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8 *Attorneys for Plaintiffs Norma Santizo*
and Mimi Lee, individually and on behalf
 9 *of all others similarly situated*

10
 11 SUPERIOR COURT OF THE STATE OF CALIFORNIA
 12 IN AND FOR THE COUNTY OF SAN MATEO

14 NORMA SANTIZO and MIMI LEE,
 15 individually and on behalf of all others
 similarly situated,

16 Plaintiffs,

17 vs.

18 NEAL’S COFFEE SHOP, INC., a California
 19 corporation; SUNIL PRASAD, an individual,
 and DOES 1 through 20, inclusive,

20 Defendants.

Case No. 24-CIV-03380
 Assigned for All Purposes to
 Honorable Nicole S. Healy, Dept. 28

**DECLARATION OF MICHELLE G. LEE
 IN SUPPORT OF PLAINTIFFS’ MOTION
 FOR ATTORNEY’S FEES, COSTS, AND
 SERVICE AWARDS**

Date: March 25, 2026
 Time: 2:00 p.m.
 Place: Dept. 28
 Judge: Honorable Nicole S. Healy

Complaint Filed: June 17, 2024
 Trial Date: None Set

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1 I, Michelle G. Lee, declare as follows:

2 1. I am a member in good standing of the bar of the State of California and a partner
3 with the law firm Rudy Exelrod Zieff & Lowe, LLP. My firm and I represent the Plaintiffs in
4 this action. I make these statements based on personal knowledge and would so testify if called
5 as a witness at trial.

6 2. This Declaration is submitted in support of Plaintiffs' Motion for Attorney's Fees,
7 Costs, and Service Awards.

8 **Class Counsel's Background and Experience**

9 3. I received a Bachelor of Arts degree from Yale University in 2004. I received a
10 Juris Doctor degree from the University of Michigan Law School, *cum laude*, in 2009.

11 4. After graduating from law school, I joined the law firm of Quinn Emanuel
12 Urquhart & Sullivan, LLP, where my practice focused on complex civil litigation. I then served
13 as a law clerk to the Honorable William H. Alsup at the United States District Court for the
14 Northern District of California.

15 5. From 2014 to the present, I have practiced with Rudy, Exelrod, Zieff & Lowe,
16 LLP. My practice and that of my firm consists of representing plaintiffs in individual and class
17 action employment litigation in state and federal courts. I have litigated numerous class action
18 matters involving a variety of employment law issues, including violations of the WARN Act and
19 state and federal wage and hour laws, including California law and the federal Fair Labor
20 Standards Act.

21 6. Along with co-counsel, my firm and I were class counsel in *Cancilla v. Ecolab,*
22 *Inc.* CV 12-03001 JD (U.S.D.C., N.D. Cal), a class and FLSA collective action brought on
23 behalf of service specialists alleging that the employer misclassified them, resulting in the
24 employer's failure to compensate them for overtime hours, to provide duty-free meal and rest
25 breaks, and to comply with various other wage and hour laws. The Court certified a settlement
26 class and granted final approval of a class action settlement providing for a \$7.5 million
27 settlement in 2015. The Court also approved an award of \$1,875,000 in attorney's fees.

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1 7. Along with co-counsel, my firm and I were class counsel in *Woodruff v.*
2 *Broadspectrum Downstream Services, Inc., formerly Timec Company, Inc.*, Case No. 3:14-CV-
3 04105-EMC (U.S.D.C., N.D. Cal.), a case involving “off-the-clock” claims for oil and gas
4 refinery workers throughout California. The Court certified a settlement class and granted final
5 approval of a class action settlement providing for a \$3,450,000 settlement fund for the benefit
6 of approximately 1,100 class members. On May 4, 2017, Judge Chen also approved a service
7 payment of \$10,000 for the class representative, \$945,677.50 in attorney’s fees, and costs in the
8 amount of \$54,467.36.

9 8. Along with co-counsel, my firm and I were class counsel in *Spicher v. Aidells*
10 *Sausage Company, Inc.* 3:15-cv-05012-WHO (U.S.D.C., N.D. Cal), a class action brought on
11 behalf of primarily part-time food Product Demonstrators. Plaintiffs alleged “off-the-clock” and
12 meal period violations, and failure to comply with various other wage and hour laws. On
13 May 31, 2017, the Court certified a settlement class and granted final approval of a class action
14 settlement providing for a \$2,375,000 settlement. The Court approved service payments of
15 \$15,000 and \$10,000 for the two class representatives, and also approved an award of
16 \$593,750.00 in attorney’s fees.

17 9. Along with co-counsel, my firm and I were class counsel in *McDonald v. CP*
18 *OpCo, LLC, et al.*, CV 4:17-cv-04915-HSG (U.S.D.C., N.D. Cal), a class action brought on
19 behalf of former employees of a nationwide party rental supplies company. Plaintiffs alleged
20 WARN Act violations arising from a mass layoff. On May 31, 2017, the Northern District
21 Court certified a settlement class and granted final approval of a class action settlement
22 providing for a \$3,000,000 million settlement. The Court approved a service payment of
23 \$10,000 for the class representative, and also approved an award of \$900,000.00 in attorney’s
24 fees.

25 10. My firm and I were class counsel in *Connolly v. Weight Watchers North America,*
26 *Inc.*, Case No. 14-cv-01983-TEH (U.S.D.C., N.D. Cal.), a case alleging that Weight Watchers
27 did not pay its California Leaders and Locations Coordinators for all the time they worked in
28 violation of the California Labor Code, failed to reimburse them for certain expenses, and also

1 violated other rights these employees had under California law. The Court certified a settlement
2 class and, on December 16, 2014, finally approved a class action settlement providing for a
3 \$1,687,500 settlement. The Court also approved service payments of \$12,500 and \$10,000
4 respectively to the two class representatives and \$421,875.00 in attorney's fees.

5 11. Along with co-counsel, my firm and I are class counsel in *Jauregui v. Safeway,*
6 *Inc.*, No. RG21095860 (Alameda Sup. Ct.), representing a certified class of approximately
7 150,000 current and former hourly employees of grocery retailer Safeway, alleging claims of
8 meal and rest period violations, unpaid wages, failure to pay wages at the proper rate of pay, and
9 failure to comply with various other wage and hour laws.

10 12. I have been recognized as one of the Top Women Attorneys in Northern
11 California by Super Lawyers (2024 and 2025), a Super Lawyer (2020-present), and one of
12 Lawdragon's 500 Leading Plaintiff Employment Lawyers in the United States (2019-2025).

13 13. I was appointed by the Chief Justice of the California Supreme Court to serve on
14 the Advisory Committee on Civil Jury Instructions, the group that advises the Judicial Council
15 on the Judicial Council of California Civil Jury Instructions (CACI). I am a chapter editor of the
16 Practising Law Institute's California Employment Law Yearbook and have served as co-chair of
17 the Practising Law Institute's California Employment Law Conference from 2023 to the present.
18 I am a member of the Executive Committee of the Labor and Employment Section of the Bar
19 Association of San Francisco. I frequently speak on employment law issues, including at the
20 ABA National Conference on Equal Opportunity Law, the National Employment Lawyers
21 Association national convention, and the Pacific Coast Labor & Employment Law Conference.

22 14. In addition to me, three other attorneys from Rudy Exelrod Zieff & Lowe LLP,
23 John T. Mullan, Jessica P. Spierer, and Julia B. Herrmann, have represented Plaintiffs and the
24 proposed Class in this action. The qualifications of my law partner John T. Mullan are laid out
25 in his declaration attached to this motion.

26 15. Jessica P. Spierer is a fourth-year Associate Attorney with the firm. She
27 graduated from Brandeis University in 2018 *magna cum laude* with a triple major and the
28 University of California, Berkeley, School of Law in 2022.

1 allegations.

2 21. As part of Class Counsel’s pre-filing investigation, counsel gathered and reviewed
3 time records, schedules, and pay stubs provided by Plaintiffs Santizo and Lee, as well as other
4 putative class members, and interviewed employees in various positions regarding Defendants’
5 practices related to timekeeping, pay, meal and rest breaks, unreimbursed business expenses, and
6 related wage and hour violations.

7 22. After filing suit, the Parties discussed potential mediation. Plaintiffs agreed to
8 mediate the case on the condition that Defendants provide certain information, including data
9 regarding time entries, pay stubs, employee policies, and certain information regarding
10 Defendants’ financial situation. Defendants produced Excel files of audited and unaudited time
11 entry records, schedules, and pay records as to the two coffee shop locations (San Mateo and
12 Burlingame), employee handbooks in English and Spanish and other miscellaneous policies, and
13 a redacted putative class list. Plaintiffs engaged an experienced damages consultant, Judy Yip at
14 Hemming Morse, LLC, to review Defendants’ payroll records and calculate damages based upon
15 these records. Ms. Yip is experienced in the valuation of wage and hour class claims. Ms. Yip’s
16 CV was filed with the Court in connection with Plaintiffs’ Motion for Preliminary Approval of
17 Class Action Settlement.

18 23. On January 17, 2025, the Parties engaged in a full-day, arms-length mediation
19 with Jeffery Owensby of Signature Resolution, who has been a well-respected mediator for over
20 a decade after previously working for 37 years as an employment and labor attorney, including as
21 a partner of four law firms. With the assistance of the Mediator, the Parties were able to come to
22 a settlement of the claims in the Action, subject to the Court’s approval. The settlement
23 negotiations, though professional, were adversarial and non-collusive. The settlement reached is
24 the product of substantial effort by the Parties and their counsel. The settlement was
25 memorialized in a Memorandum of Understanding. After several additional months of data
26 exchange and negotiations, the Parties finalized and executed the Joint Stipulation.

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The Settlement Fund

24. The settlement fund consists of \$1,175,000 in monetary relief.

25. Class Counsel estimates the total damages, interest, and penalties, including PAGA penalties, to be around \$2.47 million. Of this amount, we estimate damages, statutory penalties, and interest at approximately \$1,677,000 and PAGA penalties at approximately \$793,000. The Settlement therefore represents recovery of 47.6%, a high proportion of the damages suffered by the Class.

26. Class Members will receive significant gross settlement shares on average of approximately \$10,960. As set forth in the Settlement Agreement, Individual Settlement Awards will be calculated on an individualized, pro rata basis.

Class Counsel’s Efforts in This Case

27. Class Counsel made every effort to litigate this action in an efficient and cost-effective manner by reducing duplication of effort and assigning work to the lowest billing timekeepers available for each task wherever feasible.

28. The Parties thoroughly investigated and evaluated the factual and legal strengths and weaknesses of this case before reaching the settlement. Prior to mediation, Plaintiffs’ counsel conducted interviews with multiple class members in different positions and collected documents from the Named Plaintiffs and other employees, including schedules, pay stubs, and time records. Plaintiffs requested and Defendants provided document and data productions, including but not limited to the prospective class list, payroll data, time keeping data, employee handbooks and policies, and scheduling data. This included Excel files reflecting audited and unaudited pay and timekeeping records. In fact, mediation was contingent on Defendants’ provision of these documents. The Parties reached settlement through the mediation only after many months of investigation and fact discovery.

29. The data provided by Defendants contained numerous deficiencies including, but not limited to time entries “audited” by Defendants to change the actual recorded clock in/out times, removal of overtime entries, creation of or adjustments to meal break entries, incomplete time records and data for certain time periods, and incompatible data formatting across multiple

1 years' worth of time entries and payroll data.

2 30. These conditions inhibited Class Counsel and their expert from applying a
3 straightforward automated review of the data, and instead required Class Counsel to manually
4 comb through both the audited and unaudited versions of the data, compare the reported clock
5 in/out times with the shift schedules provided, and work with the expert to reconcile these
6 discrepancies.

7 31. In the time since the case has settled, Class Counsel spent a significant amount of
8 time working with Defendants and Plaintiffs' Expert to obtain necessary data to finalize the
9 allocation calculations for individuals based on an estimate of their individualized damages.
10 Defendants notified Class Counsel that there was no comparable daily time record data starting in
11 December 2024 because Defendants had changed timekeeping systems (several months after the
12 instant lawsuit was filed).

13 32. Due to the incomplete and inconsistent nature of the timekeeping data, Class
14 Counsel spent a significant amount of time working with the expert to calculate the accurate plan
15 of allocation for Class Members. Notably, the parties had agreed to the proposed plan of
16 allocation, which was then approved by the Court, based on the understanding that Defendant
17 would be able to sufficiently provide this information.

18 33. Additionally, Class Counsel worked with the Claims Administrator and
19 Defendants to ensure the transfer of Class Member contact information in advance of sending out
20 Notice to send to class members. Unfortunately, due to Defendants' lack of employee records for
21 all class members, including some individuals for whom Defendants had no address, social
22 security number, or phone number, Class Counsel – working with the Named Plaintiffs – spent a
23 significant amount of time attempting to find class member contact information, including
24 individually messaging potential class members on social media platforms and calling and texting
25 class members to get updated addresses. Of the 71 class members, Defendants did not have
26 complete contact information for approximately 20 individuals.

27 34. Approximately 41% of Class Counsel's lodestar is due to time incurred *after* the
28 case settled at mediation, focused on finalizing the Settlement Agreement with Defendants,

1 collecting data and reconciling data inconsistencies, and searching for class member contact
2 information where Defendants were unable to provide the information, in addition to the regular
3 duties related to overseeing a class action settlement.

4 **Attorney's Fee Lodestar**

5 35. Class Counsel undertook this representation of Plaintiffs and Class Members to
6 the exclusion of other paying work, devoting substantial time and out-of-pocket costs to this
7 litigation. My firm undertook this litigation on a contingent basis with the risk that we would not
8 be compensated for our time. To date, my firm has not been compensated for any of the time we
9 have spent litigating this matter.

10 36. The specific work performed in prosecuting this action included, pre-filing fact
11 investigation, including interviews with fact witnesses and review of schedules, pay stubs, and
12 time records; drafting the complaint; analyzing an extensive pay records and other evidentiary
13 records; interviewing class members; working with experts to determine Plaintiffs' alleged
14 damages exposure; preparing a mediation brief and attending mediation; negotiating the
15 Settlement Agreement, Notice, and all related documents; working with Defendants and an
16 expert to collect and review timekeeping, scheduling, and payroll data to calculate individual
17 damages pursuant to the agreed-upon plan of allocation; working with the Named Plaintiffs to
18 contact class members to obtain contact information; drafting the Preliminary Approval motion;
19 and assisting in the administration of the Settlement.

20 37. Given that the notice period is still open, and based on prior experience, Class
21 Counsel anticipate they will expend many more hours to respond to any class member questions,
22 disputes, or objections, file their Motion for Final Approval and prepare for the Final Approval
23 Hearing, and oversee settlement administration over the course of the next year given the
24 extended payment period of approximately a year set forth in the Settlement Agreement if the
25 proposed class action settlement is approved.

26 38. The regular and customary practice at Rudy Exelrod Zieff & Lowe, LLP is for all
27 attorneys, and litigation assistants to maintain contemporaneous time records setting forth the
28 amount of time spent (rounded to the nearest one-tenth of an hour) on each task in each case,

1 with explanatory descriptions of each task performed. My colleagues and I followed this practice
 2 throughout this litigation. During the course of this litigation, my law firm used a time entry
 3 program called ProLaw to record our billable time. At or near the time the work was performed,
 4 individual billers' hours were inputted into ProLaw, which recorded and stored the time as
 5 individual electronic entries, along with detailed descriptions of the tasks performed. I exercised
 6 billing judgment as I recorded my time, because it is my practice not to enter time that I think
 7 might be duplicative, and to reduce time for work that may have been inefficient.

8 39. To calculate my firm's lodestar for this case, I asked our accounting department to
 9 retrieve all of the time records for this case, including the time records of all attorneys at Rudy
 10 Exelrod Zieff & Lowe, LLP who have worked on this case since it was initially filed. I then
 11 reviewed all of those records and exercised billing judgment in eliminating any time entries
 12 deemed unnecessary, and ultimately determining that the hours recorded were reasonable and
 13 necessary to the advancement of this litigation. A copy of those time records are attached hereto
 14 as **Exhibit A**.

15 40. Using these computerized time records, as reduced through the exercise of my
 16 billing judgment, my staff derived a detailed billing statement of daily time entries through
 17 January 27, 2026.

18 41. Those same computerized time records, as reduced through the exercise of my
 19 billing judgment, reflect each biller's total hours worked on this litigation through January 27,
 20 2026:

<u>Timekeeper</u>	<u>Hours</u>
John T. Mullan	7.30
Michelle G. Lee	153.90
Jessica P. Spierer	89.50
Julia B. Herrmann	50.40
Paralegals	108.72
Total	409.82

1 42. As the preceding chart shows, my firm has expended 409.82 hours on this
 2 litigation through January 27, 2026. Class Counsel cut 32.30 hours in the exercise of billing
 3 judgement, or the equivalent of \$20,095.00 in fees.

4 43. The hours set forth above do not reflect the substantial additional work Rudy
 5 Exelrod Zieff & Lowe LLP will have performed by the time of the hearing on Plaintiffs’ motion
 6 for final approval and attorney’s fees and expenses, or the additional work Class Counsel will be
 7 required to perform in overseeing the settlement distribution process.

8 44. The 2026 commercial hourly rates for those who billed time to this case are as
 9 follows:

<u>Timekeeper</u>	<u>Hourly Rate</u>
John T. Mullan (Partner)	\$1,150
Michelle G. Lee (Partner)	\$950
Jessica P. Spierer (Associate)	\$600
Julia B. Herrmann (Associate)	\$500
Law Clerk	\$425
Paralegals	\$400

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 18 45. The commercial hourly rates set forth in the chart above are my firm’s current
 19 commercial billing rates and are supported by our extensive and specialized experience in wage
 20 and hour class actions like this one.

21 46. I have personal knowledge of the hourly rates charged by other attorneys with
 22 comparable experience to mine in California, as well as to the attorneys within the firm who
 23 worked on this matter. Based on that information, I believe that Rudy Exelrod Zieff & Lowe
 24 LLP’s current commercial rates are fully consistent with the market rate for attorneys with
 25 comparable expertise, experience, and qualifications.

26 47. Rudy Exelrod Zieff & Lowe LLP’s commercial hourly rates (or their historical
 27 equivalents) have been repeatedly approved by courts, including in the following more recent
 28 cases: *Jewett v. Oracle America, Inc.*, Case No. 17-CIV-02669, County of San Mateo (awarding

1 Class Counsel attorney’s fees equivalent to one-third of the Settlement Fund and approving
 2 counsel’s hourly rates); *Winget v. Sutter Health*, Case No. RG21092676, Alameda Superior Court
 3 (approving John Mullan’s 2024 hourly rate); *Hirsch v. WWNA*, 2:19-cv-9782-DSF (U.S.D.C.,
 4 C.D. Cal) (approving John Mullan’s 2021 hourly rate); *McDonald v. Apollo*, CV 4:17-cv-04915-
 5 HSG (U.S.D.C., N.D. Cal) (approving John Mullan and Michelle Lee’s 2017 hourly rate);
 6 *Woodruff v. Broadspectrum Downstream Services, Inc.*, Case No. 3:14-cv-04105-EMC
 7 (U.S.D.C., N.D. Cal.) (approving John Mullan and Michelle Lee’s 2016 hourly rates); *Spicher v.*
 8 *Aidells Sausage Company, Inc.*, Case No. 3:15-cv-05012-WHO (U.S.D.C., N.D. Cal.) (approving
 9 John Mullan and Michelle Lee’s 2017 hourly rates); *Connolly v. Weight Watchers North*
 10 *America, Inc.*, Case No. 14-cv-01983-TEH (U.S.D.C., N.D. Cal.) (approving John Mullan and
 11 Michelle Lee’s 2014 hourly rates).

12 48. I regularly represent employees on an hourly basis, in addition to my contingency
 13 fee practice. I charge my hourly clients the same commercial rate set by my firm for that
 14 calendar year, and have been paid at those rates, including my 2026 commercial rate.

15 49. Applying Rudy Exelrod Zieff & Lowe LLP’s commercial hourly rates to the hours
 16 spent on this case (as reduced in the exercise of billing judgment) yields the following lodestar
 17 chart:

18	Mullan	John T.	Partner	7.30	\$1,150.00	\$8,395.00
19	Lee	Michelle G.	Partner	153.90	\$950.00	\$146,205.00
20	Spierer	Jessica P.	Associate	89.50	\$600.00	\$53,700.00
21	Herrmann	Julia B.	Associate	50.40	\$500.00	\$25,200.00
22	Curtis	Alicia	Paralegal	20.00	\$400.00	\$8,000.00
23	Huang	Calista	Paralegal	69.85	\$400.00	\$27,940.00
24	Francis	Nishad	Paralegal	18.87	\$400.00	\$7,548.00
25						
26			Total Hours:	409.82	Total Amount:	\$276,988.00

25 50. As the preceding chart shows, Rudy Exelrod Zieff & Lowe LLP’s total lodestar
 26 through January 27, 2026, excluding time deleted in the exercise of billing judgment, is
 27 **\$276,988.00.**

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Class Counsel’s Costs

51. Our firm incurred and paid litigation costs related to this case. We maintained complete and accurate records of all such expenses, and based on those records, our bookkeeper has compiled our unreimbursed expenses as of January 27, 2026. The cost items expended were reasonable and necessary for the successful prosecution of this case, and Class Counsel could not have successfully obtained the relief they did without having incurred each cost item.

52. Class Counsel’s expenses include expert expenses, court fees, document printing, messenger services, mail and phone communications, electronic legal research, mediator’s fees, and settlement administrator costs.

53. The following chart summarizes the expenses incurred and paid by our firm:

<u>Component Description</u>	<u>Amount</u>
Expert Consulting Fees	\$17,469.00
Court Fees	\$75.00
Mediation Fees	\$4,850.00
Court Messenger Service	\$3,966.12
WestLaw Research	\$1,008.59
Total	\$27,368.71

I declare under penalty of perjury, under the laws of the United States, that the foregoing is true and correct. Executed this 30th day of January 2026.

MICHELLE G. LEE

EXHIBIT A

Rudy, Exelrod, Zieff & Lowe, LLP

Time Entry Listing

Date	Prof	Matter ID/Client Sort Matter Description Narrative	Component Task Code	Units	Price	Value
Originating: Lee, Michelle						
Professional: Curtis, Alicia (Paralegal)						
01/13/2025	AC	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Data analysis	T	6.00	400.00	2,400.00
01/09/2025	AC	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Data analysis	T	6.00	400.00	2,400.00
01/08/2025	AC	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Data analysis	T	8.00	400.00	3,200.00
				Professional: Curtis, Alicia	20.00	8,000.00
Professional: Francis, Nishad (Paralegal)						
01/08/2025	NF	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Analysis of data and compiling numbers	T	3.20	400.00	1,280.00
01/09/2025	NF	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Mediation Preparation through analysis of data and calculating discrepancies between created and modified time in time sheet	T	10.17	400.00	4,068.00
01/10/2025	NF	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Analysis of data points for Upcoming Mediation involving comparing created and modified pay	T	5.50	400.00	2,200.00
				Professional: Francis, Nishad	18.87	7,548.00
Professional: Herrmann, Julia (Associate)						
06/11/2025	JBH	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Preliminary research (1.5)	T	1.50	500.00	750.00
06/12/2025	JBH	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Research re motion for preliminary approval of settlement	T	2.00	500.00	1,000.00
06/13/2025	JBH	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Draft motion for preliminary approval of settlement	T	5.20	500.00	2,600.00

Rudy, Exelrod, Zieff & Lowe, LLP

Time Entry Listing

06/17/2025	JBH	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Write motion for preliminary approval of settlement	T	8.00	500.00	4,000.00
06/18/2025	JBH	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Write motion for preliminary approval of settlement	T	7.50	500.00	3,750.00
06/20/2025	JBH	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Write motion for preliminary approval of settlement and proposed order for preliminary approval of settlement	T	7.00	500.00	3,500.00
06/25/2025	JBH	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Write declarations for motion for preliminary approval of settlement (4)	T	4.00	500.00	2,000.00
06/27/2025	JBH	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Write declarations for motion for preliminary approval of settlement	T	3.00	500.00	1,500.00
06/30/2025	JBH	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Write declarations for motion for preliminary approval of settlement and motion for preliminary approval of settlement	T	6.00	500.00	3,000.00
07/09/2025	JBH	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Finalize motion for preliminary approval of settlement and attached declarations	T	3.50	500.00	1,750.00
07/17/2025	JBH	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Edit motion and finalize declarations for preliminary approval of settlement	T	2.70	500.00	1,350.00
		Professional: Herrmann, Julia		50.40		25,200.00
		Professional: Huang, Calista (Paralegal)				
10/31/2024	CH	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Doc review	T	3.00	400.00	1,200.00
01/03/2025	CH	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Data analysis	T	7.50	400.00	3,000.00

Rudy, Exelrod, Zieff & Lowe, LLP

Time Entry Listing

01/05/2025	CH	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Data analysis	T	5.00	400.00	2,000.00
01/02/2025	CH	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Data analysis	T	3.00	400.00	1,200.00
01/07/2025	CH	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Data analysis	T	2.00	400.00	800.00
01/08/2025	CH	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Data analysis	T	3.00	400.00	1,200.00
01/09/2025	CH	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Data analysis	T	9.00	400.00	3,600.00
01/10/2025	CH	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Data analysis	T	8.00	400.00	3,200.00
01/13/2025	CH	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Data analysis	T	14.00	400.00	5,600.00
01/11/2025	CH	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Data analysis	T	2.00	400.00	800.00
01/12/2025	CH	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Data analysis	T	7.75	400.00	3,100.00
01/14/2025	CH	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Data analysis and call with MGL/JPS about data analysis	T	0.10	400.00	40.00
01/15/2025	CH	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Call with expert	T	1.00	400.00	400.00
01/15/2025	CH	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Data analysis	T	3.50	400.00	1,400.00
01/16/2025	CH	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Calls with expert	T	1.00	400.00	400.00

Rudy, Exelrod, Zieff & Lowe, LLP

Time Entry Listing

Professional: Huang, Calista

69.85

27,940.00

Professional: Lee, Michelle (Partner)

Date	Code	Description	Day	Hours	Rate	Total
01/08/2024	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Follow up on potential new client Norma Santizo	T	1.20	950.00	1,140.00
01/10/2024	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Follow up on potential new client Norma Santizo	T	2.10	950.00	1,995.00
01/23/2024	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Follow up on potential new client Norma Santizo	T	0.50	950.00	475.00
01/24/2024	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Follow up on potential new client Norma Santizo (Neal's Coffee)	T	0.70	950.00	665.00
02/06/2024	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Follow up on potential new client Norma (Neal's Coffee)	T	0.40	950.00	380.00
03/06/2024	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Follow up on potential new client Neal's coffee (Norma Santizo)	T	0.30	950.00	285.00
03/18/2024	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Follow up on potential new client Neil's Coffee case (Norma Santizo)	T	0.40	950.00	380.00
03/27/2024	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Follow up on potential new client Neal's coffee (Norma S.) Confer with team re case development (1.0); Conduct legal research re 2802 claim (.4)	T	1.40	950.00	1,330.00
03/29/2024	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Follow up on potential new client Norma Santizo	T	0.60	950.00	570.00
04/23/2024	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Correspond with client re case update	T	0.10	950.00	95.00

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Time Entry Listing

05/02/2024	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Confer with JPS re complaint; correspond with client re next steps	T	0.30	950.00	285.00
05/08/2024	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Review and revise complaint	T	1.30	950.00	1,235.00
05/09/2024	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Review and revise complaint; confer with JPS re same	T	0.20	950.00	190.00
05/10/2024	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Revise and revise complaint	T	1.10	950.00	1,045.00
05/30/2024	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Revise PAGA letter and complaint	T	0.20	950.00	190.00
05/31/2024	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Review and revise complaint	T	0.30	950.00	285.00
06/03/2024	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Revise and revise PAGA letter (.3); review and revise complaint and initiating documents (.7)	T	1.00	950.00	950.00
06/17/2024	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Teleconference with opposing counsel Liroff	T	0.30	950.00	285.00
06/18/2024	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Teleconference with JPS re deadlines, counsel, and judicial assignment	T	0.20	950.00	190.00
06/21/2024	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Review and respond to correspondence from client; correspond with opposing counsel; research re judicial assignment	T	0.20	950.00	190.00

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Time Entry Listing

06/27/2024	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Review CMC order; correspond with opposing counsel re service issues (.3); teleconference with opposing counsel Liroff (.6)	T	0.90	950.00	855.00
07/01/2024	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Confer with team and correspond with clients re mediation	T	0.30	950.00	285.00
07/02/2024	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Teleconference with client re mediation and next steps	T	0.50	950.00	475.00
07/03/2024	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Teleconference with client; correspond with opposing counsel re mediation	T	0.40	950.00	380.00
07/16/2024	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Teleconference with opposing counsel re mediation	T	0.30	950.00	285.00
07/18/2024	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Correspond with opposing counsel re data and mediation; review client documents	T	0.20	950.00	190.00
07/24/2024	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Review answer; research re mediators; draft document requests	T	0.60	950.00	570.00
07/31/2024	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Confer with CMM re negotiations (.1)	T	0.10	950.00	95.00
08/05/2024	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Teleconference with CMM re mediation (.1); teleconference with client re case development; research re mediators (1.2)	T	1.30	950.00	1,235.00
08/06/2024	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Correspond with opposing counsel re mediation; review client correspondence; confer with JPS re document requests	T	0.30	950.00	285.00

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Time Entry Listing

08/07/2024	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Confer with JPS re retaliation issues	T	0.20	950.00	190.00
08/07/2024	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Review documents; draft correspondence to opposing counsel re retaliation	T	0.80	950.00	760.00
08/16/2024	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Draft document requests; draft correspondence to opposing counsel; research mediators	T	0.70	950.00	665.00
08/20/2024	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Correspond with client and opposing counsel re employer documents	T	0.20	950.00	190.00
08/23/2024	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Draft correspondence to opposing counsel re retaliation and continued violations; correspond with client re same; review documents	T	1.40	950.00	1,330.00
08/26/2024	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Review documents	T	0.40	950.00	380.00
08/27/2024	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Revise correspondence to opposing counsel; teleconference with client	T	0.70	950.00	665.00
08/28/2024	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Correspond with JPS re case management statement; correspond with client re case update	T	0.20	950.00	190.00
08/29/2024	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Review and revise correspondence to opposing counsel re retaliation and continuing violations (.3); confer with JPS re CMC statement and mediation (.2)	T	0.50	950.00	475.00

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Time Entry Listing

08/30/2024	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Teleconference with opposing counsel; review and revise correspondence; attention to mediation	T	1.00	950.00	950.00
09/03/2024	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Review and revise CMC statement; correspond with opposing counsel re same	T	0.20	950.00	190.00
09/10/2024	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Prepare for CMC hearing	T	0.30	950.00	285.00
09/11/2024	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Attend CMC hearing; correspond with opposing counsel	T	0.60	950.00	570.00
09/12/2024	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Teleconference with opposing counsel re mediation, data production	T	0.50	950.00	475.00
09/16/2024	MGL	9234-001/ Santizo, Norma	T	0.20	950.00	190.00
09/20/2024	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Teleconference with client re fact development (.6); review data; correspond with opposing counsel re same (.5)	T	1.10	950.00	1,045.00
09/20/2024	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Review data; correspond with opposing counsel re data and mediation	T	0.40	950.00	380.00
10/08/2024	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Review data; correspond with clients and opposing counsel re mediation	T	0.20	950.00	190.00
11/11/2024	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Confer with JPS re data production	T	0.20	950.00	190.00
11/25/2024	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Teleconference with client re mediation	T	0.30	950.00	285.00

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Time Entry Listing

12/11/2024	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Confer with team re data review (.5); prepare CMC statement and correspond with opposing counsel re same (.1)	T	0.60	950.00	570.00
12/17/2024	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Attend CMC	T	0.10	950.00	95.00
12/18/2024	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Teleconference with opposing counsel re document production and data issues	T	0.50	950.00	475.00
12/19/2024	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Draft protective order	T	0.20	950.00	190.00
12/20/2024	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Draft stipulated protective order	T	0.30	950.00	285.00
12/30/2024	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Legal research re damages issues; prepare for mediation; correspond with opposing counsel re data; confer with team re mediation brief	T	1.20	950.00	1,140.00
01/06/2025	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Draft damages model and mediation brief	T	1.80	950.00	1,710.00
01/08/2025	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Confer with team re mediation brief and damages calculations; draft mediation brief and damages model	T	4.90	950.00	4,655.00
01/09/2025	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Confer with team re mediation brief and damages calculations; draft mediation brief; draft damages model; teleconference with client	T	10.20	950.00	9,690.00
01/10/2025	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Draft mediation and damages model	T	1.60	950.00	1,520.00

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01/12/2025	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Teleconference with CH re damages analysis	T	1.50	950.00	1,425.00
01/13/2025	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Draft damages model and mediation brief	T	5.80	950.00	5,510.00
01/14/2025	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Draft damages model and mediation brief	T	3.80	950.00	3,610.00
01/15/2025	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Draft damages model and mediation brief; telephone conference with expert re damages analysis; confer with team re damages and legal research.	T	3.80	950.00	3,610.00
01/16/2025	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Telephone conferences with damages expert; finalize brief; confer with JTM and JPS re damages and mediation preparation (2.0); prepare for mediation (.8).	T	2.80	950.00	2,660.00
01/15/2025	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Draft damages model and mediation brief	T	4.20	950.00	3,990.00
01/16/2025	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Teleconference with damages expert; finalize brief	T	0.40	950.00	380.00
01/16/2025	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Teleconference with damages expert; confer with JTM and JPS re damages and mediation preparation (1.6); prepare for mediation (.7)	T	2.30	950.00	2,185.00
01/17/2025	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Prepare for and attend mediation	T	8.30	950.00	7,885.00
01/19/2025	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Draft memorandum of understanding for class settlement	T	1.20	950.00	1,140.00

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01/20/2025	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Review and revise settlement MOU	T	0.30	950.00	285.00
01/23/2025	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Review correspondence from opposing counsel re MOU; confer with team re same	T	0.20	950.00	190.00
01/24/2025	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Correspond with mediator and team re MOU	T	0.30	950.00	285.00
01/27/2025	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Teleconference with opposing counsel; correspond with opposing counsel re memorandum of understanding; teleconference with JTM; draft spreadsheet re employer taxes	T	0.80	950.00	760.00
01/28/2025	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Correspond with opposing counsel re settlement MOU	T	0.10	950.00	95.00
01/29/2025	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Revise MOU; research re settlement administrators; correspond with team and opposing counsel re MOU	T	1.50	950.00	1,425.00
01/29/2025	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Draft and finalize MOU; correspond with class representatives re same; confer with JTM re plan of allocation	T	0.60	950.00	570.00
01/30/2025	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Teleconference with class representative re settlement	T	0.30	950.00	285.00
02/06/2025	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Draft settlement agreement	T	1.50	950.00	1,425.00

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Date	Code	Description	Rate	Hours	Amount	Total
02/12/2025	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Confer with JTM re retaliation claim (.3); teleconference with opposing counsel re retaliation claim, plan of allocation (1.1); teleconference with client re next steps (.7); draft correspondence to opposing counsel (.2)	T	2.30	950.00	2,185.00
02/13/2025	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Teleconference with client re retaliation; confer with CH re data review (.6); draft correspondence to opposing counsel (.4)	T	1.00	950.00	950.00
02/18/2025	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Teleconference with expert re plan of allocation	T	0.30	950.00	285.00
02/20/2025	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Teleconference with expert (.7); draft correspondence to opposing counsel; draft settlement agreement (.2)	T	0.90	950.00	855.00
02/25/2025	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Confer with JTM re plan of allocation; correspond with opposing counsel	T	0.50	950.00	475.00
02/27/2025	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Confer with JTM re next steps (plan of allocation, meal break waivers)	T	0.20	950.00	190.00
03/04/2025	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Draft settlement agreement	T	1.00	950.00	950.00
03/05/2025	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Review employee handbook and policies; teleconference with client and correspond with opposing counsel re same (2.3); Draft settlement agreement and notice (1.9)	T	4.20	950.00	3,990.00
03/06/2025	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Teleconference with expert re plan of allocation; draft settlement agreement; confer with JTM re class notice	T	4.20	950.00	3,990.00

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03/07/2025	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Draft settlement agreement and notice; correspond with opposing counsel re same (3.5); confer with JPS re motion for preliminary approval (.2)	T	3.70	950.00	3,515.00
03/10/2025	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Teleconference with opposing counsel re settlement (.4); draft and oversee filing of CMC statement (.3)	T	0.70	950.00	665.00
03/11/2025	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Draft correspondence to opposing counsel re settlement and next steps	T	0.30	950.00	285.00
03/12/2025	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Draft settlement agreement	T	0.10	950.00	95.00
03/14/2025	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Revise settlement agreement and notice; correspond with opposing counsel re same	T	1.40	950.00	1,330.00
03/18/2025	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Prepare for and attend CMC	T	0.30	950.00	285.00
03/24/2025	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Review data; correspond with expert re same	T	0.10	950.00	95.00
04/07/2025	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Review data; correspond with expert and opposing counsel re data production	T	0.20	950.00	190.00
04/10/2025	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Teleconference with opposing counsel re settlement; retaliation (.5); correspond with expert re data (.1)	T	0.60	950.00	570.00
04/15/2025	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Teleconference with expert re data; correspond with opposing counsel re same	T	0.30	950.00	285.00

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04/23/2025	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Confer with JTM re retaliation (.1); correspond with opposing counsel and expert re data (.2)	T	0.30	950.00	285.00
04/25/2025	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Prepare for and teleconference with expert re data	T	0.80	950.00	760.00
04/29/2025	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Review data from expert; correspond with opposing counsel re settlement and data issues	T	0.40	950.00	380.00
05/09/2025	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Review data; correspond with expert	T	0.10	950.00	95.00
05/28/2025	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Review pay data and settlement documents; meet with expert re data and class list (1.0); correspond with JTM re class list (.3)	T	1.30	950.00	1,235.00
05/29/2025	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Confer with JTM re settlement agreement; review data and expert analysis	T	0.40	950.00	380.00
05/30/2025	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Revise settlement documents; correspond with settlement administrator; finalize class list; correspond with opposing counsel re settlement	T	1.50	950.00	1,425.00
06/03/2025	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Finalize settlement agreement; correspond with opposing counsel re same	T	0.40	950.00	380.00
06/06/2025	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Correspond with clients re settlement agreement	T	0.20	950.00	190.00
06/10/2025	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Teleconference with clients re settlement agreement	T	0.70	950.00	665.00

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06/11/2025	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Finalize settlement agreement; correspond with clients re same; draft motion for preliminary approval; confer with JTM and JBH re motion	T	0.90	950.00	855.00
06/23/2025	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Review and revise motion for preliminary approval; correspond with expert and settlement administrator	T	1.80	950.00	1,710.00
06/25/2025	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Confer with JBH re motion; correspond with opposing counsel	T	0.30	950.00	285.00
07/18/2025	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Review and revise motion for preliminary approval; draft declarations	T	5.40	950.00	5,130.00
07/21/2025	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Revise preliminary approval motion; correspond with clients re declarations (.4); teleconference with expert re calculations (.6); revise preliminary approval motion and supporting documents (1.5)	T	2.50	950.00	2,375.00
07/22/2025	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Finalize motion for preliminary approval; prepare submission to LWDA	T	0.70	950.00	665.00
08/12/2025	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Prepare for preliminary approval hearing; teleconference with expert; correspond with settlement administrator; confer with JTM re preliminary approval hearing	T	0.90	950.00	855.00
08/13/2025	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Prepare for hearing (.9); attend hearing (1.0)	T	1.90	950.00	1,805.00

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08/14/2025	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Teleconference with expert; correspond with Settlement administrator and staff re preliminary approval motion	T	0.50	950.00	475.00
08/18/2025	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Prepare supplemental filing; correspond with settlement administrator re same	T	0.10	950.00	95.00
08/25/2025	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Draft supplemental filing, notice, and proposed order	T	1.50	950.00	1,425.00
08/26/2025	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Draft supplemental filing, declaration, notice, and proposed order	T	2.00	950.00	1,900.00
08/27/2025	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Draft supplemental filing, declaration, notice, and proposed order	T	0.80	950.00	760.00
09/09/2025	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Review tentative ruling; confer with JPS re next steps; correspond with settlement administrator, expert, and opposing counsel re notice preparation and next steps	T	0.40	950.00	380.00
09/10/2025	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Correspond with opposing counsel and staff re hearing date; draft email to court re hearing date	T	0.20	950.00	190.00
09/12/2025	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Teleconference with clerk re hearing reservation (.1); teleconference with expert re allocation; correspond with clerk re motion deadline (.5)	T	0.60	950.00	570.00
10/01/2025	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Teleconference with expert re allocations	T	0.40	950.00	380.00

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10/02/2025	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Correspond with clients re next steps; correspond with settlement administrator re next steps and class notice preparation; correspond with opposing counsel re allocation; review allocation from damages consultant	T	0.80	950.00	760.00
10/16/2025	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Correspond with opposing counsel and settlement administrator re class notice issues	T	0.10	950.00	95.00
10/20/2025	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Confer with opposing counsel and settlement administrator re allocation data	T	0.10	950.00	95.00
11/03/2025	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Correspond with settlement administrator; draft language for class member website	T	0.40	950.00	380.00
11/07/2025	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Meet with settlement administrator and opposing counsel re contact information; correspond with expert re allocation data	T	0.30	950.00	285.00
11/12/2025	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Correspond with opposing counsel and settlement administrator re class contact information; teleconference with settlement administrator	T	0.20	950.00	190.00
11/14/2025	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Review data from expert; correspond with settlement administrator re same	T	0.10	950.00	95.00
11/18/2025	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Attention to class member contact information	T	0.20	950.00	190.00
11/25/2025	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Teleconference with client re class member contact	T	0.50	950.00	475.00

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11/26/2025	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Attention to finding class member contact information	T	0.10	950.00	95.00
12/02/2025	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Attention to class member contact information; prepare website; correspond with opposing counsel re same	T	0.80	950.00	760.00
12/03/2025	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Oversee project to collect class member contact information	T	0.10	950.00	95.00
12/04/2025	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Teleconference with settlement administrator re contact information and notice preparation; teleconference with CTB re legal research; review notice options	T	0.50	950.00	475.00
12/05/2025	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Correspond with class members re contact info; attention to notice mailing (.4); meet with settlement administrator and opposing counsel re contact info and notice mailing (.4)	T	0.80	950.00	760.00
12/08/2025	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Review and revise form of notice; correspond with settlement administrator re same	T	0.30	950.00	285.00
12/12/2025	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Contact and correspond with settlement administrator re notice mailing	T	0.10	950.00	95.00
12/15/2025	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Correspond with settlement administrator and team re notice; correspond with Legal Aid at Work re cy pres	T	0.50	950.00	475.00
12/17/2025	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Attention to notice	T	0.20	950.00	190.00

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12/18/2025	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Review court website; revise draft supplemental notice; correspond with opposing counsel re same	T	0.20	950.00	190.00
01/12/2026	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Correspond with settlement administrator re supplemental mailing; update case website re notice	T	0.10	950.00	95.00
01/14/2026	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Correspond with class representative and settlement administrator re notice mailing and contact information; correspond with JPS re attorney's fee motion; obtain fee declarations	T	0.20	950.00	190.00
01/15/2026	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Respond to class member inquiries; prepare fee and service award motion	T	0.10	950.00	95.00
01/16/2026	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Teleconference with class member re allocation issues (.8); prepare fee and service award motion, draft declaration, and confer with JPS re same (1.2)	T	2.00	950.00	1,900.00
01/21/2026	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Draft class representative and attorney fee declarations	T	1.30	950.00	1,235.00
01/22/2026	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Prepare attorney's fee motion and draft declarations re same	T	1.00	950.00	950.00
01/23/2026	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Prepare attorney's fee motion and draft declarations re same	T	0.70	950.00	665.00
01/25/2026	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Prepare attorney's fee motion and draft declarations re same	T	1.70	950.00	1,615.00

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01/26/2026	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Teleconference with JPS re fee motion preparation and drafts (.3); edit fee and cost entries (.3)	T	0.60	950.00	570.00
01/27/2026	MGL	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Draft motion for attorneys fees and costs; draft declarations (1.5); correspond with opposing counsel and settlement administrator re fee motion (.1); teleconference with class member re contact information (.1)	T	1.70	950.00	1,615.00
				Professional: Lee, Michelle	153.90	146,205.00
Professional: Mullan, John (Partner)						
01/17/2025	JTM	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Prepared for and took part in mediation	T	6.25	1,150.00	7,187.50
01/19/2025	JTM	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Reviewed and edited draft MOU	T	0.75	1,150.00	862.50
06/11/2025	JTM	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Conferred with MGL re settlement issues and followed up re document templates.	T	0.30	1,150.00	345.00
				Professional: Mullan, John	7.30	8,395.00
Professional: Spierer, Jessica (Associate)						
05/01/2024	JPS	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Draft complaint	T	1.40	600.00	840.00
05/02/2024	JPS	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Draft complaint	T	6.30	600.00	3,780.00
05/09/2024	JPS	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Draft complaint	T	1.00	600.00	600.00
05/28/2024	JPS	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Edit complaint	T	1.30	600.00	780.00
06/18/2024	JPS	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Research re potential judges	T	0.40	600.00	240.00

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08/07/2024	JPS	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Review client information for cease and desist letter	T	0.30	600.00	180.00
08/09/2024	JPS	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Draft cease and desist letter	T	1.20	600.00	720.00
08/19/2024	JPS	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Draft cease and desist letter	T	3.80	600.00	2,280.00
08/29/2024	JPS	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Draft CMC statement	T	1.00	600.00	600.00
08/30/2024	JPS	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Finalize cease and desist letter	T	0.20	600.00	120.00
09/03/2024	JPS	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Finalize CMC statement	T	0.40	600.00	240.00
09/17/2024	JPS	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Review payroll data	T	0.40	600.00	240.00
09/18/2024	JPS	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Work with litigation assistant to review data	T	0.30	600.00	180.00
10/28/2024	JPS	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Call with client	T	0.40	600.00	240.00
10/30/2024	JPS	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Meeting with team re mediation prep	T	0.40	600.00	240.00
11/11/2024	JPS	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Review defendant doc production	T	0.30	600.00	180.00
11/13/2024	JPS	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Review data produced by defendant	T	1.50	600.00	900.00
11/18/2024	JPS	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Review defendant data	T	0.80	600.00	480.00

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12/11/2024	JPS	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Review data provided by defendant; meet with MGL re data	T	0.90	600.00	540.00
12/23/2024	JPS	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Correspondence with class member	T	0.30	600.00	180.00
12/26/2024	JPS	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Research re mediation brief	T	1.20	600.00	720.00
01/02/2025	JPS	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Calculate damages	T	2.00	600.00	1,200.00
01/03/2025	JPS	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Draft mediation brief	T	0.50	600.00	300.00
01/05/2025	JPS	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Draft mediation brief	T	1.00	600.00	600.00
01/06/2025	JPS	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Draft mediation brief	T	7.00	600.00	4,200.00
01/08/2025	JPS	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Calculate damages; research PAGA	T	5.00	600.00	3,000.00
01/09/2025	JPS	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Calculate damages; team call re same	T	4.10	600.00	2,460.00
01/10/2025	JPS	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Calculate damages	T	2.30	600.00	1,380.00
01/13/2025	JPS	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Calculate damages	T	10.50	600.00	6,300.00
01/14/2025	JPS	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Calculate damages and communication with team re same	T	0.50	600.00	300.00
01/15/2025	JPS	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Call with expert and MGL	T	1.20	600.00	720.00

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01/16/2025	JPS	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Call with expert and MGL	T	1.10	600.00	660.00
01/17/2025	JPS	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Prepare for and attend mediation	T	7.30	600.00	4,380.00
02/11/2025	JPS	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Legal research re post-mediation issues	T	1.60	600.00	960.00
02/14/2025	JPS	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Communication with MGL re allocation	T	0.50	600.00	300.00
02/21/2025	JPS	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Conversation with expert and MGL	T	0.50	600.00	300.00
08/13/2025	JPS	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Attend preliminary approval hearing	T	0.30	600.00	180.00
09/09/2025	JPS	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Meeting with MGL re attorneys fees motion	T	0.40	600.00	240.00
12/02/2025	JPS	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Class member outreach; draft message to class member	T	0.80	600.00	480.00
12/04/2025	JPS	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Contact class members for addresses	T	0.20	600.00	120.00
12/05/2025	JPS	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Contact class members for addresses	T	0.20	600.00	120.00
12/17/2025	JPS	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Draft supplemental notice	T	0.40	600.00	240.00
01/22/2026	JPS	9234-001/ Santizo, Norma Santizo and Lee v. Neal's Coffee Shop and Sunil Prasad Draft Motion for Attorneys' Fees/Costs/Service Awards	T	3.00	600.00	1,800.00

