

JEFFER MANGELS BUTLER & MITCHELL LLP  
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1900 Avenue of the Stars, 7th Floor  
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Facsimile: (310) 203-0567

Special Labor and Employment Counsel for the  
Chapter 11 Debtors and Debtors In Possession

**UNITED STATES BANKRUPTCY COURT**

**CENTRAL DISTRICT OF CALIFORNIA - LOS ANGELES DIVISION**

In re

VERITY HEALTH SYSTEM OF  
CALIFORNIA, INC., *et al.*,

Debtors and Debtors In Possession.

☐ Affects All Debtors

☒ Affects Verity Health System of  
California, Inc.

☐ Affects O'Connor Hospital

☐ Affects Saint Louise Regional Hospital

☒ Affects St. Francis Medical Center

☒ Affects St. Vincent Medical Center

☒ Affects Seton Medical Center

☐ Affects O'Connor Hospital Foundation

☐ Affects Saint Louise Regional Hospital  
Foundation

☐ Affects St. Francis Medical Center of  
Lynwood Foundation

☐ Affects St. Vincent Foundation

☐ Affects St. Vincent Dialysis Center, Inc.

☐ Affects Seton Medical Center Foundation

☐ Affects Verity Business Services

☐ Affects Verity Medical Foundation

☐ Affects Verity Holdings, LLC

☐ Affects De Paul Ventures, LLC

☐ Affects De Paul Ventures - San Jose  
Dialysis, LLC

Debtors and Debtors In Possession.

Lead Case No. 2:18-bk-20151-ER

Jointly Administered With:

Case No. 2:18-bk-20162-ER

Case No. 2:18-bk-20163-ER

Case No. 2:18-bk-20164-ER

Case No. 2:18-bk-20165-ER

Case No. 2:18-bk-20167-ER

Case No. 2:18-bk-20168-ER

Case No. 2:18-bk-20169-ER

Case No. 2:18-bk-20171-ER

Case No. 2:18-bk-20172-ER

Case No. 2:18-bk-20173-ER

Case No. 2:18-bk-20175-ER

Case No. 2:18-bk-20176-ER

Case No. 2:18-bk-20178-ER

Case No. 2:18-bk-20179-ER

Case No. 2:18-bk-20180-ER

Case No. 2:18-bk-20181-ER

Chapter 11 Cases

Judge: Hon. Ernest M. Robles

**JEFFER MANGELS BUTLER & MITCHELL  
LLP'S PROFESSIONAL MONTHLY FEE  
APPLICATION FOR ALLOWANCE AND  
PAYMENT OF INTERIM COMPENSATION  
AND REIMBURSEMENT OF EXPENSES FOR  
THE PERIOD DECEMBER 2019**



1           1.       Jeffer Mangels Butler & Mitchell LLP (the "Firm") submits its Professional  
2 Monthly Fee Application For Allowance and Payment of Interim Compensation and  
3 Reimbursement of Expenses For The Period December 2019 (the "Application") for services  
4 rendered for Verity Health System of California, Inc., St. Francis Medical Center, St. Vincent  
5 Medical Center, and Seton Medical Center, debtors and debtors in possession (collectively, the  
6 "Debtor"), in the above-captioned chapter 11 bankruptcy cases (the "Cases"), during the period of  
7 December 1, 2019, to and through December 31, 2019 (the "Application Period"). In support of  
8 the Application, the Firm respectfully represents as follows:

9           2.       The Firm is special labor and employment counsel of record for Verity Heath  
10 System of California, Inc. and the above referenced affiliated debtors (collectively, "Debtors"),  
11 including Debtor. On August 7, 2019, that *Order Approving Application of Debtors to Employ*  
12 *Jeffer Mangels Butler & Mitchell LLP as Special Labor and Employment Counsel Pursuant to 11*  
13 *U.S.C. § 327(e) Nunc Pro Tunc to June 1, 2019* (docket no. 2862) was entered in the Cases  
14 whereby the Debtors were authorized, pursuant to Bankruptcy Code § 327(e), to employ the Firm  
15 as special labor and employment counsel, retroactive to June 1, 2019.<sup>1</sup> The Firm hereby applies  
16 to the Court for allowance and payment of interim compensation for services rendered to, and  
17 reimbursement of expenses incurred for, Debtor during the Application Period.

18           3.       The Firm billed a total of **\$82,576.58** in fees and expenses during the Application  
19 Period. The total fees represent **138.4 hours** expended during the period covered by this  
20 Application. These fees and expenses break down as follows:

Period	Fees	Expenses	Total
December 1, 2019 through December 31, 2019	\$59,793.00	\$22,783.58	\$82,576.58

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24           4.       Accordingly, the Firm seeks allowance of interim compensation in the amount of a  
25 total of **\$70,617.98** at this time. This total is comprised as follows: **\$47,834.40** (80% of the fees  
26 for services rendered) plus **\$22,783.58** (100% of the expenses incurred).

27  
28 <sup>1</sup> Prior to June 1, 2019, the Firm was employed by the Debtors as an ordinary course professional  
and paid pursuant to the orders entered in the Cases affecting ordinary course professionals.

5. For the postpetition period, the Firm, as a section 327(e) retained professional, has been paid to date, for services rendered to Debtor, as follows:

Application Period	Amount	Description
First (June 1, 2019-July 31, 2019)	\$311,235.42	On account of 80% of fees and 100% of costs
Second (August 1, 2019-August 31, 2019)	\$188,189.95	On account of 80% of fees and 100% of costs
Third (September 1, 2019-September 30, 2019)	\$149,014.05	On account of 80% of fees and 100% of costs
First (June 1, 2019-July 31, 2019), and Second (August 1, 2019-August 31, 2019)	\$122,506.70	Balance of fee holdback (20%)
Fourth (October 1, 2019-October 31, 2019)	\$162,541.70	On account of 80% of fees and 100% of costs
Fifth (November 1, 2019-November 30, 2019)	\$91,503.54	On account of 80% of fees and 100% of costs
<b>Total Paid to the Firm to Date</b>	<b>\$1,024,991.36</b>	On account of 80% of fees and 100% of costs and balance of fees (20%) for First and Second Application Periods

6. To date, the Firm, as a section 327(e) retained professional, is owed, from Debtor, as follows (excluding amounts owed pursuant to this Application):

Application Period	Amount	Description
First (June 1, 2019-July 31, 2019)	\$0	
Second (August 1, 2019-August 31, 2019)	\$0	
Third (September 1, 2019-September 30, 2019)	\$34,697.40	Balance of 80% of fees and 100% of costs and 20% fee holdback
Fourth (October 1, 2019-October 31, 2019)	\$39,528.20	Balance of 80% of fees and 100% of costs and 20% fee holdback
Fifth (November 1, 2019-November 30, 2019)	\$21,969.70	Balance of 80% of fees and 100% of costs and 20% fee holdback
<b>Total Owed to the Firm to Date</b>	<b>\$96,195.30</b>	

7. Attached as **Exhibit "A"** hereto is a (i) Summary of Hours and Fees for the Firm's Professionals who performed services for Debtor in connection with the Cases during the Application Period and the hourly rate for each such professional, and (ii) Summary of Time, Fees and Expenses by Debtor in connection with the Cases during the Application Period. Attached hereto as **Exhibit "B"** are the Firm's monthly billing statements by Debtor, by matter, for December, 2019; such statements represent December, 2019 billings for (i) general union and employee grievances/fact finding/arbitration matters, (ii) the claim of Mary Meeko, (iii) general

1 labor, (iv) the claim of Amy Davila, (v) the claim of Jasmine Aragon, (vi) the claim of Rosa  
2 Carcamo, (vii) the claim of Irene Rodriguez, (viii) the claim of Anil Jain, (ix) the claim of Aaron  
3 Raj, (x) the claim of Leonard Harris, (xi) the claim of Renee Capizzi, and (xii) general bankruptcy  
4 administration, i.e., fee applications and monthly fee statements.

5 8. The Firm has served a copy of this Application on the Office of the United States  
6 Trustee, the Debtors, and the Official Committee of Unsecured Creditors (the "Committee")  
7 appointed in these Cases. The Application was mailed by first class mail, postage prepaid, on the  
8 date hereof. The Notice of the filing of this Application will be given and served by lead counsel  
9 for the Debtors, pursuant to the applicable Orders of this Court.

10 9. Pursuant to this Court's *Order Authorizing Interim Fee Procedures* [Docket  
11 No. 661], the Debtors are authorized to make the payment requested herein without a further  
12 hearing or order of this Court unless an objection to this Application is filed with the Court and  
13 served upon the Notice Parties within ten (10) calendar days after the date of mailing of the  
14 Notice of this Application. If such an objection is filed, the Debtors are authorized to pay 80% of  
15 the uncontested fees and 100% of the uncontested expenses without further order of the Court. If  
16 no objection is filed, the Debtors are authorized to pay 80% of all fees requested in the  
17 Application and 100% of the uncontested expenses without further order of the Court.

18 10. The interim compensation and reimbursement of expenses sought in this  
19 Application is not final. Upon the conclusion of these cases, the Firm will seek fees and  
20 reimbursement of the expenses incurred for the totality of the services rendered in these Cases.  
21 Any interim fees or reimbursement of expenses approved by this Court and received by the Firm  
22 (along with any retainer) will be credited against such final fees and expenses as may be allowed  
23 by this Court.

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1           **WHEREFORE**, the Firm respectfully requests that the Debtors pay compensation to the  
2 Firm as requested herein pursuant to and in accordance with the terms of the *Order Authorizing*  
3 *Interim Fee Procedures*.

4 Dated: January 21, 2020

JEFFER MANGELS BUTLER & MITCHELL  
LLP

6  
7 By: /s/ Thomas M. Geher

THOMAS M. GEHER

Special Labor and Employment Attorneys  
for Chapter 11 Debtors and Debtors In  
Possession

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## EXHIBIT A

**SUMMARY OF HOURS AND FEES FOR TIMEKEEPERS**

**Application Period: December, 2019**

<b><u>Professional</u></b>	<b><u>Title</u></b>	<b><u>Hourly Rate</u></b>	<b><u>Total Hours</u></b>	<b><u>Total Fees</u></b>
An Nguyen-Ruda	Partner	\$595.00	21.1	\$12,554.50
Louise Ann Fernandez	Partner	\$795.00	0.3	\$238.50
Thomas M. Geher	Partner	\$765.00	4.2	\$3,213.00
Elina Tilman	Associate	\$395.00	87.1	\$34,404.50
Taylor Burris	Associate	\$425.00	0.4	\$170.00
Julia T. Botezatu	Associate	\$340.00	20.2	\$6,868.00
Alex Polishuk	Associate	\$475.00	4.7	\$2,232.50
Martin Fernandez	Paralegal/Practice Support Specialist/Librarian	\$280.00	0.4	\$112.00

**SUMMARY OF TIME, FEES AND EXPENSES BY DEBTOR**

**Application Period: December, 2019**

<b><u>Debtor</u></b>	<b><u>Hours</u></b>	<b><u>Fees</u></b>	<b><u>Expenses</u></b>
Verity Health System of California, Inc.	45.4	\$20,120.50	\$20,818.96
St. Vincent Medical Center	18.4	\$7,292.00	\$1.00
St. Francis Medical Center	59.1	\$25,326.00	\$1,502.18
Seton Medical Center	15.5	\$7,054.50	\$461.44
<b>TOTAL</b>	<b>138.4</b>	<b>\$59,793.00</b>	<b>\$22,783.58</b>



## EXHIBIT B



jeffer Mangels  
Butler & Mitchell LLP

Los Angeles  
San Francisco  
Orange County

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A LIMITED LIABILITY PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

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RobertoDino@verity.org

January 14, 2020  
Invoice 1774639  
Tax ID 95-3669194  
Page 1

PLEASE INDICATE INVOICE AND MATTER # WITH REMITTANCE

Our Matter # 71635-0022

For Services Through December 31, 2019

**Grievances/FactFinding/Arbitration**

Total Current Fees for Professional Services .....	\$	6,817.50
Total Current Costs .....	\$	461.44
Total Current Charges Due .....	\$	7,278.94



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PLEASE INDICATE INVOICE AND MATTER # WITH REMITTANCE

Our Matter # 71635-0022

For Services Through December 31, 2019

**Grievances/FactFinding/Arbitration**

12/01/19	Review of email from Seton Human Resources regarding bumping. An Nguyen-Ruda	0.10 hrs. 595.00/hr	\$	59.50
12/01/19	Reply to email from Seton Human Resources regarding bumping. An Nguyen-Ruda	0.10 hrs. 595.00/hr		59.50
12/02/19	Strategize regarding bumping process at Seton. An Nguyen-Ruda	0.80 hrs. 595.00/hr		476.00
12/02/19	Review email from NUHW regarding effects bargaining. An Nguyen-Ruda	0.10 hrs. 595.00/hr		59.50
12/02/19	Reply to email from NUHW regarding effects bargaining. An Nguyen-Ruda	0.10 hrs. 595.00/hr		59.50
12/02/19	Call and email correspondence with HR regarding Employee C documents for DLSE hearing. Elina Tilman	0.30 hrs. 395.00/hr		118.50
12/03/19	Conference call with Steve/Jeanette regarding bumping. An Nguyen-Ruda	0.50 hrs. 595.00/hr		297.50
12/03/19	Review of email from J. Avalos regarding effects bargaining. An Nguyen-Ruda	0.10 hrs. 595.00/hr		59.50
12/03/19	Reply to email from J. Avalos regarding effects bargaining. An Nguyen-Ruda	0.10 hrs. 595.00/hr		59.50
12/03/19	Review client documents and correspondence with S. Sharrer and HR regarding Employee C claim. Elina Tilman	0.30 hrs. 395.00/hr		118.50



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12/03/19	Email E. Paul and S. Sharrer regarding Employee C claim and summary of issues.		
	Elina Tilman	0.40 hrs. 395.00/hr	158.00
12/04/19	Case resolutions.		
	Elina Tilman	2.00 hrs. 395.00/hr	790.00
12/04/19	Correspondence with S. Sharrer, A. Estrada, J. Moe, and HR regarding Employee C claims.		
	Elina Tilman	0.50 hrs. 395.00/hr	197.50
12/04/19	Send update re Employee C claim and resolution to E. Paul and related correspondence with E. Paul and J. Moe.		
	Elina Tilman	0.90 hrs. 395.00/hr	355.50
12/04/19	Call with Employee C regarding settlement.		
	Elina Tilman	0.20 hrs. 395.00/hr	79.00
12/04/19	Review Employee C documents.		
	Elina Tilman	0.20 hrs. 395.00/hr	79.00
12/04/19	Draft settlement agreement and withdrawal letter for Employee C claim.		
	Elina Tilman	1.10 hrs. 395.00/hr	434.50
12/04/19	Analysis of release issues and make revisions to agreement.		
	Elina Tilman	0.40 hrs. 395.00/hr	158.00
12/04/19	Email Employee C regarding agreement and settlement terms.		
	Elina Tilman	0.40 hrs. 395.00/hr	158.00
12/05/19	Case resolution.		
	Elina Tilman	2.00 hrs. 395.00/hr	790.00



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12/05/19	Check in call with CNA re bumping. An Nguyen-Ruda	0.50 hrs. 595.00/hr	297.50
12/05/19	Review of email from D. Delmar re SEIU bumping. An Nguyen-Ruda	0.10 hrs. 595.00/hr	59.50
12/05/19	Advise re various bumping issues. An Nguyen-Ruda	0.50 hrs. 595.00/hr	297.50
12/05/19	Email correspondence with J. Moe, S. Sharrer and hearing officer regarding Employee c claim case closure. 0.6 Elina Tilman	0.60 hrs. 395.00/hr	237.00
12/05/19	Email correspondence with Employee C regarding case issues. 0.3 Elina Tilman	0.30 hrs. 395.00/hr	118.50
12/06/19	Email correspondence with payroll and Employee C regarding payment information. Elina Tilman	0.30 hrs. 395.00/hr	118.50
12/09/19	Prepare for and participate in call with Steve Sharrer and Jeanette Corbett re closure of workplace investigation. Taylor Burras	0.40 hrs. 425.00/hr	170.00
12/09/19	Review of email from S. Sharrer re response to bumping. An Nguyen-Ruda	0.10 hrs. 595.00/hr	59.50
12/09/19	Draft response to union re bumping issues. An Nguyen-Ruda	0.20 hrs. 595.00/hr	119.00
12/10/19	Teleconference with NUHW re bumping issues. An Nguyen-Ruda	0.30 hrs. 595.00/hr	178.50
12/10/19	Review of email from J. Corbett re bumping issues. An Nguyen-Ruda	0.10 hrs. 595.00/hr	59.50



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12/11/19	Review of email from A. Morris re offer list.		
	An Nguyen-Ruda	0.10 hrs. 595.00/hr	59.50
12/11/19	Preparation of email re employee separation.		
	An Nguyen-Ruda	0.50 hrs. 595.00/hr	297.50
12/17/19	Review email from S. Sharrer re open enrollment.		
	An Nguyen-Ruda	0.10 hrs. 595.00/hr	59.50
12/18/19	Review of information for application process.		
	An Nguyen-Ruda	0.20 hrs. 595.00/hr	119.00
Total Fees for Professional Services for this Matter for this Invoice .....			\$ 6,817.50

**Chargeable Costs**

Overnight Delivery	\$	461.44
Total Chargeable Costs for this Matter for this Invoice.....	\$	461.44
Total Fees and Costs for this Matter for this Invoice.....	\$	7,278.94



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January 14, 2020  
Invoice 1774639  
Tax ID 95-3669194  
Page 6

PLEASE INDICATE INVOICE AND MATTER # WITH REMITTANCE

PAY BY U.S. MAIL:	PAY BY WIRE: City National Bank 400 N. Roxbury Drive, Beverly Hills, California 90210	
<p>JMBM LLP Lockbox File 1263 1801 W. Olympic Blvd. Pasadena, CA 91199-1263</p>	<p><b>ABA:</b> <b>SWIFT Code:</b> <i>For international wires</i> <b>Account Name:</b> <b>Account No.:</b> <b>Please reference:</b></p>	<p>122016066 CINAUS6L JMBM Depository Acct 12714 4494 Client - Matter: 71635-0022 Invoice No. 1774639 Attorney: Marta M. Fernandez</p>

Costs may have been incurred which are not included on this invoice. Costs are shown on invoices when they are entered into our accounting system, not necessarily on the dates they were incurred.

Payment is due on all invoices upon presentation. A carrying charge will be added at a rate of 1% per month from the date of the invoice on those invoices not paid by the last day of the month following the month the invoice was issued.

The Firm is a California limited liability partnership.

If you have any questions regarding this invoice, please Email: Finance@jmbm.com

**Summary of Fees**

	Hours	Rate/Hr	Dollars
Taylor Burras	0.40	425.00	170.00
An Nguyen-Ruda	4.60	595.00	2,737.00



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RobertoDino@verity.org

January 14, 2020  
Invoice 1774639  
Tax ID 95-3669194  
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Summary of Fees			
	Hours	Rate/Hr	Dollars
Elina Tilman	9.90	395.00	3,910.50
TOTALS .....	\$ 14.90	457.55	6,817.50



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SamanthaSchumacher@verity.org  
RobertoDino@verity.org

January 14, 2020  
Invoice 1774640  
Tax ID 95-3669194  
Page 1

PLEASE INDICATE INVOICE AND MATTER # WITH REMITTANCE

Our Matter # **71635-0024**

For Services Through December 31, 2019

adv. Mary Meeko

Total Current Fees for Professional Services .....	\$	237.00
Total Current Costs .....	\$	0.00
Total Current Charges Due .....	\$	237.00



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January 14, 2020  
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Page 2

PLEASE INDICATE INVOICE AND MATTER # WITH REMITTANCE

Our Matter # 71635-0024  
adv. Mary Meeko

For Services Through December 31, 2019

12/02/19	Email correspondence with S. Sharrer and Andrew regarding checks. Elina Tilman	0.20 hrs. 395.00/hr	\$	79.00
12/03/19	Email correspondence with opposing counsel regarding pending issues. Elina Tilman	0.20 hrs. 395.00/hr		79.00
12/05/19	Email correspondence with opposing counsel regarding pending issues. Elina Tilman	0.20 hrs. 395.00/hr		79.00
Total Fees for Professional Services for this Matter for this Invoice .....				\$ 237.00
Total Fees and Costs for this Matter for this Invoice .....				\$ 237.00



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January 14, 2020  
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PLEASE INDICATE INVOICE AND MATTER # WITH REMITTANCE

PAY BY U.S. MAIL:	PAY BY WIRE: City National Bank 400 N. Roxbury Drive, Beverly Hills, California 90210	
<p>JMBM LLP Lockbox File 1263 1801 W. Olympic Blvd. Pasadena, CA 91199-1263</p>	<p><b>ABA:</b> <b>SWIFT Code:</b> <i>For international wires</i> <b>Account Name:</b> <b>Account No.:</b> <b>Please reference:</b></p>	<p>122016066 CINAUS6L JMBM Depository Acct 12714 4494 Client - Matter: 71635-0024 Invoice No. 1774640 Attorney: Marta M. Fernandez</p>

Costs may have been incurred which are not included on this invoice. Costs are shown on invoices when they are entered into our accounting system, not necessarily on the dates they were incurred.

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Summary of Fees			
	Hours	Rate/Hr	Dollars
Elina Tilman	0.60	395.00	237.00
<b>TOTALS .....</b>	<b>0.60</b>	<b>395.00</b>	<b>237.00</b>

**JMBM**

Jeffer Mangels  
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SamanthaSchumacher@verity.org  
RobertoDino@verity.org

January 14, 2020  
Invoice 1774691  
Tax ID 95-3669194  
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PLEASE INDICATE INVOICE AND MATTER # WITH REMITTANCE

Our Matter # 72379-0001

For Services Through December 31, 2019

**General Labor**

Total Current Fees for Professional Services .....	\$	197.50
Total Current Costs .....	\$	1.00
Total Current Charges Due .....	\$	198.50
 Total Due.....	 \$	 214.30



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PLEASE INDICATE INVOICE AND MATTER # WITH REMITTANCE

Our Matter # **72379-0001**

For Services Through December 31, 2019

**General Labor**

12/08/19	Review documents and email from T. Hopper and respond re same to T. Hopper and S. Sharrer		
	Elina Tilman	0.50 hrs. 395.00/hr	\$ 197.50
	Total Fees for Professional Services for this Matter for this Invoice .....		\$ 197.50

**Chargeable Costs**

12/30/19	Los Angeles County Superior Court name search		\$ 1.00
	Total Chargeable Costs for this Matter for this Invoice .....		\$ 1.00
	Total Fees and Costs for this Matter for this Invoice .....		\$ 198.50



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<p>JMBM LLP Lockbox File 1263 1801 W. Olympic Blvd. Pasadena, CA 91199-1263</p>	<p>ABA: SWIFT Code: <i>For international wires</i> Account Name: Account No.: Please reference:</p>	<p>122016066 CINAUS6L JMBM Depository Acct 12714 4494 Client - Matter: 72379-0001 Invoice No. 1774691 Attorney: Marta M. Fernandez</p>

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Summary of Fees			
	Hours	Rate/Hr	Dollars
Elina Tilman	0.50	395.00	197.50
TOTALS .....	0.50	395.00	197.50



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Our Matter # 72379-0009

For Services Through December 31, 2019

**Grievances/FactFinding/Arbitration**

Total Current Fees for Professional Services.....	\$	416.50
Total Current Costs .....	\$	0.00
Total Current Charges Due .....	\$	416.50



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PLEASE INDICATE INVOICE AND MATTER # WITH REMITTANCE

Our Matter # 72379-0009

For Services Through December 31, 2019

**Grievances/FactFinding/Arbitration**

12/01/19	Review of email from St. Vincent Human resources regarding bumping.			
	An Nguyen-Ruda	0.10 hrs.	595.00/hr	\$ 59.50
12/01/19	Reply to email from St. Vincent Human Resources regarding bumping.			
	An Nguyen-Ruda	0.10 hrs.	595.00/hr	59.50
12/03/19	Review of transfer and other policies for effects bargaining.			
	An Nguyen-Ruda	0.50 hrs.	595.00/hr	297.50
Total Fees for Professional Services for this Matter for this Invoice .....				\$ 416.50
Total Fees and Costs for this Matter for this Invoice.....				\$ 416.50





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Summary of Fees			
	Hours	Rate/Hr	Dollars
An Nguyen-Ruda	0.70	595.00	416.50
<b>TOTALS</b> .....	0.70	595.00	416.50



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Our Matter # 72379-0011

For Services Through December 31, 2019

adv. Amy Davila

Total Current Fees for Professional Services .....	\$	6,678.00
Total Current Costs .....	\$	0.00
Total Current Charges Due .....	\$	6,678.00



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Our Matter # 72379-0011  
adv. Amy Davila

For Services Through December 31, 2019

12/03/19	Research re good faith settlement requirements Julia T. Botezatu	1.50 hrs. 340.00/hr	\$	510.00
12/04/19	Review of research re motion for good faith determination. An Nguyen-Ruda	0.30 hrs. 595.00/hr		178.50
12/04/19	Review and analysis of good faith requirements. Elina Tilman	0.60 hrs. 395.00/hr		237.00
12/09/19	Review of email from Plaintiff's counsel re status of settlement agreement An Nguyen-Ruda	0.10 hrs. 595.00/hr		59.50
12/11/19	Status update re settlement. An Nguyen-Ruda	0.30 hrs. 595.00/hr		178.50
12/11/19	Email correspondence with opposing counsel regarding settlement agreement. Elina Tilman	0.20 hrs. 395.00/hr		79.00
12/11/19	Draft settlement agreement. Elina Tilman	0.60 hrs. 395.00/hr		237.00
12/11/19	Email correspondence with K. Muphy and A. Williams regarding case issues. Elina Tilman	0.20 hrs. 395.00/hr		79.00
12/12/19	Draft Kforce agreement. Elina Tilman	0.60 hrs. 395.00/hr		237.00



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12/12/19	Make additions to Davila agreement. Elina Tilman	0.40 hrs. 395.00/hr	158.00
12/12/19	Final review of settlement agreement. An Nguyen-Ruda	0.30 hrs. 595.00/hr	178.50
12/13/19	Review and make additions to plaintiff and Kforce contract Elina Tilman	0.90 hrs. 395.00/hr	355.50
12/13/19	Email correspondence with E. Paul regarding pending issues. Elina Tilman	0.20 hrs. 395.00/hr	79.00
12/13/19	Email correspondence with Plaintiff's counsel regarding agreement. Elina Tilman	0.60 hrs. 395.00/hr	237.00
12/13/19	Review Plaintiff's edits to agreement and respond and revise. Elina Tilman	0.50 hrs. 395.00/hr	197.50
12/13/19	Analysis of good faith requirements. Elina Tilman	0.60 hrs. 395.00/hr	237.00
12/13/19	Research re the application of a good faith settlement determination to contractual indemnity claims Julia T. Botezatu	1.00 hrs. 340.00/hr	340.00
12/16/19	Review of email from Plaintiff's counsel; reply to email from Plaintiff's counsel re the same; revision to agreement. An Nguyen-Ruda	0.40 hrs. 595.00/hr	238.00
12/23/19	Draft proposed order granting application for determination of good faith settlement Julia T. Botezatu	0.30 hrs. 340.00/hr	102.00

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12/23/19	Draft declaration in support of stipulated application for determination of good faith settlement		
	Julia T. Botezatu	0.60 hrs. 340.00/hr	204.00
12/23/19	Draft notice of settlement and of stipulated application for good faith settlement determination		
	Julia T. Botezatu	0.50 hrs. 340.00/hr	170.00
12/23/19	Draft stipulated application for good faith settlement determination		
	Julia T. Botezatu	2.50 hrs. 340.00/hr	850.00
12/23/19	Review emails from opposing counsel and edits to agreement; research regarding good faith determination and review pleadings; analysis of next steps and email co-counsel re same.		
	Elina Tilman	1.50 hrs. 395.00/hr	592.50
12/24/19	Revisions to stipulated application for good faith settlement determination		
	Julia T. Botezatu	0.80 hrs. 340.00/hr	272.00
12/24/19	Review good faith material.		
	Elina Tilman	0.30 hrs. 395.00/hr	118.50
12/26/19	Call and email correspondence with opposing counsel.		
	Elina Tilman	0.20 hrs. 395.00/hr	79.00
12/26/19	Call and email correspondence with co-counsel.		
	Elina Tilman	0.20 hrs. 395.00/hr	79.00
12/26/19	Make additions to settlement agreement and finalize.		
	Elina Tilman	0.30 hrs. 395.00/hr	118.50
12/26/19	Review good faith order documents.		
	Elina Tilman	0.30 hrs. 395.00/hr	118.50



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12/30/19	Email correspondence with S. Sharrer regarding settlement agreement. Elina Tilman	0.20 hrs. 395.00/hr	79.00
12/31/19	Analysis of pending issues and email co-counsel. Elina Tilman	0.20 hrs. 395.00/hr	79.00
Total Fees for Professional Services for this Matter for this Invoice .....			\$ 6,678.00
Total Fees and Costs for this Matter for this Invoice .....			\$ 6,678.00



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Summary of Fees

	Hours	Rate/Hr	Dollars
Julia T. Botezatu	7.20	340.00	2,448.00
An Nguyen-Ruda	1.40	595.00	833.00



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Summary of Fees			
	Hours	Rate/Hr	Dollars
Elina Tilman	8.60	395.00	3,397.00
TOTALS .....	17.20	388.26	6,678.00





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Our Matter # 72391-0001

For Services Through December 31, 2019

**General Labor**

Total Current Fees for Professional Services .....	\$	316.00
Total Current Costs .....	\$	0.00
Total Current Charges Due .....	\$	316.00
Total Due.....	\$	316.00



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PLEASE INDICATE INVOICE AND MATTER # WITH REMITTANCE

Our Matter # 72391-0001

For Services Through December 31, 2019

**General Labor**

12/26/19	Analysis of pending issues and email J. Moe re same.		
	Elina Tilman	0.30 hrs. 395.00/hr	\$ 118.50
12/26/19	Review Ahinasi pleadings and pending deadlines.		
	Elina Tilman	0.50 hrs. 395.00/hr	197.50
Total Fees for Professional Services for this Matter for this Invoice .....			\$ 316.00
Total Fees and Costs for this Matter for this Invoice.....			\$ 316.00
Please Remit Total Balance Due.....			\$ 316.00



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Summary of Fees			
	Hours	Rate/Hr	Dollars
Elina Tilman	0.80	395.00	316.00
<b>TOTALS .....</b>	<b>0.80</b>	<b>395.00</b>	<b>316.00</b>



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Our Matter # 72391-0020

For Services Through December 31, 2019

**Grievances/FactFinding/Arbitration**

Total Current Fees for Professional Services .....	\$	8,926.00
Total Current Costs .....	\$	27.00
Total Current Charges Due .....	\$	8,953.00



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PLEASE INDICATE INVOICE AND MATTER # WITH REMITTANCE

Our Matter # 72391-0020

For Services Through December 31, 2019

**Grievances/FactFinding/Arbitration**

12/02/19	Review of email from M. Carbuccia regarding wage scales. An Nguyen-Ruda	0.10 hrs. 595.00/hr	\$	59.50
12/02/19	Review of email from D. Delmar regarding bumping. An Nguyen-Ruda	0.10 hrs. 595.00/hr		59.50
12/02/19	Reply to email from D. Delmar regarding bumping. An Nguyen-Ruda	0.10 hrs. 595.00/hr		59.50
12/02/19	Review email from UNAC regarding impacted list. An Nguyen-Ruda	0.10 hrs. 595.00/hr		59.50
12/02/19	Analysis of pending issues and next steps. Elina Tilman	0.40 hrs. 395.00/hr		158.00
12/02/19	Review client documents and email correspondence with J. Moe and L. Vargas regarding related issues. Elina Tilman	0.70 hrs. 395.00/hr		276.50
12/02/19	Email correspondence with P. Chandron regarding UNAC agreement issues and email correspondence with J. Moe regarding related issues. Elina Tilman	0.40 hrs. 395.00/hr		158.00
12/03/19	Review of email from D. Delmar regarding employee resignation and credit. An Nguyen-Ruda	0.10 hrs. 595.00/hr		59.50
12/03/19	Reply to email from D. Delmar regarding employee resignation. An Nguyen-Ruda	0.10 hrs. 595.00/hr		59.50



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12/03/19	Telephone call with UNAC regarding check resignations and credits. An Nguyen-Ruda	0.50 hrs. 595.00/hr	297.50
12/03/19	Review of ICU investigation finding. An Nguyen-Ruda	0.20 hrs. 595.00/hr	119.00
12/03/19	Review and make edits to unac agreement. Elina Tilman	0.60 hrs. 395.00/hr	237.00
12/03/19	Call and email correspondence with S. Sharrer regarding UNAC agreement. Elina Tilman	0.40 hrs. 395.00/hr	158.00
12/03/19	Call K. Murphy regarding Nguyen and review docket information. Elina Tilman	0.20 hrs. 395.00/hr	79.00
12/03/19	Call and email correspondence with P. Chandron regarding UNAC agreements. Elina Tilman	0.40 hrs. 395.00/hr	158.00
12/03/19	Review discovery issues. Elina Tilman	0.30 hrs. 395.00/hr	118.50
12/04/19	Conference call with Dentons and E. Paul re file review. An Nguyen-Ruda	0.40 hrs. 595.00/hr	238.00
12/04/19	Email correspondence with S. Sharrer, P. Chandran, and J. Moe regarding UNAC agreements. Elina Tilman	0.30 hrs. 395.00/hr	118.50
12/04/19	Analysis of pending issues and email B. Paulsen re same. Elina Tilman	0.20 hrs. 395.00/hr	79.00
12/05/19	Review of email from D. Delmar re temporary employee status. An Nguyen-Ruda	0.10 hrs. 595.00/hr	59.50



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12/05/19	Reply to email from D. Delmar re temporary employee status. An Nguyen-Ruda	0.10 hrs. 595.00/hr	59.50
12/05/19	Call and email correspondence with B. Paulsen regarding pending issues. 0.3 Elina Tilman	0.30 hrs. 395.00/hr	118.50
12/05/19	Analysis of next steps and email correspondence with witnesses regarding fact-gathering. 0.8 Elina Tilman	0.80 hrs. 395.00/hr	316.00
12/05/19	Review J. Moe's letters and related documents and discussion with him re same. 0.9 Elina Tilman	0.90 hrs. 395.00/hr	355.50
12/05/19	Review client documents. 0.7 Elina Tilman	0.70 hrs. 395.00/hr	276.50
12/05/19	Email correspondence with S. Sharrer regarding payments. 0.2 Elina Tilman	0.20 hrs. 395.00/hr	79.00
12/05/19	Review and compare UNAC agreements. 0.4 Elina Tilman	0.40 hrs. 395.00/hr	158.00
12/05/19	Email correspondence with S. Sharrer and C. Chandran regarding agreements. 0.2 Elina Tilman	0.20 hrs. 395.00/hr	79.00
12/06/19	Review of various documents re personnel matter. An Nguyen-Ruda	0.50 hrs. 595.00/hr	297.50
12/06/19	Call and email correspondence with S. Sharrer regarding A. Jain settlement. Elina Tilman	0.20 hrs. 395.00/hr	79.00



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12/06/19	Review and compare UNAC agreements and email correspondence with F. Chandran regarding pending issues. Elina Tilman	0.40 hrs. 395.00/hr	158.00
12/06/19	Analysis of pending issues regarding litigation and email correspondence with G. Strapp re same. Elina Tilman	0.20 hrs. 395.00/hr	79.00
12/08/19	Email S. Sharrer regarding needed documents for pending litigation. Elina Tilman	0.50 hrs. 395.00/hr	197.50
12/09/19	Capizzi: Review of email from S. Sharrer re interview and investigation, An Nguyen-Ruda	0.20 hrs. 595.00/hr	119.00
12/09/19	Advise re various bumping issues. An Nguyen-Ruda	0.50 hrs. 595.00/hr	297.50
12/09/19	Review of 1113/1114 order. An Nguyen-Ruda	0.50 hrs. 595.00/hr	297.50
12/09/19	Preparation of memorandum deadlines and notice requirements under collective bargaining agreement. An Nguyen-Ruda	1.20 hrs. 595.00/hr	714.00
12/09/19	Conference call with S. Sharrer re various bumping issues. An Nguyen-Ruda	0.20 hrs. 595.00/hr	119.00
12/10/19	Email correspondence with employees and opposing counsel regarding settlement agreements. Elina Tilman	0.30 hrs. 395.00/hr	118.50
12/10/19	Conference call with S. Sharrer and D. Drake re investigation. An Nguyen-Ruda	0.50 hrs. 595.00/hr	297.50





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12/11/19	Email with B. Paulsen regarding fact-gathering for employee H claim. Elina Tilman	0.20 hrs. 395.00/hr	79.00
12/11/19	Analysis of pending issues. Elina Tilman	0.20 hrs. 395.00/hr	79.00
12/12/19	Analysis of pending deadlines and issues. Elina Tilman	0.50 hrs. 395.00/hr	197.50
12/12/19	Review agreement and email P. Chandran re same. Elina Tilman	0.20 hrs. 395.00/hr	79.00
12/13/19	Email correspondence with P. Chandran and S. Sharrer regarding agreements. Elina Tilman	0.20 hrs. 395.00/hr	79.00
12/13/19	Review UNAC agreement and determine deadlines. Elina Tilman	0.20 hrs. 395.00/hr	79.00
12/13/19	Call with J. Moe and K. Murphy regarding small claims matter. Elina Tilman	0.20 hrs. 395.00/hr	79.00
12/23/19	Review agreements and documents and related correspondence with P. Chandran and S. Sharrer. Elina Tilman	0.70 hrs. 395.00/hr	276.50
12/23/19	Email correspondence with G. Galvez regarding pending agreements and J. Moe. Elina Tilman	0.30 hrs. 395.00/hr	118.50
12/23/19	Review deceleration regarding Employee H. and analysis of next steps. Elina Tilman	0.40 hrs. 395.00/hr	158.00
12/24/19	Review education chart and call with N. Nasu regarding same. Elina Tilman	0.40 hrs. 395.00/hr	158.00



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12/24/19	Email P. Chandron regarding UNAC agreement. Elina Tilman	0.10 hrs. 395.00/hr	39.50
12/26/19	Pulled San Bernardino Superior Court documents re Ahinasi v. St. Francis Medical for E. Tilman. Martin R. Fernandez	0.30 hrs. 280.00/hr	84.00
12/27/19	Call with J. Moe regarding agreements and review related emails. Elina Tilman	0.20 hrs. 395.00/hr	79.00
12/27/19	Email correspondence with opposing counsel regarding settlement agreements. Elina Tilman	0.20 hrs. 395.00/hr	79.00
12/27/19	Draft supplemental litigation hold for Employee H and email E. Paul re same. Elina Tilman	0.40 hrs. 395.00/hr	158.00
12/30/19	Email correspondence with arbitrator regarding mediation. Elina Tilman	0.20 hrs. 395.00/hr	79.00
12/31/19	Call and email correspondence with J. Moe and D. Galvez regarding case withdrawals and review documents. Elina Tilman	0.30 hrs. 395.00/hr	118.50
12/31/19	Email correspondence with S. Sharrer and AIG regarding Employee H claim. Elina Tilman	0.20 hrs. 395.00/hr	79.00
Total Fees for Professional Services for this Matter for this Invoice .....			\$ 8,926.00



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**Chargeable Costs**

12/26/19	San Bernardino County Superior Court documents	\$	27.00
Total Chargeable Costs for this Matter for this Invoice.....		\$	27.00
Total Fees and Costs for this Matter for this Invoice.....		\$	8,953.00

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**Summary of Fees**

	Hours	Rate/Hr	Dollars
Martin R. Fernandez	0.30	280.00	84.00
An Nguyen-Ruda	5.50	595.00	3,272.50
Elina Tilman	14.10	395.00	5,569.50
TOTALS .....	\$ 19.90	448.54	8,926.00



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Our Matter # 72391-0021

For Services Through December 31, 2019

adv. Jasmine Aragon

Total Current Fees for Professional Services .....	\$	332.50
Total Current Costs .....	\$	0.00
Total Current Charges Due .....	\$	332.50



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Our Matter # 72391-0021  
adv. Jasmine Aragon

For Services Through December 31, 2019

11/19/19 Telephonic appearance for Case Management Conference (.4); prepare  
status update for file (.3).

Alex Polishuk	0.70 hrs. 475.00/hr	\$	332.50
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Total Fees for Professional Services for this Matter for this Invoice .....	\$	332.50
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Total Fees and Costs for this Matter for this Invoice.....	\$	332.50
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Summary of Fees

	Hours	Rate/Hr	Dollars
Alex Polishuk	0.70	475.00	332.50
<b>TOTALS .....</b>	<b>0.70</b>	<b>475.00</b>	<b>332.50</b>



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Our Matter # 72391-0026  
adv. Rosa Carcamo

For Services Through December 31, 2019

Total Current Fees for Professional Services .....	\$	276.50
Total Current Costs .....	\$	356.40
Total Current Charges Due .....	\$	632.90





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PLEASE INDICATE INVOICE AND MATTER # WITH REMITTANCE

Our Matter # 72391-0026  
adv. Rosa Carcamo

For Services Through December 31, 2019

12/02/19	Review documents from mediator and analysis of pending issues. Elina Tilman	0.30 hrs. 395.00/hr	\$	118.50
12/30/19	Analysis of documents and case status. Elina Tilman	0.40 hrs. 395.00/hr		158.00
Total Fees for Professional Services for this Matter for this Invoice .....				\$ 276.50

**Chargeable Costs**

12/04/19	Los Angeles County Superior Court document Document Reproduction		\$	3.00 353.40
Total Chargeable Costs for this Matter for this Invoice .....				\$ 356.40
Total Fees and Costs for this Matter for this Invoice .....				\$ 632.90



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Summary of Fees			
	Hours	Rate/Hr	Dollars
Elina Tilman	0.70	395.00	276.50
<b>TOTALS .....</b>	<b>0.70</b>	<b>395.00</b>	<b>276.50</b>



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Our Matter # **72391-0028**

For Services Through December 31, 2019

**adv. Irene Rodriquez**

Total Current Fees for Professional Services .....	\$	553.00
Total Current Costs .....	\$	2.00
Total Current Charges Due .....	\$	555.00



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PLEASE INDICATE INVOICE AND MATTER # WITH REMITTANCE

Our Matter # 72391-0028

For Services Through December 31, 2019

adv. Irene Rodriquez

12/04/19	Review documents from opposing counsel and related correspondence with J. Moe, opposing counsel, and S. Sharrer. Elina Tilman	0.50 hrs. 395.00/hr	\$	197.50
12/05/19	Email correspondence with A. Fierro and opposing counsel regarding settlement. Elina Tilman	0.30 hrs. 395.00/hr		118.50
12/13/19	Review dismissal and email correspondence with opposing counsel regarding same. Elina Tilman	0.40 hrs. 395.00/hr		158.00
12/31/19	Email correspondence with opposing counsel regarding withdrawals. Elina Tilman	0.20 hrs. 395.00/hr		79.00
Total Fees for Professional Services for this Matter for this Invoice .....				\$ 553.00

**Chargeable Costs**

12/23/19	Los Angeles County Superior Court document	\$	2.00
Total Chargeable Costs for this Matter for this Invoice.....			\$ 2.00



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Total Fees and Costs for this Matter for this Invoice..... \$ 555.00

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Summary of Fees			
	Hours	Rate/Hr	Dollars
Elina Tilman	1.40	395.00	553.00
TOTALS .....	\$ 1.40	395.00	553.00



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Our Matter # **72391-0029**  
**adv. Anil Jain**

For Services Through December 31, 2019

**REVISED 1/16/2020**

Total Current Fees for Professional Services.....	\$	416.50
Total Current Costs.....	\$	0.00
Total Current Fees and Costs.....	\$	416.50
Total Current Charges Due.....	\$	0.00



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Our Matter # **72391-0029**  
**adv. Anil Jain**

For Services Through December 31, 2019

12/02/19	Review of email from J. Moc regarding settlement.			
	An Nguyen-Ruda	0.20 hrs. 595.00/hr	\$	119.00
12/04/19	Conference call with Plaintiff's counsel and mediator re settlement.			
	An Nguyen-Ruda	0.50 hrs. 595.00/hr		297.50
Total Fees for Professional Services for this Matter for this Invoice .....			\$	416.50
Total Fees and Costs for this Matter for this Invoice.....			\$	0.00





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RobertoDino@vcrity.org

January 13, 2020  
Invoice 1774645  
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<p>JMBM LLP Lockbox File 1263 1801 W. Olympic Blvd. Pasadena, CA 91199-1263</p>	<p><b>ABA:</b> <b>SWIFT Code:</b> <i>For international wires</i> <b>Account Name:</b> <b>Account No.:</b> <b>Please reference:</b></p>	<p>122016066 CINAUS6L JMBM Depository Acct 12714 4494 Client - Matter: 72391-0029 Invoice No. 1774645 Attorney: Marta M. Fernandez</p>

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**Summary of Fees**

	Hours	Rate/Hr	Dollars
An Nguyen-Ruda	0.70	595.00	416.50
<b>TOTALS .....</b>	<b>0.70</b>	<b>595.00</b>	<b>416.50</b>



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PLEASE INDICATE INVOICE AND MATTER # WITH REMITTANCE

Our Matter # 72391-0033

For Services Through December 31, 2019

adv. Aaron Raj

Total Current Fees for Professional Services .....	\$	869.00
Total Current Costs .....	\$	0.00
Total Current Charges Due .....	\$	869.00



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PLEASE INDICATE INVOICE AND MATTER # WITH REMITTANCE

Our Matter # 72391-0033

For Services Through December 31, 2019

adv. Aaron Raj

12/02/19	Email correspondence with J. Moe and L. Vargas concerning pending issues.			
	Elina Tilman	0.20 hrs.	395.00/hr	\$ 79.00
12/04/19	Review bk letter and POC.			
	Elina Tilman	0.40 hrs.	395.00/hr	158.00
12/04/19	Email and call with J. Moe and regarding letter changes and pending issues.			
	Elina Tilman	0.20 hrs.	395.00/hr	79.00
12/04/19	Analysis of pending issues.			
	Elina Tilman	0.20 hrs.	395.00/hr	79.00
12/13/19	Review personal file and make necessary redactions.			
	Elina Tilman	0.90 hrs.	395.00/hr	355.50
12/13/19	Email opposing counsel regarding production.			
	Elina Tilman	0.10 hrs.	395.00/hr	39.50
12/13/19	Email with employee regarding pending issues.			
	Elina Tilman	0.20 hrs.	395.00/hr	79.00
Total Fees for Professional Services for this Matter for this Invoice .....				\$ 869.00



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Total Fees and Costs for this Matter for this Invoice..... \$ 869.00

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Summary of Fees			
	Hours	Rate/Hr	Dollars
Elina Tilman	2.20	395.00	869.00
TOTALS .....	2.20	395.00	869.00



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Our Matter # 72391-0034

For Services Through December 31, 2019

adv. Leonard Harris

Total Current Fees for Professional Services .....	\$	13,019.00
Total Current Costs .....	\$	1,116.78
Total Current Charges Due .....	\$	14,135.78



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Our Matter # 72391-0034

For Services Through December 31, 2019

adv. Leonard Harris

12/02/19	Review of bankruptcy issues. An Nguyen-Ruda	0.20 hrs. 595.00/hr	\$	119.00
12/03/19	Telephone call with J. Moe regarding claim bar. An Nguyen-Ruda	0.50 hrs. 595.00/hr		297.50
12/04/19	Review of draft email to carrier re mediation (.1); reply to email from E. Paul re mediation (.1). An Nguyen-Ruda	0.20 hrs. 595.00/hr		119.00
12/06/19	Preparation for meetings Elina Tilman	2.00 hrs. 395.00/hr		790.00
12/06/19	Email correspondence with B. Paulsen and L. Vargas and analysis of pending issues. Elina Tilman	0.50 hrs. 395.00/hr		197.50
12/06/19	Review client documents and prepare for fact-gathering meetings. Elina Tilman	2.00 hrs. 395.00/hr		790.00
12/09/19	Fact-gathering interviews. Elina Tilman	6.50 hrs. 395.00/hr		2,567.50
12/09/19	Travel to airport and flight to LA. Elina Tilman	2.70 hrs. 395.00/hr		1,066.50
12/09/19	Travel from airport to hospital. Elina Tilman	0.30 hrs. 395.00/hr		118.50
12/10/19	Call and email correspondence with J. Moe regarding pending issues. Elina Tilman	0.30 hrs. 395.00/hr		118.50



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12/10/19	Fact-gathering interviews and analysis of documents. Elina Tilman	5.30 hrs. 395.00/hr	2,093.50
12/10/19	Travel back to SF, including from airport. Elina Tilman	2.80 hrs. 395.00/hr	1,106.00
12/10/19	Travel to Hospital Elina Tilman	0.40 hrs. 395.00/hr	158.00
12/12/19	Telephone conference with opposing counsel. Louise Ann Fernandez	0.30 hrs. 795.00/hr	238.50
12/12/19	Draft Answers to complaint Elina Tilman	0.90 hrs. 395.00/hr	355.50
12/12/19	Review pleadings. Elina Tilman	0.40 hrs. 395.00/hr	158.00
12/12/19	Case Analysis Elina Tilman	0.60 hrs. 395.00/hr	237.00
12/12/19	Email with employees regarding pending issues. Elina Tilman	0.40 hrs. 395.00/hr	158.00
12/12/19	Review of answers for court filing. An Nguyen-Ruda	0.40 hrs. 595.00/hr	238.00
12/13/19	Call and email correspondence with employees regarding pending issues. Elina Tilman	0.60 hrs. 395.00/hr	237.00
12/13/19	Review client documents. Elina Tilman	0.60 hrs. 395.00/hr	237.00





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12/13/19	Finalize Answers to complaint. Elina Tilman	0.50 hrs. 395.00/hr	197.50
12/13/19	Call with J. Moe regarding pending issues. Elina Tilman	0.20 hrs. 395.00/hr	79.00
12/18/19	Drive from St. Francis. Alex Polishuk	0.80 hrs. 475.00/hr	380.00
12/18/19	Interview and obtain declaration from witness. Alex Polishuk	1.10 hrs. 475.00/hr	522.50
12/18/19	Travel time to St. Francis Medical Center to interview and obtain declaration from witness. Alex Polishuk	0.80 hrs. 475.00/hr	380.00
12/19/19	Review and email from C. Stahlman re J. Winnikow (Mediator) An Nguyen-Ruda	0.10 hrs. 595.00/hr	59.50
Total Fees for Professional Services for this Matter for this Invoice .....			\$ 13,019.00

**Chargeable Costs**

12/09/19	Breakfast	\$	13.64
12/09/19	Lunch		20.00
12/09/19	Hotel Fee 12/9-12/10- For Fact Gathering		234.33
12/09/19	Travel to SFO Airport- For Fact Gathering		41.84
12/09/19	Travel from LAX to SFMC- For Fact Gathering		25.55
12/09/19	Travel from Hotel to SFMC- For Fact Gathering		24.81
12/09/19	Travel to dinner from hotel- For Fact Gathering		7.84
12/09/19	Los Angeles County Superior Court document		9.00
12/10/19	Lunch		38.38



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12/10/19	Travel from Hotel to LAX- For Fact Gathering	26.49
12/10/19	Travel from SFO Airport back to SF- For Fact Gathering	37.50
12/10/19	Los Angeles County Superior Court document	13.00
	Air Fare	561.00
	Attorney Service/Messenger	28.75
	Document Reproduction	34.65
Total Chargeable Costs for this Matter for this Invoice..... \$		1,116.78
Total Fees and Costs for this Matter for this Invoice..... \$		14,135.78



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**Summary of Fees**

	Hours	Rate/Hr	Dollars
Louise Ann Fernandez	0.30	795.00	238.50
An Nguyen-Ruda	1.40	595.00	833.00



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Summary of Fees			
	Hours	Rate/Hr	Dollars
Alex Polishuk	2.70	475.00	1,282.50
Elina Tilman	27.00	395.00	10,665.00
TOTALS .....	\$ 31.40	414.62	13,019.00



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PLEASE INDICATE INVOICE AND MATTER # WITH REMITTANCE

Our Matter # 72391-0035

For Services Through December 31, 2019

adv. Renee Capizzi

Total Current Fees for Professional Services.....	\$	617.50
Total Current Costs.....	\$	0.00
Total Current Charges Due.....	\$	617.50



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Our Matter # 72391-0035

For Services Through December 31, 2019

adv. Renee Capizzi

12/06/19	Draft e-mail to client outlining the following (1) documents and records to be obtained for purpose of evaluating case; (2) employees to be interviewed for purpose of evaluating case; (3) external physicians to be interviewed for purpose of evaluating case; and (4) outline of alleged events.			
	Alex Polishuk	0.50 hrs.	475.00/hr	\$ 237.50
12/10/19	Telephone calls with Denise Delmar, Vice President of Human Resources at St. Francis, regarding allegations made by Capizzi in her claim.			
	Alex Polishuk	0.80 hrs.	475.00/hr	380.00
Total Fees for Professional Services for this Matter for this Invoice .....				\$ 617.50
Total Fees and Costs for this Matter for this Invoice .....				\$ 617.50



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Summary of Fees			
	Hours	Rate/Hr	Dollars
Alex Polishuk	1.30	475.00	617.50
<b>TOTALS .....</b>	<b>1.30</b>	<b>475.00</b>	<b>617.50</b>

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Our Matter # 72167-0022

For Services Through December 31, 2019

**Grievances/FactFinding/Arbitration**

Total Current Fees for Professional Services .....	\$	16,907.50
Total Current Costs .....	\$	4.00
Total Current Charges Due .....	\$	16,911.50





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PLEASE INDICATE INVOICE AND MATTER # WITH REMITTANCE

Our Matter # 72167-0022

For Services Through December 31, 2019

**Grievances/FactFinding/Arbitration**

12/01/19	Review of spreadsheet of employee applications from buyer for bargaining.			
	An Nguyen-Ruda	0.20 hrs.	595.00/hr	\$ 119.00
12/02/19	Conference call with CNA regarding bumping.			
	An Nguyen-Ruda	0.40 hrs.	595.00/hr	238.00
12/03/19	Analysis of litigation matters for future handling.			
	An Nguyen-Ruda	0.80 hrs.	595.00/hr	476.00
12/03/19	Telephone call with J. Moe regarding litigation matter and strategy.			
	An Nguyen-Ruda	0.50 hrs.	595.00/hr	297.50
12/03/19	Telephone call with S. Sharrer and D. Kirchner regarding retirement plans.			
	An Nguyen-Ruda	0.50 hrs.	595.00/hr	297.50
12/03/19	Provide advise regarding various bumping matters regarding effects bargaining.			
	An Nguyen-Ruda	1.00 hrs.	595.00/hr	595.00
12/03/19	Fact-gathering			
	Elina Tilman	1.00 hrs.	395.00/hr	395.00
12/03/19	Call with J. Moe regarding various litigation matters.			
	Elina Tilman	1.30 hrs.	395.00/hr	513.50



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12/03/19	Review documents and make additions to chart. Elina Tilman	1.30 hrs. 395.00/hr	513.50
12/03/19	Call and email correspondence with S. Martin regarding pending issues. Elina Tilman	0.20 hrs. 395.00/hr	79.00
12/03/19	Analysis of documents needed and email T. Hopper re same. Elina Tilman	0.20 hrs. 395.00/hr	79.00
12/04/19	Review email documents for project and email B. Paulsen regarding pending issues. Elina Tilman	0.80 hrs. 395.00/hr	316.00
12/05/19	Review letters and email S. Martin flagging issues re same. 1.1 Elina Tilman	1.10 hrs. 395.00/hr	434.50
12/05/19	Strategize regarding email project and charting. 0.9 Elina Tilman	0.90 hrs. 395.00/hr	355.50
12/05/19	Review letters and email S. Martin flagging issues re same. 1.1 Elina Tilman	1.10 hrs. 395.00/hr	434.50
12/05/19	Strategize regarding email project and charting. 0.9 Elina Tilman	0.90 hrs. 395.00/hr	355.50
12/06/19	Review of client files re litigation. Julia T. Botezatu	1.00 hrs. 340.00/hr	340.00
12/06/19	Review email from SEIU representative re bumping. An Nguyen-Ruda	0.10 hrs. 595.00/hr	59.50
12/06/19	Reply to email from SEIU representative. An Nguyen-Ruda	0.10 hrs. 595.00/hr	59.50



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RobertoDino@verity.org

January 13, 2020  
Invoice 1774934  
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PLEASE INDICATE INVOICE AND MATTER # WITH REMITTANCE

12/06/19	Review email from S. Sharrer re bumping. An Nguyen-Ruda	0.10 hrs. 595.00/hr	59.50
12/10/19	Email correspondence with S. Sharrer regarding pending issues. Elina Tilman	0.30 hrs. 395.00/hr	118.50
12/10/19	Review of email from S. Sharrer to SEIU representative re bumping process. An Nguyen-Ruda	0.10 hrs. 595.00/hr	59.50
12/10/19	Teleconference with S. Sharrer re various bumping and labor issues. An Nguyen-Ruda	0.40 hrs. 595.00/hr	238.00
12/11/19	Conference call with S. Sharrer re various labor status. An Nguyen-Ruda	0.30 hrs. 595.00/hr	178.50
12/11/19	Review of research re employee privacy issues. An Nguyen-Ruda	0.20 hrs. 595.00/hr	119.00
12/11/19	Review and analysis of client documents. Julia T. Botezatu	4.00 hrs. 340.00/hr	1,360.00
12/11/19	Analysis of pending document and litigation issues and call and email with S. Sharrer re same. Elina Tilman	0.50 hrs. 395.00/hr	197.50
12/11/19	Analysis of pending deadlines regarding Employee D lawsuit and email with K. Murphy re same and Employee N lawsuit. Elina Tilman	0.30 hrs. 395.00/hr	118.50
12/12/19	Analysis of pending issues. Elina Tilman	0.50 hrs. 395.00/hr	197.50
12/12/19	Review of enrollment emails. An Nguyen-Ruda	0.20 hrs. 595.00/hr	119.00



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**ATTORNEYS AT LAW**

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PLEASE INDICATE INVOICE AND MATTER # WITH REMITTANCE

12/12/19	Review of client file re litigation. Julia T. Botezatu	2.00 hrs. 340.00/hr	680.00
12/13/19	Review project regarding litigation. Elina Tilman	0.70 hrs. 395.00/hr	276.50
12/13/19	Strategize regarding pending litigation issues. Elina Tilman	0.80 hrs. 395.00/hr	316.00
12/13/19	Teleconference with J. Moe re bankruptcy litigation issues. An Nguyen-Ruda	0.50 hrs. 595.00/hr	297.50
12/16/19	Conference call with Steve re labor strategy. An Nguyen-Ruda	0.50 hrs. 595.00/hr	297.50
12/17/19	Review client files re litigation. Julia T. Botezatu	1.00 hrs. 340.00/hr	340.00
12/19/19	Conference call with CEO, General Counsel and Chief of Human Resources re upcoming labor strategies. An Nguyen-Ruda	0.90 hrs. 595.00/hr	535.50
12/23/19	Analysis of pending issues. Elina Tilman	0.40 hrs. 395.00/hr	158.00
12/24/19	Email correspondence with K. Murphy, review related minute order and analysis of next steps regarding Dahl. Elina Tilman	1.10 hrs. 395.00/hr	434.50
12/24/19	Analysis of pending issues regarding litigation project and review related documents. Elina Tilman	0.40 hrs. 395.00/hr	158.00
12/27/19	Analysis of pending issues. Elina Tilman	0.40 hrs. 395.00/hr	158.00



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12/27/19	Review litigation and related deadlines and make chart re same. Elina Tilman	1.20 hrs. 395.00/hr	474.00
12/27/19	Pulled Los Angeles Superior Court document re Dahl v. Payroll Express for E.Tilman. Martin R. Fernandez	0.10 hrs. 280.00/hr	28.00
12/30/19	Review and analysis of documents and make determination regarding liability and procedural posture. Elina Tilman	3.60 hrs. 395.00/hr	1,422.00
12/30/19	Analysis of client documents re litigation Julia T. Botezatu	3.00 hrs. 340.00/hr	1,020.00
12/31/19	Review and analysis of pending matters and make determinations for chart. Elina Tilman	2.30 hrs. 395.00/hr	908.50
12/31/19	Analysis of client documents re litigation Julia T. Botezatu	2.00 hrs. 340.00/hr	680.00
Total Fees for Professional Services for this Matter for this Invoice .....			\$ 16,907.50

**Chargeable Costs**

12/27/19	Los Angeles County Superior Court document	\$	4.00
Total Chargeable Costs for this Matter for this Invoice.....			\$ 4.00



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January 13, 2020  
Invoice 1774934  
Tax ID 95-3669194  
Page 7

PLEASE INDICATE INVOICE AND MATTER # WITH REMITTANCE

Total Fees and Costs for this Matter for this Invoice..... \$ 16,911.50

PAY BY U.S. MAIL:	PAY BY WIRE: City National Bank 400 N. Roxbury Drive, Beverly Hills, California 90210	
<p>JMBM LLP Lockbox File 1263 1801 W. Olympic Blvd. Pasadena, CA 91199-1263</p>	<p><b>ABA:</b> <b>SWIFT Code:</b> <i>For international wires</i> <b>Account Name:</b> <b>Account No.:</b> <b>Please reference:</b></p>	<p>122016066 CINAUS6L JMBM Depository Acct 12714 4494 Client - Matter: 72167-0022 Invoice No. 1774934 Attorney: Marta M. Fernandez</p>

Costs may have been incurred which are not included on this invoice. Costs are shown on invoices when they are entered into our accounting system, not necessarily on the dates they were incurred.



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January 13, 2020  
Invoice 1774934  
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Page 8

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The Firm is a California limited liability partnership.

If you have any questions regarding this invoice, please Email: [Finance@jmbm.com](mailto:Finance@jmbm.com)

Summary of Fees			
	Hours	Rate/Hr	Dollars
Julia T. Botezatu	13.00	340.00	4,420.00
Martin R. Fernandez	0.10	280.00	28.00
An Nguyen-Ruda	6.80	595.00	4,046.00
Elina Tilman	21.30	395.00	8,413.50
TOTALS .....	\$ 41.20	410.38	16,907.50

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January 14, 2020  
Invoice 1774658  
Tax ID 95-3669194  
Page 1

PLEASE INDICATE INVOICE AND MATTER # WITH REMITTANCE

Our Matter # **72167-0029**

For Services Through December 31, 2019

**Bankruptcy Administration**

Total Current Fees for Professional Services .....	\$	3,213.00
Total Current Costs .....	\$	20,814.96
Total Current Charges Due .....	\$	24,027.96





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January 14, 2020  
Invoice 1774658  
Tax ID 95-3669194  
Page 2

PLEASE INDICATE INVOICE AND MATTER # WITH REMITTANCE

Our Matter # 72167-0029

For Services Through December 31, 2019

**Bankruptcy Administration**

12/02/19	Review Global Notice re October Fee Statements. Tom Geher	0.10 hrs. 765.00/hr	\$	76.50
12/18/19	Work on November 2019 Fee Statement. Tom Geher	3.00 hrs. 765.00/hr		2,295.00
12/19/19	Finalize November Fee Statement. Tom Geher	0.50 hrs. 765.00/hr		382.50
12/19/19	Work on Notice of JMBM Rate Adjustment. Tom Geher	0.50 hrs. 765.00/hr		382.50
12/20/19	Prepare email to H. Yip re November Leds file. Tom Geher	0.10 hrs. 765.00/hr		76.50
Total Fees for Professional Services for this Matter for this Invoice .....				\$ 3,213.00

**Chargeable Costs**

Document Reproduction	\$	20,460.00
Overnight Delivery		36.01
Postage		318.95
Total Chargeable Costs for this Matter for this Invoice .....		\$ 20,814.96



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January 14, 2020  
Invoice 1774658  
Tax ID 95-3669194  
Page 3

PLEASE INDICATE INVOICE AND MATTER # WITH REMITTANCE

Total Fees and Costs for this Matter for this Invoice..... \$ 24,027.96

PAY BY U.S. MAIL:	PAY BY WIRE: City National Bank 400 N. Roxbury Drive, Beverly Hills, California 90210	
JMBM LLP Lockbox File 1263 1801 W. Olympic Blvd. Pasadena, CA 91199-1263	ABA: SWIFT Code: <i>For international wires</i> Account Name: Account No.: Please reference:	122016066 CINAUS6L JMBM Depository Acct 12714 4494 Client - Matter: 72167-0029 Invoice No. 1774658 Attorney: Marta M. Fernandez

Costs may have been incurred which are not included on this invoice. Costs are shown on invoices when they are entered into our accounting system, not necessarily on the dates they were incurred.

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PLEASE INDICATE INVOICE AND MATTER # WITH REMITTANCE

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If you have any questions regarding this invoice, please Email: [Finance@jmbm.com](mailto:Finance@jmbm.com)

Summary of Fees			
	Hours	Rate/Hr	Dollars
Tom Geher	4.20	765.00	3,213.00
TOTALS .....	4.20	765.00	3,213.00

## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:  
1900 Avenue of the Stars, 7th Floor, Los Angeles, CA 90067

A true and correct copy of the foregoing document entitled (*specify*): **JEFFER MANGELS BUTLER & MITCHELL LLP'S PROFESSIONAL MONTHLY FEE APPLICATION FOR ALLOWANCE AND PAYMENT OF INTERIM COMPENSATION AND REIMBURSEMENT OF EXPENSES FOR THE PERIOD DECEMBER 2019**; will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) January 21, 2020, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☒ Service information continued on attached page

**2. SERVED BY UNITED STATES MAIL:** On (*date*) January 21, 2020, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☒ Service information continued on attached page

**3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL** (*state method for each person or entity served*): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) January 21, 2020, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

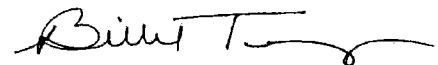
**SERVED BY OVERNIGHT**

Honorable Ernest M. Robles  
United States Bankruptcy Court  
Central District of California  
Edward R. Roybal Federal Building and Courthouse  
255 E. Temple Street, Suite 1560  
Los Angeles, CA 90012

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

January 21, 2020 Billie Terry



Date

Printed Name

Signature

**ADDITIONAL SERVICE INFORMATION**

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):**

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- Christine R Etheridge christine.etheridge@ikonfin.com

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- Christian T Kim ckim@dumas-law.com, ckim@ecf.inforuptcy.com
- Jane Kim jkim@kellerbenvenuti.com

**ADDITIONAL SERVICE INFORMATION**

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):**

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- Susan I Montgomery susan@simontgomerylaw.com,  
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