addition, over 60 deposition were taken in this case, some of which were taken throughout the United States, while others were taken in various parts of California.

5. Finally, due to the various notices provided to the class members in this case, Class Counsel has spent a significant amount of time speaking with countless class members, explaining the status of this case and the terms of the settlement to each and every class member that contact Class Counsel.

6. After substantial discovery and investigation, and countless motions, this case was mediated at arms-length with an experienced and well respected class action mediator, Antonio Piazza, which ultimately led to this current settlement.

7. Based on my review of all relevant data and information in this case, it is my belief that the settlement reached in this matter is fair, reasonable and adequate.

8. The hours incurred by the attorneys in my firm, which are billed contemporaneously, are set forth in the billing records attached hereto as Exhibit "A." I have been approved by District Courts in California with respect to my firm's billing practices, including most recently by Judge Larson in the matter of Napoto v. DHL Express (USA) Inc., United States District Court, Northern District of California, Case No. 3:2009-CV-09-01551-JL.

1 9. My firm has been approved by the United States District Court for the Central and Northern
2 Districts of California, including most recently by Judge Larson in the *Napoto* case identified above.

3 10. For this case, my billing rate was between \$500 to \$600 per hour. In 2009, I was approved at
4 the hourly rate of \$500 per hour by various Courts, including by the Central District of California in the
5 matter of *Castro et al. v. UPS Ground Freight, Inc.*, Central District of California Case No. CV 08-
6 4898 ODW (CWx). In addition, the other attorneys at my firm, namely Daniel H. Chang, Howard L.
7 Magee, and Craig S. Hubble, billed between rates of \$600 to \$700 per hour.

8 11. My qualifications are as follows: I received my JD from Arizona State University College of
9 Law in 2003. During law school, I was a summer associate at the law firm of Brobeck, Phleger &
10 Harrison. I graduated cum laude from Arizona State University College of Law in the top 10% of my
11 class. While I was in law school, I was the Associate Managing Editor of the Arizona State University
12 College of Law, Law Journal. For more than one and one-half years after graduating from law school, I
13 practiced law as an associate at the Los Angeles County offices of Ogletree Deakins Nash Smoak &
14 Stewart, P.C., a national employment defense law firm, representing Fortune 500 companies in
15 employment matters, including wage and hour class actions.

16 12. My primary practice is employment law. I have handled a number of wage and hour matters
17 including class actions and individual actions, on both plaintiff and defense sides. I have a practice that
18 encompasses cases in the Los Angeles Superior Courts, the Orange County Superior Courts, the San
19 Francisco County Superior Courts, the San Diego County Superior Courts, and the United States
20 District Courts for the Central District of California. I have been named as Class Counsel in a number
21 of class actions that have been granted final approval by the Superior Courts of Los Angeles County,
22 Orange County, San Francisco County, and the United States District Court for the Central District of
23 California, including the following Class Actions: *Chan Lanier v. Citigroup, Inc. et al.*, San Francisco
24 Superior Court Case No. CGC-05-445143; *Ortega v. AIG*, Central District of California Case No. CV
25 06-0196-RSWL (PJWx); *Universal Protection Overtime Cases*, Orange County Superior Court Case
26 No. JCCP 4480; *Zamudio v. Clear Channel Communications et al.*, Los Angeles Superior Court Case
27 No. BC 368755; *Hernandez v. CVS Corporation et al.*, Los Angeles Superior Court Case No. JCCP
28 4539; *Tse v. Best Buy*, Los Angeles Superior Court Case No. BC 392717, *Moody v. Charming Shoppes*,

1 *Inc.*, Northern District of California Case No. C 07-06073 JL, and *Montelongo et al. v. Cox Auto*
2 *Trader, Inc.*, San Francisco Superior Court Case No. CGC 08-483561.

3 13. As for Mr. Chang, he received his *Juris Doctorate* from Golden Gate University School of
4 Law in 1996. After graduation, he worked for the firm of Bolden & Martin in Los Angeles, California,
5 where his practice focused primarily on business litigation for clients such as General Motors
6 Acceptance Corporation. After leaving Bolden & Martin, he was an associate with the firm Hemar,
7 Roussio & Heald in Encino, California, an AV-rated law firm practicing primarily in the area of
8 business litigation. In April of 2000, he opened my own practice in Los Angeles, California. During
9 the course of his practice, he has handled hundreds of cases on behalf of consumers and employees
10 throughout California. In May of 2005, he was one of the founding members of the law firm Diversity
11 Law Group, P.C., where his practice has included representing consumers and employees in class
12 actions. Based on such qualifications, Mr. Chang was billed out at between \$600-\$650 per hour on this
13 matter.

14 14. As for Mr. Magee, he received his JD from University of Southern California in 1996. Upon
15 his graduation, he was employed by the law firm of Brobeck, Phleger & Harrison, focusing on
16 employment law. In 2002, Mr. Magee became employed by Ogletree Deakins Nash Smoak & Stewart,
17 P.C., where he eventually became a shareholder. In 2009, Mr. Magee quit his employment with
18 Ogletree Deakins Nash Smoak & Stewart, P.C., and became a shareholder with my law firm. During
19 his entire legal career, Mr. Magee has focused his practices solely on employment law, including
20 numerous wage and hour class actions. Based on such qualifications, Mr. Magee was billed out at
21 between \$700 per hour on this matter.

22 15. As for Mr. Hubble, he received his JD from the University of Texas School of Law in 1990,
23 graduating *magna cum laude*. Upon graduation, he joined the Houston office of Baker Botts LLP in
24 Houston, Texas. Mr. Hubble subsequently practiced as an associate or senior associate at Ahmad &
25 Zavitsanos, P.C., an employment and civil litigation boutique in Houston; in the Dallas office of Akin,
26 Gump, Strauss, Hauer & Feld, LLP; in the Los Angeles office of Christensen, Glaser, Fink, Jacobs,
27 Weil & Shapiro, LLP and in the Los Angeles office of Howrey LLP. Prior to working for Diversity
28 Law Group, he served as in-house counsel for Beverly Hill Properties, the largest apartment owner in

1 Southern California. Since 1990, his practice has focused primarily upon civil and employment
2 litigation. In this regard, he has been counsel of record on a number of wage and hour matters,
3 including class actions, including *Chan Lanier v. Citigroup, Inc. et al.*, San Francisco Superior Court
4 Case No. CGC-05-445143, *Saberi et al. v. BFS Retail & Commercial Operations, LLC et al.*, Alameda
5 Superior Court Case No. RG08406555, and *Baltazar v. Portellus, Inc.*, Orange County Superior Court
6 Case No. 07CC01375. Based on such qualifications, Mr. Hubble was billed out at between \$600-\$650
7 per hour on this matter.

8 16. Based on the billing records attached as Exhibit A, my firm has incurred approximately
9 2100.8 hours in attorney time through the end of April 2011 on this matter. I anticipate an additional
10 100 hours to be incurred by my office for the remainder of this case, for which supplemental time
11 sheets will be submitted. Based thereon, and based on an average rate of \$600 per hour, the total
12 amount of attorneys' fees that will be incurred by my firm for the entirety of this case shall be
13 approximately \$1,320,480.00.

14 17. To date, there are no objections to the Settlement or the amounts requested for Class Counsels'
15 attorneys' fees.

16
17 I declare under penalty of perjury that the foregoing is true and correct. Executed on this 2nd
18 day of June, 2011 at Los Angeles, California.

19
20 _____ /s/
21 Larry W. Lee

EXHIBIT A

**TO DECLARATION
OF LARRY W. LEE**

REDACTED

DIVERSITY LAW GROUP
A Professional Corporation
444 S. Flower Street, Suite 1370
Los Angeles, CA 90071

Invoice submitted to:
Alicia Harris
TRACKING HOURS ONLY

November 05, 2008

In Reference To: Harris, Alicia v. Vector Marketing Corp.
*Invoice #*11698

Professional Services

	<u>Hrs/Rate</u>
10/3/2008 LWL Draft class action complaint	1.30
10/6/2008 LWL Further draft class action complaint	1.80
10/10/2008 CSH Review and revise class action complaint	2.10
10/14/2008 LWL Finalize complaint for filing; finalize letter to LWDA re PAGA violations	0.80
10/22/2008 LWL Confer with Paul Matheson [REDACTED]	0.40
For professional services rendered	<u>6.40</u>

DIVERSITY LAW GROUP

A Professional Corporation
 444 S. Flower Street, Suite 1370
 Los Angeles, CA 90071

Invoice submitted to:
 Alicia Harris
 TRACKING HOURS ONLY

December 03, 2008

In Reference To: Harris, Alicia v. Vector Marketing Corp.

*Invoice #*11755

Professional Services

	<u>Hrs/Rate</u>	<u>Amount</u>
11/18/2008 LWL Draft first amended complaint	1.90	
LWL Draft correspondence to opposing counsel re stipulation to filing of first amended complaint	0.40	
11/19/2008 LWL Review and revise first amended complaint	1.40	
LWL Review notice of removal filed by defendant	1.70	
CSH Revise first amended complaint	1.60	
11/24/2008 LWL Confer with opposing counsel re stipulation to filing of amended complaint	0.20	
11/25/2008 LWL Draft stipulation re filing of amended complaint; confer with opposing counsel [REDACTED]	1.20	
For professional services rendered	8.40	

Additional Charges :

DIVERSITY LAW GROUP

A Professional Corporation
 444 S. Flower Street, Suite 1370
 Los Angeles, CA 90071

Invoice submitted to:
 Alicia Harris
 TRACKING HOURS ONLY

January 06, 2009

In Reference To: Harris, Alicia v. Vector Marketing Corp.

*Invoice #*11804

Professional Services

	<u>Hrs/Rate</u>
12/1/2008 LWL Confer with opposing counsel re stipulation to file FAC	0.20
12/5/2008 LWL Confer with opposing counsel re stipulation; finalize same for filing	0.70
LWL Draft motion for leave to amend complaint	1.40
12/10/2008 LWL Confer with opposing counsel re first amended complaint	0.30
12/17/2008 LWL Confer with opposing counsel re rule 26f conference	0.20
12/22/2008 LWL Confer with opposing counsel re rule 26f conference	0.30
12/23/2008 LWL Confer with opposing counsel re rule 26f conference	0.40
12/26/2008 LWL Confer with opposing counsel re rule 26f conference	0.10
12/29/2008 LWL Confer with opposing counsel re scheduling rule 26f conference	0.40
For professional services rendered	<u>4.00</u>

DIVERSITY LAW GROUP

A Professional Corporation
 444 S. Flower Street, Suite 1370
 Los Angeles, CA 90071

Invoice submitted to:

Alicia Harris

TRACKING HOURS ONLY

February 05, 2009

In Reference To: Harris, Alicia v. Vector Marketing Corp.

*Invoice #*11856

Professional Services			<u>Hrs/Rate</u>
1/2/2009	LWL	Confer with counsel [REDACTED]	0.20
1/5/2009	LWL	Confer with opposing counsel re rule 26 conference	0.20
	LWL	Conduct legal research re motion for conditional class certification	3.70
1/7/2009	LWL	Confer with opposing counsel re rule 26 conference	0.20
	LWL	Draft special interrogatories	1.60
1/8/2009	LWL	Draft case management statement	2.20
	LWL	Further draft special interrogatories; review defendant's answer in connection with same	1.70
	LWL	Draft motion for conditional class certification	3.30
1/12/2009	LWL	Draft request for production of documents	2.10
	LWL	Draft notice of deposition of Defendant	1.60
	LWL	Further draft motion for conditional class certification; conduct legal research re same	2.70

Alicia Harris

Page 2

			<u>Hrs/Rate</u>
1/13/2009	LWL	Further draft motion for conditional class certification; conduct legal research re same	1.80
	LWL	Confer with opposing counsel re rule 26 conference	0.10
1/14/2009	LWL	Conduct legal research re motion for FLSA conditional certification	3.70
1/15/2009	LWL	Conduct research [REDACTED]	4.20
	LWL	Travel to and meet with opposing counsel re Rule 26 conference; draft email to opposing counsel re same	1.80
	LWL	Draft second amended complaint and stipulation to file same	1.10
	CSH	Research re [REDACTED] reviewed materials in preparation of and attended Rule 26(f) Joint Planning Meeting	1.50
1/17/2009	LWL	Conduct further research [REDACTED]	2.90
1/29/2009	LWL	Draft consent re magistrate judge	0.50
	LWL	Draft ADR certification	0.30
			<hr/> 37.40

DIVERSITY LAW GROUP

A Professional Corporation
 444 S. Flower Street, Suite 1370
 Los Angeles, CA 90071

Invoice submitted to:
 Alicia Harris
 TRACKING HOURS ONLY

March 06, 2009

In Reference To: Harris, Alicia v. Vector Marketing Corp.

*Invoice #*11906

Professional Services

	<u>Hrs/Rate</u>
2/3/2009 LWL Review documents received by Harris from defendants	0.30
2/4/2009 LWL Review ADR stipulation revised by defendants	0.50
2/5/2009 LWL Finalize stipulation re filing of second amended complaint for filing	0.40
LWL Finalize ADR certification and stipulation re same for filing	0.50
2/10/2009 LWL Confer with opposing counsel re discovery extension	0.30
LWL Draft initial disclosures	1.80
2/16/2009 LWL Confer with opposing counsel re case management statement	0.30
2/18/2009 LWL Review revised case management statement from defendant; confer with opposing counsel re same	2.20
2/21/2009 LWL Confer with opposing counsel re status conference	0.40
2/24/2009 LWL Confer with opposing counsel re status conference and discovery matters	0.80
2/25/2009 LWL Revise initial disclosures	2.40

Alicia Harris

Page 2

		<u>Hrs/Rate</u>
2/25/2009	LWL Travel to and attend initial status conference	5.50
	LWL Confer with opposing counsel re ADR matters	0.30
2/26/2009	LWL Further revise initial disclosures	1.50
	LWL Review documents to be produced with initial disclosures	3.20
	LWL Review court orders re scheduling matters	1.40
For professional services rendered		<hr/> 21.80

DIVERSITY LAW GROUP

A Professional Corporation
 444 S. Flower Street, Suite 1370
 Los Angeles, CA 90071

Invoice submitted to:
 Alicia Harris
 TRACKING HOURS ONLY

April 06, 2009

In Reference To: Harris, Alicia v. Vector Marketing Corp.

*Invoice #*11953

Professional Services

		<u>Hrs/Rate</u>
3/2/2009	LWL Confer with opposing counsel re mediation; confer with mediator re same	0.60
	LWL Draft notice of association of counsel	0.40
3/3/2009	LWL Confer with opposing counsel re deposition dates; confer with Harris re same	0.80
3/7/2009	LWL Draft meet and confer letter to opposing counsel	1.10
3/8/2009	LWL Confer with opposing counsel re discovery matters	0.40
	LWL Draft amended notice of deposition for Defendant	0.70
3/11/2009	LWL Initial review of documents produced by Defendants	2.40
3/12/2009	LWL Draft public records request to DLSE	0.60
3/13/2009	LWL Conduct legal research re [REDACTED]	3.60
3/15/2009	LWL Conduct further legal research re [REDACTED]	3.20
3/16/2009	LWL Conduct further legal research re [REDACTED]	2.70

Alicia Harris

Page 2

		<u>Hrs/Rate</u>
3/17/2009	LWL Confer with opposing counsel re deposition schedules	0.30
	LWL Draft deposition outline and notes for Plaintiff's deposition preparation	2.60
3/18/2009	LWL Confer with opposing counsel re deposition schedules	0.60
	LWL Travel to meet with Harris for deposition preparation	1.30
	LWL Further review documents in preparation for deposition and mediation	2.70
	LWL Conduct further legal research re [REDACTED]	2.30
3/19/2009	LWL Travel to and meet with Harris for deposition preparation	3.80
	LWL Review amended notice of deposition for plaintiff; draft objection to same	2.30
	LWL Review documents and prepare same for production to opposing counsel	3.60
	LWL Confer with opposing counsel re deposition schedule	0.40
3/20/2009	LWL Review and revise objection to amended notice of deposition to plaintiff; draft correspondence to opposing counsel re same	1.10
	LWL Conduct further legal research re [REDACTED]	2.80
	LWL Review answer to second amended complaint	0.80
3/21/2009	LWL Draft deposition outline for PMK depo; prepare exhibits for same	8.30
3/22/2009	LWL Further draft deposition outline for PMK depo	6.40
3/23/2009	LWL Review exhibits and documents in preparation for PMK depo	7.60
3/24/2009	LWL Finalize depo outline and exhibits	3.40

Alicia Harris

Page 3

		<u>Hrs/Rate</u>
3/24/2009	LWL Draft mediation brief; conduct legal research in connection with same	5.20
3/25/2009	LWL Take deposition of Defendant	8.20
	LWL Review documents in preparation for Plaintiff's deposition; confer with Harris re [REDACTED]	3.40
	LWL Further draft mediation brief; conduct legal research in connection with same	2.20
3/26/2009	LWL Confer with Harris in preparation of deposition	1.60
	LWL Travel to and attend plaintiff's deposition	3.70
	LWL Further draft mediation brief	4.20
3/27/2009	LWL Finalize mediation brief and exhibits	5.30
3/30/2009	LWL Confer with mediator re mediation issues	1.10
3/31/2009	LWL Attend mediation	3.50
	LWL Draft motion for conditional class certification	3.20
	DHC Review Mediation Brief; attend mediation	3.50 500.00/hr
For professional services rendered		<hr/> 111.90

DIVERSITY LAW GROUP

A Professional Corporation
 444 S. Flower Street, Suite 1370
 Los Angeles, CA 90071

Invoice submitted to:
 Alicia Harris
 TRACKING HOURS ONLY

May 05, 2009

In Reference To: Harris, Alicia v. Vector Marketing Corp.

*Invoice #*11999

Professional Services

	<u>Hrs/Rate</u>
4/1/2009 LWL Further draft motion for conditional class certification	5.30
LWL Conduct legal research in preparation of opposing summary judgment	3.20
4/3/2009 LWL Confer with opposing counsel re tolling agreement	0.30
4/4/2009 LWL Draft tolling agreement	0.90
4/5/2009 LWL Further draft motion for conditional class certification	4.80
4/6/2009 LWL Review and revise tolling agreement; confer with opposing counsel re same	1.30
LWL Review documents produced by DLSE re wage claims filed against Vector	2.30
4/7/2009 LWL Finalize tolling agreement for filing	0.40
LWL Further review documents produced by DLSE re [REDACTED] confer with DLSE re same	1.50
4/8/2009 LWL Further legal research re [REDACTED]	2.90
4/12/2009 LWL Review Harris depo transcript	3.60

Alicia Harris

Page 2

			<u>Hrs/Rate</u>
4/13/2009	LWL	Further review Harris depo	3.90
4/20/2009	LWL	Conduct legal research in preparation for opposition to motion for summary judgment	3.30
4/22/2009	LWL	Conduct further legal research in preparation for opposition to motion for summary judgment	3.40
4/25/2009	LWL	Draft updated case management report; confer with opposing counsel re same	1.30
4/27/2009	LWL	Confer with mediator re settlement	0.90
4/28/2009	LWL	Confer with mediator re settlement	0.30
4/29/2009	LWL	Further conduct legal research re opposition to motion for summary judgment	3.10
	LWL	Confer with mediator re settlement	0.30
For professional services rendered			<u>43.00</u>

DIVERSITY LAW GROUP

A Professional Corporation
 444 S. Flower Street, Suite 1370
 Los Angeles, CA 90071

Invoice submitted to:
 Alicia Harris
 TRACKING HOURS ONLY

June 03, 2009

In Reference To: Harris, Alicia v. Vector Marketing Corp.

Invoice #12050

Professional Services

	<u>Hrs/Rate</u>
5/2/2009 LWL Confer with opposing counsel re joint statement	0.20
5/4/2009 LWL Confer with opposing counsel re joint statement	0.30
5/5/2009 LWL Review revisions to joint statement made by opposing counsel	1.20
5/6/2009 LWL Finalize joint statement	0.60
5/7/2009 DHC Review Harris depo	3.30
5/13/2009 LWL Attend status conference	0.80
5/14/2009 LWL Research re [REDACTED]	4.30
5/15/2009 CSH Review PMK depo	4.60
5/16/2009 LWL Review Harris deposition in preparation of opposing summary judgment	4.70
DHC Review PMK depo	5.20
5/25/2009 CSH Review Harris depo	3.80

Alicia Harris

			<u>Hrs/Rate</u>
5/30/2009	LWL	Conduct further research re summary judgment motion	3.40
5/31/2009	LWL	Review Harris deposition in connection with preparing opposition to summary judgment; prepare memo re same	6.40
For professional services rendered			<hr/> 38.80

DIVERSITY LAW GROUP

A Professional Corporation
 444 S. Flower Street, Suite 1370
 Los Angeles, CA 90071

Invoice submitted to:
 Alicia Harris
 TRACKING HOURS ONLY

July 06, 2009

In Reference To: Harris, Alicia v. Vector Marketing Corp.

*Invoice #*12096

Professional Services

	<u>Hrs/Rate</u>
6/1/2009 LWL Review PMK deposition in connection with preparing opposition to summary judgment; prepare memo re same	2.90
6/3/2009 LWL Further review PMK deposition in connection with preparing opposition to summary judgment; prepare memo re same	4.60
6/4/2009 LWL Review defendant's motion for summary judgment	3.70
LWL Further review PMK depo transcript in preparation of drafting opposition to motion for summary judgment	1.40
6/5/2009 LWL Draft objection to evidence submitted by Defendant; review Defendant's declarations re same	5.20
LWL Draft correspondence to opposing counsel re stipulation	1.10
6/6/2009 LWL Draft opposition to motion for summary judgment	6.70
6/7/2009 LWL Further draft opposition to motion for summary judgment	7.40
6/8/2009 LWL Review class member declarations submitted by Defendant re MSJ	3.90
LWL Further draft opposition to motion for summary judgment	2.80

Alicia Harris

Page 2

		<u>Hrs/Rate</u>
6/8/2009	CSH Preliminary draft of objections to summary judgment evidence; reviewed declarations in support of motion for summary judgment; legal research re same; conferences with co-counsel re [REDACTED]; attention to travel arrangements for summary judgment hearing	1.90
6/9/2009	LWL Further draft opposition to motion for summary judgment	3.70
	LWL Review declarations submitted by college professors re MSJ	2.20
	CSH Revised objections to summary judgment evidence; legal research re same; reviewed declarations of professors in support of motion for summary judgment	2.00
6/10/2009	LWL Further draft opposition to motion for summary judgment; conduct legal research re same	3.90
	CSH Reviewed additional declarations; reviewed case and discovery materials; revised objection to summary judgment evidence; additional legal research re same; conferences with Larry Lee	3.10
6/11/2009	LWL Further draft opposition to motion for summary judgment; conduct legal research re same	5.40
	LWL Confer with opposing counsel re discovery matters	0.70
	CSH Revised objections to summary judgment evidence	1.00
6/12/2009	CSH Preliminary draft of declaration in support of objections to summary judgment evidence; revised objections to summary judgment evidence	1.50
6/13/2009	LWL Further draft opposition to motion for summary judgment; conduct legal research re same	7.20
6/14/2009	LWL Further draft opposition to motion for summary judgment and supporting documents	9.40
6/15/2009	LWL Review and revise opposition to motion for summary judgment and supporting documents	6.70
	CSH Revised opposition to summary judgment; conferences with Larry Lee re same	10.00

Alicia Harris

Page 3

			<u>Hrs/Rate</u>
6/16/2009	LWL	Review and revise opposition to motion for summary judgment and supporting documents	8.40
	LWL	Confer with Harris re [REDACTED]	1.20
	CSH	Revised opposition to summary judgment; revised objections to summary judgment evidence and supporting declaration; conferences with Larry Lee re [REDACTED]	5.00
6/17/2009	LWL	Finalize opposition to motion for summary judgment and supporting documents	5.80
	CSH	Finalized objections to summary judgment evidence and supporting declaration; conferences with Larry Lee re [REDACTED]	1.00
6/18/2009	LWL	Confer with court re additional time for discovery; confer with opposing counsel re [REDACTED]	1.10
	LWL	Review declarations of defendant's declarants in preparation of conference call	1.40
	LWL	Draft correspondence to opposing counsel re depositions	0.70
	LWL	Confer with mediator re settlement status	0.70
	CSH	Conferences with co-counsel re discovery issues; reviewed email communications from opposing counsel	0.20
6/19/2009	LWL	Draft correspondences to opposing counsel re setting of depositions	0.80
	LWL	Conduct background research re [REDACTED]	2.10
6/22/2009	CSH	Conferences with Larry Lee re discovery issues in connection with motion for summary judgment	0.30
	LWL	Confer with mediator re settlement status	0.60
	LWL	Confer with court clerk and opposing counsel re depositions	0.70

Alicia Harris

		<u>Hrs/Rate</u>
6/22/2009	LWL Draft deposition subpoenas and notice of depositions for 3rd party depos; research addresses for same	2.30
6/23/2009	LWL Confer with opposing counsel re [REDACTED]	0.50
	LWL Draft deposition outline for 3rd party witnesses	2.40
	LWL Confer with mediator re settlement	0.60
6/24/2009	LWL Confer with opposing counsel re [REDACTED]	0.40
	LWL Confer with mediator re settlement	0.30
	LWL Further draft deposition outline	1.30
	LWL Draft notice of depositions	0.40
6/25/2009	LWL Further draft deposition outline for witnesses	2.70
	LWL Confer with witnesses and opposing counsel re deposition scheduling	0.40
6/26/2009	LWL Further draft deposition outline for witnesses; prepare exhibits for same; confer with opposing counsel re same	3.20
	LWL Revise stipulation re briefing schedule; confer with opposing counsel re same	0.80
	LWL Draft second set of document requests to defendant	0.80
6/27/2009	LWL Further draft deposition outline for witnesses; review exhibits for same	2.10
6/28/2009	LWL Further draft deposition outline for witnesses; review exhibits for same	4.60
6/29/2009	CSH Conferences with Larry Lee re [REDACTED] [REDACTED]	0.30

Alicia Harris

		<u>Hrs/Rate</u>
6/29/2009	LWL Take deposition of Monica Carrasco	6.00
	LWL Take deposition of Matthew Lewis	3.80
	LWL Draft ex parte application; confer with opposing counsel re same	3.70
6/30/2009	LWL Take deposition of JP Arlie	5.50
	LWL Revise stipulation re briefing schedule; confer with court and opposing counsel re same	1.10
For professional services rendered		<u>171.60</u>

DIVERSITY LAW GROUP

A Professional Corporation
 444 S. Flower Street, Suite 1370
 Los Angeles, CA 90071

Invoice submitted to:
 Alicia Harris
 TRACKING HOURS ONLY

August 06, 2009

In Reference To: Harris, Alicia v. Vector Marketing Corp.
*Invoice #*12151

Professional Services		<u>Hrs/Rate</u>
7/1/2009	LWL Confer with opposing counsel re [REDACTED]	0.80
	LWL Review and revise stipulation re briefing schedule	0.40
	LWL Confer with 3rd party witness re continuance of depo	0.30
7/2/2009	LWL Draft 3rd set of document requests	0.90
	LWL Draft responses to Defendant's 2nd set of document requests	0.80
7/6/2009	LWL Confer with opposing counsel re depositions	0.30
	LWL Review correspondence from witness' attorney re [REDACTED] research re same	0.80
	CSH Legal research re [REDACTED] conference with Larry Lee re same	0.50
7/8/2009	LWL Confer with opposing counsel re depositions	1.30
	LWL Draft correspondence to Downey's counsel re [REDACTED]	0.80
	LWL Draft Downey deposition outline	4.70

Alicia Harris

Page 2

	<u>Hrs/Rate</u>
7/9/2009 LWL Travel to Indianapolis for Downey deposition	8.50
LWL Prepare exhibits for Downey deposition	2.90
LWL Confer with opposing counsel re deposition	0.40
CSH Conferences with Larry Lee re [REDACTED]	0.40
7/10/2009 LWL Take deposition of Downey; travel back to Los Angeles from same	10.50
7/12/2009 LWL Draft supplemental opposition re M\$J	2.80
7/13/2009 LWL Draft depo notice re Mariano	0.30
7/14/2009 LWL Confer with opposing counsel re Mariano deposition	0.80
7/15/2009 LWL Review Carrasco depo transcript	3.70
7/16/2009 LWL Further review Carrasco depo transcript	2.90
LWL Review meet and confer letter from opposing counsel; draft response to same	1.10
7/17/2009 LWL Further draft supplemental opposition	3.30
7/19/2009 LWL Review deposition transcript of Matthew Lewis	4.80
LWL Conduct research re Mary Kay sales reps in preparation of Mariano deposition	2.30
LWL Draft supplemental declaration of Harris re supplemental opposition	1.30
LWL Review deposition transcript of JP Arlie	5.30
7/20/2009 CSH Reviewed Mary Kay case in Texas; conferences with Larry Lee re [REDACTED]	0.40

Alicia Harris

Page 3

		<u>Hrs/Rate</u>
7/20/2009	LWL Confer with opposing counsel re discovery matters	1.10
	LWL Prepare exhibits for Mariano deposition	2.40
	LWL Draft deposition outline for Mariano deposition	4.40
7/21/2009	CSH Conferences with Larry Lee re [REDACTED]	0.50
	LWL Travel to Baltimore for Mariano deposition	7.50
	LWL Further prepare exhibits for Mariano deposition	1.80
7/22/2009	CSH Conferences with Larry Lee re [REDACTED]	0.20
	LWL Take deposition of Mariano; travel back to Los Angeles from same	10.50
7/23/2009	CSH Drafted and revised supplemental objections to Defendant's summary judgment evidence; conferences with Larry Lee re [REDACTED]	2.60
	LWL Review deposition transcript of Scott Downey	4.70
	LWL Draft supplemental opposition to Defendants' MSJ; prepare exhibits for same	9.60
7/24/2009	CSH Revised supplemental opposition to Defendant's motion for summary judgment; conferences with Larry Lee re [REDACTED]	3.20
	LWL Review Mariano deposition transcript	3.70
	LWL Further draft supplemental opposition to Defendants' MSJ and prepare exhibits for same	7.90
	LWL Meet and confer with opposing counsel re discovery matters and filing of amended complaint	0.80
	LWL Confer with potential expert witness	0.70
7/28/2009	LWL Draft meet and confer letter to opposing counsel	1.10

Alicia Harris

Page 4

Hrs/Rate

7/30/2009 LWL Confer with opposing counsel re amending complaint

0.50

For professional services rendered

126.50

DIVERSITY LAW GROUP

A Professional Corporation
 444 S. Flower Street, Suite 1370
 Los Angeles, CA 90071

Invoice submitted to:
 Alicia Harris
 TRACKING HOURS ONLY

September 09, 2009

In Reference To: Harris, Alicia v. Vector Marketing Corp.

Invoice #12203

Professional Services		<u>Hrs/Rate</u>
8/3/2009	LWL Confer with mediator re settlement discussions	0.40
8/6/2009	LWL Draft supplemental discovery responses; confer with Harris re [REDACTED]	2.30
8/10/2009	LWL Draft third amended complaint; confer with opposing counsel re same	1.60
	LWL Confer with opposing counsel re discovery matters	0.20
8/12/2009	LWL Confer with opposing counsel re discovery matters	0.30
8/13/2009	LWL Draft settlement demand letter	1.40
8/17/2009	LWL Meet and confer with opposing counsel re discovery matters and amending complaint	1.20
8/18/2009	LWL Confer with opposing counsel re discovery matters and amending complaint	0.30
8/19/2009	LWL Review defendants' MSJ reply brief	4.70
8/21/2009	LWL Confer with opposing counsel re amending complaint and discovery matters	0.60
8/22/2009	LWL Draft motion to amend complaint	2.80

Alicia Harris

Page 2

			<u>Hrs/Rate</u>
8/22/2009	LWL	Review defendant's reply brief in preparation for MSJ hearing	4.30
8/23/2009	LWL	Further draft motion to amend complaint; draft related documents re same	2.70
	LWL	Review documents in preparation for MSJ hearing	3.10
8/24/2009	LWL	Further review and revise motion for leave to file amended complaint and related documents; prepare exhibits for same	2.80
	LWL	Confer with opposing counsel re discovery matters	0.60
8/25/2009	CSH	Reviewed materials in preparation for summary judgment hearing; travel to San Francisco re same; conferences with Larry Lee re [REDACTED]	4.00
	LWL	Prepare notes for MSJ hearing; review documents re same	4.30
	LWL	Travel to San Francisco for MSJ hearing	2.30
	LWL	Finalize motion for leave to amend for filing	1.10
8/26/2009	CSH	Attended summary judgment hearing in San Francisco; conferences with Larry Lee re same; return travel to Los Angeles	7.50
	LWL	Attend MSJ hearing; travel back to Los Angeles from same	5.50
8/28/2009	LWL	Confer with opposing counsel re discovery matters	0.30
8/31/2009	LWL	Confer with opposing counsel re discovery matters	1.20
For professional services rendered			55.50

DIVERSITY LAW GROUP

A Professional Corporation
 444 S. Flower Street, Suite 1370
 Los Angeles, CA 90071

Invoice submitted to:
 Alicia Harris
 TRACKING HOURS ONLY

October 09, 2009

In Reference To: Harris, Alicia v. Vector Marketing Corp.

*Invoice #*12255

Professional Services

	<u>Hrs/Rate</u>
9/1/2009 LWL Confer with mediator re settlement discussions	0.50
9/4/2009 LWL Review order re MSJ	2.70
LWL Confer with mediator re settlement discussions	0.40
9/5/2009 LWL Confer with mediator re settlement discussions	0.50
9/9/2009 LWL Draft PAGA letter to LWDA; legal research in connection with same	1.20
9/10/2009 LWL Review defendant's supplemental discovery responses	0.70
LWL Draft motion to compel; confer with opposing counsel re same	1.10
9/13/2009 LWL Further draft motion to compel	3.80
9/14/2009 LWL Further draft motion to compel; draft supporting declaration, separate statement and proposed order re same	4.30
LWL Draft motion for sanctions and supporting declaration	1.80
9/15/2009 LWL Finalize motion to compel and motion for sanctions and supporting documents	3.20

Alicia Harris

Page 2

Hrs/Rate

9/24/2009 LWL Confer with mediator re settlement discussions

0.80

For professional services rendered

21.00

Additional Charges :

DIVERSITY LAW GROUP

A Professional Corporation
 444 S. Flower Street, Suite 1370
 Los Angeles, CA 90071

Invoice submitted to:
 Alicia Harris
 TRACKING HOURS ONLY

November 12, 2009

In Reference To: Harris, Alicia v. Vector Marketing Corp.

*Invoice #*12306

Professional Services

	<u>Hrs/Rate</u>
10/5/2009 LWL Review defendant's opposition to motion to compel and sanctions; draft reply brief to same	6.40
10/6/2009 LWL Review defendant's opposition to motion to amend complaint; draft reply brief to same	7.40
10/9/2009 LWL Preliminary review of motion to stay; confer with opposing counsel re same	1.40
10/12/2009 LWL Confer with opposing counsel re motion to stay	0.40
10/14/2009 LWL Draft tolling stipulation and stipulation to continue; confer with opposing counsel re same	2.40
10/15/2009 LWL Confer with opposing counsel re stipulations; review revised stipulations	0.90
10/16/2009 LWL Confer with opposing counsel re stipulations	0.20
10/19/2009 LWL Review defendant's ex parte; draft opposition to same	5.70
10/20/2009 LWL Review and revise opposition to defendant's ex parte	2.90
10/21/2009 LWL Travel to and attend motion for leave to amend and motion to compel	9.20
LWL Review defendant's motion for certification and stay; conduct legal research re same	4.90

Alicia Harris

Page 2

			<u>Hrs/Rate</u>
10/22/2009	LWL	Review court orders	0.50
10/26/2009	LWL	Confer with opposing counsel re settlement matters	0.40
	LWL	Draft opposition to motion for certification and stay; conduct legal research re same	6.30
	LWL	Review Defendant's motion for certification and stay	2.90
10/27/2009	LWL	Finalize opposition to motion for certification and stay; conduct legal research re same	4.80
	LWL	Confer with opposing counsel re settlement matters; conduct damage analysis in connection with same	1.30
10/28/2009	LWL	Confer with opposing counsel re discovery matters; review documents re same	1.10
10/29/2009	LWL	Confer with opposing counsel re settlement matters	0.80
10/30/2009	LWL	Confer with opposing counsel re settlement matters	0.90
For professional services rendered			60.80

DIVERSITY LAW GROUP

A Professional Corporation
 444 S. Flower Street, Suite 1370
 Los Angeles, CA 90071

Invoice submitted to:
 Alicia Harris
 TRACKING HOURS ONLY

December 14, 2009

In Reference To: Harris, Alicia v. Vector Marketing Corp.

*Invoice #*12370

Professional Services

	<u>Hrs/Rate</u>
11/1/2009 LWL Review defendant's document requests; draft response to same	1.30
11/2/2009 LWL Finalize responses to defendant's document requests; confer with Harris re same	0.80
LWL Confer with court clerk re hearing date	0.30
11/3/2009 LWL Confer with court clerk and opposing counsel re CMC	0.40
11/4/2009 LWL Review order re denying leave to amend	1.60
11/6/2009 LWL Confer with opposing counsel re joint report	0.70
LWL Review of Cutco presentation video produced by defendant	0.80
LWL Draft joint report; review documents re same	1.80
11/9/2009 LWL Review and revise joint report; confer with opposing counsel re same	1.70
11/11/2009 LWL Confer with opposing counsel re settlement matters	0.80

Alicia Harris

Page 2

			<u>Hrs/Rate</u>
11/16/2009	LWL	Travel to and attend motion for certification of order; travel back to LA from same	8.50
	LWL	Confer with claims admin re FLSA administration issues	0.40
11/19/2009	HLM	Review November 16 hearing transcript; confer with Larry Lee re: same and issue re: potential second round of mediation.	0.80
11/23/2009	LWL	Confer with opposing counsel re mediation; confer with mediator re same	0.60
11/25/2009	LWL	Confer with opposing counsel re mediation; confer with mediator re same	0.30
11/29/2009	LWL	Draft motion for leave to amend; conduct legal research re same	3.20
11/30/2009	LWL	Further draft motion for leave to amend; draft supporting documents re same	2.80
For professional services rendered			<hr/> 26.80

DIVERSITY LAW GROUP

A Professional Corporation
 444 S. Flower Street, Suite 1370
 Los Angeles, CA 90071

Invoice submitted to:
 Alicia Harris
 TRACKING HOURS ONLY

January 19, 2010

In Reference To: Harris, Alicia v. Vector Marketing Corp.

*Invoice #*12423

Professional Services

	<u>Hrs/Rate</u>
12/1/2009 LWL Confer with mediator re mediation issues	0.50
LWL Finalize motion for leave to amend	1.30
12/2/2009 LWL Confer with mediator and opposing counsel re mediation issues	0.60
12/3/2009 LWL Confer with mediator re mediation issues	0.50
12/4/2009 LWL Confer with opposing counsel re meet and confer	0.20
12/7/2009 LWL Confer with opposing counsel re meet and confer	0.30
12/8/2009 LWL Review and revise joint report; confer with opposing counsel re same	1.10
12/9/2009 LWL Further review and revise joint report; confer with opposing counsel re same; conduct research re same	2.30
12/11/2009 LWL Confer with co-counsel re [REDACTED]	1.70
12/14/2009 LWL Draft notice of association of counsel	0.50
12/15/2009 LWL Review defendant's opposition to motion to amend in preparation for hearing; conduct legal research re [REDACTED] confer with co-counsel re [REDACTED]	3.80

Alicia Harris

Page 2

	<u>Hrs/Rate</u>
12/16/2009 LWL Travel to and attend motion for leave to amend; travel back from same	10.50
For professional services rendered	<u>23.30</u>

DIVERSITY LAW GROUP

A Professional Corporation
 444 S. Flower Street, Suite 1370
 Los Angeles, CA 90071

Invoice submitted to:
 Alicia Harris
 TRACKING HOURS ONLY

February 19, 2010

In Reference To: Harris, Alicia v. Vector Marketing Corp.

*Invoice #*12485

Professional Services

	<u>Hrs/Rate</u>
1/5/2010 LWL Review order re motion to amend; confer with counsel re same	1.60
1/12/2010 LWL Confer with counsel re case status	0.50
1/13/2010 LWL Confer with counsel re meeting	0.40
LWL Prepare documents for co-counsel; confer with co-counsel re [REDACTED]	1.60
1/19/2010 LWL Confer with opposing counsel re meeting	0.40
1/22/2010 LWL Meet with counsel re case status	2.30
LWL Confer with court re trial date	0.70
1/25/2010 LWL Draft stipulation re trial date	0.80
1/29/2010 LWL Confer with counsel re discovery matters	0.30
For professional services rendered	8.60

DIVERSITY LAW GROUP

A Professional Corporation
 444 S. Flower Street, Suite 1370
 Los Angeles, CA 90071

Invoice submitted to:
 Alicia Harris
 TRACKING HOURS ONLY

March 10, 2010

In Reference To: Harris, Alicia v. Vector Marketing Corp.

*Invoice #*12554

Professional Services

	<u>Hrs/Rate</u>
2/1/2010 LWL Review stipulation; confer with opposing counsel re same	0.40
2/5/2010 LWL Confer with counsel re case status and discovery matters; prepare deposition transcripts for co-counsel	0.90
LWL Review and revise class notice	0.70
2/8/2010 LWL Review correspondence from opposing counsel	0.60
2/9/2010 LWL Confer with counsel re [REDACTED]	0.40
2/10/2010 LWL Confer with counsel re [REDACTED]	0.30
2/12/2010 LWL Confer with counsel re [REDACTED]	0.60
2/15/2010 LWL Review documents from counsel; confer with counsel re same	1.10
2/17/2010 LWL Confer with counsel re [REDACTED]	0.30
2/23/2010 LWL Confer with counsel re [REDACTED]	0.20
2/24/2010 LWL Review discovery propounded by defendant; confer with Harris re [REDACTED]	1.60

Alicia Harris

Page 2

Hrs/Rate

2/25/2010 LWL Confer with counsel re discovery matters

0.40

2/26/2010 LWL Draft trial schedule outline; confer with opposing counsel re same

1.40

For professional services rendered

8.90

DIVERSITY LAW GROUP

A Professional Corporation
 444 S. Flower Street, Suite 1370
 Los Angeles, CA 90071

Invoice submitted to:
 Alicia Harris
 TRACKING HOURS ONLY

April 19, 2010

In Reference To: Harris, Alicia v. Vector Marketing Corp.

Invoice #12647

Professional Services

	<u>Hrs/Rate</u>
3/1/2010 LWL Confer with counsel re discovery matters	0.70
3/2/2010 LWL Confer with counsel re discovery matters	1.20
3/3/2010 LWL Confer with counsel re discovery matters	0.70
3/4/2010 LWL Confer with counsel re discovery matters	0.80
3/5/2010 LWL Review and revise discovery responses; prepare documents for same	1.20
3/8/2010 LWL Review and revise joint case mgmt statement; confer with counsel re same	1.10
3/9/2010 LWL Confer with opposing counsel re joint statement	0.90
3/10/2010 LWL Confer with opposing counsel re joint statement	1.40
3/11/2010 LWL Confer with opposing counsel re joint statement; review and revise same	1.50
LWL Review correspondences re mailing of pre-cert letter to class members	0.60
LWL Draft supplemental joint statement	1.70

Alicia Harris

Page 2

	<u>Hrs/Rate</u>
3/12/2010 LWL Confer with opposing counsel re supplemental joint statement	1.30
3/13/2010 LWL Revise supplemental joint statement; confer with counsel re same	1.50
3/14/2010 LWL Confer with counsel re supplemental joint statement	0.60
3/15/2010 LWL Review and revise supplemental statement; confer with counsel re same	1.60
3/16/2010 LWL Confer with counsel re discovery matters	0.80
LWL Review documents in preparation of status conference	1.40
3/17/2010 LWL Travel to and attend status conference; travel back to Los Angeles from same	9.50
3/22/2010 LWL Confer with counsel re discovery matters	0.60
LWL Review and revise motion for conditional class certification	4.10
LWL Confer with Lynette Harris re subpoena	0.40
LWL Review and revise notice to class members	0.70
3/23/2010 LWL Confer with counsel re cross brief	0.50
LWL Confer with counsel re discovery matters	0.40
LWL Review and revise cross brief	2.30
3/24/2010 LWL Travel to and meet with co-counsel re discussion of case strategies	4.30
3/25/2010 LWL Confer with counsel re discovery matters; confer with client re [REDACTED]	1.40
3/28/2010 LWL Review Harris phone records for discovery responses	3.70

Alicia Harris

Page 3

		<u>Hrs/Rate</u>
3/29/2010	LWL Finalize discovery responses; review documents in connection with same	1.40
3/30/2010	LWL Confer with counsel re discovery matters	0.40
	LWL Review court order re QSP issue; confer with counsel re same	0.80
3/31/2010	LWL Review and revise class member interview skit; confer with counsel re same	1.40
	LWL Confer with counsel re discovery matters	0.80
	LWL Review and revise brief re QSP discovery; confer with counsel re [REDACTED]	1.60
For professional services rendered		<u>53.30</u>

DIVERSITY LAW GROUP

A Professional Corporation
 444 S. Flower Street, Suite 1370
 Los Angeles, CA 90071

Invoice submitted to:
 Alicia Harris
 TRACKING HOURS ONLY

May 18, 2010

In Reference To: Harris, Alicia v. Vector Marketing Corp.

*Invoice #*12731

Professional Services

	<u>Hrs/Rate</u>
4/1/2010 LWL Confer with counsel re discovery matters	1.10
LWL Prepare sample knives for inspection	1.20
4/2/2010 LWL Attend telephone hearing with Court; confer with counsel re same	1.20
LWL Meet with opposing counsel re inspection of sample knife set	0.80
4/3/2010 LWL Confer with class members	1.10
4/5/2010 LWL Confer with counsel re discovery matters	1.30
LWL Confer with class members	2.30
LWL Review order re leave to amend	1.20
4/6/2010 LWL Confer with counsel re discovery matters	0.40
4/7/2010 LWL Confer with counsel re discovery matters	0.70
4/9/2010 LWL Legal research re FLSA conditional class cert motion	3.20

Alicia Harris

Page 2

			<u>Hrs/Rate</u>
4/12/2010	LWL	Review and revise class cert motion	3.10
	LWL	Review and revise opposition to motion for judgment on pleadings	2.30
	LWL	Confer with class members re declarations	1.40
	LWL	Draft class member declarations	2.10
4/13/2010	LWL	Confer with class members re declarations; review and revise same	3.40
	LWL	Review and revise class cert motion	4.30
	LWL	Review and revise opposition to motion for judgment on pleadings	1.70
	LWL	Review and revise opt in form	0.80
4/14/2010	LWL	Confer with class members re declarations; review and revise same	1.10
	LWL	Review and revise class cert motion	5.20
	LWL	Review and revise opposition to motion for judgment on pleadings	1.30
4/15/2010	LWL	Confer with counsel re discovery matters	0.60
4/16/2010	LWL	Confer with counsel re discovery matters	1.20
4/19/2010	LWL	Meet with Lynette Harris re depo prep	1.70
	LWL	Review and revise stipulation re phone records	0.70
4/20/2010	LWL	Review and revise stipulation re phone records; confer with counsel re same	0.70
4/21/2010	LWL	Attend L. Harris deposition	3.60

Alicia Harris

Page 3

			<u>Hrs/Rate</u>
4/23/2010	LWL	Confer with counsel re discovery matters	0.70
4/30/2010	LWL	Review opposition to class certification; review reply brief to same	5.30
	LWL	Confer with Harris re [REDACTED] confer with counsel re [REDACTED]	0.80
For professional services rendered			<hr/> 56.50

DIVERSITY LAW GROUP

A Professional Corporation
 444 S. Flower Street, Suite 1370
 Los Angeles, CA 90071

Invoice submitted to:
 Alicia Harris
 TRACKING HOURS ONLY

June 21, 2010

In Reference To: Harris, Alicia v. Vector Marketing Corp.

*Invoice #*12814

Professional Services

	<u>Hrs/Rate</u>
5/3/2010 LWL Draft joint conference statement	1.20
5/4/2010 LWL Review and revise joint conference statement; confer with counsel re same	0.90
5/5/2010 LWL Review and revise joint conference statement; confer with counsel re same	1.20
5/7/2010 LWL Review and revise stip re discovery matters	0.80
5/10/2010 LWL Review opposition to FLSA class cert in preparation for hearing	2.60
5/11/2010 LWL Further review documents in preparation for class cert and mtn for judgment on the pleadings hearings	2.80
LWL Review correspondence from opposing counsel re plaintiff's deposition; confer with opposing counsel re same	0.80
5/12/2010 LWL Travel to and attend class certification and mtn for judgment on the pleadings; travel back to Los Angeles from same	10.50
5/13/2010 LWL Draft Boost phone authorization; confer with Boost re same	0.80
LWL Review subpoenas issued by Defendant	0.70
5/16/2010 LWL Review and revise supplemental brief re class certification motion	1.70

Alicia Harris

Page 2

		<u>Hrs/Rate</u>
5/17/2010	LWL Further review and revise supplemental brief re class certification motion	1.30
5/18/2010	LWL Review court order re motion for class certification	1.60
5/19/2010	LWL Review and revise class notice; confer with counsel re same	1.40
	LWL Draft records request to Boost Mobile; confer with counsel re [REDACTED]	0.60
5/20/2010	LWL Review and revise class notice; confer with counsel and administrator re same	2.30
	LWL Review subpoena request from defendant; confer with counsel re same	0.40
	LWL Review court order re motion for judgment on the pleadings; confer with counsel re same	1.20
5/21/2010	LWL Review Court order re class notice	0.80
	LWL Further revise class notice; confer with counsel and administrator re same	2.20
5/22/2010	LWL Confer with counsel re mailing of class notices	0.40
5/23/2010	LWL Confer with counsel re mailing of class notices	0.70
	LWL Draft third amended complaint	1.30
5/24/2010	LWL Confer with counsel re mailing of class notices and discussions with class members	0.60
	LWL Confer with counsel re class administration matters	0.70
5/25/2010	LWL Confer with counsel re class administration matters	0.80
	LWL Review Lynette Harris depo transcript; confer with Ms. Harris re [REDACTED] confer with opposing counsel re changes to same	3.90
	LWL Review correspondence from opposing counsel re subpoena of phone records	0.30

Alicia Harris

Page 3

		<u>Hrs/Rate</u>
5/26/2010	LWL Review correspondence from opposing counsel re discovery matters	0.60
	LWL Further revise third amended complaint	0.50
5/26/2010	LWL Confer with class members re filing of claims	0.80
	LWL Review discovery responses and summary of same	1.30
	LWL Confer with counsel re discovery matters	0.60
	LWL Confer with Harris re [REDACTED]	0.80
5/27/2010	LWL Draft supplemental discovery responses; confer with Harris re [REDACTED]	0.70
	LWL Confer with class members and class admin re filing of claims	2.80
	LWL Confer with counsel re discovery matters	0.70
	LWL Finalize third amended complaint	1.10
5/28/2010	LWL Finalize amended discovery responses; confer with opposing counsel re same	1.20
	LWL Confer with class members and class admin re filing of claims	3.10
	For professional services rendered	<u>69.70</u>

DIVERSITY LAW GROUP

A Professional Corporation
 444 S. Flower Street, Suite 1370
 Los Angeles, CA 90071

Invoice submitted to:
 Alicia Harris
 TRACKING HOURS ONLY

July 27, 2010

In Reference To: Harris, Alicia v. Vector Marketing Corp.

*Invoice #*12900

Professional Services

	<u>Hrs/Rate</u>
6/1/2010 LWL Confer with class members and class admin re filing of opt in forms	1.30
6/2/2010 LWL Confer with class members and class admin re filing of opt in forms	1.60
6/3/2010 LWL Confer with class members and class admin re filing of opt in forms	0.80
LWL Confer with counsel re discovery matters	0.30
6/4/2010 LWL Confer with class members and class admin re filing of opt in forms; confer with administrator re same	2.80
LWL Review and revise motion to quash	1.70
6/7/2010 LWL Confer with class members and class admin re filing of opt in forms; confer with administrator re same	2.30
LWL Confer with counsel re amended complaint	0.60
6/8/2010 LWL Confer with class members and class admin re filing of opt in forms; confer with administrator re same	1.70
LWL Legal research re [REDACTED]	2.20
LWL Review stipulation re filing of responsive pleading; confer with counsel re same	0.30

Alicia Harris

Page 2

		<u>Hrs/Rate</u>
6/9/2010	LWL Confer with class members and class admin re filing of opt in forms; confer with administrator re same	2.10
6/10/2010	LWL Confer with class members and class admin re filing of opt in forms; confer with administrator re same	2.30
6/11/2010	LWL Confer with class members and class admin re filing of opt in forms; confer with administrator re same	1.60
	LWL Attend Baker deposition	1.30
6/13/2010	LWL Review draft responses to discovery requests	0.80
6/14/2010	LWL Confer with class members and class admin re filing of opt in forms; confer with administrator re same	1.90
6/15/2010	LWL Confer with class members and class admin re filing of opt in forms; confer with administrator re same	1.70
	LWL Confer with opposing counsel re discovery matters	0.70
6/16/2010	LWL Confer with counsel re third amended complaint	0.50
6/17/2010	LWL Research re [REDACTED] confer with counsel re same	1.30
6/18/2010	LWL Confer with class members and class admin re filing of opt in forms; confer with administrator re same	2.10
6/21/2010	LWL Confer with class members and class admin re filing of opt in forms; confer with administrator re same	1.30
6/22/2010	LWL Confer with sprint re phone records; confer with opposing counsel re same	0.70
	LWL Confer with class members and class admin re filing of opt in forms; confer with administrator re same	1.10
6/23/2010	LWL Confer with class members and class admin re filing of opt in forms; confer with administrator re same	1.60
	LWL Confer with counsel re discovery matters	0.40
6/24/2010	LWL Confer with class members and class admin re filing of opt in forms; confer with administrator re same	1.30

Alicia Harris

Page 3

		<u>Hrs/Rate</u>
6/25/2010	LWL Confer with class members and class admin re filing of opt in forms; confer with administrator re same	1.60
6/26/2010	LWL Confer with class members and class admin re filing of opt in forms; confer with administrator re same	1.10
6/28/2010	LWL Confer with class members and class admin re filing of opt in forms; confer with administrator re same	1.40
6/29/2010	LWL Confer with class members and class admin re filing of opt in forms; confer with administrator re same	0.80
For professional services rendered		<hr/> 43.20

DIVERSITY LAW GROUP

A Professional Corporation
 444 S. Flower Street, Suite 1370
 Los Angeles, CA 90071

Invoice submitted to:
 Alicia Harris
 TRACKING HOURS ONLY

August 31, 2010

In Reference To: Harris, Alicia v. Vector Marketing Corp.

*Invoice #*12994

Professional Services

	<u>Hrs/Rate</u>
7/1/2010 LWL Review oppositions to discovery motions	2.40
LWL Confer with class members re filing of consent forms	1.10
7/2/2010 LWL Confer with class members re filing of consent forms; confer with claims admin re same	1.60
7/6/2010 LWL Confer with class members re filing of consent forms; confer with claims admin re same	1.40
LWL Review motion to strike in preparation of drafting opposition to same	1.30
LWL Conduct legal research in connection with reply brief re motion to compel	1.60
7/7/2010 LWL Confer with class members re filing of consent forms; confer with claims admin re same	0.80
LWL Finalize reply briefs re motions to compel and quash; prepare same for filing	1.60
7/8/2010 LWL Confer with witnesses re coordination of investigator interviews	1.60
LWL Confer with counsel and investigator re service of subpoena	1.10
LWL Confer with class members re filing of consent forms; confer with claims admin re same	1.10

Alicia Harris

Page 2

			<u>Hrs/Rate</u>
7/8/2010	LWL	Conduct legal research re deposition of absent class members	3.40
7/9/2010	LWL	Confer with class members re filing of consent forms; confer with claims admin re same	0.60
7/10/2010	LWL	Confer with class members re filing of consent forms	0.70
	LWL	Review motion for judgment on pleadings; draft opposition to same; legal research re same	5.40
7/11/2010	LWL	Further draft opposition to motion for judgment on pleadings; legal research re same	6.70
7/12/2010	LWL	Confer with class members and claims admin re filing of consent forms	0.80
7/14/2010	LWL	Confer with class member re case status	0.40
7/16/2010	LWL	Review email from EEOC re Vector	0.70
7/17/2010	LWL	Review and revise privilege log	1.30
	LWL	Review and revise opposition to motion to strike	3.10
7/19/2010	LWL	Confer with class members re filing of consent forms; confer with claims admin re same	1.70
	LWL	Confer with client re [REDACTED] confer with counsel re same	0.70
	LWL	Review and revise opposition to motion to strike; confer with counsel re same	1.20
7/20/2010	LWL	Confer with class members re filing of consent forms; confer with claims admin re same	1.40
	LWL	Review and revise opposition to motion to strike; confer with counsel re same	0.70
	LWL	Confer with witnesses re deposition scheduling	0.80
	LWL	Review documents in preparation of motion to compel and to quash	2.40

Alicia Harris

Page 3

		<u>Hrs/Rate</u>
7/21/2010	LWL Travel to and attend motion to compel and to quash; travel back to Los Angeles from same	7.30
7/22/2010	LWL Confer with class members re filing of consent forms; confer with claims admin re same	1.50
	LWL Draft supplemental brief re motion to compel; research Vector's website re same	3.10
7/23/2010	LWL Confer with class members re filing of consent forms; confer with claims admin re same	1.30
	LWL Finalize supplemental brief re motion to compel; research Vector's website re same; review court order in connection with same; review hearing transcript in connection with same	2.60
	LWL Review signed witness statements produced by defendant	1.70
	LWL Revise 30(b)(6) depo topics	1.10
7/24/2010	LWL Confer with class members re filing of consent forms; confer with claims admin re same	1.10
7/26/2010	LWL Confer with class members re filing of consent forms; confer with claims admin re same	2.60
	LWL Confer with client re discovery matters	0.40
	LWL Review documents in preparation of Simpson deposition	1.20
7/27/2010	LWL Confer with class members re filing of consent forms; confer with admin re same	1.30
	LWL Meet with Simpson re deposition; attend deposition of Simpson	2.80
	LWL Review defendant's discovery briefs	1.30
7/30/2010	LWL Draft joint status conference statement; confer with counsel re same	1.70
	For professional services rendered	78.60

DIVERSITY LAW GROUP

A Professional Corporation
 444 S. Flower Street, Suite 1370
 Los Angeles, CA 90071

Invoice submitted to:
 Alicia Harris
 TRACKING HOURS ONLY

September 22, 2010

In Reference To: Harris, Alicia v. Vector Marketing Corp.

Invoice #13410

Professional Services

	<u>Hrs/Rate</u>
8/1/2010 LWL Confer with counsel re case management conference	0.60
8/2/2010 LWL Attend depositions of Rosemonds; confer with Rosemonds re same	2.80
LWL Confer with counsel re case status matters	1.60
LWL Confer with opposing counsel re deadlines	0.40
LWL Confer with administrator re admin issues	0.30
8/3/2010 LWL Attend deposition of Burton; confer with Burton re same	2.70
LWL Review and revise joint case management statement	1.30
LWL Meet and confer with opposing counsel re discovery matters	0.70
8/4/2010 LWL Review and revise joint case management statement; confer with opposing counsel re same	1.40
LWL Review and revise joint letter brief re Harris depo	0.80
LWL Confer with administrator re admin issues	0.40

Alicia Harris

Page 2

		<u>Hrs/Rate</u>
8/5/2010	LWL Review and revise joint letter brief re Harris depo; legal research re same; confer with opposing counsel re same	1.30
	LWL Confer with opposing counsel re discovery matters	0.60
8/9/2010	LWL Review court order re Harris depo; confer with counsel re same	0.80
8/10/2010	LWL Review court order re Harris depo; confer with counsel re same	0.80
	LWL Confer with class member and claims admin re opt in forms	0.60
8/11/2010	LWL Confer with counsel re discovery matters	1.10
	LWL Confer with class member and claims admin re opt in forms	0.30
	LWL Review and revise joint letter brief	0.70
	LWL Review documents in preparation of Harris depo; confer with Harris re same	1.40
8/12/2010	LWL Further review documents in preparation of Harris depo; confer with Harris re same	0.60
	LWL Confer with class member re filing of opt in form	0.20
	LWL Confer with counsel re discovery matters	0.70
8/13/2010	LWL Further review documents in preparation of Harris depo; confer with Counsel re same	1.10
	LWL Review expert witness reports	1.30
	LWL Confer with class member re filing of opt in form; confer with class admin re same	0.40
	LWL Review documents in preparation of class member depositions; confer with counsel re same	1.80
	CSH Conferences with co-counsel re deposition scheduling issues	0.40

Alicia Harris

Page 3

			<u>Hrs/Rate</u>
8/15/2010	DHC	Review of Client intake form and e-mails among counsel related to deposition scheduling; revise form	1.20
	LWL	Draft memo re class member deposition issues	0.80
8/16/2010	DHC	Meet with client and co-counsel for deposition; attend deposition of class member Garrett Rast	5.00
	LWL	Review order re motion to quash	0.40
	LWL	Confer with counsel re class member depositions	1.10
	LWL	Further review documents in preparation of Harris depo; draft memo re same	2.40
	CSH	Reviewed materials re deposition testimony and deposition preparation; conferences with L. Lee and D. Chang re deposition scheduling issues	1.00
8/17/2010	LWL	Meet with Harris to prepare for deposition	3.20
	LWL	Attend deposition of Harris	4.60
	LWL	Review order re motion to strike	0.80
	CSH	Conferences with co-counsel re deposition scheduling and strategy issues; reviewed case materials	1.00
	HLM	Meet and confer with Alicia Harris in connection with preparation for deposition.	4.00
8/18/2010	DHC	Witness interviews in preparation for depositions	1.20
	LWL	Confer with counsel re class member depositions	1.20
	LWL	Draft status report; review and revise same; confer with opposing counsel re same	2.10
	CSH	Preparation for depositions; conferences with co-counsel re same; reviewed rough transcript of prior deposition	1.50
8/19/2010	DHC	Attend depositions of witnesses Katherine Davison and Kelli Michael	7.00

Alicia Harris

Page 4

		<u>Hrs/Rate</u>
8/19/2010	LWL Attend class member depo	3.10
	LWL Review documents in preparation of Krilanovich depo	1.20
	CSH Attended deposition of Katherine Davison; prepared Andrew Carrasco for deposition; prepared Steven Krilanovic for deposition; conferences with co-counsel regarding discovery issues	5.30
8/20/2010	DHC Make further changes to deposition outline based on testimony to date	1.20
	LWL Attend depo of Krilanovich	3.80
	LWL Confer with counsel re class member depositions	0.90
	LWL Finalize opposition to motion to leave	0.80
	CSH Attended deposition of Andrew Carrasco; conferences with co-counsel regarding strategy and scheduling issues	4.00
8/21/2010	DHC Prepare witness Aldo Alvarez for deposition	0.80
	LWL Confer with counsel re discovery matters	0.50
8/22/2010	LWL Review documents in preparation of class member deposition	1.10
	CSH Prepared Lysa Jones for deposition	0.80
8/23/2010	DHC Prepare witness David Garcia for deposition	0.80
	DHC Attend deposition of Aldo Alvarez	3.80
	LWL Attend deposition of Robles	4.80
	LWL Confer with counsel re class member depo issues	1.30
	LWL Review and revise motion to intervene; confer with Hunter re same	1.80

Alicia Harris

Page 5

			<u>Hrs/Rate</u>
8/23/2010	CSH	Attended deposition of Lysa Jones in Sacramento; prepared Jeremy Richard for deposition conferences with co-counsel regarding strategy and scheduling issues; travel to Sacramento for deposition	6.30
8/24/2010	DHC	Appear for deposition of Matthew Garcia	2.40
	DHC	Further modify depo outline to use in preparation of witnesses	0.60
	LWL	Travel to San Francisco for motion for reconsideration	2.20
	LWL	Review motion for reconsideration papers in preparation for hearing	3.40
	LWL	Review emails re deposition issues	1.30
	CSH	Attended deposition of Jeremy Richard in Sacramento; conferences with co-counsel regarding strategy and scheduling issues	3.50
8/25/2010	DHC	Conference call with co-counsel; prepare for next day's depositions	1.00
	LWL	Attend motion for reconsideration and status conference; travel back to LA from same	5.80
	LWL	Review emails re deposition issues	0.80
	LWL	Conference call with co-counsel re deposition issues	0.70
	CSH	Travel from Sacramento to Los Angeles; conferences with co-counsel regarding depositions and strategy issues	2.50
8/26/2010	DHC	Attend depositions of Stephen Africa and James Moxley	7.60
	LWL	Conference call with co-counsel re deposition issues	1.40
	LWL	Review court orders	0.80
	CSH	Prepared David Ruff for deposition; conferences with Jesus Gonzalez re deposition; conferences with co-counsel regarding strategy and scheduling issues	1.30

Alicia Harris

Page 6

		<u>Hrs/Rate</u>
8/27/2010	DHC Attend depositions of Steven Guevara and Jordan Tasch	7.80
	LWL Travel to and attend depo of defendant	5.30
	LWL Confer with counsel re deposition issues	1.10
	CSH Attended deposition of David Ruff; conferences with co-counsel regarding strategy and scheduling issues	3.30
8/28/2010	LWL Confer with counsel re deposition issues	1.30
	LWL Review documents in preparation of class member depositions	1.80
	LWL Review Harris, Burton, Rosemonds, and Simpson depo transcripts	6.80
	CSH Attended deposition of Jesus Gonzalez; conferences with witness in preparation for deposition	3.50
8/29/2010	LWL Travel to and attend depositions of Hunter and Gupton	10.40
8/30/2010	DHC Prepare Maria Agullar for deposition	1.00
	LWL Attend depositions of Pries and Aguilar	7.20
	LWL Confer with counsel re deposition issues	1.10
	LWL Review and revise school record authorizations	0.80
	CSH Conferences with co-counsel re progress of depositions and additional scheduling and strategy issues	0.40
8/31/2010	DHC Travel to deposition; attend deposition of Amber Meyer in Santa Barbara; travel to San Francisco for class member depositions	8.20
	LWL Confer with counsel re deposition issues	1.30
	LWL Travel to San Francisco in preparation of class member depositions	2.30

Alicia Harris

Page 7

	<u>Hours</u>
For professional services rendered	206.80

DIVERSITY LAW GROUP

A Professional Corporation
 444 S. Flower Street, Suite 1370
 Los Angeles, CA 90071

Invoice submitted to:
 Alicia Harris
 TRACKING HOURS ONLY

October 13, 2010

In Reference To: Harris, Alicia v. Vector Marketing Corp.

*Invoice #*13576

Professional Services

	<u>Hrs/Rate</u>
9/1/2010 LWL Confer with counsel re deposition issues	1.10
LWL Attend depositions of class members; travel back to Los Angeles from same	12.40
CSH Conferences with co-counsel re discovery issues	0.30
DHC Attend depositions of Adam O'Brien and Shaquoia White; prepare for next day's deposition	7.50
9/2/2010 LWL Attend deposition of class member	3.80
LWL Confer with counsel and class members re deposition issues	0.90
LWL Review depo changes from Burton, Rosemonds, and Simpson; confer with opposing counsel re same	1.30
DHC Attend deposition of Morgan Mann; travel back to Los Angeles	7.50
9/3/2010 LWL Review opposition to motion to intervene	1.80
LWL Confer with counsel re deposition issues	0.70
LWL Review class member depo transcripts	4.30

Alicia Harris

Page 2

		<u>Hrs/Rate</u>
9/4/2010	LWL Review class member depo transcripts	2.80
9/7/2010	LWL Draft joint statement; confer with opposing counsel re same	1.20
	LWL Confer with counsel re depo issues	0.60
	CSH Conferences call re review and coding of deposition transcripts; conferences with co-counsel re [REDACTED] call to deponent re document production	0.80
	DHC Participate in telephonic conference among co-counsel; begin coding deposition transcript of Amber Meyer	2.20
9/8/2010	LWL Review and revise joint statement; confer with opposing counsel re same	0.90
	LWL Confer with counsel re depo issues	0.30
	LWL Review class member depo transcripts	3.20
	DHC Code deposition transcript of James Moxley	1.70
9/9/2010	LWL Confer with counsel re motion to intervene issues	1.10
	LWL Confer with counsel re depo issues	0.20
	DHC Code deposition transcript of Jordan Tasch	1.80
9/10/2010	LWL Review class member depo transcripts	3.40
	DHC Code deposition transcript of Katherine Davis	1.50
9/13/2010	LWL Confer with opposing counsel re discovery matters	0.40
	LWL Review class member depo transcripts	2.60
	DHC Code deposition transcript of Shaquoia White	1.20

Alicia Harris

Page 3

			<u>Hrs/Rate</u>
9/14/2010	LWL	Review motion to intervene and related documents in preparation of hearing	3.20
9/15/2010	LWL	Travel to and attend motion to intervene; travel back to Los Angeles from same	9.80
	LWL	Legal research re motion to intervene for supplemental brief	2.20
9/16/2010	LWL	Review class member depo transcripts in preparation of class cert motions	4.10
	LWL	Review and revise motion to intervene supplemental brief	1.40
9/17/2010	DHC	Code issue of training specific to Vector; e-mail to co-counsel re same	3.60
	LWL	Review class member depo transcripts in preparation of class cert motions	3.80
	LWL	Review order re motion to intervene	1.30
9/18/2010	LWL	Review class member depo transcripts in preparation of class cert motions	5.10
9/19/2010	LWL	Review class member depo transcripts in preparation of class cert motions	4.80
9/20/2010	LWL	Review class member depo transcripts in preparation of class cert motions	2.90
	LWL	Review and revise FLSA final certification motion; legal research re same	2.40
9/21/2010	LWL	Confer with mediator re settlement matters	0.50
	LWL	Review class member depo transcripts in preparation of class cert motions	2.40
	LWL	Review and revise class cert motions; legal research re same	3.30
	LWL	Draft Harris declaration re class cert motion	1.10
9/22/2010	LWL	Review and revise class cert motions; draft supporting declarations re same	4.60

Alicia Harris

Page 4

	<u>Hrs/Rate</u>
9/24/2010 LWL Preliminary review of defendant's motions for decertification	2.30
9/27/2010 LWL Conduct legal research re opposition to motion for decertification of FLSA class	2.70
9/28/2010 LWL Review defendant's motion for decertification re FLSA claims	3.50
9/29/2010 LWL Draft opposition to motion for decertification of FLSA class; legal research re same	4.20
LWL Review Saad expert witness declaration and related documents in connection with opposition to decert motion and deposition of Saad	2.10
9/30/2010 LWL Further draft opposition to motion for decertification of FLSA class; legal research re same	5.40
LWL Further review Saad expert witness declaration and related documents in connection with opposition to decert motion and deposition of Saad	2.40
For professional services rendered	146.60

DIVERSITY LAW GROUP

A Professional Corporation
 444 S. Flower Street, Suite 1370
 Los Angeles, CA 90071

Invoice submitted to:
 Alicia Harris
 TRACKING HOURS ONLY

November 15, 2010

In Reference To: Harris, Alicia v. Vector Marketing Corp.

*Invoice #*13652

Professional Services

	<u>Hrs/Rate</u>
10/1/2010 LWL Further draft opposition to motion for decertification of FLSA class; legal research re same	7.30
LWL Attend Saad deposition	3.10
10/4/2010 LWL Confer with counsel re class cert motions	0.30
LWL Further legal research in connection with class cert motions	3.20
10/5/2010 LWL Further legal research in connection with class cert motions	4.70
10/6/2010 LWL Review and revise opposition to decert motions; research re same	4.90
10/14/2010 LWL Review motion for leave to file reply and reply brief	1.30
10/18/2010 LWL Review reply briefs re class cert motions; finalize same for filing	1.40
10/19/2010 LWL Draft joint CMC statement; confer with opposing counsel re same	1.10
10/20/2010 LWL Review and finalize joint CMC statement for filing	0.50
10/26/2010 LWL Review briefs in preparation for class certification motions; confer with Harris re [REDACTED]	3.80

Alicia Harris

Page 2

	<u>Hrs/Rate</u>
10/27/2010 LWL Travel to and attend motion for class certification	9.80
LWL Legal research re supplemental brief	1.60
10/28/2010 LWL Review supplemental brief	0.80
10/29/2010 LWL Review and revise supplemental brief	0.70
10/30/2010 LWL Review defendant's supplemental brief	0.50
For professional services rendered	<u>45.00</u>

DIVERSITY LAW GROUP

A Professional Corporation
 444 S. Flower Street, Suite 1370
 Los Angeles, CA 90071

Invoice submitted to:
 Alicia Harris
 TRACKING HOURS ONLY

December 23, 2010

In Reference To: Harris, Alicia v. Vector Marketing Corp.

Invoice #13804

Professional Services

	<u>Hrs/Rate</u>
11/5/2010 LWL Review court order re class cert motion	2.30
11/7/2010 LWL Confer with counsel re case status	0.40
11/8/2010 LWL Review defendant's ex parte application	1.20
11/9/2010 LWL Review and revise class notice	1.30
11/10/2010 LWL Review and revise class notice; confer with Court and opposing counsel re same	1.60
11/11/2010 LWL Review and revise stip re class notice; confer with counsel re same	0.80
11/16/2010 LWL Confer with co-counsel re [REDACTED]	3.20
11/22/2010 LWL Review defendant's application for appellate review	2.60
11/23/2010 LWL Conduct legal research re [REDACTED]	2.70
LWL Confer with opposing counsel re class notice	0.30
11/24/2010 LWL Review and revise discovery requests; confer with opposing counsel re same	1.60

Alicia Harris

Page 2

	<u>Hours</u>
For professional services rendered	18.00

DIVERSITY LAW GROUP

A Professional Corporation
 444 S. Flower Street, Suite 1370
 Los Angeles, CA 90071

Invoice submitted to:
 Alicia Harris
 TRACKING HOURS ONLY

January 31, 2011

In Reference To: Harris, Alicia v. Vector Marketing Corp.

*Invoice #*14466

Professional Services

		<u>Hrs/Rate</u>
12/1/2010	LWL Further research re [REDACTED]; draft memo re same	6.20
	LWL Review defendant's revisions to class notice and correspondence to court re same; confer with counsel re same	2.10
12/2/2010	LWL Review revised class notice	0.40
	LWL Confer with counsel re discovery matters	0.80
	LWL Further research re [REDACTED]; draft memo re same	3.40
12/3/2010	LWL Confer with counsel re class notice extension	0.80
12/6/2010	LWL Confer with counsel re discovery matters and training videos	1.20
12/7/2010	LWL Review correspondence re discovery and class notice issues	0.80
	LWL Review defendant's appeal brief to 9th circuit; review response to same	3.40
12/8/2010	LWL Confer with counsel re class notice issues; review stipulation re same	1.30
12/9/2010	LWL Confer with counsel re filing of MSJ	0.80

Alicia Harris

Page 2

			<u>Hrs/Rate</u>
12/9/2010	LWL	Review defendant's reply brief re appeal and motion for leave to file same	2.70
	LWL	Confer with counsel re filing of stipulation re notice	0.40
12/14/2010	LWL	Confer with counsel re homework assignments; review memo re same	1.20
12/21/2010	LWL	Review interviews re homework; confer with counsel re same	1.30
12/22/2010	LWL	Confer with counsel re discovery issues	0.60
12/23/2010	LWL	Confer with counsel re class list	0.60
12/28/2010	LWL	Preliminary review of class data; confer with counsel re same	1.40
For professional services rendered			<hr/> 29.40

DIVERSITY LAW GROUP

A Professional Corporation
 444 S. Flower Street, Suite 1370
 Los Angeles, CA 90071

Invoice submitted to:
 Alicia Harris
 TRACKING HOURS ONLY

February 22, 2011

In Reference To: Harris, Alicia v. Vector Marketing Corp.

*Invoice #*14701

Professional Services

	<u>Hrs/Rate</u>
1/3/2011 LWL Confer with counsel re class notice issues	0.60
1/4/2011 LWL Review defendant's ex parte application re motion to stay	1.40
1/5/2011 LWL Confer with counsel re stip to continue stay on class notice; review same	0.70
1/10/2011 LWL Review discovery responses from defendant	1.60
1/11/2011 LWL Confer with counsel re case status	0.60
LWL Review correspondence to court of appeal	0.60
1/12/2011 LWL Confer with counsel re discovery issues	0.70
1/13/2011 LWL Confer with counsel re discovery issues	0.70
1/14/2011 LWL Review class data and discovery responses from defendant; confer with counsel re same	1.90
1/15/2011 LWL Confer with counsel re discovery matters	0.30
1/17/2011 LWL Confer with counsel re discovery matters	0.40

Alicia Harris

Page 2

		<u>Hrs/Rate</u>
1/18/2011	LWL Confer with counsel re discovery matters and class notice	0.80
	LWL Review and revise motion to compel	1.30
1/19/2011	LWL Confer with counsel re discovery matters	0.70
1/20/2011	LWL Confer with counsel re motion to compel	0.40
	LWL Confer with counsel re discovery issues	0.80
	LWL Review motions to compel	2.10
1/21/2011	LWL Confer with counsel re discovery issues	0.70
1/25/2011	LWL Confer with counsel re motion to stay	0.60
1/26/2011	LWL Review defendant's opposition to motion to compel	1.70
	LWL Confer with counsel re discovery issues	0.60
	LWL Review class data produced by defendant	0.70
	LWL Review ex parte application filed by defendant	0.80
1/27/2011	LWL Confer with counsel re motion to stay	0.40
	LWL Legal research re Labor Code section 450 issues in preparation of hearing re motion to compel; confer with counsel re same	3.20
	LWL Review memo re recruiting program	0.80
	LWL Finalize PMK depo notice and letter re same	0.70
1/30/2011	LWL Draft supplemental brief re motion to compel; legal research re same; review court hearing transcript re same	4.30

Alicia Harris

Page 3

	<u>Hrs/Rate</u>
1/31/2011 LWL Further draft supplemental brief re motion to compel; legal research re same	4.70
LWL Confer with counsel re class notice issues	0.80
LWL Review and revise opposition to motion to stay	1.90
For professional services rendered	<hr/> 37.80

DIVERSITY LAW GROUP

A Professional Corporation
 444 S. Flower Street, Suite 1370
 Los Angeles, CA 90071

Invoice submitted to:
 Alicia Harris
 TRACKING HOURS ONLY

April 05, 2011

In Reference To: Harris, Alicia v. Vector Marketing Corp.

Invoice #15043

Professional Services			<u>Hrs/Rate</u>
2/1/2011	LWL	Review transcripts re training sessions	3.60
	LWL	Confer with counsel re class notice issues	0.60
	LWL	Reviw documents in preparation of motion to stay	3.40
	LWL	Further revise supplemental brief re motion to compel	1.80
2/2/2011	LWL	Travel to and attend motion to stay; travel back to Los Angeles from same	11.30
2/3/2011	LWL	Review 3 day training session transcript	3.10
	LWL	Confer with counsel re class notice and discovery issues	1.40
	LWL	Review emergency appeal to stay	1.80
	HLM	Review transcripts re training sessions	4.20
2/4/2011	LWL	Review opposition to motion to stay	2.10
	LWL	Draft motion for summary judgment; legal research re same	4.80

Alicia Harris

Page 2

		<u>Hrs/Rate</u>
2/4/2011	LWL Confer with counsel re class notice and discovery issues	0.80
	LWL Review new sample knife set agreements produced by defendant; confer with counsel re same	1.30
	HLM Review three day training session transcripts	3.50
2/5/2011	LWL Conference call with expert witness	1.60
	LWL Further draft motion for summary judgment; legal research re same; review documents re same	5.60
	HLM Conduct legal research re motion for summary judgment; confer with Larry Lee re same	5.00
2/6/2011	LWL Further draft motion for summary judgment; legal research re same; review documents re same	6.70
2/7/2011	LWL Further draft motion for summary judgment; legal research re same; review documents re same	3.60
	LWL Conference call with expert witness; review documents re same	2.60
	LWL Review reply brief re emergency motion to stay	1.10
2/8/2011	LWL Further draft motion for summary judgment; confer with counsel re same	3.80
	LWL Confer with counsel re class notice and discovery issues	1.60
	LWL Review order from 9th Circuit; confer with counsel re same	0.80
	DHC Legal research on issues pertaining to summary judgment; revise Motion for Summary Judgment; confer with co-counsel re same	4.70
	HLM Legal research re motion for summary judgment	5.70
2/9/2011	LWL Draft administrative motion to file under seal; prepare documents for same	3.10
	LWL Review and revise motion for summary judgment	3.80

Alicia Harris

Page 3

			<u>Hrs/Rate</u>
2/9/2011	HLM	Review and revise motion for summary judgment	3.00
	HLM	Confer with class members re class status	1.50
2/10/2011	LWL	Confer with counsel re mediation	0.30
2/11/2011	LWL	Confer with counsel re mailing of notices	0.40
2/14/2011	LWL	Confer with counsel re MSJ documents	0.80
	LWL	Confer with class members re case status	1.30
	LWL	Conduct legal research re [REDACTED]	2.60
	DHC	Legal research on [REDACTED] memo to Larry Lee re same	3.20
2/15/2011	LWL	Confer with class members re case status	1.80
	LWL	Review defendant's motion for summary judgment	2.60
	LWL	Conduct further legal research re [REDACTED]	1.70
	LWL	Review defendant's supplemental discovery responses	0.80
	HLM	Confer with class members re case status	1.20
2/16/2011	LWL	Review depo notice for expert and correspondence re same; confer with counsel re same	1.20
	LWL	Confer with class members re case status	1.50
	LWL	Conduct further legal research re [REDACTED]	1.20
2/17/2011	LWL	Finalize PMK depo notice	0.40

Alicia Harris

Page 4

			<u>Hrs/Rate</u>
2/17/2011	LWL	Confer with class members re case status	1.90
	LWL	Confer with counsel re expert depo issues	0.80
	LWL	Confer with Harris re case status	0.50
	LWL	Review defendant's declarations in support of MSJ in preparation of drafting objections to same	2.40
	HLM	Confer with class members re case status	2.20
2/18/2011	LWL	Confer with class members re case status	2.20
	LWL	Confer with counsel re expert depo issues	0.70
	LWL	Review documents from expert witness	1.60
	HLM	Confer with Larry Lee re [REDACTED]	0.70
2/19/2011	LWL	Review defendant's MSJ and declarations in support of same	4.30
	DHC	Receipt and review of Defendant's Motion for Summary Judgment; legal research; confer with co-counsel re same	4.60
2/20/2011	DHC	Legal research on issues raised in Declaration submitted in support of Defendant's Motion for Summary Judgment; begin draft objections to Declarations	3.80
	DHC	Review and revise Opposition to Defendant's Motion for Summary Judgment	3.50
	HLM	Review Defendant's motion for summary judgment; confer with Larry Lee re same	4.50
2/21/2011	LWL	Review Arnoff declaration	1.90
	LWL	Confer with class members re case status	1.30
	LWL	Review and revise objections to defendant's declarations	3.30

Alicia Harris

Page 5

			<u>Hrs/Rate</u>
2/21/2011	DHC	Finalize initial draft of Objections to Defendant's Declaration; forward to Larry Lee for review	4.50
	HLM	Wor on objections to Defendant's declarations	2.60
2/22/2011	LWL	Confer with class memembers re case status	2.80
	LWL	Further review and revise objections to defendant's declarations	3.60
	LWL	Review and revise opposition to defendant's MSJ	3.80
	LWL	Confer with counsel re Arnoff declaration	0.60
	LWL	Review court order	0.30
	LWL	Review opt out report	0.20
	HLM	Confer with class members re case status	1.80
	HLM	Work on opposition to Defendant's motion for summary judgment	3.70
2/23/2011	LWL	Confer with class members re case status	1.10
	LWL	Further revise opposition to Defendant's MSJ; confer with counsel re same	4.70
	LWL	Review correspondence re mediation	0.50
	DHC	Further review and revise Objections to Defendant's Declaration; forward to co-counsel for review	2.20
	HLM	Confer with class members re case status	2.20
	HLM	Further work on opposition to Defendant's Motionfor summary Judgment; confer with Larry Lee re same	3.70
2/24/2011	LWL	Confer with class memebbers re case status	1.40

Alicia Harris

Page 6

		<u>Hrs/Rate</u>
2/24/2011	LWL Further revise opposition to Defendant's MSJ; legal research re same; confer with counsel re same	5.30
	LWL Review Arnoff depo transcript	3.70
	HLM Conduct legal research re opposition to Defendant's motion for summary judgment	3.50
	HLM Confer with class members re case status	1.20
2/25/2011	LWL Confer with class members re case status	0.80
	HLM Confer with class members re case status	0.50
2/28/2011	LWL Confer with class members re case status	2.30
	LWL Confer with court re admin motion to file under seal; confer with counsel re same	0.40
	LWL Review defendant's opposition to Plaintiff's MSJ	2.60
	HLM Confer with class members re case status	1.40
	HLM Review defendant's opposition to Plaintiff's MSJ	2.00
	For professional services rendered	<u>222.50</u>

Alicia Harris

Page 7

DIVERSITY LAW GROUP

A Professional Corporation
 444 S. Flower Street, Suite 1370
 Los Angeles, CA 90071

Invoice submitted to:
 Alicia Harris
 TRACKING HOURS ONLY

May 04, 2011

In Reference To: Harris, Alicia v. Vector Marketing Corp.

*Invoice #*15260

Professional Services

		<u>Hrs/Rate</u>
3/1/2011	DHC Receipt and review of draft mediation brief; revise same; forward to co-counsel for review	2.20
	LWL Confer with class members re case status	1.40
	LWL Further review defendant's opposition to Plaintiff's MSJ; legal research re same	3.80
	LWL Review weekly report	0.30
	LWL Review and revise mediation brief	2.10
	HLM Review and revise mediation brief; confer with Larry Lee re same	1.90
3/2/2011	LWL Confer with class members re case status	1.10
	LWL Review defednant's objection to PMK depo notice	0.80
	HLM Review defendant's opposition to plaintiff's MSJ; conduct legal research re same	3.40
3/3/2011	LWL Confer with class members re case status	0.80
	LWL Review and revise reply brief re MSJ and supporting documents; finalize same for filing	3.70

Alicia Harris

Page 2

			<u>Hrs/Rate</u>
3/4/2011	LWL	Review discovery responses and documents produced by Defendant	1.60
	HLM	Confer with class members re case status	0.90
3/7/2011	DHC	Review pleadings, summary judgment documents, and mediator brief in preparation for mediation	6.80
	LWL	Confer with class members re case status	1.10
	LWL	Revise correspondence to court re mediation	0.40
	HLM	Confer with class members re case status	0.90
3/8/2011	LWL	Confer with class members re case status	0.70
	LWL	Review opt out report	0.40
	LWL	Review mediation brief and related documents in preparation of mediation	2.30
	HLM	Work on reply brief re MSJ	1.50
3/9/2011	DHC	Travel to Maui for mediation; meeting of counsel in preparation for mediation	9.00
	LWL	Travel to Maui for mediation	8.30
	HLM	Multiple conversations with Alicia Harris regarding mediation; travel to Maui for mediation and prepare for mediation	11.50
3/10/2011	DHC	Attend mediation	8.00
	LWL	Attend mediation	7.80
	HLM	Various call with Alicia Harris, [REDACTED] participate in mediation; confer with Larry Lee re [REDACTED]	8.90
3/12/2011	LWL	Travel back to Los Angeles from Mediation	7.80

Alicia Harris

Page 3

		<u>Hrs/Rate</u>
3/13/2011	DHC Travel back to Los Angeles from mediation	9.00
	HLM Travel to Los Angeles from Maui in connection with completion of mediation	9.50
3/14/2011	DHC Review draft Motion for Preliminary Approval; revise same; forward to co-counsel for review	4.80
	LWL Confer with counsel re settlement issues	1.20
	LWL Confer with class members re case status	1.60
	HLM Review and revise draft motion for Preliminary Approval	2.40
3/15/2011	LWL Confer with counsel re settlement issues	1.40
	LWL Confer with class members re case status	0.40
3/16/2011	LWL Confer with counsel re settlement issues	1.20
	HLM Confer with class members re case status	0.80
3/17/2011	LWL Confer with counsel re settlement issues	1.60
	LWL Confer with class members re case status	1.10
	HLM Confer with class members re case status	0.70
3/18/2011	LWL Confer with class members re case status	0.60
	LWL Review and revise settlement agreement; confer with counsel re same	3.20
	LWL Draft fourth amended complaint and stipulation to file same	1.80
	LWL Review and revise motion for preliminary approval; draft declarations for same	2.90

Alicia Harris

Page 4

		<u>Hrs/Rate</u>
3/18/2011	LWL Confer with counsel and claims admin re claims process	0.70
	HLM Confer with class members re case status	1.10
3/19/2011	LWL Revise fourth amended complaint and stipulation to file same	0.70
	LWL Further review and revise motion for preliminary approval	2.30
3/20/2011	LWL Review and revise class notice; confer with counsel re same	1.80
	HLM Review fourth amended complaint	0.50
3/21/2011	LWL Confer with counsel re settlement issues	1.10
	LWL Review and revise settlement documents	1.40
3/22/2011	LWL Confer with counsel re settlement issues	1.30
	LWL Confer with class members re case status	0.40
	LWL Review opt out status report	0.30
	HLM Review settlement documents and confer with Larry Lee re same	1.20
3/23/2011	LWL Confer with counsel re settlement issues	1.50
3/24/2011	LWL Confer with counsel re class members	1.40
	LWL Review and revise settlement documents	1.70
	HLM Confer with class members re case status	0.80
3/25/2011	LWL Further review and revise settlement documents	2.60

Alicia Harris

Page 5

			<u>Hrs/Rate</u>
3/25/2011	LWL	Confer with counsel re settlement issues	1.80
	LWL	Review and revise motion for preliminary approval	1.20
	HLM	Further review and revisions to settlement documents	1.90
3/28/2011	LWL	Review and revise settlement documents and preliminary approval motion; confer with counsel re same	3.80
3/29/2011	LWL	Further revise settlement documents and preliminary approval motion; confer with counsel re same	4.70
3/30/2011	LWL	Confer with client re settlement agreement	1.30
3/31/2011	LWL	Review class notices; confer with counsel re same	1.30
4/5/2011	LWL	Confer with counsel re settlement documents; review and revise same	1.40
For professional services rendered			181.80

DIVERSITY LAW GROUP

A Professional Corporation
 444 S. Flower Street, Suite 1370
 Los Angeles, CA 90071

Invoice submitted to:
 Alicia Harris
 TRACKING HOURS ONLY

May 27, 2011

In Reference To: Harris, Alicia v. Vector Marketing Corp.

Invoice #15400

Professional Services

		<u>Hrs/Rate</u>
4/1/2011	LWL Confer with counsel and claims admin re settlement documents	0.70
4/4/2011	LWL Draft joint settlement; confer with opposing counsel re same	0.70
	LWL Confer with counsel re settlement documents; review and revise same	1.20
	HLM Review settlement documents; confer with Larry Lee re same	1.60
4/5/2011	DHC Review settlement documents; confer with counsel re same; revise same	1.40
4/6/2011	LWL Confer with counsel re class notice issues	0.70
4/7/2011	LWL Review documents in preparation of preliminary approval motion	1.90
4/8/2011	LWL Travel to and attend motion for preliminary approval; travel back to Los Angeles from same	11.50
	LWL Legal research re [REDACTED]	3.60
4/9/2011	LWL Further legal research re [REDACTED]	4.30
	DHC Legal research on [REDACTED] memorandum; confer with co-counsel re same	2.40

Alicia Harris

Page 2

			<u>Hrs/Rate</u>
4/10/2011	LWL	Draft brief re reversion of settlement funds; confer with counsel re same	4.80
	LWL	Review motion for preliminary approval of transcript	1.10
	HLM	Review and revise brief re [REDACTED]; confer with Larry Lee re same	1.90
	HLM	Conduct legal research re [REDACTED] confer with Larry Lee re same	2.70
4/11/2011	LWL	Review court orders re preliminary approval motion	0.80
	LWL	Further legal research re preliminary approval brief	2.90
	DHC	Review brief re [REDACTED] legal research; revise brief; confer with co-counsel re same	2.80
4/12/2011	LWL	Further legal research re reversion of settlement funds and payment to class members	3.80
	DHC	Review court order re preliminary approval; confer with co-counsel re same	0.80
4/13/2011	LWL	Further legal research re [REDACTED]; finalize brief re same for filing	4.10
	HLM	Confer with Class members re status of case	1.30
4/14/2011	LWL	Review supplemental brief from Defendant re preliminary approval motion	2.40
4/15/2011	DHC	Legal research on issues raised in preliminary approval hearing; confer with co-counsel re same	4.60
4/18/2011	LWL	Confer with class member re case status; confer with claims admin re same	0.60
	DHC	Review defendant's brief re preliminary approval motion; confer with co-counsel re same	1.80
4/19/2011	LWL	Confer with counsel re preliminary approval motion hearing	0.30
	LWL	Review supplemental briefs in preparation of preliminary approval motion hearing	2.30

Alicia Harris

Page 3

			<u>Hrs/Rate</u>
4/19/2011	HLM	Review supplemental briefs and confer with Larry Lee re issues for preliminary approval hearing	2.90
4/20/2011	LWL	Travel to and attend motion for preliminary approval; travel back to Los Angeles from same	9.50
	DHC	Confer with class members re case status	2.20
4/21/2011	LWL	Review and revise class notices	1.20
4/22/2011	LWL	Review further revised class notices; review class data re same	2.20
	HLM	Confer with class members re case status	0.50
	DHC	Review weekly summary report; confer with co-counsel re same	1.20
4/25/2011	DHC	Review class notice; revise same; confer with co-counsel re same	1.20
4/26/2011	LWL	Confer with counsel re class notices	0.80
	LWL	Review weekly summary report	0.40
	LWL	Confer with class members re case status	0.80
4/29/2011	LWL	Review order re preliminary approval; confer with counsel re same	1.20
	DHC	Review preliminary approval order; confer with co-counsel re same	0.70
4/30/2011	LWL	Confer with counsel re settlement documents	0.60
For professional services rendered			94.40