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8 UNITED STATES BANKRUPTCY COURT

9 CENTRAL DISTRICT OF CALIFORNIA – LOS ANGELES DIVISION

10 In re
11 VERITY HEALTH SYSTEM OF
CALIFORNIA, INC., *et al.*,
12 Debtors and Debtors In Possession.

- 13 ☐ Affects All Debtors
14 ☒ Affects Verity Health System of
California, Inc.
15 ☒ Affects O'Connor Hospital
16 ☐ Affects Saint Louise Regional Hospital
☒ Affects St. Francis Medical Center
17 ☒ Affects St. Vincent Medical Center
☒ Affects Seton Medical Center
18 ☐ Affects O'Connor Hospital Foundation
☐ Affects Saint Louise Regional Hospital
19 Foundation
☐ Affects St. Francis Medical Center of
20 Lynwood Foundation
☐ Affects St. Vincent Foundation
21 ☐ Affects St. Vincent Dialysis Center, Inc.
☐ Affects Seton Medical Center Foundation
22 ☐ Affects Verity Business Services
☒ Affects Verity Medical Foundation
23 ☐ Affects Verity Holdings, LLC
☐ Affects De Paul Ventures, LLC
24 ☐ Affects De Paul Ventures - San Jose
Dialysis, LLC

25 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

Hon. Judge Ernest M. Robles

**BARTKO ZANKEL BUNZEL &
MILLER'S SECOND AND FINAL
APPLICATION FOR ALLOWANCE AND
PAYMENT OF COMPENSATION AND
REIMBURSEMENT OF EXPENSES FOR
(I) THE INTERIM FEE PERIOD (MAY 1,
2020 – SEPT. 4, 2020), AND (II) THE
FINAL FEE PERIOD (JAN. 9, 2020 –
SEPT. 4, 2020); DECL. OF AN NGUYEN
RUDA IN SUPPORT THEREOF**

Date: December 16, 2020

Time: 10:00 a.m.

Place: Courtroom 1568

255 East Temple Street

Los Angeles, California 90012

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**TO THE HONORABLE ERNEST M. ROBLES, UNITED STATES BANKRUPTCY
JUDGE, THE OFFICE OF THE UNITED STATES TRUSTEE, AND ALL INTERESTED
PARTIES:**

BARTKO ZANKEL BUNZEL & MILLER (“BZBM”), special labor and employment counsel for the Debtors in the above-referenced jointly administered Chapter 11 cases, hereby submits its *Second and Final Application for Allowance and Payment of Compensation and Reimbursement for (I) the Interim Fee Period (May 1, 2020 – Sept. 4, 2020), and (II) the Final Fee Period (Jan. 9, 2020 – Sept. 4, 2020)* (the “Final Application”). This Final Application seeks an order from the Court for the final allowance and payment of: (i) compensation for services rendered during the period of May 1, 2020 through September 4, 2020 (the “Second Interim Fee Period”) in the amount of \$974,250.69, comprising fees of \$962,738.00 and expenses of \$11,512.69;¹ and (ii) the balance due BZBM of \$346,588.11.² BZBM is also seeking an order from this Court for allowance on a final basis of compensation for professional services provided for: (i) the period commencing January 9, 2020 through and including September 4, 2020 (the “Final Fee Period”) in the amount of \$1,614,016.70, consisting of fees of \$1,592,790.00 and expenses in the amount of \$21,226.70; and (ii) those fees incurred after September 4, 2020 in connection with the preparation of this Final Application. In support of this Final Application, BZBM respectfully represents as follows:

¹ In accordance with BZBM’s monthly fee applications during the Second Interim Fee Period [Docket Nos. 4984, 5220, 5985, and 6160], BZBM has been paid 80% of fees and 100% of expenses for the May, June, and July 2020 fee applications (i.e., payment of \$627,662.58, with \$156,694.80 owed for the 20% holdback for that time period). However, no payment has been made yet for the August/September 2020 fee application.

² After filing this Final Application, but prior to the hearing thereon, BZBM anticipates receiving payment for the August 1, 2020 – September 4, 2020 time period in the amount of \$154,040.51, representing 80% of fees plus 100% of expenses as reflected in the monthly fee application [Docket No. 6160]. Thus, the balance due BZBM pursuant to the Final Application would be reduced by that amount.

I. SUMMARY OF INFORMATION FOR THIS FINAL APPLICATION

A. Type of Services Rendered by Applicant

Lead Counsel, An Nguyen Ruda, has been labor and employment counsel to Debtors for approximately a decade. In January 2020, she moved her practice to BZBM. Pursuant to Bankruptcy Code § 327(e), BZBM applied and was approved to serve as special labor and employment counsel to the Debtors, and each of them, so that Ms. Ruda and her team, including Louise Ann Fernandez and Elina Tilman, could remain as special labor counsel.

B. Date and Chapter of Case

Debtors filed voluntary petitions for relief under Chapter 11 of Title 11, United States Code (the “Bankruptcy Code”) on August 31, 2018 (the “Petition Date”). The Debtors’ cases have been jointly administered with the chapter 11 bankruptcies cases filed by their affiliated entities under the lead case of Debtor Verity Health System of California, Inc. (“VHS”). Following the Petition Date, the Debtors continued to operate their business and manage their affairs as debtors in possession pursuant to sections 1107 and 1108 of the Bankruptcy Code.

C. Date and Entry of Order Approving Applicant’s Employment

On February 27, 2020, that *Order Approving Application of Debtors to Employ Bartko Zankel Bunzel & Miller as Special Labor and Employment Counsel Pursuant to 11 U.S.C. § 327(e) Nunc Pro Tunc to January 9, 2020* [Docket No. 4182] (the “Employment Order”) was entered by the Bankruptcy Court authorizing Debtors to employ BZBM as special labor and employment counsel. The effective date of BZBM’s employment is retroactive to January 9, 2020.

D. Summary of Fees Paid, Costs Reimbursed, and Amounts Still Owed From the Prior Applications

1. Amount of Advance Payment Received

None. BZBM did not receive a retainer for its employment as special labor and employment counsel for the Debtors.

2. Total Amounts Sought Pursuant to Prior Applications

On July 15, 2020, BZMB’s *First Interim Application for Fees and Expense Reimbursement for the Period of January 9, 2020 through April 30, 2020; Declaration of An*

1 *Nguyen Ruda* [Docket No. 5085] (the “First Interim Fee Application”) was filed seeking approval
2 and payment of fees in the amount of \$639,766.01, comprising fees of \$630,052.00 and expenses
3 in the amount of \$9,714.01.

4 On August 12, 2020, the Court entered that *Order on Professionals’ Interim Applications*
5 *for Fees and Expense Reimbursement for the Period of January 1, 2020 through April 30, 2020*
6 *[Docket Nos. 5097, 5087, 5041, 5075, 5071, 5079 and 5085]* [Docket No. 5483] whereby, among
7 other things, BZBM’s First Interim Fee Application was approved in full.

8 In addition, pursuant to the Employment Order and Fee Procedure Orders entered by this
9 Court [Docket Nos. 661, 826 and 4182], BZBM, as special labor and employment counsel, filed
10 four monthly fee applications [Docket Nos. 4984, 5220, 5985, and 6160] seeking approval and
11 payment of compensation for services rendered during the Second Interim Fee Period in the
12 amount of \$974,250.69, comprising fees of \$962,738.00 and expenses of \$11,512.69

Monthly Fee Application	Fees	Expenses	Total
Fourth Monthly Fee Application (May 1, 2020 – May 31, 2020)	\$232,681.00	\$34.48	\$232,715.48
Fifth Monthly Fee Application (June 1, 2020 – June 30, 2020)	\$296,041.00	\$197.60	\$296,238.60
Sixth Monthly Fee Application (July 1, 2020 – July 31, 2020)	\$254,752.00	\$651.30	\$255,403.30
Seventh Monthly Fee Application (August 1, 2020 – September 4, 2020)	\$179,264.00	\$10,629.31	\$189,893.31
	<u>\$962,738.00</u>	<u>\$11,512.69</u>	<u>\$974,250.69</u>

21 **3. Total Amounts Paid and Remaining Due to BZBM From Prior**
22 **Applications**

23 BZBM has been paid the sum of \$639,766.01 on account of BZBM’s First Interim Fee
24 Application. No sums remain to be paid with respect to BZBM’s First Interim Fee Application.

25 However, as set forth above, BZBM filed four monthly fee applications during the Second
26 Interim Fee Period. With respect thereto, BZBM has received the total sum of \$627,662.58. The
27 amount paid represents 80% of the fees incurred and 100% of the expenses incurred for the May,
28 June, and July 2020 monthly fee applications [Docket Nos. 4984, 5220, 5985]. No payment has

been made as of yet for the August 1, 2020 – September 4, 2020 monthly fee application [Docket No. 6160]. The below chart identifies the amounts paid and amounts remaining due to BZBM in accordance with BZBM’s four monthly fee applications, as follows:

Breakdown of Amounts Paid and Remaining Amounts Owed
May 1, 2020 – September 4, 2020

Monthly Fee Applications	Total Paid to BZBM (80% Fees / 100% Costs)	Amounts Owed (20% Holdback)	Amounts Owed (80% of Fees and 100% of Costs)
Fourth Monthly Fee Application (May 1, 2020 – May 31, 2020)	\$186,179.28	\$46,536.20	-
Fifth Monthly Fee Application (June 1, 2020 – June 30, 2020)	\$237,030.40	\$59,208.20	-
Sixth Monthly Fee Application (July 1, 2020 – July 31, 2020)	\$204,452.90	\$50,950.40	-
Seventh Monthly Fee Application (July 1, 2020 – July 31, 2020)	\$0	\$35,852.80	\$154,040.51
	\$627,662.58	\$192,547.60	\$154,040.51

E. Summary of Requested Fees and Costs

Applicable Time Period	1/9/2020 – 9/4/2020
Hours Expended	3,389 hours
Total Fees Incurred	\$1,592,790.00
Blended Hourly Rate	\$469.99
Total Expenses Incurred	\$21,226.70
Total Fees and Expenses Incurred	\$1,614,016.70

The estimated time spent and amount charged for the preparation of this Final Application, which is not reflected in the above amounts or in the attached bills/invoices, is 24.0 hours for a total sum of \$9,480.00 in fees. (See Declaration of An Nguyen Ruda, ¶ 10 (“Ruda Decl.”).)

F. Source and Amount of Cash Available to Pay Professionals

BZBM is informed and believes that the present cash on hand in Debtors’ estates is sufficient to pay all fees and costs requested by professionals. With respect to the issue of the “source and amount of cash available to pay professionals,” BZBM hereby references and

incorporates by this reference the final fee application of Debtors' general bankruptcy counsel, Dentons US LLP, who are now counsel for the Post Effective Date Debtors.

II. DESCRIPTION OF CASE AND SERVICES

Sections 330 and 331 of the Bankruptcy Code, Rule 2016 of the Federal Rules of Bankruptcy Procedure, Local Bankruptcy Rule 2016-1, the United States Trustee Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under 11 U.S.C. § 330 ("UST Fee Guide"), and the Employment Order and Fee Procedure Orders entered by this Court [Docket Nos. 661, 826 and 4182], set forth certain requirements that a professional must satisfy in order to obtain an allowance for professional fees and reimbursement of costs. As is set forth more fully herein, BZBM believes this Final Application complies with all statutory guidelines and court-imposed requirements.

A. Brief Narrative History of the Present Posture of the Case and Significant Events During the Relevant Time Period

Pursuant to Local Rule 2016-1(a)(1)(A)(iv), BZBM, with respect to providing a brief narrative history of Debtors' chapter 11 cases and their present posture, references and incorporates by this reference the final fee application of Debtors' general bankruptcy counsel, Dentons US LLP, who are now counsel for the Post Effective Date Debtors.

B. Brief Narrative Statement of the Services Rendered and the Time Expended During the Time Period Covered by the Final Application

BZBM is, pursuant to Bankruptcy Code § 327(e), special labor and employment counsel to the Debtors, and each of them. BZBM has allocated its services by Debtor and by specific matter per Debtor. BZBM does its best to place time entries and expenses into the specific matter which reflects the work performed per Debtor. To the extent that BZBM's First Interim Fee Application [Docket No. 5085] already provided a narrative statement of the services rendered, with supporting detail as to the fees, costs, and the time expended during the January 9, 2020 through April 30, 2020 time period (the "First Interim Period"), that information is incorporated herein by reference as though set forth in full. For the Second Interim Fee Period covered by this Final

Application, for each of the following Debtors, BZBM has rendered services/costs in the following matters:

i. St. Vincent Medical Center: (a) General Labor, (b) Hospital Closure, (c) Elizabeth Gendron matter, (d) Eutrice Graham matter, and (e) Elizabeth Siquian matter.

ii. Seton Medical Center: (a) General Labor, (b) Robert Mahan matter, (c) Waheed Wahidi matter, (d) Oshioakpemeh Atogwe matter, (e) Jeffrey Bonifacio, and (f) Investigations.

iii. St. Francis Medical Center: (a) General Labor, (b) Investigations, (c) Diane Nguyen matter, (d) Sonnia Ahinasi matter, (e) Jasmine Aragon matter, (f) Leonard Harris matter, (g) Rosa Carcamo matter, (h) Cynthia Sorto matter, (i) Renee Capizzi matter, (j) Tricia Aliazis matter, (k) Natalie Nguyen matter, (l) Joan Martin matter, (m) Aaron Raj matter, (n) Priscilla Chukwemezie, and (o) Eddie Gonzalez.

iv. Verity Health System of California, Inc.: (a) General Labor, (b) Mesha Sanford matter, (c) Alana Dahl matter, (d) Philip Pellerin matter, (e) Bankruptcy administration (employment applications, fee statements and fee applications), (f) Mike Fayfel matter, (g) Esmeralda Garcia matter, (h) Romona Webb matter, and (i) Linda Williams matter.

v. O'Connor Hospital: (a) General Labor, (b) Denise Greenwood matter, (c) Sydney Thomson matter, and (d) Christina Makem.

vi. Richard Adcock & Steven Sharrer/VHS: CNA vs. Verity matter.

vii. Verity Medical Foundation: (a) General Labor, (b) Sofia Santiago matter, and (c) Valeria Revollo Angulo matter.

Attached as Exhibit "A" to the appended Ruda Decl. is a (i) Summary of Hours and Fees for BZBM's professionals who performed services for Debtors in connection with their chapter 11 cases during the Second Interim Fee Period and the hourly rate for each such professional, and (ii) Summary of Time, Fees and Expenses by Debtor in connection with Debtors' chapter 11 cases during the Second Interim Fee Period. Attached to the Ruda Decl. as Exhibit "B" is BZBM's firm profile/resume of the BZBM professionals who performed services for Debtors' chapter 11 cases.

Below is a summary by Debtor and matter of the services rendered by BZBM, as Debtors' special labor and employment counsel, during the Second Interim Fee Period.

1. St. Vincent Medical Center

a. General Labor

During the Second Interim Fee Period , the time spent in this category includes the following tasks: (i) general labor advice; (ii) analyze and respond to subpoena requests for documents; (iii) work on information requests; (iv) review and analyze new employee claims; (v) communications with Debtor's general bankruptcy counsel regarding ongoing case matters/claims and strategic discussions; (vi) preparation of responsive pleadings; (vii) preparation of Mediation statement; and (viii) correspondence with the carrier.

BZBM's invoices with respect to this Debtor and category of services are attached to the Ruda Decl. as Exhibit "C."

The time expended by BZBM during the Second Interim Fee Period in this category: 15.10 hours, for a total of \$6,504.50.

b. Hospital Closure

During the Second Interim Fee Period, the time spent in this category includes the following tasks: (i) general labor advice; (ii) work related to ULP filing; (iii) communications with NRLB relating to ULP determinations; and (iv) communications with Debtors regarding SEIU settlement.

BZBM's invoices with respect to this Debtor and category of services are attached to the Ruda Decl. as Exhibit "D."

The time expended by BZBM during the Second Interim Fee Period in this category: 1.10 hours, for a total of \$654.50.

c. Elizabeth Gendron Matter

During the Second Interim Fee Period, the time spent in this category includes the following tasks: (i) strategic analysis for case plan; and (ii) review and analysis of case documents.

1 BZBM's invoices with respect to this Debtor and category of services are attached to the
2 Ruda Decl. as Exhibit "E."

3 The time expended by BZBM during the Second Interim Fee Period in this category:
4 0.60 hours, for a total of \$225.00.

5 **d. Eutrice Graham Matter**

6 During the Second Interim Fee Period, the time spent in this category includes the
7 following tasks: (i) fact gathering and strategic analysis; and (ii) review and analysis of case
8 documents and projects.

9 BZBM's invoices with respect to this Debtor and category of services are attached to the
10 Ruda Decl. as Exhibit "F."

11 The time expended by BZBM during the Second Interim Fee Period in this category: 0.90
12 hours, for a total of \$425.50.

13 **e. Elizabeth Siquian Matter**

14 During the Second Interim Fee Period, the time spent in this category includes the
15 following tasks: (i) fact gathering for the claim; (ii) review and analysis of case documents; and
16 (iii) communications with insurance carrier and Debtor's general bankruptcy counsel regarding
17 claim status.

18 BZBM's invoices with respect to this Debtor and category of services are attached to the
19 Ruda Decl. as Exhibit "G."

20 The time expended by BZBM during the Second Interim Fee Period in this category: 0.70
21 hours, for a total of \$276.50.

22 **2. Seton Medical Center**

23 **a. General Labor**

24 During the Second Interim Fee Period, the time spent in this category includes the
25 following tasks: (i) general labor advice; (ii) research and fact finding concerning claims;
26 (iii) bargaining calls with AHMC and CNA; (iv) investigations; (v) calls with Debtor regarding
27 various labor issues; (vi) analysis of personnel issues, claims and production of documents;
28 (vii) strategic advice on bargaining strategy and status; (viii) preparation for 1113 negotiations,

1 and analysis/ recommendations with respect to proposed 1113 modifications; (ix) attend
2 bargaining sessions with CNA, NUHW, and Local 20; (x) review and redline collective bargaining
3 agreements; (xi) communications with buyer regarding negotiations and collective bargaining
4 agreements; (xii) analysis relating to union negotiations; (xiii) review and respond to subpoenas;
5 (xiv) conference calls/emails with labor unions; (xv) work relating to RFIs; (xvi) provide guidance
6 on meal period waiver issues; and (xvii) analysis of subpoenas and next steps.

7 BZBM's invoices with respect to this Debtor and category of services are attached to the
8 Ruda Decl. as Exhibit "H."

9 The time expended by BZBM during the Second Interim Fee Period in this category:
10 463.70 hours, for a total of \$238,549.50.

11 **b. Robert Mahan Matter**

12 During the Second Interim Fee Period, the time spent in this category includes the
13 following tasks: (i) analysis of case and fact gathering; (ii) communicate with client regarding
14 Mahan information request; and (iii) prepare analysis of documents needed for claim.

15 BZBM's invoices with respect to this Debtor and category of services are attached to the
16 Ruda Decl. as Exhibit "I."

17 The time expended by BZBM during the Second Interim Fee Period in this category: 1.90
18 hours, for a total of \$832.50.

19 **c. Waheed Wahidi Matter**

20 During the Second Interim Fee Period, the time spent in this category includes the
21 following task: (i) fact-gathering and analysis of client documents; and (ii) email client regarding
22 payroll documents.

23 BZBM's invoices with respect to this Debtor and category of services are attached to the
24 Ruda Decl. as Exhibit "J."

25 The time expended by BZBM during the Second Interim Fee Period in this category: 1.10
26 hours, for a total of \$434.50.

d. Oshioakpeme Atogwe Matter

During the Second Interim Fee Period, the time spent in this category includes the following tasks: (i) analysis of case status and fact-gathering; (ii) review of case documents and claims; (iii) correspond with DEHF agent regarding charge status; (iv) prepare chronology of events; (v) strategize regarding case with Debtor and Debtor's general bankruptcy counsel; and (vi) work on case closure.

BZBM's invoices with respect to this Debtor and category of services are attached to the Ruda Decl. as Exhibit "K."

The time expended by BZBM during the Second Interim Fee Period in this category: 11.80 hours, for a total of \$4,699.00.

e. Jeffrey Bonifacio

During the Second Interim Fee Period, the time spent in this category includes the following tasks: (i) analyze case documents and claims; (ii) communications with opposing counsel regarding labor code request; (iii) communications with client to obtain documents for labor code requests; (iv) work on labor code production; (v) strategize regarding case; and (vi) draft pleading.

BZBM's invoices with respect to this Debtor and category of services are attached to the Ruda Decl. as Exhibit "L."

The time expended by BZBM during the Second Interim Fee Period in this category: 8.00 hours, for a total of \$3,160.00.

f. Investigations

During the Second Interim Fee Period, the time spent in this category includes the following tasks: (i) investigation and fact finding relating to PACU investigation, including witness interviews; (ii) analyze documents relating to investigation; (iii) prepare investigation report; (iv) debrief client regarding investigation; and (v) communications with union regarding investigation.

BZBM's invoices with respect to this Debtor and category of services are attached to the Ruda Decl. as Exhibit "M."

1 The time expended by BZBM during the Second Interim Fee Period in this
2 category: 37.30 hours, for a total of \$22,193.50.

3 **3. St. Francis Medical Center**

4 **a. General Labor**

5 During the Second Interim Fee Period, the time spent in this category includes the
6 following tasks: (i) general labor advice; (ii) prepare for and attend UNAC and SEIU bargaining;
7 (iii) prepare bargaining notes; (iv) correspond with SEIU regarding bargaining; (v) strategize with
8 Verity Team on bargaining issues; (vi) strategize and work on information requests; (vii) analysis
9 of subpoenas, correspondence/calls regarding same, and work on related production of documents;
10 (viii) gather and analyze documents for 1113 motion; (ix) prepare/revise pleadings in support of
11 1113 motion; (x) various calls with Debtor's general bankruptcy counsel to discuss case strategy,
12 bargaining status, NLRB charge, information requests, and other labor matters; (xi) legal research
13 concerning employee privacy issues, prepare write-up of privacy analysis, and call with client to
14 discuss same; (xii) revisions to settlement agreements; (xiii) legal research and analysis of union
15 issues, and draft summary of same; (xiv) attend Prime/UNAC negotiation, and facilitate
16 settlement; (xv) legal research and prepare analysis of authorization, disclosure, and notice
17 requirements in criminal matters; (xvi) work on mediation brief; (xvii) preparation for and attend
18 1113 hearing; (xviii) work on RFI tracker; (xix) prepare client memo relating to investigation
19 reports; (xx) communications with Debtor's general bankruptcy counsel on claim issues;
20 (xxi) work on employee accommodation request; (xxii) correspondence with UNAC re HIPAA
21 release; (xxiii) work on grievance claim; (xxiv) work on labor code requests; and (xxv) calls with
22 client regarding transition issues.

23 BZBM's invoices with respect to this Debtor and category of services are attached to the
24 Ruda Decl. as Exhibit "N."

25 The time expended by BZBM during the Second Interim Fee Period in this category:
26 575.60 hours, for a total of \$299,096.00.

b. Investigations

During the Second Interim Fee Period, the time spent in this category includes the following tasks: (i) investigation and fact finding concerning claims, including witness interviews; (ii) analyze documents for investigations; (iii) prepare summary of witness interviews; (iv) communication with client regarding investigations; and (v) correspond with counsel regarding investigation.

BZBM's invoices with respect to this Debtor and category of services are attached to the Ruda Decl. as Exhibit "O."

The time expended by BZBM during the Second Interim Fee Period in this category: 22.60 hours, for a total of \$9,987.00.

c. Diane Nguyen Matter

During the Second Interim Fee Period, the time spent in this category includes the following tasks: (i) analysis of client documents; (ii) draft pleading; (iii) prepare CMC and attend CMC hearing; and (iv) communications with Debtor's general bankruptcy counsel regarding case matters.

BZBM's invoices with respect to this Debtor and category of services are attached to the Ruda Decl. as Exhibit "P."

The time expended by BZBM during the Second Interim Fee Period in this category: 1.80 hours, for a total of \$731.00.

d. Sonnia Ahinasi Matter

During the Second Interim Fee Period, the time spent in this category includes the following tasks: (i) analysis of case and gather documents; (ii) communicate with Debtor's general bankruptcy counsel concerning this matter; (iii) preparation of record keeping request; and (iv) attention to court deadlines.

BZBM's invoices with respect to this Debtor and category of services are attached to the Ruda Decl. as Exhibit "Q."

The time expended by BZBM during the Second Interim Fee Period in this category: 3.70 hours, for a total of \$1,441.50.

e. Jasmine Aragon Matter

During the Second Interim Fee Period, the time spent in this category includes the following tasks: (i) fact-gathering and related analysis; (ii) review client documents; (iii) preparation of CMC; and (iv) correspond with Debtor regarding client documents.

BZBM's invoices with respect to this Debtor and category of services are attached to the Ruda Decl. as Exhibit "R."

The time expended by BZBM during the Second Interim Fee Period in this category: 2.20 hours, for a total of \$849.00.

f. Leonard Harris Matter

During the Second Interim Fee Period, the time spent in this category includes the following tasks: (i) correspondence with insurance carrier regarding case and pending issues; (ii) correspondence and strategy relating to mediation issues; (iii) work on mediation brief and related exhibits; (iv) correspondence with Debtors' general bankruptcy counsel and Debtors concerning case issues; (v) analyze client documents; (vi) prepare CMC; (vii) strategize regarding work relating to fact-gathering; (viii) call with client relating to mediation and settlement authority; (ix) represent client at mediation; (x) prepare settlement agreement; and (xi) work on dismissal and withdrawal.

BZBM's invoices with respect to this Debtor and category of services are attached to the Ruda Decl. as Exhibit "S."

The time expended by BZBM during the Second Interim Fee Period in this category: 78.70 hours, for a total of \$36,066.50.

g. Rosa Carcamo Matter

During the Second Interim Fee Period, the time spent in this category includes the following tasks: (i) update exposure analysis and communications with insurance carrier regarding same; (ii) work on mediation brief; (iii) negotiate settlement; (iv) work on settlement agreement and redlines; (v) communications with opposing counsel relating to settlement; (vi) communicate with Debtors' general bankruptcy counsel concerning case status and next steps;

(vii) prepare joint stipulation for CMC; (viii) attend CMC hearing; (ix) communications regarding mediator and mediation; and (x) review of client documents.

BZBM's invoices with respect to this Debtor and category of services are attached to the Ruda Decl. as Exhibit "T."

The time expended by BZBM during the Second Interim Fee Period in this category: 27.50 hours, for a total of \$13,188.50.

h. Cynthia Sorto Matter

During the Second Interim Fee Period, the time spent in this category includes the following tasks: (i) prepare discovery requests; (ii) communicate with Debtor concerning discovery matters; (iii) investigation and fact gathering concerning claims, including witness interviews; (iv) prepare witness summaries; (v) revise deposition notice; (vi) work on and gather discovery documents; (vii) prepare case exposure analysis; (viii) prepare responses to discovery; (ix) coordinate with plaintiff's counsel regarding discovery scheduling and deadlines; (x) prepare documents for production; (xi) analyze plaintiff's responses to discovery; (xii) communicate with insurance carrier regarding pending matters; (xiii) draft objections to deposition notice; (xiv) meet and confer communications with plaintiff's counsel regarding discovery and settlement; (xv) research and draft analysis of discovery issues; (xvi) prepare privilege log; (xvii) work on supplemental discovery responses and production of documents; and (xviii) prepare protective order.

BZBM's invoices with respect to this Debtor and category of services are attached to the Ruda Decl. as Exhibit "U."

The time expended by BZBM during the Second Interim Fee Period in this category: 125.70 hours, for a total of \$52,277.50.

i. Renee Capizzi Matter

During the Second Interim Fee Period, the time spent in this category includes the following tasks: (i) correspondence with plaintiff's counsel regarding potential case resolution; (ii) gathering and analysis of case documents and WC deposition; (iii) prepare case memorandum for client; and (iv) strategize regarding potential settlement.

1 BZBM's invoices with respect to this Debtor and category of services are attached to the
2 Ruda Decl. as Exhibit "V."

3 The time expended by BZBM during the Second Interim Fee Period in this category:
4 5.10 hours, for a total of \$2,874.50.

5 **j. Tricia Aliazis Matter**

6 During the Second Interim Fee Period, the time spent in this category includes the
7 following tasks: (i) analysis of case claims; (ii) analyze and gather client documents; (iii) email
8 DFEH investigator regarding case; and (iv) review DFEH case closure notice.

9 BZBM's invoices with respect to this Debtor and category of services are attached to the
10 Ruda Decl. as Exhibit "W."

11 The time expended by BZBM during the Second Interim Fee Period in this category: 0.70
12 hours, for a total of \$276.50.

13 **k. Natalie Nguyen Matter**

14 During the Second Interim Fee Period, the time spent in this category includes the
15 following tasks: (i) analyze and gather client documents; (ii) draft pleading; (iii) communicate
16 with Debtor's general bankruptcy counsel concerning CMS, new lawsuit, stay of proceedings, and
17 bankruptcy court ruling; (iv) correspondence with insurance carrier regarding lawsuit and case
18 defense; (v) draft settlement agreement; and (vi) communicate with Debtor and Debtors' counsel
19 regarding settlement terms.

20 BZBM's invoices with respect to this Debtor and category of services are attached to the
21 Ruda Decl. as Exhibit "X."

22 The time expended by BZBM during the Second Interim Fee Period in this category:
23 11.30 hours, for a total of \$4,443.50.

24 **l. Joan Martin Matter**

25 During the Second Interim Fee Period, the time spent in this category includes the
26 following tasks: (i) draft analysis of documents needed for claim.

27 BZBM's invoices with respect to this Debtor and category of services are attached to the
28 Ruda Decl. as Exhibit "Y."

1 The time expended by BZBM during the Second Interim Fee Period in this category: 0.30
2 hours, for a total of \$112.50.

3 **m. Aaron Raj Matter**

4 During the Second Interim Fee Period, the time spent in this category includes the
5 following tasks: (i) update case analysis; (ii) review DLSE claim and strategize regarding
6 response; (iii) communicate with Debtor and Debtor's general bankruptcy counsel regarding case;
7 (iv) prepare letter to DLSE and supporting exhibits; (v) review worker's compensation documents;
8 (vi) prepare worker's compensation certificate; and (vii) work relating to case closure.

9 BZBM's invoices with respect to this Debtor and category of services are attached to the
10 Ruda Decl. as Exhibit "Z."

11 The time expended by BZBM during the Second Interim Fee Period in this category: 7.80
12 hours, for a total of \$3,131.00.

13 **n. Priscilla Chukwumezie Matter**

14 During the Second Interim Fee Period, the time spent in this category includes the
15 following tasks: (i) analysis of charge documents; (ii) email insurance carrier regarding case;
16 (iii) correspondence with Debtor's general bankruptcy counsel regarding claim; (iv) analyze client
17 documents; (v) analysis of case and needed fact-gathering; (vi) correspondence with EEOC officer
18 and investigative officer regarding position statement; and (vii) draft letter to EEOC appealing
19 denial.

20 BZBM's invoices with respect to this Debtor and category of services are attached to the
21 Ruda Decl. as Exhibit "AA."

22 The time expended by BZBM during the Second Interim Fee Period in this category 5.40
23 hours, for a total of \$2,133.00.

24 **o. Eddie Gonzalez Matter**

25 During the Second Interim Fee Period, the time spent in this category includes the
26 following tasks: (i) finalize labor code production; (ii) finalize earnings history production; and
27 (iii) email opposing counsel regarding labor code request.

1 BZBM's invoices with respect to this Debtor and category of services are attached to the
2 Ruda Decl. as Exhibit "AB."

3 The time expended by BZBM during the Second Interim Fee Period in this category 1.0
4 hours, for a total of \$395.00.

5 **4. Verity Health System of California, Inc.**

6 **a. General Labor Matter**

7 During the Second Interim Fee Period, the time spent in this category includes the
8 following tasks: (i) general labor advice; (ii) draft IC agreement, and correspondence regarding
9 same; (iii) analysis of employee agreements; (iv) research regarding LOA issues, and draft
10 summary of issues for client; (v) work on pending subpoena requests; (vi) prepare analysis of
11 background check issue; (vii) calls with Debtor and Debtor's general counsel regarding bargaining
12 status and 1113 strategy; (viii) revise KEIP agreement; (ix) prepare client memorandum for CA
13 workshare plans; (x) calls with Debtor regarding pending investigations and litigation; (xi) prepare
14 declaration and exhibits; (xii) draft 19 KERP plan agreements; (xiii) analysis of lawsuit status and
15 pending issues; (xiv) work on information requests; (xv) work on protocols and insurance carrier
16 notices regarding WARN; (xvi) work on analysis of recommendations for subpoenas;
17 (xvii) strategize regarding pending litigation; (xviii) call with client regarding grievances,
18 union/labor status and other personnel matters; (xix) prepare exhibits for Omnibus Reply and
19 Supplemental Brief in Support of Motions under § 1113; (xx) communications with carrier
20 regarding insurance issues; (xxi) work on RIF agreement; (xxii) update master chart regarding
21 litigation and case progress; (xxiii) review DLSE response; (xxiv) research and analysis of final
22 pay issues, and prepare summary of same; (xxv) draft separation agreements; (xxvi) prepare
23 independent contractor agreements; and (xxvii) coordinate with client on transition items.

24 BZBM's invoices with respect to this Debtor and category of services are attached to the
25 Ruda Decl. as Exhibit "AC."

26 The time expended by BZBM during the Second Interim Fee Period in this category:
27 202.20 hours, for a total of \$92,565.00.

28

b. Mesha Sanford Matter

During the Second Interim Fee Period, the time spent in this category includes the following tasks: (i) prepare documents requests; (ii) analyze client documents; (iii) analysis of issues relating to individual defendant; (iv) prepare responsive pleadings for VHS and the individual defendant; (v) prepare deposition notice; (vi) call with individual defendant regarding case and facts; (vii) prepare CMC and attend hearing; (viii) meet and confer with plaintiff's counsel regarding case issues and discovery; (ix) work on and gather discovery materials; and (x) preparation of case exposure analysis.

BZBM's invoices with respect to this Debtor and category of services are attached to the Ruda Decl. as Exhibit "AD."

The time expended by BZBM during the Second Interim Fee Period in this category: 38.00 hours, for a total of \$16,370.00.

c. Alana Dahl Matter

During the Second Interim Fee Period, the time spent in this category includes the following tasks: (i) analysis of case and pleading matters; (ii) analysis of contracts between PE and client; (iii) communicate with Debtors' general bankruptcy counsel concerning pending issues; (iv) analysis of case documents; and (v) analysis and work on settlement and release.

BZBM's invoices with respect to this Debtor and category of services are attached to the Ruda Decl. as Exhibit "AE."

The time expended by BZBM during the Second Interim Fee Period in this category: 6.70 hours, for a total of \$3,186.50.

d. Philip Pellerin Matter

During the Second Interim Fee Period, the time spent in this category includes the following tasks: (i) fact-gathering and analysis of case claims; (ii) review and respond to DFEH letter re charge; and (iii) update client regarding DFEH charge.

BZBM's invoices with respect to this Debtor and category of services are attached to the Ruda Decl. as Exhibit "AF."

1 The time expended by BZBM during the Second Interim Fee Period in this category: 2.70
2 hours, for a total of \$1,130.50.

3 **e. Bankruptcy Administration**

4 During the Second Interim Fee Period , the time spent in this category includes the
5 following tasks: (i) preparation of four monthly fee statements/applications with respect to the
6 months of May 1, 2020 through September 4, 2020; (ii) communications with Debtors' counsel
7 and the Office of the United States Trustee concerning the above; (iii) preparation of BZBM's
8 First Interim Application for approval and payment of fees and expenses, including supporting
9 declarations; (iv) review court's tentative ruling regarding interim fee applications; and (v) work
10 relating to the order on interim fee applications.

11 BZBM's invoices with respect to this Debtor and category of services are attached to the
12 Ruda Decl. as Exhibit "AG."

13 The time expended by BZBM during the Second Interim Fee Period in this category: 60.70
14 hours, for a total of \$23,802.50.

15 **f. Mike Fayfel Matter**

16 During the Second Interim Fee Period, the time spent in this category includes the
17 following tasks: (i) review carrier letter; and (ii) email client regarding coverage.

18 BZBM's invoices with respect to this Debtor and category of services are attached to the
19 Ruda Decl. as Exhibit "AH."

20 The time expended by BZBM during the Second Interim Fee Period in this category:
21 hours, 0.20 for a total of \$79.00.

22 **g. Esmeralda Garcia Matter**

23 During the Second Interim Fee Period, the time spent in this category includes the
24 following task: (i) analyze and summarize documents for case plan.

25 BZBM's invoices with respect to this Debtor and category of services are attached to the
26 Ruda Decl. as Exhibit "AI."

27 The time expended by BZBM during the Second Interim Fee Period in this category:
28 hours, 1.50 for a total of \$562.50.

1 **h. Romona Webb Matter**

2 During the Second Interim Fee Period, the time spent in this category includes the
3 following tasks: (i) Review and analysis of EEOC charge; (ii) communicate with client regarding
4 EEOC charge; (iii) review and analysis of Kforce agreements; (iv) review and respond to carrier
5 regarding EEOC charge; (v) work on tender letter and exhibits; (vi) draft pleading; and
6 (vii) review and respond to case closure letter, and update client regarding case status.

7 BZBM's invoices with respect to this Debtor and category of services are attached to the
8 Ruda Decl. as Exhibit "AJ."

9 The time expended by BZBM during the Second Interim Fee Period in this category:
10 hours, 4.60 for a total of \$1,817.00.

11 **i. Linda Williams Matter**

12 During the Second Interim Fee Period, no amounts were charged for legal services.
13 However, BZBM had expenses for Expert Services rendered in the amount of \$10,409.31.

14 BZBM's invoices with respect to this Debtor and costs are attached to the Ruda Decl. as
15 Exhibit "AK."

16 **5. O'Connor Hospital**

17 **a. General Labor**

18 During the Second Interim Fee Period, the time spent in this category includes the
19 following tasks: (i) review of subpoenas and work on related action items; (ii) meet and confers
20 relating to subpoenas; (iii) prepare custodian declaration, and communications relating to same;
21 (iv) analysis of claims and next steps; (v) gather and review documents for claim; (vi) work on
22 labor code request; (vii) communications with insurance carrier regarding claims and case status;
23 (viii) work on grievance issues; (ix) analysis of settlement demand letter, and related
24 communications; and (x) email client case updates.

25 BZBM's invoices with respect to this Debtor and category of services are attached to the
26 Ruda Decl. as Exhibit "AL."

27 The time expended by BZBM during the Second Interim Fee Period in this category: 9.50
28 hours, for a total of \$3,812.50.

b. Denise Greenwood Matter

During the Second Interim Fee Period, the time spent in this category includes the following tasks: (i) analysis of case file and DFEH response; (ii) review correspondence from opposing counsel; (iii) communicate with Debtor's general bankruptcy counsel regarding case matters; (iv) communications with insurance carrier regarding case status; (v) review and respond to email from plaintiff's counsel regarding possible mediation; and (vi) analyze client documents.

BZBM's invoices with respect to this Debtor and category of services are attached to the Ruda Decl. as Exhibit "AM."

The time expended by BZBM during the Second Interim Fee Period in this category: 6.50 hours, for a total of \$2,927.50.

c. Sydney Thomson Matter

During the Second Interim Fee Period, the time spent in this category includes the following tasks: (i) analysis of case strategy; (ii) work on stipulation for continuance of mediation; (iii) analysis and evaluation of proposed mediator, and communications relating to mediator selection; (iv) prepare status summary; (v) communicate with plaintiff's counsel regarding discovery requests; (vi) update insurance carrier regarding case, and provide status report; (vii) analyze claim and related documents; (viii) draft document related to anticipated mediation; (ix) communicate with Debtor regarding case matters; (x) analysis of fact-gathering and case strategy for mediation; and (xi) work relating to potential witness interviews.

BZBM's invoices with respect to this Debtor and category of services are attached to the Ruda Decl. as Exhibit "AN."

The time expended by BZBM during the Second Interim Fee Period in this category: 52.70 hours, for a total of \$22,466.50.

d. Christina Makem Matter

During the Second Interim Fee Period, the time spent in this category includes the following tasks: (i) analysis of liability regarding Makem; (ii) communicate with Debtor and Debtor's general counsel regarding case; (iii) correspond with DFEH investigator regarding charge; (iv) communicate with insurance carrier regarding coverage and case; (v) analyze client

documents and APA; (vi) work on position statement and related fact-gathering; and (vii) draft hold letter to County counsel.

BZBM's invoices with respect to this Debtor and category of services are attached to the Ruda Decl. as Exhibit "AO."

The time expended by BZBM during the Second Interim Fee Period in this category: 21.60 hours, for a total of \$8,852.00.

6. Richard Adcock & Steven Sharrer/Verity Health Systems of CA

a. CNA vs Verity

During the Second Interim Fee Period, the time spent in this category includes the following tasks: (i) work on opposition to withdrawal motion; (ii) research regarding withdrawal of reference; (iii) communicate with Debtors and Debtor's general bankruptcy counsel regarding defense strategy and mediation issues; (iv) work on reply for motion to dismiss; (v) coordinate with Debtor's general bankruptcy counsel on briefing and stay of action to accommodate mediation; (vi) analysis and evaluation of proposed mediator and mediation dates; (vii) review documents requested by insurance carrier; (viii) prepare exposure analysis for mediation; (ix) draft mediation statement; (x) research relating to mediation statement; (xi) attend mediation; (xii) revisions to term sheet and communications relating to same; (xiii) mediation session relating to term sheet; (xiv) review of proposed settlement agreement; (xv) review of 9019 motion; and (xvi) redline of release.

BZBM's invoices with respect to this Debtor and category of services are attached to the Ruda Decl. as Exhibit "AP."

The time expended by BZBM during the Second Interim Fee Period in this category: 121.20 hours, for a total of \$71,874.00.

7. Verity Medical Foundation

a. General Labor

During the Second Interim Fee Period, the time spent in this category includes the following tasks: (i) communications regarding Rodriguez subpoena; (ii) analysis of new wage and hour claims; (iii) communicate with Debtor regarding claims and subpoenas; (iv) work on DSLE

1 letter and exhibits; (v) fact-gathering relating to claims; (vi) analyze client documents; (vii) review
2 and analysis of Best subpoena, and follow-up regarding same; and (viii) work relating to motion to
3 compel.

4 BZBM's invoices with respect to this Debtor and category of services are attached to the
5 Ruda Decl. as Exhibit "AQ."

6 The time expended by BZBM during the Second Interim Fee Period in this category: 13.30
7 hours, for a total of \$5,253.50.

8 **b. Sofia Santiago Matter**

9 During the Second Interim Fee Period, the time spent in this category includes the
10 following tasks: (i) communicate with Debtor's general bankruptcy counsel regarding claims;
11 (ii) draft letter to DLSE regarding claims; (iii) analyze client documents and determine potential
12 exhibits relevant to claim; (iv) research and analysis regarding waiting time penalties; (v) draft
13 response letter to DLSE regarding Santiago claim; and (vi) strategize regarding claim.

14 BZBM's invoices with respect to this Debtor and category of services are attached to the
15 Ruda Decl. as Exhibit "AR."

16 The time expended by BZBM during the Second Interim Fee Period in this category: 7.60
17 hours, for a total of \$3,002.00.

18 **c. Valeria Revollo Angulo Matter**

19 During the Second Interim Fee Period, the time spent in this category includes the
20 following tasks: (i) review carrier response regarding Angulo case; and (ii) communicate with
21 Debtor's general bankruptcy counsel regarding Angulo case.

22 BZBM's invoices with respect to this Debtor and category of services are attached to the
23 Ruda Decl. as Exhibit "AS."

24 The time expended by BZBM during the Second Interim Fee Period in this category: 0.20
25 hours, for a total of \$79.00.

C. Detailed Listing of All Time Spent by the Professional on the Matters for Which Compensation is Sought During the Second Interim Fee Period

The recorded time devoted by BZBM and the fees incurred during the Second Interim Fee Period in performing its duties as the Debtors' special labor and employment counsel are detailed in Exhibit "C" to and through Exhibit "AS" appended to the Ruda Decl.

D. Costs and Summary of Expenses

1. Costs Incurred During the Second Interim Fee Period

The costs incurred by BZBM during the Second Interim Fee Period are included and itemized in the invoices which make up Exhibits "C" through "AS" to the Ruda Decl. BZBM has made every effort to limit the cost of expenses and to use the most economical means available for accomplishing the tasks requiring expenditures. Costs are reflected on invoices when they are entered into BZBM's computerized accounting system and do not necessarily reflect the date costs were incurred. BZBM believes that all expenses that BZBM advanced on behalf of the Debtors were necessarily incurred and are properly charged as administrative expenses of the estate. Below is a summary of expenses by category:

Category	Amount
Federal Express	\$34.48
Expert Services	\$10,409.31
Court Service and Filing Fees	\$1,068.90
TOTAL =	\$11,512.69

Federal Express mail was used for filings and other necessary deliveries that were not adequate via regular postage. Expert service fees were paid for services rendered. Court service and filing fees were incurred with respect to Court filings.

E. Hourly Rates

The hourly rates of all professionals and paralegals rendering services in this case during the Second Interim Fee Period are set forth as part of Exhibit "A" to the Ruda Decl. and are billed at the attorney's normal hourly rate.

1 **F. Description of Professionals' Education and Experience**

2 BZBM is a San Francisco based law firm that employs approximately 45 attorneys who
3 practice law in, among other fields, labor and employment, business litigation, class actions,
4 enforcement and data privacy, franchise and distribution, intellectual property litigation, patent
5 litigation, real estate litigation, trade secret litigation, trademark litigation, transactional real estate,
6 and trust and estate litigation.

7 Attached to the Ruda Decl. as Exhibit "B" are the biographies of the professionals and
8 paralegals employed by BZBM who rendered services in this case.

9 **III. LEGAL ARGUMENT**

10 **A. Compensation Standards Generally**

11 The legal standard used by a bankruptcy court to determine the allowance of fees involves
12 statutory interpretation and construction of Bankruptcy Code § 330(a). Section 330(a)(1)
13 authorizes "reasonable compensation for actual, necessary services rendered" by a professional.
14 Section 330(a)(3) outlines factors a court should consider when determining what is reasonable
15 compensation for services rendered.³

16 BZBM believes all services which it rendered were reasonable, actual and necessary.
17 Section 330(a)(1)(A). In addition, BZBM believes all services which it rendered were "reasonably
18 likely to benefit the debtor's estate." *See* Section 330(a)(4).⁴

19
20 ³ Section 330(a)(3) provides:

21 In determining the amount of reasonable compensation to be awarded, the court shall
22 consider the nature, the extent, and the value of such services, taking into account all relevant
23 factors, including –

- 23 (A) the time spent on such services;
24 (B) the rates charged for such services;
25 (C) whether the services were necessary to the administration of, or beneficial at the
26 time at which the service was rendered toward the completion of, a case under this title; and
27 (D) whether the services were performed within a reasonable amount of time
28 commensurate with the complexity, importance, and nature of the problem, issue, or task
addressed.

⁴ Section 330(a)(4), a section which outlines when compensation should not be allowed, states in

1 Thus, BZBM believes the question which the Court will answer is what legal standard
2 should be used to determine whether its services were “necessary” or “beneficial” to the estate?
3 The question is answered in this circuit by the guidance provided by *In re Auto Parts Club, Inc.*,
4 211 B.R. 29 (B.A.P. 9th Cir. 1999); accord, *In re Mednet*, 251 B.R. 103 (B.A.P. 9th Cir. 2000)
5 (“*Mednet*”). The “standard is an objective one as to whether the fees were reasonable and
6 necessary at the time they were incurred.” *In re Auto Parts Club, Inc.*, 211 B.R. at 35; *Mednet*,
7 251 B.R. at 107. Thus, *Mednet* provides: “[t]he statute does not require that the services result in
8 a material benefit to the estate in order for the professional to be compensated; the applicant must
9 demonstrate only that the services were ‘reasonably likely’ to benefit the estate at the time the
10 services were rendered. The statute is clear and unambiguous.” *Id.* at 108. *Mednet* then goes on
11 to explain the analysis of how this is accomplished:

12 A bankruptcy court also must examine the circumstances and the manner in which
13 services are performed and the results achieved in order to arrive at a determination
14 of a reasonable fee allowance. Such examination, in general, should include the
15 following questions: First, were the services authorized? Second, were the
16 services necessary or beneficial to the administration of the estate at the time they
17 were rendered? Third, are the services adequately documented? Fourth, are the
18 fees requested reasonable, taking into consideration the factors set forth in
19 § 330(a)(3)? [citation omitted].

20 Finally, in making this determination, the court must take into consideration whether the
21 professional exercised reasonable billing judgment. *Id.* at 108. *Mednet* cites to *Unsecured*

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pertinent part:

... the court shall not allow compensation for –
(ii) services that were not –
(I) reasonably likely to benefit the debtor’s estate;

...
BZBM assumes the court must make two findings – one positive and one negative (albeit a
“double” negative). The positive finding is that the services were “actual and necessary” under
Section 330(a)(1). The “double” negative is that the services were not reasonably likely not to
benefit the debtor’s estate under Section 330(a)(4). The double negative is better phrased as a
positive: the court should find that the services were reasonably likely to benefit the debtor’s
estate. See *In re Mednet*, 251 B.R. 103, 105 (B.A.P. 9th Cir. 2000).

1 *Creditors' Comm. v. Puget Sound Plywood, Inc.*, 924 F.2d 944, 957-58 (9th Cir. 1991) regarding
2 the requirement that a professional use reasonable billing judgment.

3 **B. The Fees and Expenses Requested Should Be Awarded Based Upon**
4 **Applicable Law**

5 The fees and expenses requested by this Final Application are an appropriate award for
6 BZBM's services in acting as special labor and employment counsel to the Debtors.

7 **1. Factors in Evaluating Requests for Compensation**

8 As set forth above, pursuant to Section 330 of the Bankruptcy Code, the Court may award
9 to a professional person reasonable compensation for actual, necessary services rendered and
10 reimbursement for actual, necessary expenses incurred. As further set forth above, the fees for
11 which BZBM requests compensation and the costs incurred for which BZBM requests
12 reimbursement are for actual and necessary services rendered and costs incurred.

13 The professional services rendered by BZBM have required an expenditure of substantial
14 time and effort. BZBM professionals spent in excess of 1,960.90 hours with respect to various
15 labor and employment matters for Debtors. While certain of the work done by BZBM in the case
16 was done by senior lawyers, much of the work was delegated to attorneys at lower billing rates.
17 While this may result in a higher blended hourly rate, the effectiveness of not having multiple
18 attorneys involved in each matter resulted in lower overall fees and also was appropriate based on
19 the nature and scope of the work involved which BZBM believes was handled efficiently and
20 effectively.

21 **2. The Lodestar Award Should be Calculated Multiplying a Reasonable**
22 **Hourly Rate Times the Hours Expended**

23 In determining the amount of allowable fees under Section 330(a), courts are to be guided
24 by the same "general principles" as are applied in determining awards under the federal fee-
25 shifting statutes, with "some accommodation to the peculiarities of bankruptcy matters." *In re*
26 *Manoa Finance Co., Inc.*, 853 F.2d 687, 691 (9th Cir. 1988); *see also Meronk v. Arter & Hadden,*
27 *LLP*, 249 B.R. 208, 213 (B.A.P. 9th Cir. 2000).

Twelve factors relevant to determining such fees were initially identified in *Johnson v. Georgia Highway Express, Inc.*, 488 F.2d 714, 717-19 (5th Cir. 1974) (“*Johnson*”), a Title VII class action case under the Civil Rights Act of 1964, 42 U.S.C. § 2000e *et seq.* and *Kerr v. Screen Extras Guild, Inc.*, 526 F.2d 67, 70 (9th Cir. 1975) (“*Kerr*”), cert. denied, 425 U.S. 951 (1976): (1) the time and labor required, (2) the novelty and difficulty of the questions, (3) the skill requisite to perform the legal service properly, (4) the preclusion of other employment by the attorney due to acceptance of the case, (5) the customary fee, (6) whether the fee is fixed or contingent, (7) time limitations imposed by the client or the circumstances, (8) the amount involved and the results obtained, (9) the experience, reputation, and ability of the attorneys, (10) the undesirability of the case, (11) the nature and length of the professional relationship with the client and (12) awards in similar cases. While the *Johnson* and *Kerr* courts only offered guidelines as to relevant factors, thereafter, the Supreme Court, in enunciating guidelines to determine reasonable fees under the Civil Rights Attorney’s Fees Award Act of 1976, 42 U.S.C. § 1988, held:

The initial estimate of a reasonable attorney’s fee is properly calculated by multiplying the number of hours reasonably expended on the litigation times a reasonable hourly rate. Adjustments to that fee then may be made as necessary in the particular case. *Blum vs. Stenson*, 465 U.S. 886 (1984).

This is the “lodestar” calculation. Furthermore, the Supreme Court more explicitly indicated that the factors relevant to determining fees should be applied using the lodestar approach, rather than an *ad hoc* approach. In fact, while holding that the attorney’s fee provision of the Clean Air Act, 42 U.S.C. § 7401 *et seq.*, should be interpreted like that of the Civil Rights Act, the Supreme Court expressly rejected the *ad hoc* application of the factors set forth in the *Johnson* and *Kerr*, stating that, “the lodestar figure includes most, if not all, of the relevant factors constituting a ‘reasonable’ attorney’s fee . . .” *Pennsylvania v. Delaware Valley Citizens’ Council for Clean Air*, 487 U.S. 546, 563-66 (1986).

Thus, while the lodestar approach is the primary basis for determining fee awards under the federal fee-shifting statutes and under the Bankruptcy Code, the other factors, previously applied in an *ad hoc* fashion, still apply in calculating the appropriate hourly rate to use under the

1 lodestar approach. *In re Charles Russell Buckridge, Jr.*, 367 B.R. 191, 201 (C.D. Cal. 2007) (“a
2 court is permitted to adjust the lodestar up or down using a ‘multiplier’ based on the criteria listed
3 in § 330 and its consideration of the *Kerr* factors not subsumed within the initial calculations of
4 the lodestar.”) For example, although the Sixth Circuit rejected an approach to fees (in chapter 13
5 cases) which dictated that only a “normal and customary” fee should be awarded absent
6 exceptional results, the Sixth Circuit nonetheless acknowledged that:

7 The court can legitimately take into account the typical compensation that is
8 adequate for attorney’s fees in Chapter 13 cases, as long as it expressly discusses
9 these factors in light of the reasonable hours worked and a reasonable hourly rate.
10 The bankruptcy court also may exercise its discretion to consider other factors such
11 as the novelty and difficulty of the issues, the special skills of counsel, the results
12 obtained, and whether the fee awarded is commensurate with fees for similar
13 professional services in non-bankruptcy cases in the local area. *In re Boddy*, 950
14 F.2d 334, 338 (6th Cir. 1991).

15 Thus, the twelve factors cited in *Johnson* and *Kerr* remain relevant to the lodestar analysis.

16 **a. The Time and Labor Required**

17 The time for which compensation is sought is set forth in detail in BZBM’s professional
18 fee statement contained in Exhibits “C” through “AS” attached hereto. In light of the scope of
19 services rendered and the demands of the case, BZBM’s services and time expenditures are
20 reasonable.

21 **b. The Novelty and Difficulty of the Questions Involved**

22 The novelty and difficulty of the questions presented in this case involve issues regarding
23 complex employment and labor issues, including union bargaining and litigation of employment
24 claims. *See also* Section II.B. *supra*.

25 **c. The Skill Requisite to Perform the Legal Services Properly**

26 BZBM believes its professionals have exhibited the high level of skill required to represent
27 the interests of the Debtors’ estates. BZBM has addressed the complex employment and labor
28 issues for which it has been engaged and progress is being made in connection with the matters for
29 which it has been engaged.

d. The Preclusion of Other Employment by the Attorney Due to the Acceptance of the Case

BZBM's senior attorneys played a major role in BZBM's representation of the Debtors in these cases, clearly precluding the acceptance of alternative employment as to the many hours worked.

e. The Customary Fee

The hourly rates being charged by BZBM's professionals in these cases are their normal and standard hourly rates.

f. Whether the Fee is Fixed or Contingent

BZBM seeks fixed compensation based on the lodestar formula which it believes is appropriate in this case. This is consistent with the expectation of BZBM and the Debtors.

g. Time Limitations Imposed by the Circumstances

As set forth herein, the time limitations imposed upon BZBM professionals have been significant.

h. The Amount Involved and the Results Obtained

The case and the matters being handled by BZBM is progressing towards a favorable and desired outcome, based, in part, upon the efforts put forth by BZBM professionals.

i. The Experience, Reputation and Abilities of the Firm

The experience, reputation and abilities of BZBM's attorneys are well known and respected in this community.

j. The Undesirability of This Case

This case is not undesirable.

k. Awards in Similar Cases

The award BZBM seeks in this case is similar to awards that BZBM has received in similar cases. Exhibits "C" through "AS" are copies of the Firm's time reports and records kept in the regular course of business reflecting the services rendered and the expenses incurred by BZBM during the case. BZBM's time reports are initially handwritten on timesheets or entered into a computer program by the attorney or paralegal performing the described services. The time

1 reports are organized on a daily basis. BZBM is sensitive to issues of “lumping” and, unless time
2 was spent in one time frame on a variety of different matters, separate time entries are set forth in
3 the time reports. BZBM’s charges for its professional services are based upon the time, nature,
4 extent and value of such services and the cost of comparable services in this area, other than in a
5 case under the Bankruptcy Code.

6 **IV. BZBM’S REQUEST FOR FEES AND COSTS SHOULD BE APPROVED**

7 BZBM believes this Final Application complies with all statutory guidelines and court-
8 imposed requirements respecting fee applications.

9 Pursuant to Section 330 of the Bankruptcy Code, the Court may award to professional
10 persons employed under section 327 reasonable compensation for the actual, necessary services
11 rendered and reimbursement for the actual, necessary expenses incurred. BZBM believes the
12 amount sought in this Final Application for the January 9, 2020 through September 4, 2020 time
13 period is reasonable for the professional services performed by BZBM on behalf of the Debtors.
14 BZBM believes that the services that BZBM has rendered constitute necessary and appropriate
15 services incident to representation of the Debtors, and is within the scope of the work authorized
16 by the Order authorizing employment of BZBM. Other than members of BZBM, BZBM has no
17 agreement to share any of the fees which may be awarded to it in this Final Application.
18 Therefore, for the reasons set forth above, BZBM respectfully submits that the foregoing
19 establishes that BZBM’s requested fees and expenses are reasonable and appropriate and should
20 be approved by this Court.

21 BZBM has arranged for a copy of this Final Application to be served on counsel for the
22 Post Effective Date Debtors, the Liquidating Trustee, and upon the Office of the United States
23 Trustee. The Notice of this Final Application will be given and served by counsel for the Post
24 Effective Date Debtors, pursuant to the applicable Orders of this Court. Debtors have been
25 requested to execute a declaration approving the amounts sought by this Final Application.
26 BZBM will file such declaration prior to the hearing on this Final Application or provide the Court
27 with an explanation as to why such declaration could not be filed.

V. CONCLUSION

BZBM believes it has herein complied with all statutory guidelines and court-imposed requirements relating to applications for compensation and reimbursement of costs. Accordingly, BZBM believes that it should be awarded the amounts requested herein.

WHEREFORE, BZBM prays that the Court enter its Order:

1. Approving BZBM's requested compensation for services rendered and expenses incurred during the Second Interim Fee Period in the amount of \$974,250.69, comprising fees of \$962,738.00 and expenses of \$11,512.69; and
2. Authorizing and directing payment to BZBM of the allowed and unpaid Second Interim Fee Period compensation in the amount of \$346,588.11 (subject to reduction if payment of \$154,040.51 has been made by the date of the hearing, in which case the balance due would be \$192,547.60); and
3. Approving on a final basis of BZBM's request for compensation for professional services rendered and expenses incurred for the Final Fee Period in the amount of \$1,614,016.70, consisting of fees of \$1,592,790.00 and expenses in the amount of \$21,226.70
4. Authorizing and directing payment to BZBM for such additional fees incurred after September 4, 2020 in preparing the Final Application, which are estimated at \$9,480.00; and
5. Granting such other and further relief as the Court deems just and proper.

DATED: November 2, 2020

Respectfully submitted,

BARTKO ZANKEL BUNZEL & MILLER
A Professional Law Corporation

By: /s/ Kerry L. Duffy
Kerry L. Duffy
Attorneys for Debtors and Debtors In Possession
VERITY HEALTH SYSTEM OF CALIFORNIA,
INC., *et al.*

DECLARATION OF AN NGUYEN RUDA

I, An Nguyen Ruda, declare:

1. I am an attorney duly admitted to practice law in the State of California and before the United States District Court for the Central District of California and am a principal in the law firm Bartko Zankel Bunzel & Miller (“BZBM”), special labor and employment counsel for Debtors, and each of them. I have personal knowledge of the facts stated herein, or have gained such knowledge from a review of the books, records and files of BZBM kept in the ordinary course of BZBM’s business, and, if called as a witness, I could and would competently testify thereto.

2. I submit this declaration in support of BZBM’s *Second and Final Application for Allowance and Payment of Compensation and Reimbursement for (I) the Interim Fee Period (May 1, 2020 – Sept. 4, 2020), and (II) the Final Fee Period (Jan. 9, 2020 – Sept. 4, 2020)* (the “Final Application”)

3. I am the partner and attorney at BZBM with primary responsibility for the representation of Debtors with respect to labor and employment matters. I am one of the attorneys at BZBM responsible for overseeing the billing in this matter and for assuring compliance with the UST Fee Guide.

4. BZBM previously filed its *First Interim Application For Allowance and Payment of Compensation and Reimbursement of Expenses for the Period of January 9, 2020 through April 30, 2020; Declaration of An Nguyen Ruda* [Docket No. 5085] (the “First Interim Fee Application”), which is incorporated herein by reference as though stated in full. Supporting exhibits to the First Interim Fee Application were attached thereto as Exhibits “A” through “AS.” Exhibit “A” was the (i) Summary of Hours and Fees for BZBM’s professionals who performed services for Debtors in connection with their chapter 11 cases during the January 9, 2020 through April 30, 2020 time period (the “First Interim Period”) and the hourly rate for each such professional, and (ii) Summary of Time, Fees and Expenses by Debtor in connection with Debtors’ chapter 11 cases during the First Interim Period. Biographical information for each BZBM billing professional who rendered services on behalf of the Trustee during the First Interim

1 Period was attached thereto as Exhibit “B.” The time and billing records, *i.e.*, invoices/bills, for
2 the First Interim Period were attached thereto as Exhibits “C” through “AS.” As stated in my
3 declaration submitted in support of the First Interim Fee Application, I reviewed the time and
4 billing records attached thereto, and believe that: (i) the legal services described therein were
5 actually performed and that such services were reasonably necessary to represent the Debtors and
6 were in the best interests of the Debtors’ Estate; and (ii) all expenses advanced on behalf of the
7 Debtors were necessarily incurred and are properly charged as administrative expenses of the
8 estate

9 5. Attached hereto as Exhibit “A” is the (i) Summary of Hours and Fees for BZBM’s
10 professionals who performed services for Debtors in connection with their chapter 11 cases during
11 the May 1, 2020 through September 4, 2020 time period (the “Second Interim Period”) and the
12 hourly rate for each such professional, and (ii) Summary of Time, Fees and Expenses by Debtor in
13 connection with Debtors’ chapter 11 cases during the Second Interim Period.

14 6. I have reviewed the time and billing records for the Second Interim Period, copies
15 of which are attached as Exhibits “C” through “AS” to the Final Application. I believe that the
16 legal services described therein were actually performed and that such services were reasonably
17 necessary to represent the Debtors and were in the best interests of the Debtors’ Estate.

18 7. I have reviewed the billing records for the Second Interim Period and believe that
19 all expenses advanced on behalf of the Debtors were necessarily incurred and are properly charged
20 as administrative expenses of the estate. Below is a summary of expenses by category:

Category	Amount
Federal Express	\$34.48
Expert Services	\$10,409.31
Court Service and Filing Fees	\$1,068.90
TOTAL =	\$11,512.69

26 Federal Express mail was used for filings and other necessary deliveries that were not
27 adequate via regular postage. Expert service fees were paid for services rendered. Court service
28 and filing fees were incurred with respect to Court filings.

8. The amounts requested in the Final Application for fees and costs are based on the records kept in the ordinary course of BZBM's business with time entries made at or about the time of the transactions noted in the records by persons responsible for maintaining the records.

9. Biographical information for each BZBM billing professional who has rendered services on behalf of the Trustee during the Second Interim Fee Period is attached hereto as Exhibit “B.”

10. In preparing the Final Application, BZBM spent an estimated 24.0 hours at Ms. Duffy's standard and normal hourly rate of \$395.00 per hour, for a total sum of \$9,480.00 in fees (which amount reflects a reduction in fees and is less than the actual hours incurred).

11. I have reviewed the Final Application and am familiar with its contents. Rather than restating in this Declaration the facts and representations contained in the Final Application, I hereby incorporate in full such factual statements and representations herein by this reference and confirm that they are true and correct.

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

Executed on November 2, 2020 at San Carlos, California.

/s/ An Nguyen Ruda
AN NGUYEN RUDA

EXHIBIT A

Debtor	Hours	Fees	Expenses
Verity Health Systems	316.60	139,513.00	10,954.21
Seton Medical Center	523.80	269,869.00	-
Saint Francis Medical Center	869.40	427,003.00	470.00
Saint Vincent Medical Center	18.40	8,086.00	-
Oconnor Hospital	90.30	38,058.50	54.00
Richard Adcock & Steven Sharrer/ Verity Health Systems of CA	121.20	71,874.00	34.48
Verity Medical Foundation	21.10	8,334.50	-
TOTAL	1,960.80	962,738.00	11,512.69

Professional	Title	Hourly Rate	Total Hours	Total Fees
Ferguson, Elizabeth T	Associate	375.00	284.90	106,837.50
Raymond, Marcia	Associate	395.00	68.70	27,136.50
Tilman, Elina	Associate	395.00	532.30	210,258.50
Goldenberg, Jan	Legal Assistant	125.00		-
Ingroff, Terry	Legal Assistant	125.00		-
Sage, Barbara	Legal Assistant	125.00		-
Shepard, Janet	Legal Assistant	125.00		-
Chou, Chet	Paralegal	195.00	1.20	234.00
Torres, Gloria	Paralegal	195.00	8.30	1,618.50
Knapp, Dana Marie	Paralegal	195.00		-
Duffy, Kerry L.	Partner	395.00	86.30	34,088.50
Riley, Benjamin K.	Partner	595.00		-
Fernandez, Louise Ann	Partner	595.00	342.80	203,966.00
Quazzo, Marco	Partner	595.00	29.60	17,612.00
Ruda, An Nguyen	Partner	595.00	604.10	359,439.50
Dunlap, Oliver	Partner	595.00	2.60	1,547.00
	Total		1,960.80	962,738.00

EXHIBIT B



An Nguyen Ruda



Contact

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Direct: 415.291.4534
Fax: 415.956.1152
Email: aruda@bzbm.com

Education

Santa Clara University, School of Law, J.D.,
magna cum laude, 2001

University of California, Berkeley, *with highest honors*, B.A., 1997

Bar Admissions

State Bar of California

U.S. District Courts for the Northern, Southern,
Central and Eastern Districts of California

Speaking Engagements

Continuing Education of the Bar Presents:
Fundamentals of Employment Law

Publications

Labor & Employment New Year Round-Up:
What to Expect in 2020

Labor & Employment 2018 Legislative Round-
Up: What to Expect in 2019

The California Court of Appeal Further Burdens
California Hospitals by Barring Meal Waivers
for Employees Working Long Shifts

Daily Journal: Franchisors Should Beware
Standardized Noncompetes

Aspatore/Thompson Reuters: Inside the Minds:
Negotiating and Drafting Employment
Agreements, 2014 ed.

Practice Areas

Labor and Employment Litigation (single plaintiff and class action)

Trade Secrets

Collective Bargaining

Advice and Counseling

Outside General Counsel Services

Experience

An Nguyen Ruda is co-chair of the Labor and Employment practice group. She takes a problem-solving approach to personnel issues brought by her clients whether it be advice, counseling, collective bargaining or litigation. An has and seeks long term legal and business relationships with her clients. She would much rather provide compliance review and strategic advice on the front end, rather than have clients pay for litigation on the back end.

An takes no greater pleasure than in seeing her clients grow, and every year where there is no employment litigation for her clients is another year of success.

Where litigation is unavoidable, An has worked on high stakes cases and obtained great results for clients. Some examples include:

- Leveraging through litigation the return of stock and ownership to a Company whose C-Suite had allegedly misappropriated trade secrets and misused company assets to form a competing entity. This case was filed in the Northern District of California and implicated citizens of Luxembourg, Russia and Dubai.
- Obtaining a defense award in a wrongful termination matter filed by a C-Suite Executive of a financial services company.
- Defeating class certification in several wage and hour class actions with over \$100 million in exposure.
- Obtaining an award against a defense lawyer who keep documents in contravention of a settlement agreement, which resulted in two court of appeal decisions.

Besides advice, counseling and litigation, a significant portion of An's practice is traditional labor. An has served as the Chief Negotiator on several significant labor contracts, including multiple Master Collective Bargaining Agreements, initial labor agreements as well successor agreements. Most recently, An served as the Chief Negotiator for the Los Angeles Times in their initial contact with The NewsGuild. Also, she negotiated the consensual modification of eight labor agreements in 75 days with six labor unions for a hospital system in bankruptcy. An has negotiated collective labor agreements with healthcare, manufacturing, newspaper unions.

An Nguyen Ruda

Media Recognition

Daily Journal: Dealmakers 4

Daily Journal: Restrictive settlements may not fly

San Francisco Business Times: Flex Time Law Hits S.F.

Employment Law Daily: Employee's "welcome letter" is arguably employment contract incorporating job application's terms

The Recorder: On the Move

An and her team can also assist employers who have existing unions with advice, arbitrations, unfair labor practice charges, and union petition for election or other attempts to organize. An is known for her creative solutions, and respectful labor relations, and ability to quickly close collective bargaining agreements.

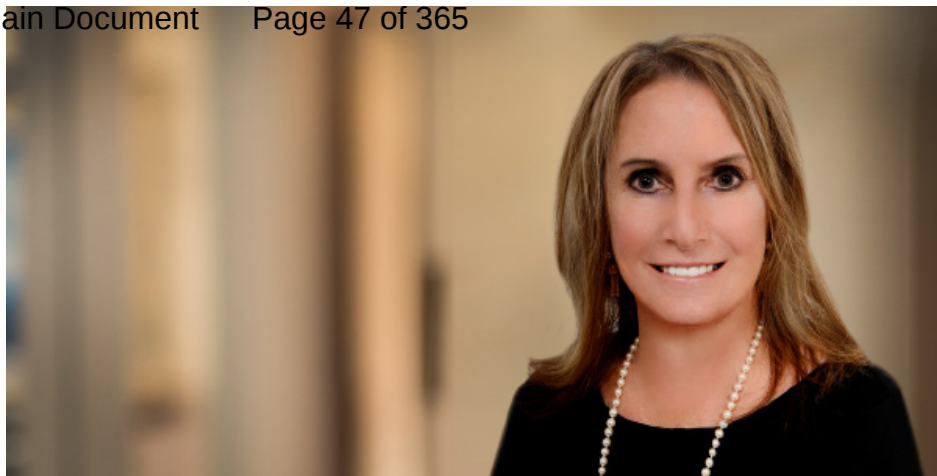
Prior to joining the firm, An was a partner at Jeffer Mangels Butler & Mitchell LLP. An started her legal career at Crosby Heafey Roach & May, prior to and after its acquisition by Reed Smith LLP.

Languages

Vietnamese



Louise Ann Fernandez



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Email: lfernandez@bzbm.com

Address: 12100 Wilshire Blvd., Suite 600
Los Angeles, CA 90025

Education

George Washington University Law
School, J.D., 1978

Stanford University, A.B., 1975

Professional Affiliations

Member, Executive Committee, Labor and
Employment Law Section, State Bar of
California (1987-1989)

Member, Labor and Employment Law Section,
Los Angeles County Bar Association

American Bar Association

Board Member, Assistance Dogs of the West
(2018-2020)

Member, Pitzer College Board of Trustees

Bar Admissions

State Bar of California

Federal Courts in California

United States Court of Appeals, Ninth Circuit

Practice Areas

Labor and Employment

Class Action Defense

Trade Secret Litigation

Intellectual Property Litigation

Health Care Labor Law

Appellate Litigation

Experience

Louise Ann "Luzann" Fernandez is co-chair of the Labor and Employment practice group, with more than 30 years of experience. Luzann is a fierce litigator who is hired by corporations, hospitals, and celebrities for high profile and exposure cases. Luzann does not back down from challenges facing her clients and comes up with out of the box and novel theories.

Luzann is also active as an independent investigator. Using her litigation experience, Luzann investigates claims of discrimination, retaliation, harassment, and other corporate compliance issues.

Luzann serves as a mediator and is a volunteer mediator for the Central District of California Mediation/Conciliation program. She brings her extensive experience to resolve conflicts.

Prior to joining the firm, Luzann was the Chair of the Labor and Employment practice group at Jeffer Mangels Butler & Mitchell LLP where she founded the group. Luzann started her legal career as a field attorney at the National Labor Relations Board.

Representative Cases

Represented entertainment executive against false accusations of sexual assault. Obtained both a dismissal, seven-figure public settlement on a malicious prosecution case in favor of the executive, and a public apology in the New York Times.

Represented technology company in its litigation against C-Suite executives who misappropriated trade secrets and company resources to start a competing venture. Luzann was able to obtain jurisdiction over the foreign nationals which was pivotal to the case.

Defeated class certification on behalf of numerous clients.

Architect of strategy to hold a California executive of a global cosmetics company to his nonsolicitation and non-compete.

Obtained judgment against a Plaintiff's lawyer on behalf of a technology company who failed to return documents to the Company post-litigation.

Obtained summary judgment on behalf of a global cosmetics company; thus, eliminating the risk of class certification.

Argued en banc before Ninth Circuit on National Labor Relations Act preemption issues.

Louise Ann Fernandez

Honors

Recognized in *Best Lawyers in America*®,
Labor and Employment Law - Management,
2016-2021

Named as a "Super Lawyer," by *Los Angeles
Magazine*, 2004-2019

Martindale-Hubbell Peer Review, AV Rating

Recognized in "Best Lawyers in Southern
California," *Los Angeles Magazine*, 2015-2020

Recognized in "Women in Law," *Los Angeles
Magazine*, 2017-2019

Included in "Top Women Attorneys in Southern
California," *Los Angeles Magazine*, 2014-2018

Named by the *Daily Journal* as one of
California Top Labor & Employment Lawyers,
2010, 2013

Speaking Engagements

The Twenty Ninth Annual Labor and Employment Law Symposium: Effective Advocacy in
Employment Arbitrations: The Experts Tell You What Works and What Works Against You

Legal Update for the Professional and Human Resources Association: Contingent Workforce
Issues

Presentation: Sexual Harassment in the Workplace - Louise Ann Fernandez

University of California Los Angeles Entertainment Symposium: Rush to the Future: New Rights
and Wrongs in the Entertainment Industry

Publications

Labor & Employment New Year Round-Up: What to Expect in 2020

Labor & Employment 2018 Legislative Round-Up: What to Expect in 2019

New Law Prohibits California Employers From Asking Applicants About Salary History

CLIENT ALERT: 2017 Criminal Background Laws

Corporate Law Winter 2010 Newsletter: Employee Monitoring in an Electronic Age



Kerry L. Duffy



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Education

University of California,
Hastings College of the Law, J.D., 2004
(Moot Court Awards: Honorable Mention,
Best Advocacy Brief, Best Oral Argument)

Miami University B.A. Cum Laude
(Psychology; Organizational Behavior and
History), 1999

Professional Affiliations

American Bar Association

Association of Business Trial Lawyers (ABTL),
Northern California Chapter

Queen's Bench Bar Association

Board Member, SFPM Educational Enrichment
Foundation, Fall 2015 to 2019

Bar Admissions

State Bar of California, 2004

United States District Courts for all of
California, 2005

Publications

Author, "California Responses to Supercenter
Development: A Survey of Ordinances, Cases
and Elections," Public Law Research Institute
Reports, Spring 2004

Practice Areas

Labor & Employment	Privacy and Security Breach Litigation
Business Litigation	Proposition 65 Matters
Intellectual Property Litigation	Antitrust Litigation

Experience

Kerry Duffy is a Principal of the firm. Ms. Duffy has been involved in multiple high value commercial litigation cases. She has successfully represented clients in a range of matters, including employment disputes, antitrust claims, privacy claims, data breaches, bankruptcy, breach of contract, and Proposition 65 claims. She also has significant experience in e-discovery counseling and data management.

Prior to joining the firm, Ms. Duffy practiced in Oakland, California, specializing in bankruptcy litigation. She was a judicial extern to the Honorable Randall J. Newsome (Ret.), Chief Judge of the United States Bankruptcy Court, Northern District of California. While in law school, Ms. Duffy was an extern in the Office of the United States Trustee of the U.S. Department of Justice, San Francisco Division.

Representative Cases

Ms. Duffy helped obtain a defense verdict in a civil antitrust monopolization trial where the plaintiffs asked the jury for \$34 million.

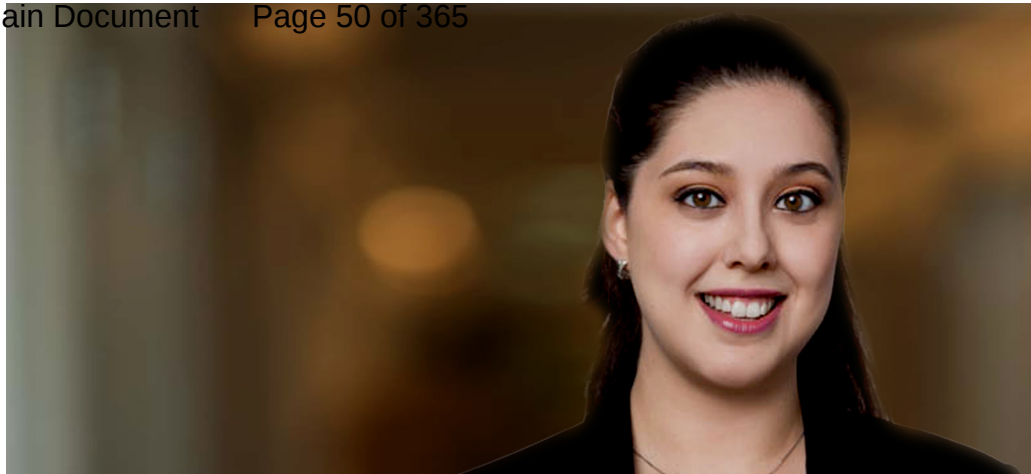
Ms. Duffy successfully resolved a FDIC investigation concerning a failed bank.

A major healthcare organization provider was represented by Ms. Duffy in a vendor breach of contract case.

Ms. Duffy was a member of the firm's trial team in a trademark case over the use of a business name in which the firm twice defeated Wells Fargo's motions for a preliminary injunction. *Wells Fargo v. ABD*, 2014 WL 4312021.



Elina Tilman



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Practice Areas

Labor and Employment

Education

University of California, Davis, School of Law,
J.D., 2013 (*Business Law Journal*: Executive
Editor; articles selection editor)

University of San Francisco, B.A.
(English Literature; Humanities Honors
Program; minor in Criminal Justice Studies),
2010

Experience

Elina is a labor and employment law attorney with experience in employment counseling, labor law, workplace investigations, employment litigation, and administrative proceedings (before the NLRB, PERB, EEOC, DFEH, and DLSE). Elina graduated from UC Davis, King Hall and holds a Bachelor's Degree in English from the University of San Francisco. Elina joined the firm in 2020; she previously worked at Jeffer Mangels Butler & Mitchell LLP and Renne Sloan Holtzman & Sakai LLP, where she advised clients in the private and public sector.

Bar Admissions

State Bar of California



Oliver Q. Dunlap



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Email: odunlap@bzbm.com

Education

LLM Coursework, University College London,
England, 2002

University of Texas, School of Law, Austin, J.D.,
2002

Georgetown University, Washington, D.C.,
B.S.F.S., 1995

Kings College, University of London, England

McGhee Center for Eastern Mediterranean
Studies, Alanya, Turkey

Professional Affiliations

Conference of California Bar Associations
(CCBA): Executive Board

California Bar Association: Special Committee
for Administration of Justice, Electronic Access
Working Group, and California Commission on
Access to Justice; Litigation Section, Standing
Committee on Jury Instructions

Bar Association of San Francisco: Conference of
California Bar Associations (Executive Commit-
tee, Chair and Delegate)

Alameda County Bar Association: Intellectual
Property Steering Committee (2010 to 2013)

Earl Warren Inn of Court: Best Program (2010),
Best Male Lead (2012)

TREC 2009 Legal Track: Topic Authority and
e-Discovery analyst

Practice Areas

Business Litigation	Pharmaceutical Products Liability
Class Action Litigation	Toxic Tort & Environmental Law
Enforcement and Data Privacy	Trade Secret Litigation
Intellectual Property Litigation	White Collar & International and Internal Investigations
Internal Investigations & Securities	Wine Law
International Human Rights and Alien Tort Statute	

Experience

Oliver Dunlap is a Principal of the firm. He is a civil litigator with extensive experience in a broad range of complex matters, including work with clients in the life sciences, healthcare, technology, financial services, and energy and resources industries. He has successfully litigated matters involving mass torts, complex commercial disputes, products liability, business litigation, intellectual property, toxic torts and environmental defense, securities and internal investigations, international human and civil rights, and wine law. Mr. Dunlap has regularly represented Fortune 500 and 1000 companies and industry leaders, as well as mid-sized corporations and start-ups, always with an eye to both his clients' litigation and business goals.

Prior to joining the firm, Mr. Dunlap was a senior attorney at King & Spalding and an associate at Morrison & Foerster. He also served with the Office of the Prosecutor at the Yugoslavia and Rwanda War Crimes Tribunal. He has significant trial experience, has led multi-firm and office teams in international complex litigation and in responding to major state and federal government investigations for multinational corporations and industry leaders. He actively participates in community organizations, state bar and pro bono work, and professional diversity and training initiatives.

Representative Cases

COMMERCIAL LITIGATION

Mr. Dunlap serves as counsel for domestic and international technology, life sciences, health-care, financial services, food & wine, design, e-commerce, retail and energy companies in complex litigation and business disputes. He has successfully litigated issues involving sales contracts, contractor and employment agreements, stock option grants, fraud, tort and tortious interference, licensing and marketing contracts, pricing and accounting disputes, non-disclosure agreements, tax matters, and importation and antitrust issues in state and federal courts. He also guides clients to effectively mitigate risk pre- and post-litigation, and provides strategic guidance on compliance with federal and state regulations – including privacy, data security and e-discovery regimes – writs of attachment, claims for equitable and injunctive relief, and California's Unfair Business Practices Code (§ 17200).

Oliver Q. Dunlap

Professional Affiliations [Cont.]

Alumnus, Appellate Division of the office of Prosecutor for the International Criminal Tribunal for the Former Yugoslavia and International Criminal Tribunal for Rwanda

Bar Admissions

California State Bar, 2003

United States Supreme Court

United States Court of Appeals for the Ninth Circuit, 2003

United States District Court for the Northern District of California, 2003

United States District Court for the Eastern District of California, 2011

United States District Court for the Southern District of California, 2011

United States District Court for the Central District of California, 2011

United States District Court for the District of Idaho, 2007

Honors

United Way Baby KoKo Awards (2014, 2015)

Northern California Rising Star – Class Action/Mass Torts (2013)

California Lawyer Magazine, Angel Award (2008)

Wiley W. Manuel Award for Pro Bono Legal Services (2005, 2008, 2009)

Presentations

CCBA and State Bar CLE Conference: "Respecting Diversity in the Realm of Privacy and Data Security" (October 2017)

Pharma U, "Genomes, Consent, and Courtrooms: Navigating the Legal and Ethical Challenges Related to Uses of Clinical Trial Biospecimens and Data" (Pharmaceutical University, 2015)

King & Spalding e-Learn: "Picking Fora: Trends in the Art of Removal"

Representative Cases [Continued]

At a recent trial in Santa Clara County Superior Court, following successful cross-examinations of key plaintiff witnesses, Mr. Dunlap argued Motion for Judgment that resulted in complete defense victory at close of plaintiff's case. The four-and-a-half year, highly contentious contract and tort litigation concerned allegations regarding the sale of defendant's products throughout Asia, and the company's acquisition of a Swedish software company. The case involved supervising and coordinating electronic files, witnesses and other work with offices in Colorado, Sweden, Idaho, Malaysia, Hong Kong, Singapore, Seoul and California.

Mr. Dunlap negotiated settlement for a major accounting firm in civil suit related to off-shore tax strategies, following IRS litigation with a plaintiff who had engaged firm's services. He also resolved individual and class claims brought in California courts against a reporting agency concerning personal credit reports and vendor double reporting.

MASS TORT & LIFE SCIENCES

Mr. Dunlap represents leading pharmaceutical manufacturers in product liability, off-label marketing and pricing disputes brought in state and federal courts. He has removed, litigated and resolved mass claims related to statins, diabetes, anti-psychotic and acid-reflux drugs, obtaining early dismissal or settlement in most cases.

Mr. Dunlap also coordinates MDL and JCCP proceedings for large-scale litigation, and has managed related removal proceedings and dockets for local distributors and medical device manufacturers. Throughout, he preserves patient privacy and confidentiality in the litigation process, including compliance with HIPAA and related regulations. He has overseen settlement and dismissal of resolved cases in concurrent state and federal courts, including management of MSP and MMSEA issues, and related claims administration.

Mr. Dunlap was lead counsel in California and Idaho medical board reviews of licensed medical and mental health professionals, based upon services provided to inmates in Idaho and California state prisons. He obtained an opinion reversal by opposing counsel's lead expert following deposition and initial review of expert reports in the case. He also provided deposition and trial testimony counsel to state hospital employees in civil and criminal lawsuits. Mr. Dunlap is a regular presenter and participant in industry-wide pharmaceutical and medical device conferences.

TOXIC TORT & ENVIRONMENTAL

Mr. Dunlap successfully opposed a Notice of Violation under California Proposition 65 for a leading, global petrochemical company, and negotiated withdrawal of the Notice without the need for formal litigation.

He also serves as counsel for chemical manufacturers in cases involving claims by private and public entities related to alleged groundwater contamination, for petro-chemical companies in cases involving airborne emissions, and for high-tech companies in EPA superfund actions. In this work he has successfully brought motions to disqualify experts, dismiss claims and limit damages based upon deposition testimony and IMEs.

Mr. Dunlap manages litigation for a variety of fortune 1000 companies in products liability and premises claims stemming from alleged exposure to legacy asbestos-containing products; including negotiation of early dismissal, successful filing for summary judgment, and preparation for and successful litigation of cases at trial.

Oliver Q. Dunlap

Presentations [[Continued](#)]

Discovery: Techniques, Strategies, Plans and Pitfalls in Complex Litigation (BALSF workshop)

Complex Litigation – Discovery and Case Management (BALSF workshop)

Building Your E-Discovery Tool Kit: Nuts & Bolts Issues Corporate Counsel Need to Know (Client workshop)

Publications

Bar Association of San Francisco Bulletin, "Laws & the Lawyers (You Never Heard of) that Make Them" (September 2016)

California Lawyer and Daily Journal, "New Rules for Litigators: 2016 Brings Significant Changes to the California Code of Civil Procedure" (February 2016)

Senate Bills 75 (enacted June 27, 2013) and 852 (enacted June 20, 2014); authored successful CCBA legislation to increase State Court budgets

Bar Association of San Francisco Bulletin, "California's Court Funding Crisis" (January 2012)

Bar Association of San Francisco Bulletin, "Conference of California Bar Associations 2011, Long Beach: Take that Otto" (November 2011)

Bar Association of San Francisco Bulletin, "Conference of Delegates" (April 2009)

San Francisco Attorney Magazine, "Attorney Lifestyle" articles (Spring 2004 and Summer 2005)

Representative Cases [[Continued](#)]

INTELLECTUAL PROPERTY

Mr. Dunlap represents leading high-technology, electronics and life-science corporations in patent infringement, trade secret, and design patent, trade dress and trade mark litigation before U.S. District Courts, the Federal Circuit, I.T.C., U.S.P.T.O. and various international bodies. As local counsel Mr. Dunlap has assisted in coordinating massive international patent litigation in the social networking, software, lithography, smart card and pharmaceuticals industries. He also has acted as lead counsel in more discrete matters for leading retailers and foreign manufacturers, frequently negotiating early resolutions to matters for his clients. He has negotiated early resolutions and settlement agreements in matters for leading retailers, designers and foreign manufacturers.

Mr. Dunlap advises commercial design, energy, food production and e-commerce businesses in securing, protecting and monetizing their intellectual property, including trademark, copyright, trade dress, design patent and trade secret protection, and he has appeared and litigated before the ITC, Federal Circuit, District Court for the District of Columbia, and Northern District of California.

INTERNAL INVESTIGATIONS AND SECURITIES

Mr. Dunlap provides counseling for Fortune 500 companies concerning state and federal regulatory regimes, and in connection with both formal and informal government investigations. He has created and implemented compliance best practices, privacy, data security and e-discovery guidelines for clients, and his CIPP certification is pending. He has presented to corporate governance bodies and negotiated with DOJ, DOT, DHHS, FTC, FERC, SEC and other governmental agencies. He guides clients to effectively mitigate litigation risk and corporate compliance issues, and provides strategic guidance and representation in state and federal courts, and before government agencies and international tribunals.

Mr. Dunlap has led internal investigations related to AG investigations of the insurance industry, auto manufacturers and backdating allegations, SEC investigations of insider trading claims, and private party actions for securities law violations. He has also managed internal investigations and electronic discovery related to product liability, marketing and pricing matters for financial services, tech, life sciences and energy clients.

INTERNATIONAL HUMAN RIGHTS – ALIEN TORT STATUTE

Mr. Dunlap served with the United Nations' Office of the Prosecutor for the Yugoslavia and Rwanda War Crimes Tribunal. He has litigated issues of individual and corporate liability for violations of international law through his work with the United Nations and various NGOs.

Mr. Dunlap has defended extraction companies in Alien Tort Statute actions brought by foreign plaintiffs and governmental entities. He has litigated issues of individual and corporate liability for violations of international law, and jus cogens norms applicable under the statute.

He also has obtained fees, damages and injunctive relief in civil rights lawsuit on behalf of transgendered state prison inmates, and in FOIA litigation related to immigrant communities, and he has represented San Francisco and Alameda county underserved in various pro bono matters.

Oliver Q. Dunlap

Representative Cases [Continued]

FOOD & WINE INDUSTRY

Mr. Dunlap represents collectors, auction houses and vendors in efforts to address sales of counterfeit old and rare wines. He successfully resolved a multi-million dollar dispute, traced known fakes to their sources, and assisted in local and federal law enforcement investigation of the industry.

Mr. Dunlap has negotiated settlement of marketing and sales contract dispute between a major wine and spirits producer and its former US importer and business partner, including conducting related investigations of South American production facilities and holdings.

Mr. Dunlap has also provided regulatory guidance to a leading California nut and snack manufacturer.



Marco Quazzo



Contact

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Email: mquazzo@bzbm.com
LinkedIn: Marco Quazzo

Education

University of California Berkeley
School of Law (Boalt Hall), J.D., 1989
(Order of the Coif)

Harvard University, A.B., Magna Cum Laude
(Economics and History), 1984

Professional Affiliations

Association of Business Trial Lawyers

Faculty Member, National Institute for
Trial Advocacy (NITA)

Faculty Member, University of San Francisco
Law School, Intensive Advocacy Program

Bar Admissions

State Bar of California

Ninth Circuit Court of Appeals

U.S. District Courts for the Northern, Central and
Eastern Districts of California

Practice Areas

Business Litigation	Trade Secret Litigation
Enforcement and Data Privacy	Trademark, Copyright and Technology Licensing Litigation
Franchise and Distribution	Transactional Real Estate
Intellectual Property Litigation	Trust and Estate Litigation
Real Estate Litigation	Trustee and Fiduciary Litigation

Experience

Marco Quazzo is a Principal of the firm. He is a trial lawyer with broad experience in business and real estate litigation including disputes arising from the purchase and sale of businesses and real property, partnership and shareholder disputes, corporate governance disputes, trustee disputes, disputes arising from real property leasing or construction, disputes involving manufacturers, dealers, distributors or suppliers, and disputes involving business torts, fraud, breach of contract and breach of fiduciary duty. Marco has tried many cases to verdict in U.S. District Court and California Superior Court and frequently represents clients in arbitration and mediation proceedings. He is a former law clerk of the Hon. D. Lowell Jensen of the United States District Court for the Northern District of California.

Representative Cases

Marco defended the directors and officers of a mortgage bank against breach of fiduciary duty claims by shareholders who sought \$30 million in damages.

Marco represented a real estate investment trust in pursuing breach of contract and fraud claims against a property management company entrusted with managing and selling a shopping center portfolio of 60 properties.

Marco successfully defended commercial property sellers against claims by a title insurance company for \$3.3 million in damages by obtaining a dismissal before trial with the plaintiff recovering nothing.

Marco represented two real estate developers in an eight-week jury trial in California Superior Court against claims of fraud and breach of contract.

Marco represented a major automobile company in a \$3 million dispute with two suppliers involving the shipment of hundreds of thousands of vehicles between California and Hawaii.

Marco defended the selling shareholders of a high technology company against indemnity claims totaling \$25 million asserted by the buyer after losses arose from patent infringement litigation that was pending at the time of sale.

Marco Quazzo

Honors

Honored as a Northern California
"Super Lawyer" by Thomson Reuters more than
a dozen times since the inception of its annual
survey

Rated "AV Preeminent" by Martindale-Hubbell,
indicating very high legal ability and ethical
standards

Recipient of the Golden Eagle award from The
Guardsmen for work on behalf of at-risk youth
in the Bay Area

Recipient of the Community Service Award from
the Jack Berman Advocacy Center for legal
work on behalf of victims of gun violence

Holds a 10.0 rating from Avvo

Publications

**5 Guidelines Courts Will Use to Decide
Force Majeure Claims in COVID-19 Cases,**
Los Angeles & San Francisco Daily Journal
(May 4, 2020)

**Corporate Officers and Directors Face
Personal Liability Under The Responsible
Corporate Officer Doctrine,** Bloomberg BNA
Corporate Accountability Report (August 2013)

Speaking Engagements

Guest Lecturer, University of San Francisco
Law School, Corporate Governance Seminar

Representative Cases [Continued]

Marco represented the general partner of a family investment partnership against claims of breach of fiduciary duty and fraud asserted by 15 limited partners after the general partner adopted a diversified investment strategy.

Marco defended a corporate officer against claims by dozens of investors for breach of fiduciary duty and fraud after the corporation filed bankruptcy.

Marco defended a hedge fund operator against claims by an investor for breach of fiduciary duty and fraud.

Marco secured summary judgment in U.S. District Court on behalf of an investment bank against a company which refused to pay a \$2 million "success fee" after the company was acquired in a private equity transaction.

Marco's client, a shipping company, prevailed at trial in U.S. District Court on all claims against a medical clinic in a dispute arising from the clinic's negligent treatment of the company's employee. *SeaRiver Maritime, Inc. v. Industrial Medical Services, Inc.*, 983 F.Supp. 1287 (N.D. Cal. 1997).

Marco litigated claims against a real estate broker for breach of fiduciary duty and fraud on behalf of a commercial property developer.

Marco litigated premises liability claims against a building owner and security company, and negligence claims against a gun manufacturer and retailer on behalf of a shooting victim at 101 California Street in San Francisco.

Marco litigated claims for breach of contract, non-disclosure, fraud and construction defects on behalf of a property owner who incurred more than \$1 million in water damage against the seller, developer and contractor for the property.

Marco prosecuted inverse condemnation and negligence claims for property damage after a city-owned water main burst, causing a flood on an automobile dealer's lot that damaged dozens of new vehicles.

Marco secured a favorable settlement in a JAMS arbitration proceeding on behalf of the estate of a deceased shareholder of a closely held company that refused to repurchase his shares upon his death.



Benjamin K. Riley



Contact

Main: 415.956.1900

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Email: briley@bzbm.com

LinkedIn: Benjamin K. Riley

Education

University of California, Berkeley,
School of Law (Boalt Hall), J.D., 1983
(Associate Editor, California Law Review)

Dartmouth College, A.B. Cum Laude (History),
1979

Professional Affiliations

Bar Association of San Francisco

Litigation Counsel of America

Association of Business Trial Lawyers

American Bar Association

Bar Admissions

State Bar of California

Honors

Chambers Ranked for Intellectual Property Litigation: Trademark, Copyright & Trade Secrets

Recognized by "Best Lawyers," Commercial Litigation and Patent Litigation, 2021

Fellow, Litigation Counsel of America

California Lawyer of the Year

President, Northern California Chapter of the Association of Business Trial Lawyers

Editor, "ABTL Report"

Practice Areas

Business Litigation

Class Action Litigation

Intellectual Property Litigation

Patent Litigation

Real Estate Litigation

Trade Secret Litigation

Trademark, Copyright and Technology Licensing Litigation

Trust and Estate Litigation

Experience

Ben Riley is a Principal of the firm and serves on its Executive Committee. He has tried nearly 30 cases to verdict including jury trials, court trials, and complex arbitrations. His practice focuses on Intellectual Property Litigation, including patents, trade secrets, copyrights, trademarks and license disputes. He also has an active practice in Business Litigation, including class action defense, defense of "consumer claims" under the Lanham Act and unfair competition statutes, accounting issues, and real property litigation.

Mr. Riley also represents companies in connection with director and officer, securities, fiduciary duty, and internal investigation issues, and obtained a defense verdict in a six-week securities class action jury trial. Finally, Mr. Riley represents private clients and charities in Trust and Estate Litigation.

Mr. Riley is ranked by Chambers as among the top 13 California attorneys in Intellectual Property Litigation: Trademark, Copyright & Trade Secrets. Chambers writes: "Benjamin Riley is 'very organized, writes beautifully and is great in front of judges,' report sources, further noting: 'He's very bright, quick to grasp technical and legal issues, and he's very efficient.' He is an experienced practitioner skilled in handling a broad range of contentious IP matters. He is particularly highlighted for his expertise in trade secret disputes."

Mr. Riley has lectured and published extensively as to Intellectual Property, Business Litigation, Trust & Estate Litigation, and trial practice skills. He is an expert in commercial arbitration law and procedure and regularly handles important cases before the world's leading arbitration forums. He also has an active practice as a Mediator for the Northern District of California and for private litigants.

Representative Cases

In *In Re Trust of Robert A. Naify*, Mr. Riley is defending four petitions challenging trust dispositions, involving issues of alleged oral contracts, separate and community property, and trust termination. Claimants seek in excess of \$1 billion.

In *Cloud Cruiser Arbitration*, Mr. Riley prosecuted breach of license claims involving database software for monitoring and use of cloud computing.

Benjamin K. Riley

Honors [Continued]

Lawyer Representative to the Ninth Circuit selected by the judges of the Northern District of California

Fellow, American Bar Foundation

Master, McFetridge Inn of Court

Best Lawyers in America

Named as a "Super Lawyer" every year since 2004

Publications

Saving the Japanese YWCA Building, Daily Journal (November 15, 2019)

Sometimes It Pays to Opt for a Jury in Business Disputes, Litigation Magazine, Vol. 45, No. 4 (Summer 2019), at 12

Trying a Trade Secret Case: A Road Map, Litigation Magazine, Vol. 43, No. 3 (Spring 2017), at 47

Catch the Conscience: Scripting a Winning Opening Statement, 9 Litigation Commentary & Review (January/February 2017)

President Signs Defend Trade Secrets Act of 2016, BZB Alert

How Not to Regret Your Direct: Exploring the Human Story, Litigation Magazine, Vol. 41, No. 2 (Winter 2015), at 51

"Trade Secret Damages," Chapter 9, Calculating and Proving Damages, Law Journal Press (2011)

Three Legal Lessons for Startups, Fortune.com (2011)

Secrets Service, Los Angeles Daily Journal (November 21, 2008)

Three Pitfalls for Trade Secret Plaintiffs, ABA Business Torts Journal, Vol. 15, No. 3 (Spring/Summer 2008)

Tips For A Successful Arbitration, ABTL Northern California Report, Vol. 14, No. 3 (Summer 2005)

Representative Cases [Continued]

In *Netlist v. Diablo*, Mr. Riley represented plaintiff in the trial of trade secret, patent and trademark claims involving HyperCloud® LR-DIMM memory module technology.

In *Wells Fargo v. ABD*, Mr. Riley represented the defendants in a trademark case over his client's business name, twice defeating Wells Fargo's motions for preliminary injunction. 2014 WL 4312021.

In *Geron v. ViaCyte*, Mr. Riley successfully defended a Section 146 appeal of a patent interference action based on the PTO Board of Appeals' finding of lack of enablement.

In *Scicom v. Actuate*, Mr. Riley prosecuted a copyright and breach of contract action concerning the misuse of database software.

In *Impinj v. Synopsys*, Mr. Riley represented the Claimant in a JAMS arbitration regarding the rights and restrictions under an Asset Purchase Agreement and the sale of non-volatile memory semiconductor technology.

Mr. Riley successfully defended Washington Mutual, JP Morgan and Raytheon in disputes over copyright and software license agreements concerning database software.

In *Juarez et al. v. Jani-King*, Mr. Riley defeated class certification in a matter involving the alleged violation of California wage and hour laws asserted against world's largest janitorial franchise companies. An appeal of the matter is pending.

In *Dr. Bronner's Magic Soap v. Hain Celestial, et al.*, Mr. Riley obtained a dismissal of unfair competition and Lanham Act claims in favor of a cosmetic manufacturer accused of deceptively labeling products as "Organic."

In *Sun Microsystems v. Azul*, Mr. Riley represented the plaintiff in connection with patent, trade secret, contract and interference claims brought against its former employees concerning JAVA-based software and hardware for parallel chip computing.

In *Broadband Holdings v. Norwest*, Mr. Riley obtained summary judgment for former directors and venture capital shareholders in a breach of fiduciary duty and fraud action.

In *Forge v. National Semiconductor*, Mr. Riley obtained a defense verdict for his client after a six-week class action jury trial alleging breach of fiduciary duty and Sections 11 and 12 securities law violations in connection with the manufacture of microprocessors.

In *Soko Bukai v. YWCA*, Mr. Riley successfully sued for breach of trust in connection with a historic building in San Francisco's Japantown resulting in conveyance of the historic home of the Japanese YWCA to a community childcare organization.



Elizabeth T. Ferguson

Contact

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Practice Areas

Labor & Employment	Antitrust
Business Litigation	IP & Brand Protection Supply Chain Security
Intellectual Property Litigation	White Collar Investigations

Education

University of California, Hastings College of the Law, J.D., *cum laude*, 2017

University of California, Santa Cruz, B.A. (Legal Studies), 2008

Professional Affiliations

Alameda County Bar Association

Bar Admissions

State Bar of California

U.S. District Courts for the Northern and Central Districts of California

Experience

Elizabeth (Lisa) Ferguson is an associate in the firm's Labor & Employment Group and Business Litigation Group. Lisa represents clients in a variety of matters, including commercial litigation, intellectual property, antitrust, and white collar investigations.

Prior to joining the firm, Lisa represented insurers in complex coverage disputes at both the state and federal court level. As coverage counsel, Lisa handled a wide range of cases, including construction defect, product liability, habitability, property, and wrongful incarceration. Lisa achieved favorable settlements on behalf of her clients in contentious coverage matters.

In law school, Lisa was a member of the *Hastings Law Journal* and received Witkin and CALL Awards in Remedies and the CALL Award in Bankruptcy. Lisa spent her summers volunteering at Public Defender's Offices in the Bay Area to assist indigent clients facing misdemeanor and felony charges.

EXHIBIT C

BARTKO ZANKEL BUNZEL

BARTKO ZANKEL BUNZEL & MILLER
A Professional Law Corporation

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www.bzbm.com

June 3, 2020

Saint Vincent Medical Center
601 S. Figueroa Street
Suite 4050
Los Angeles, CA 90017

Invoice #: 125852
Client #: 2767
Matter #: 000
Billing Attorney: ANR

For professional services rendered and disbursements advanced through May 31, 2020:

RE: General Labor

DETAIL OF PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
5/10/20	ET	Analysis of pending litigation and statute of limitation issues.	.20	79.00
5/15/20	ANR	Review of email from S. Sharrer re SEIU settlement.	.10	59.50
5/18/20	ET	Review three emails from CT and email regarding subpoena production from K. Murphy.	.10	39.50
5/21/20	ET	Review and analysis of Scott subpoena for SVMC and SMC and related objections.	.20	79.00
5/21/20	ET	Call with opposing counsel regarding Scott subpoena.	.10	39.50
5/21/20	ET	Email correspondence with opposing counsel regarding Scott subpoena.	.10	39.50
5/21/20	ET	Call with K. Chapman regarding subpoenas.	.20	79.00
5/21/20	ET	Email correspondence with L. Ho, S. Sharrer, and E. Paul regarding Scott subpoena.	.30	118.50
5/22/20	ET	Review subpoena for Sprague.	.10	39.50
5/22/20	ET	Review Sprague case docket and complaint.	.10	39.50
5/22/20	ET	Email correspondence with E. Paul, K. Chapman, and J. Viedeo regarding subpoena, next steps, and requirements.	.20	79.00

TOTAL PROFESSIONAL SERVICES RENDERED

\$ 691.50

BARTKO ZANKEL BUNZEL & MILLER

Client #: 2767
Matter #: 000

June 3, 2020
Invoice #: 125852

TIMEKEEPER SUMMARY

Name	Rate	Hours	Amount	N/C Hr	N/C \$
Tilman, Elina	395.00	1.60	632.00	.00	.00
Ruda, An Nguyen	595.00	.10	59.50	.00	.00
TOTALS		1.70	\$ 691.50	.00	\$.00

TOTAL THIS INVOICE **\$ 691.50**

*Balance is due within 30 days from the date of this invoice.
We reserve the right to charge interest at 10% per annum on amounts not paid within 30 days.*

In Account With

BARTKO ZANKEL BUNZEL

BARTKO ZANKEL BUNZEL & MILLER

A Professional Law Corporation

One Embarcadero Center, Ste. 800

San Francisco, CA 94111

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July 6, 2020

Saint Vincent Medical Center
601 S. Figueroa Street
Suite 4050
Los Angeles, CA 90017

Invoice #: 126060
Client #: 2767
Matter #: 000
Billing Attorney: ANR

For professional services rendered and disbursements advanced through June 30, 2020:

RE: General Labor

DETAIL OF PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
6/17/20	ET	Preliminary review of Fayfel's letter.	.10	39.50
6/17/20	ET	Email J. Moe re Fayfel.	.10	39.50
6/18/20	ET	Review and analysis of M Fayfel demand letters and related correspondence.	.50	197.50
6/18/20	ET	Draft summary regarding Fayfel claims and related analysis.	.60	237.00
6/18/20	ET	Email correspondence with J. Moe and K. Chapman regarding E. Siquion.	.20	79.00
6/25/20	ET	Review and analysis of Manalo subpoena and workers comp documents.	.30	118.50
6/25/20	ET	Email correspondence with K. Vitale and K. Chapman regarding Manalo subpoena.	.20	79.00
6/28/20	ET	Review carrier coverage letters.	.10	39.50
6/29/20	ET	Respond to L. Ho regarding Manolo subpoena.	.10	39.50
6/29/20	ET	Email correspondence with M. Kwok and H. Biehel regarding patient record request.	.10	39.50
6/29/20	ET	Rapp: Review and analysis of POCs.	.10	39.50
6/29/20	ET	Rapp: Email L. Ho regarding case facts.	.10	39.50
6/29/20	ET	Rapp: Email correspondence with J. Moe regarding case and plan incorporation.	.20	79.00
6/30/20	ET	Call with J. Moe re Rapp claim.	.30	118.50
6/30/20	ET	Email correspondence with J. Moe and A. Estrada re Rapp and plan information.	.40	158.00
6/30/20	ET	Review Rapp client documents.	.10	39.50
6/30/20	ET	Calls with J. Moe and K. Murphy re employment claims and Plan inclusion.	.20	79.00

TOTAL PROFESSIONAL SERVICES RENDERED**\$ 1,461.50**

BARTKO ZANKEL BUNZEL & MILLER

Client #: 2767
Matter #: 000

July 6, 2020
Invoice #: 126060

TIMEKEEPER SUMMARY

Name	Rate	Hours	Amount	N/C Hr	N/C \$
Tilman, Elina	395.00	3.70	1,461.50	.00	.00
TOTALS		3.70	\$ 1,461.50	.00	\$.00

TOTAL THIS INVOICE

\$ 1,461.50

*Balance is due within 30 days from the date of this invoice.
We reserve the right to charge interest at 10% per annum on amounts not paid within 30 days.*

BARTKO ZANKEL BUNZEL

BARTKO ZANKEL BUNZEL & MILLER

A Professional Law Corporation

One Embarcadero Center, Ste. 800

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www.bzbm.com

August 5, 2020

Saint Vincent Medical Center
601 S. Figueroa Street
Suite 4050
Los Angeles, CA 90017

Invoice #: 126309
Client #: 2767
Matter #: 000
Billing Attorney: ANR

For professional services rendered and disbursements advanced through July 31, 2020:

RE: General Labor

DETAIL OF PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
7/01/20	ET	Review CT subpoena and email correspondence with K. Murphy regarding same.	.10	39.50
7/03/20	ET	Assess settlement value and exposure for ERW claim.	.30	118.50
7/03/20	ET	.Email J. Moe regarding ERW claim.	.10	39.50
7/08/20	ET	Preliminary review of Botary subpoena.	.10	39.50
7/08/20	ET	Email L. Vargas regarding Manalo subpoena.	.10	39.50
7/08/20	ET	Email correspondence with K. Murphy regarding Batory and Motul subpoenas. 0.1	.10	39.50
7/09/20	ANR	Review of NLRB answer.	.20	119.00
7/10/20	LAF	Finalize answer.	.50	297.50
7/10/20	LAF	Emails to Dentons re answer.	.30	178.50
7/10/20	LAF	Revisions to Answer.	.40	238.00
7/10/20	LAF	Review motions and briefs in preparation of Mediation statement.	1.00	595.00
7/10/20	ET	Email correspondence with L. Ho and J. Oviedo regarding Manalo subpoena.	.10	39.50
7/10/20	ET	Analysis of next steps regarding Manalo subpoena.	.10	39.50
7/13/20	ET	Email correspondence with L. Ho, R. Muhen, and L. Sergeant regarding Manalo subpoena.	.20	79.00
7/13/20	ET	Analysis of next steps regarding Manalo subpoena.	.20	79.00
7/13/20	ET	Review and analysis of Batory subpoena.	.20	79.00
7/13/20	ET	Email correspondence with L. Ho, R. Muhen, and L. Sergeant regarding Manalo subpoena.	.30	118.50
7/14/20	ET	Email correspondence with R. Muhen regarding payroll information for subpoenas.	.20	79.00
7/22/20	ET	Review and analysis of Manalo subpoena.	.10	39.50
7/22/20	ET	Email opposing counsel regarding objections to Manalo subpoena.	.40	158.00

Client #: 2767
Matter #: 000

August 5, 2020
Invoice #: 126309

Date	Tkpr	Description	Hours	Amount
7/22/20	ET	Email L. Ho and L. Seargeant regarding Manalo and Batory subpoena documents.	.50	197.50
7/22/20	ET	Email correspondence with R. Mohun regarding payroll records for Manalo and Batory subpoenas.	.20	79.00
7/22/20	ET	Preliminary review of Manalo documents.	.10	39.50
7/23/20	ET	Review and analysis of Manalo client documents and redactions for subpoena production.	1.20	474.00
7/23/20	ET	Complete declaration for Manalo subpoena.	.10	39.50
7/23/20	ET	Email correspondence with L. Ho and R. Muhen regarding Manalo subpoena.	.20	79.00
7/23/20	ET	Analysis of next steps regarding Batory subpoena.	.20	79.00
7/23/20	ET	Email H. Beihel and J. Oviedo regarding Batory subpoena pending issues.	.40	158.00
7/23/20	ET	Preliminary review of Batory records.	.10	39.50
7/24/20	ET	Finalize Manalo production.	.20	79.00
7/24/20	ET	Email process server regarding Manalo productions.	.10	39.50
7/24/20	ET	Review Amaro court's notice regarding proceedings.	.10	39.50
7/24/20	ET	Email L. Ho and K. Vitale regarding Amaro case.	.10	39.50
7/28/20	ET	Call with process server regarding Batory subpoena.	.10	39.50
7/28/20	ET	Email correspondence with process server and L. Ho regarding Batory subpoena and declaration.	.20	79.00
7/29/20	LAF	ULP review.	.10	59.50
7/29/20	LAF	Respond to NLRB emails.	.10	59.50

TOTAL PROFESSIONAL SERVICES RENDERED

\$ 4,075.00

TIMEKEEPER SUMMARY

Name	Rate	Hours	Amount	N/C Hr	N/C \$
Tilman, Elina	395.00	6.40	2,528.00	.00	.00
Fernandez, Louise Ann	595.00	2.40	1,428.00	.00	.00
Ruda, An Nguyen	595.00	.20	119.00	.00	.00
TOTALS		9.00	\$ 4,075.00	.00	\$.00

TOTAL THIS INVOICE

\$ 4,075.00

*Balance is due within 30 days from the date of this invoice.
We reserve the right to charge interest at 10% per annum on amounts not paid within 30 days.*

BARTKO ZANKEL BUNZEL & MILLER

Client #: 2767
Matter #: 000

August 5, 2020
Invoice #: 126309

BARTKO ZANKEL BUNZEL

BARTKO ZANKEL BUNZEL & MILLER

A Professional Law Corporation

One Embarcadero Center, Ste. 800

San Francisco, CA 94111

p: 415.956.1900

f: 415.956.1152

www.bzbm.com

September 8, 2020

Saint Vincent Medical Center
601 S. Figueroa Street
Suite 4050
Los Angeles, CA 90017

Invoice #: 126686
Client #: 2767
Matter #: 000
Billing Attorney: ANR

For professional services rendered and disbursements advanced through September 4, 2020:

RE: General Labor

DETAIL OF PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
8/03/20	ET	Review carrier letter regarding Sequin and Fayfel.	.10	39.50
8/03/20	ET	Email correspondence with K. Chapman, J. Moe, and K. Murphy regarding carrier letters for Sequin and Fayfel.	.20	79.00
8/13/20	ET	Review Martinez correspondence from process server.	.10	39.50
8/13/20	ET	Email correspondence with K. Murphy regarding Martinez subpoena.	.10	39.50
8/24/20	ET	Review and analysis of Cruz subpoena.	.10	39.50
8/24/20	ET	Email K. Chapman regarding Cruz subpoena.	.10	39.50

TOTAL PROFESSIONAL SERVICES RENDERED

\$ 276.50

TIMEKEEPER SUMMARY

Name	Rate	Hours	Amount	N/C Hr	N/C \$
Tilman, Elina	395.00	.70	276.50	.00	.00
TOTALS		.70	\$ 276.50	.00	\$.00

TOTAL THIS INVOICE

\$ 276.50

Balance is due within 30 days from the date of this invoice.

Client #: 2767
Matter #: 000

September 8, 2020
Invoice #: 126686

We reserve the right to charge interest at 10% per annum on amounts not paid within 30 days.

EXHIBIT D

BARTKO ZANKEL BUNZEL

BARTKO ZANKEL BUNZEL & MILLER
A Professional Law Corporation

One Embarcadero Center, Ste. 800
San Francisco, CA 94111
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www.bzbm.com

June 3, 2020

Saint Vincent Medical Center
601 S. Figueroa Street
Suite 4050
Los Angeles, CA 90017

Invoice #: 125853
Client #: 2767
Matter #: 001
Billing Attorney: ANR

For professional services rendered and disbursements advanced through May 31, 2020:

RE: Hospital Closure

DETAIL OF PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
5/11/20	LAF	Telephone call with NLRB re ULP determinations.	.50	297.50
5/11/20	ANR	Review of board response to ULP filing.	.30	178.50
5/20/20	ANR	Review of email from S. Sharrer re settlement checks for SEIU.	.10	59.50
5/25/20	ANR	Review email from S. Sharrer re separation agreement re SEIU settlement.	.10	59.50
5/25/20	ANR	Reply to email from S. Sharrer re SEIU settlement agreement.	.10	59.50

TOTAL PROFESSIONAL SERVICES RENDERED \$ 654.50

TIMEKEEPER SUMMARY

Name	Rate	Hours	Amount	N/C Hr	N/C \$
Fernandez, Louise Ann	595.00	.50	297.50	.00	.00
Ruda, An Nguyen	595.00	.60	357.00	.00	.00
TOTALS		1.10	\$ 654.50	.00	\$.00

TOTAL THIS INVOICE \$ 654.50

Balance is due within 30 days from the date of this invoice.

We reserve the right to charge interest at 10% per annum on amounts not paid within 30 days.

EXHIBIT E

BARTKO ZANKEL BUNZEL

BARTKO ZANKEL BUNZEL & MILLER
A Professional Law Corporation

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June 3, 2020

Saint Vincent Medical Center
601 S. Figueroa Street
Suite 4050
Los Angeles, CA 90017

Invoice #: 125854
Client #: 2767
Matter #: 003
Billing Attorney: ANR

For professional services rendered and disbursements advanced through May 31, 2020:

RE: Gendron, Elizabeth

DETAIL OF PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
5/01/20	ETF	Continue review and analysis of issues for case plan	.50	187.50
5/05/20	ETF	Continue review and analysis of documents for case strategy plan.	.10	37.50
TOTAL PROFESSIONAL SERVICES RENDERED				\$ 225.00

TIMEKEEPER SUMMARY

Name	Rate	Hours	Amount	N/C Hr	N/C \$
Ferguson, Elizabeth T	375.00	.60	225.00	.00	.00
TOTALS		.60	\$ 225.00	.00	\$.00

TOTAL THIS INVOICE

\$ 225.00

*Balance is due within 30 days from the date of this invoice.
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EXHIBIT F

BARTKO ZANKEL BUNZEL

BARTKO ZANKEL BUNZEL & MILLER
A Professional Law Corporation

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f: 415.956.1152
www.bzbm.com

June 3, 2020

Saint Vincent Medical Center
601 S. Figueroa Street
Suite 4050
Los Angeles, CA 90017

Invoice #: 125855
Client #: 2767
Matter #: 005
Billing Attorney: ANR

For professional services rendered and disbursements advanced through May 31, 2020:

RE: **Graham, Eutrice**

DETAIL OF PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
5/01/20	ETF	Continue analysis re case strategy	.30	112.50
5/04/20	OQD	Analysis of case status report, litigation file, and related outstanding litigation deadlines, tasks, and projects.	.40	238.00

TOTAL PROFESSIONAL SERVICES RENDERED \$ 350.50

TIMEKEEPER SUMMARY

Name	Rate	Hours	Amount	N/C Hr	N/C \$
Ferguson, Elizabeth T	375.00	.30	112.50	.00	.00
Dunlap, Oliver Q	595.00	.40	238.00	.00	.00
TOTALS		.70	\$ 350.50	.00	\$.00

TOTAL THIS INVOICE \$ 350.50

*Balance is due within 30 days from the date of this invoice.
We reserve the right to charge interest at 10% per annum on amounts not paid within 30 days.*

In Account With

BARTKO ZANKEL BUNZEL

BARTKO ZANKEL BUNZEL & MILLER

A Professional Law Corporation

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San Francisco, CA 94111

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www.bzbm.com

September 8, 2020

Saint Vincent Medical Center
 601 S. Figueroa Street
 Suite 4050
 Los Angeles, CA 90017

Invoice #: 126687
 Client #: 2767
 Matter #: 005
 Billing Attorney: ANR

For professional services rendered and disbursements advanced through September 4, 2020:

RE: Graham, Eutrice

DETAIL OF PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
8/11/20	ETF	Review documents needed for claim.	.20	75.00
TOTAL PROFESSIONAL SERVICES RENDERED				\$ 75.00

TIMEKEEPER SUMMARY

Name	Rate	Hours	Amount	N/C Hr	N/C \$
Ferguson, Elizabeth T	375.00	.20	75.00	.00	.00
TOTALS		.20	\$ 75.00	.00	\$.00

TOTAL THIS INVOICE **\$ 75.00**

*Balance is due within 30 days from the date of this invoice.
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EXHIBIT G

BARTKO ZANKEL BUNZEL

BARTKO ZANKEL BUNZEL & MILLER
A Professional Law Corporation

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July 6, 2020

Saint Vincent Medical Center
601 S. Figueroa Street
Suite 4050
Los Angeles, CA 90017

Invoice #: 126063
Client #: 2767
Matter #: 008
Billing Attorney: ANR

For professional services rendered and disbursements advanced through June 30, 2020:

RE: Elizabeth Siquian

DETAIL OF PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
6/23/20	ET	Review client documents for claim information.	.30	118.50
6/23/20	ET	Email B. Paulsen regarding needed information.	.10	39.50
6/24/20	ET	Email correspondence with B. Paulsen regarding documents.	.10	39.50
6/24/20	ET	Email carrier regarding claim.	.10	39.50
6/28/20	ET	Email correspondence with K. Chapam regarding status.	.10	39.50

TOTAL PROFESSIONAL SERVICES RENDERED \$ 276.50

TIMEKEEPER SUMMARY

Name	Rate	Hours	Amount	N/C Hr	N/C \$
Tilman, Elina	395.00	.70	276.50	.00	.00
TOTALS		.70	\$ 276.50	.00	\$.00

TOTAL THIS INVOICE \$ 276.50

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EXHIBIT H

BARTKO ZANKEL BUNZEL

BARTKO ZANKEL BUNZEL & MILLER
A Professional Law Corporation

One Embarcadero Center, Ste. 800
San Francisco, CA 94111
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f: 415.956.1152
www.bzbm.com

June 3, 2020

Seton Medical Center
601 S. Figueroa Street
Suite 4050
Los Angeles, CA 90017

Invoice #: 125836
Client #: 2765
Matter #: 000
Billing Attorney: ANR

For professional services rendered and disbursements advanced through May 31, 2020:

RE: General Labor

DETAIL OF PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
5/01/20	ANR	Review of employee matter regarding possible separation.	.20	119.00
5/04/20	LAF	Legal research re NUHW leaflets and bulletin board issues.	.80	476.00
5/04/20	LAF	Debrief with Steve Sharrer regarding research results and recommendations.	.40	238.00
5/04/20	ET	Make additions and revisions to IC agreement.	.40	158.00
5/04/20	ET	Email S. Sharrer and R. Robinson regarding IC and next steps.	.10	39.50
5/06/20	LAF	Review and respond to emails re potential investigation.	.30	178.50
5/07/20	LAF	Call with Steve Sharrer regarding employee issues.	.50	297.50
5/07/20	LAF	Research issues re release of personnel files.	1.00	595.00
5/07/20	LAF	Debrief with Steve Sharrer regarding personnel file issues.	.50	297.50
5/07/20	ANR	Conference call with S. Sharrer regarding Seton labor matters.	.30	178.50
5/07/20	ET	Call with S. Sharrer and K. Caligiure regarding pending labor issues.	1.00	395.00
5/07/20	ET	Research parameters of medical inquiries.	.80	316.00
5/07/20	ET	Review client documents in preparation for call with S. Sharrer.	.20	79.00
5/08/20	ANR	Review of correspondence re investigation.	.20	119.00
5/08/20	ANR	Revision to investigation correspondence.	.20	119.00
5/08/20	ANR	Telephone call with S. Sharrer re labor matters.	.10	59.50
5/08/20	ET	Analysis of pending issues regarding investigation.	.10	39.50
5/08/20	ET	Email correspondence with S. Sharrer regarding labor issue.	.10	39.50
5/11/20	LAF	Telephone call regarding management investigation.	.40	238.00
5/11/20	ANR	Conference call with S. Sharrer re labor issue.	.50	297.50
5/12/20	ANR	Review of probationary period language re NUHW contract.	.10	59.50
5/12/20	ANR	Email to S. Sharrer re probationary period language.	.10	59.50

Client #: 2765
Matter #: 000June 3, 2020
Invoice #: 125836

Date	Tkpr	Description	Hours	Amount
5/12/20	ANR	Revise of investigation letter.	.20	119.00
5/14/20	ANR	Conference call with S. Sharrer re investigation.	.30	178.50
5/14/20	ANR	Conference call with S. Sharrer and investigator re preliminary findings.	.50	297.50
5/14/20	ANR	Review of floating procedures and language.	.50	297.50
5/14/20	ANR	Preparation of email to S. Sharrer re bargaining timeline.	1.10	654.50
5/15/20	ANR	Conference call with S. Sharrer re labor issues.	.50	297.50
5/18/20	MLR	Conduct analysis regarding re: contact with physician	2.00	790.00
5/18/20	MLR	Prepare memo summarizing analysis regarding contact with physician	.30	118.50
5/19/20	ANR	Review of possible negotiation timeline.	.30	178.50
5/19/20	ANR	Conference call with AHCM team, Dentons and Verity team re labor negotiations.	.30	178.50
5/19/20	ANR	Conference call with Verity Leadership re negotiations.	.30	178.50
5/19/20	ANR	Conference call with S. Sharrer re labor strategy.	.50	297.50
5/19/20	ANR	Review of doctor's notes re employee discipline.	.50	297.50
5/20/20	ANR	Conference call with buyer re negotiation process.	.30	178.50
5/20/20	ANR	Review of employee disciplinary process and file.	.30	178.50
5/22/20	ANR	Review of negotiation timeline.	.40	238.00
5/22/20	ANR	Telephone call with S. Sharrer re timeline.	.30	178.50
5/22/20	ANR	Conference call with client and buyer re 1113 process.	.40	238.00
5/22/20	ANR	Conference call with S. Sharrer re labor matters.	.50	297.50
5/22/20	ANR	Emails with S. Alberts re timeline.	.10	59.50
5/22/20	ET	Email correspondence with S. Sharrer regarding CBA issues.	.20	79.00
5/22/20	ET	Review CBAs and lawsuits.	.20	79.00
5/22/20	ET	Review process for bargaining.	.10	39.50
5/22/20	ET	Review K. Chapman's email regarding lawsuits and email E. Paul regarding same.	.10	39.50
5/26/20	ANR	Preparation of agenda for call with buyer.	.80	476.00
5/26/20	ANR	Conference call with buyer re collective bargaining agreements.	1.40	833.00
5/26/20	ET	Review agenda re 1113 negotiations.	.10	39.50
5/26/20	ET	Call with buyer S. Sharrer in preparation for 1113 negotiations.	1.30	513.50
5/26/20	ET	Review and prepare CBA related documents for bargaining.	1.80	711.00
5/26/20	ET	Email internal group re CBAs.	.10	39.50
5/26/20	ET	Review documents for hold follow-up.	.30	118.50
5/27/20	ANR	Conference call with S. Sharrer re preparation for daily AHMC call.	.90	535.50
5/27/20	ANR	Conference call with AHMC re collective bargaining agreement review and 1113 modification.	2.00	1,190.00
5/27/20	ANR	Preparation of 1113 negotiations.	1.50	892.50
5/27/20	ANR	Review email from CNA re meeting dates.	.10	59.50
5/27/20	ANR	Review of time away program and benefits.	.50	297.50

Client #: 2765
Matter #: 000June 3, 2020
Invoice #: 125836

Date	Tkpr	Description	Hours	Amount
5/27/20	ET	Prepare for call regarding bargaining.	.10	39.50
5/27/20	ET	Call with S. Sharrer and buyer regarding bargaining.	1.80	711.00
5/27/20	ET	Call with S. Sharrer regarding pending issues.	.20	79.00
5/27/20	ET	Review client documents for needed information for NUHW bargaining.	.80	316.00
5/27/20	ET	Email correspondence with S. Sharrer and L. Ho regarding Scott subpoena.	.30	118.50
5/27/20	ET	Review responsive records to subpoena.	.10	39.50
5/27/20	ET	Review notes regarding NUHW CBA changes.	.80	316.00
5/27/20	ET	Redline NUHW CBA.	4.20	1,659.00
5/27/20	ET	Review Local 20 changes.	.10	39.50
5/28/20	ANR	Conference call with S. Sharrer re preparation for AHMC daily call.	1.00	595.00
5/28/20	ANR	Extensive conference call with Verity and AHMC team re 1113 modifications.	2.00	1,190.00
5/28/20	ANR	Additional telephone call with S. Sharrer re 1113 proposal.	.50	297.50
5/28/20	ANR	Review of proposed modifications.	1.80	1,071.00
5/28/20	ANR	Review of Local 39 proposed modification.	.20	119.00
5/28/20	ET	Call with AHMC re CNA bargaining.	2.00	790.00
5/28/20	ET	Prepare documents for call with AHMC.	.10	39.50
5/28/20	ET	Prepare documents for review re SMC bargaining.	.30	118.50
5/28/20	ET	Email J. Saito re documents.	.20	79.00
5/28/20	ET	Review internal correspondence re bargaining sessions and documents.	.20	79.00
5/28/20	ET	Email correspondence with L. Ho re Scott subpoena.	.20	79.00
5/28/20	ET	Redline Local 20 CBA and related portions.	3.20	1,264.00
5/28/20	ET	Redline NUHW CBA.	.70	276.50
5/28/20	ET	Strategize re NUHW and Local 20 redlines.	1.30	513.50
5/28/20	ET	Review waiver law.	.20	79.00
5/28/20	ET	Make revisions to NUHW and Local 20 CBAs re meal and rest break and waivers.	1.50	592.50
5/28/20	ET	Redline CNA CBA.	1.40	553.00
5/29/20	ANR	Conference call with Verity Team re 1113 redline modification (CNA).	1.20	714.00
5/29/20	ANR	Daily call with AHMC re CBA modifications.	1.30	773.50
5/29/20	ANR	Emails to unions re 1113 bargaining dates.	.10	59.50
5/29/20	ET	Call with S. Sharrer re NUHW and Local 20 bargaining.	1.00	395.00
5/29/20	ET	Call with AHMC re NUHW and Local 20 bargaining.	1.00	395.00
5/29/20	ET	Redlines CNA agreement.	1.90	750.50
5/29/20	ET	Redline Local 20 and NUHW.	1.60	632.00
5/29/20	ET	Review AHMC documents.	.20	79.00
5/30/20	ANR	Review of proposed 1113 modifications.	1.60	952.00
5/30/20	ANR	Review of various questions from buyer re CBA modifications 1113.	.50	297.50
5/30/20	ANR	Email to buyer re proposed modifications.	.10	59.50

BARTKO ZANKEL BUNZEL & MILLER

Client #: 2765
Matter #: 000

June 3, 2020
Invoice #: 125836

Date	Tkpr	Description	Hours	Amount
5/30/20	ET	Redline CNA Master and Local CBA and integrate into one CBA.	5.20	2,054.00
5/30/20	ET	Call with S. Sharrer re bargaining issues.	1.50	592.50

TOTAL PROFESSIONAL SERVICES RENDERED

\$ 34,401.50

TIMEKEEPER SUMMARY

Name	Rate	Hours	Amount	N/C Hr	N/C \$
Tilman, Elina	395.00	39.00	15,405.00	.00	.00
Raymond, Marcia L.	395.00	2.30	908.50	.00	.00
Fernandez, Louise Ann	595.00	3.90	2,320.50	.00	.00
Ruda, An Nguyen	595.00	26.50	15,767.50	.00	.00
TOTALS		71.70	\$ 34,401.50	.00	\$.00

TOTAL THIS INVOICE

\$ 34,401.50

*Balance is due within 30 days from the date of this invoice.
We reserve the right to charge interest at 10% per annum on amounts not paid within 30 days.*

In Account With

BARTKO ZANKEL BUNZEL

BARTKO ZANKEL BUNZEL & MILLER

A Professional Law Corporation

One Embarcadero Center, Ste. 800

San Francisco, CA 94111

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July 6, 2020

Seton Medical Center
601 S. Figueroa Street
Suite 4050
Los Angeles, CA 90017

Invoice #: 126047
Client #: 2765
Matter #: 000
Billing Attorney: ANR

For professional services rendered and disbursements advanced through June 30, 2020:

RE: General Labor

DETAIL OF PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
6/01/20	ANR	Daily conference call with AHMC re collective bargaining.	.40	238.00
6/01/20	ANR	Preparation for 1113 negotiations.	1.40	833.00
6/01/20	ANR	Conference call with S. Sharrer re 1113 strategy.	.80	476.00
6/01/20	ET	Call with AHMC re bargaining.	.40	158.00
6/01/20	ET	Review documents re CNA local agreement.	.10	39.50
6/01/20	ET	Email J. Saito regarding CBA provisions.	.10	39.50
6/02/20	ANR	Conference call with buyer re collective bargaining agreements.	1.10	654.50
6/02/20	ANR	Conference call with S. Sharrer re bargaining strategy.	.50	297.50
6/02/20	ANR	Review of union grievance issue.	.30	178.50
6/02/20	ANR	Review of employee investigation report.	.50	297.50
6/02/20	ET	Review and analysis of emails and CIGNA documents re leave of absence issues.	.30	118.50
6/02/20	ET	Call with S. Sharrer re leave issues.	.20	79.00
6/02/20	ET	Research re leave issues.	1.60	632.00
6/02/20	ET	Draft summary re leave laws and respond to specific issues in case.	.90	355.50
6/02/20	ET	Respond to Hope re subpoena issues.	.10	39.50
6/04/20	ANR	Conference call with buyer re negotiation process.	.40	238.00
6/04/20	ANR	Review of email from buyer re revised documents.	.10	59.50
6/04/20	ANR	Reply to email from buyer re revised documents.	.10	59.50
6/04/20	ANR	Coordination of union meeting dates.	.60	357.00
6/04/20	ET	Draft objections to Scott subpoena.	.40	158.00
6/04/20	ET	Review Scott subpoena documents.	.20	79.00
6/04/20	ET	Draft declaration for Scott subpoenas.	.20	79.00

Client #: 2765
Matter #: 000

July 6, 2020
Invoice #: 126047

Date	Tkpr	Description	Hours	Amount
6/04/20	ET	Email L. Vargas re declarations.	.10	39.50
6/05/20	ANR	Email with buyer re negotiations.	.10	59.50
6/08/20	ANR	Conference call with buyer re 1113 modifications.	.30	178.50
6/08/20	ANR	Conference call with union re negotiations.	.30	178.50
6/08/20	ANR	Email to labor unions confirming bargaining date.	.20	119.00
6/08/20	ANR	Review of redline modifications.	1.20	714.00
6/08/20	ET	Review redline of CNA CBA.	.40	158.00
6/08/20	ET	Call with AHMC and review emails regarding bargaining status.	.10	39.50
6/09/20	ANR	Review of buyer time-off policy.	.20	119.00
6/09/20	ANR	Revision to Local 20 redline.	.80	476.00
6/09/20	ANR	Review of Local 39 redline.	.80	476.00
6/09/20	ANR	Revision of NUHW redline.	1.10	654.50
6/09/20	ANR	Revision to CNA redline.	1.50	892.50
6/09/20	ET	Redline Local 20 CBA.	1.40	553.00
6/09/20	ET	Redline NUHW CBA.	1.40	553.00
6/09/20	ET	Review wage order re waivers.	.10	39.50
6/09/20	ET	Redline Local 39 CBA.	1.10	434.50
6/09/20	ET	Review issues with redlines.	.20	79.00
6/10/20	ANR	Conference call with Buyer re negotiations.	1.10	654.50
6/10/20	ANR	Revisions to Seton CBAs.	2.40	1,428.00
6/10/20	ANR	Review of employee accommodation issue.	.20	119.00
6/10/20	ANR	Review of letters re transmission of 1113 proposal.	.20	119.00
6/10/20	ANR	Review of buyer's comments re CBA redlines.	.20	119.00
6/10/20	ET	Email correspondence with Judy and Albert re redlines.	.30	118.50
6/10/20	ET	Redline CNA CBA.	1.60	632.00
6/10/20	ET	Call with internal AHMC team and S. Sharrer re bargaining.	1.10	434.50
6/10/20	ET	Analysis of next steps re SMC bargaining.	.40	158.00
6/10/20	ET	Review wage and hour issue re meal breaks.	.30	118.50
6/10/20	ET	Make further redline to CNA CBA and integrate Master issues.	3.50	1,382.50
6/10/20	ET	Outline points for SMC bargaining.	.20	79.00
6/10/20	ET	Make CBA redlines to Local 20, NUHW, and Local 39.	.70	276.50
6/10/20	ET	Email Judy re mail period waiver issues.	.30	118.50
6/10/20	ET	Make additions and edits to redlines to Local 20, NUHW, and Local 39 CBA.	2.40	948.00
6/10/20	ET	Email correspondence with Judy regarding meal waivers.	.40	158.00
6/11/20	ANR	Preparation call with Buyer.	.50	297.50
6/11/20	ANR	Preparation for 1113 negotiations.	1.20	714.00
6/11/20	ANR	Attend 1113 negotiations with CNA.	2.00	1,190.00

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Date	Tkpr	Description	Hours	Amount
6/11/20	ANR	Attend 1113 negotiations with NUHW.	2.00	1,190.00
6/11/20	ANR	Attend 1113 negotiations with Local 20.	2.00	1,190.00
6/11/20	ANR	Status update to client of negotiations.	.30	178.50
6/11/20	ANR	Email to J. Jackson re employee matter.	.10	59.50
6/11/20	ANR	Preparation of negotiation calendar.	.50	297.50
6/11/20	ET	Internal call with AHMC and S. Alberts regarding 6-11 bargaining.	.80	316.00
6/11/20	ET	Bargaining call with AHMC and CNA notetaker.	2.00	790.00
6/11/20	ET	Finalize redlines and pdfs of redlines for Local 20, CNA, and NUHW.	.80	316.00
6/11/20	ET	Prepare note documents for AHMC bargaining.	.30	118.50
6/11/20	ET	Bargaining call with AHMC and NUHW - notetaker.	2.00	790.00
6/11/20	ET	Bargaining call with Local 20 notetaker.	2.00	790.00
6/11/20	ET	Email correspondence with Local 20, NUHW, and CNA representatives regarding redlines.	.20	79.00
6/11/20	ET	Draft Local 20 RFIs.	.20	79.00
6/11/20	ET	Caucus call with Judy and Albert regarding bargaining.	.50	197.50
6/12/20	LAF	Attend bargaining and caucus sessions.	4.00	2,380.00
6/12/20	LAF	Update notes by comparing articles and citations.	1.20	714.00
6/12/20	ANR	Conference call with Buyer re status update re negotiations.	.30	178.50
6/12/20	ANR	Preparation for negotiations.	1.50	892.50
6/12/20	ANR	Attend 1113 negotiations with CNA.	2.50	1,487.50
6/12/20	ANR	Emails to unions re negotiation calendar.	.20	119.00
6/12/20	ANR	Conference call with Local 39 re negotiation dates.	.30	178.50
6/12/20	ANR	Status update re negotiations.	.20	119.00
6/12/20	ET	Call with J. Saito, A. Yeh, and E. Tuckman regarding bargaining.	.40	158.00
6/12/20	ET	Review bargaining documents.	.60	237.00
6/12/20	ET	Email J. Saito, A. Yeh, and E. Tuckman regarding bargaining.	.10	39.50
6/12/20	ET	Email correspondence with S. Alberts and D. Martin regarding bargaining.	.20	79.00
6/15/20	LAF	Preparation for 1113 negotiations.	1.30	773.50
6/15/20	LAF	Attend CNA 1113 negotiations.	3.00	1,785.00
6/15/20	LAF	Attend Local 20, 1113 negotiations.	1.50	892.50
6/15/20	LAF	Attend NUHW negotiations.	1.50	892.50
6/15/20	ANR	Preparation for 1113 negotiations.	1.30	773.50
6/15/20	ANR	Attend CNA 1113 negotiations.	3.00	1,785.00
6/15/20	ANR	Attend Local 20, 1113 negotiations.	1.50	892.50
6/15/20	ANR	Attend NUHW negotiations.	1.50	892.50
6/15/20	ANR	Review of draft Local 39, 1113 letter.	.30	178.50
6/15/20	ANR	Email to S. Alberts re draft Local 39 proposal.	.10	59.50

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Date	Tkpr	Description	Hours	Amount
6/15/20	ANR	Review email from Local 39 re releases.	.10	59.50
6/15/20	ANR	Email to Seton re release.	.10	59.50
6/15/20	ANR	Review of medical plan design.	.30	178.50
6/15/20	ET	Redline Local 39 CBA.	.80	316.00
6/15/20	ET	Email correspondence with J. Saito and S. Alberts regarding Local 39.	.60	237.00
6/15/20	ET	Review Local 39 letter and related information.	.20	79.00
6/15/20	ET	Review and analysis of internal documents and dockets regarding Local 20 RFI and response.	.60	237.00
6/15/20	ET	Bargaining call with Local 20 -- attend as note taker.	.80	316.00
6/15/20	ET	Review and update Local 20 notes.	1.60	632.00
6/15/20	ET	Update RFI list for internal review.	.20	79.00
6/16/20	ETF	Review RFIs for Local 20 and draft tracker and prepare inventory re same.	.60	225.00
6/16/20	ETF	Review RFIs for Local 39 and draft tracker and prepare inventory re same.	.30	112.50
6/16/20	ETF	Review RFIs for NUHW and draft tracker and prepare inventory re same.	.50	187.50
6/16/20	LAF	Prepare counter proposal for CNA negotiations.	2.00	1,190.00
6/16/20	LAF	Prepare NUHW counter.	1.30	773.50
6/16/20	LAF	Work on CNA bargaining notes.	1.20	714.00
6/16/20	ANR	Preparation for Local 39 negotiations.	.90	535.50
6/16/20	ANR	Local 39 negotiations.	1.00	595.00
6/16/20	ANR	Review of financial status.	.50	297.50
6/16/20	ANR	Review email from J. Jackson re personnel file request.	.10	59.50
6/16/20	ANR	Reply to email from J. Jackson re personnel file request.	.10	59.50
6/16/20	ANR	Status update re negotiations.	.50	297.50
6/16/20	ANR	Preparation of CNA 1113 counter.	1.80	1,071.00
6/16/20	ANR	Preparation of NUHW counter.	1.80	1,071.00
6/16/20	ET	Caucus call with Judy Saito and Albert Yeh regarding bargaining.	.10	39.50
6/16/20	ET	Bargaining call with Local 39 and AHMC act as notetaker.	1.10	434.50
6/16/20	ET	Prepare for bargaining with Local 39.	.20	79.00
6/16/20	ET	Email correspondence with S. Alberts regarding Local 39 bargaining.	.10	39.50
6/16/20	ET	Review correspondence regarding RFIs and bargaining documents.	.20	79.00
6/16/20	ET	Update bargaining material for all unions.	.40	158.00
6/16/20	ET	Review Bonifacio letter and determine deadlines.	.20	79.00
6/16/20	ET	Email correspondence with J. Jackson and N. Nasu regarding Bonifacio letter.	.40	158.00
6/17/20	ETF	Review Seton emails re NUHW and update tracker re same.	.30	112.50
6/17/20	ETF	Review Seton emails re Local 20 and update tracker re same.	.30	112.50
6/17/20	ETF	Review Seton emails re CNA and update tracker re same.	.30	112.50
6/17/20	ETF	Review Seton emails re Local 39 and update tracker re same.	.20	75.00

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Date	Tkpr	Description	Hours	Amount
6/17/20	LAF	Respond to email from H Levy re information request from AHMC.	.20	119.00
6/17/20	ANR	Preparation for 1113 bargaining.	1.50	892.50
6/17/20	ANR	Attend CNA morning session of 1113 bargaining.	2.50	1,487.50
6/17/20	ANR	Attend Local 20 1113 negotiations.	1.00	595.00
6/17/20	ANR	Attend NUHW 1113 negotiations.	2.00	1,190.00
6/17/20	ANR	Attend afternoon session CNA 1113 negotiations.	1.00	595.00
6/17/20	ET	Call with A. Yeh and J. Saito re bargaining sessions with Local 20, CNA, and NUHW.	1.30	513.50
6/17/20	ET	Bargaining call with CNA, attend as note-taker.	.50	197.50
6/17/20	ET	Finalize redlines and prepare for bargaining.	.20	79.00
6/17/20	ET	Preliminary review of EJJ.	.30	118.50
6/17/20	ET	Email correspondence with N. Dulos re EJJ.	.20	79.00
6/17/20	ET	Call and email C. Doherty re bargaining.	.10	39.50
6/17/20	ET	Review bargaining emails for Local 20 and CNA.	.20	79.00
6/17/20	ET	Bargaining call with Local 20 attend as notetaker.	1.00	395.00
6/17/20	ET	Bargaining call with NUHW attend as notetaker.	2.00	790.00
6/17/20	ET	Update bargaining information.	.30	118.50
6/17/20	ET	Afternoon bargaining call with CNA act as notetaker.	1.00	395.00
6/17/20	ET	Email P. Opp and K. Murphy re EJB claim.	.20	79.00
6/18/20	ETF	Review multiple bargaining notes and emails re negotiations with NUHW and update tracker	.80	300.00
6/18/20	ETF	Review multiple bargaining notes and emails re negotiations with Local 20 and update tracker.	.80	300.00
6/18/20	ETF	Review multiple bargaining notes and emails re negotiations with CNA and update tracker.	.70	262.50
6/18/20	ANR	Status update re negotiations.	.30	178.50
6/18/20	ET	Email correspondence with N. Dublos, P. Opp, and K. Murphy regarding EJB.	.30	118.50
6/18/20	ET	Review notes for counter to CNA.	1.10	434.50
6/18/20	ET	Prepare counter proposals for CNA.	3.40	1,343.00
6/19/20	ETF	Review emails re RFIs.	.20	75.00
6/19/20	ETF	Update tracker re RFIs.	.30	112.50
6/19/20	ETF	Summarize email list for client and AHMC re same.	.10	37.50
6/19/20	ETF	Review further emails re RFIs for Local 20.	.30	112.50
6/19/20	ETF	Review further emails re RFIs for CNA.	.20	75.00
6/19/20	ETF	Update tracker.	.40	150.00
6/19/20	ETF	Email client and AHMC re RFIs.	.20	75.00
6/19/20	LAF	Attend Local 20 negotiations.	2.00	1,190.00
6/19/20	LAF	Attend CNA negotiations.	2.00	1,190.00

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Date	Tkpr	Description	Hours	Amount
6/19/20	LAF	Attend NUHW negotiations.	2.50	1,487.50
6/19/20	LAF	Review correspondence re donated leave.	.20	119.00
6/19/20	ANR	Preparation for negotiations.	1.80	1,071.00
6/19/20	ANR	Attend Local 20 negotiations.	2.00	1,190.00
6/19/20	ANR	Attend CNA negotiations.	2.00	1,190.00
6/19/20	ANR	Attend NUHW negotiations.	2.50	1,487.50
6/19/20	ET	Call with J. Saito and A. Yeh for bargaining.	.50	197.50
6/19/20	ET	Review and finalize CNA counter.	.20	79.00
6/19/20	ET	Review internal documents and RFIs and status.	.50	197.50
6/19/20	ET	Strategize regarding bargaining and to do items.	.50	197.50
6/20/20	ANR	Telephone call with J. Sclant re data pull.	.20	119.00
6/20/20	ANR	Email to J. Sclant re benefits.	.10	59.50
6/20/20	ANR	Review of email from J. Saito re benefits offering.	.10	59.50
6/22/20	ANR	Telephone call with J. Si and J. Schlant re costing.	.50	297.50
6/22/20	ANR	Telephone call with K. Caligiure re personnel matter.	.30	178.50
6/23/20	ANR	Telephone call with AHMC broker re benefits offering.	.50	297.50
6/23/20	ANR	Review of Local 39 position.	.30	178.50
6/23/20	ANR	Email Local 39 position to Buyer.	.10	59.50
6/23/20	ANR	Telephone call with J. Saito re negotiations .	.30	178.50
6/24/20	LAF	Review of notes and proposals in preparation for 1113 negotiations with unions.	1.00	595.00
6/24/20	LAF	1113 negotiations with NUHW and caucus.	2.50	1,487.50
6/24/20	LAF	1113 negotiations with CNA and caucus.	1.50	892.50
6/24/20	LAF	Review of data request status.	.20	119.00
6/24/20	LAF	Review email from H Levy re pharmacy employee issue.	.10	59.50
6/24/20	LAF	Telephone call re pharmacy employee issue.	.50	297.50
6/24/20	ANR	Preparation for 1113 negotiations with unions.	1.10	654.50
6/24/20	ANR	1113 negotiations with NUHW and caucus.	2.50	1,487.50
6/24/20	ANR	1113 negotiations with CNA and caucus.	1.50	892.50
6/24/20	ANR	Conference call with J. Si and J. Schlant re data analytics.	.50	297.50
6/24/20	ANR	Telephone call with Seton CNO re personnel matter.	.50	297.50
6/24/20	ANR	Conference call with B. Florence of Local 39 re proposal.	.30	178.50
6/24/20	ANR	Review of data request status.	.20	119.00
6/24/20	ET	Prepare for NUHW bargaining with AHMC.	.10	39.50
6/24/20	ET	Attend NUHW and AHMC bargaining attend as note-taker.	.60	237.00
6/24/20	ET	Call with J. Saito and A. Yeh regarding NUHW and CNA bargaining.	.50	197.50
6/24/20	ET	Review notes and outline needed RFIs for NUHW.	.20	79.00
6/24/20	ET	Prepare for CNA bargaining with AHMC.	.10	39.50

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Date	Tkpr	Description	Hours	Amount
6/24/20	ET	Attend CNA and AHMC bargaining attend as note-taker.	.30	118.50
6/24/20	ET	Email correspondence with J. Saito regarding release language.	.10	39.50
6/25/20	ETF	Update RFI tracker and inventory of RFIs based on further responses to NUHW and Local 20.	.40	150.00
6/25/20	ANR	Preparation for 1113 negotiation.	1.20	714.00
6/25/20	ANR	Attend 1113 negotiations with Local 20.	1.80	1,071.00
6/25/20	ANR	Attend 1113 negotiations with CNA.	1.70	1,011.50
6/25/20	ANR	Attend 1113 negotiation call with Local 39.	.80	476.00
6/25/20	ANR	Conference call with J. Si/J. Schlant and buyer re costing.	.50	297.50
6/25/20	ET	Review bargaining materials.	.20	79.00
6/26/20	ETF	Review bargaining exchanges and organize same for declaration	.30	112.50
6/26/20	ANR	Preparation for 1113 negotiations and medical benefits review.	2.10	1,249.50
6/26/20	ANR	Conference call with AHMC broker re medical benefits.	.50	297.50
6/26/20	ANR	Preparation of side letter re medical benefits.	.30	178.50
6/26/20	ANR	Attend 1113 negotiations with NUHW.	1.00	595.00
6/26/20	ANR	Attend 1113 negotiations with CNA.	1.30	773.50
6/26/20	ANR	Status update to client re negotiations.	.20	119.00
6/26/20	ANR	Review of email from J. Saito re insurance rates.	.10	59.50
6/26/20	ANR	Email to Local 20 re medical benefits.	.20	119.00
6/26/20	ET	Review and analysis of bargaining documents for declarations.	.40	158.00
6/26/20	ET	Review and analysis of NUHW proposals and counter proposals.	.40	158.00
6/26/20	ET	Prepare for NUHW bargaining session	.10	39.50
6/26/20	ET	Prepare for CNA bargaining session.	.10	39.50
6/26/20	ET	Attend NUHW bargaining session as notetaker.	1.00	395.00
6/26/20	ET	Attend CNA bargaining session as notetaker.	1.30	513.50
6/26/20	ET	Update NUHW and CNA bargaining notes.	.20	79.00
6/27/20	ANR	Email to J. Schlant regarding insurance rates.	.10	59.50
6/28/20	ANR	Attend 1113 negotiation call with NUHW and Buyer.	.80	476.00
6/28/20	ANR	Caucus with Buyer regarding negotiations.	.60	357.00
6/28/20	ANR	Revise proposed 401k language.	.20	119.00
6/28/20	ET	NUHW: Review bargaining notes and redlines and identity TA's and opening articles.	1.70	671.50
6/28/20	ET	Local 20: Review bargaining notes and redlines and identity TA's and opening articles.	.30	118.50
6/28/20	ET	CNA: Review redlines and identity TA's and opening articles.	.60	237.00
6/29/20	ETF	Review bargaining notes for Seton negotiations with Local 20.	.40	150.00
6/29/20	ETF	Review bargaining notes for Seton negotiations with CNA.	.30	112.50

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Date	Tkpr	Description	Hours	Amount
6/29/20	ETF	Review bargaining notes for Seton negotiations with NUHW.	.40	150.00
6/29/20	ETF	Review bargaining notes for Seton negotiations with Local 39.	.20	75.00
6/29/20	ETF	Determine what outstanding RFIs exist.	.20	75.00
6/29/20	ETF	Update tracker and list for client and AHMC regarding bargaining notes.	.50	187.50
6/29/20	LAF	Review and respond to numerous emails regarding collective bargaining status.	.50	297.50
6/29/20	LAF	Review and revise proposals and proposal tracker.	1.20	714.00
6/29/20	ANR	Preparation for negotiations.	.80	476.00
6/29/20	ANR	Attend CNA negotiations.	1.20	714.00
6/29/20	ANR	Attend NUHW negotiations and caucus.	1.40	833.00
6/29/20	ANR	Review of email from Local 39.	.10	59.50
6/29/20	ANR	Reply to email from Local 39.	.10	59.50
6/29/20	ET	Review bargaining notes and proposals to make final list of TAs and open issues for Local 20 1113 negotiation.	.90	355.50
6/29/20	ET	Review bargaining notes and proposals to make final list of TAs and open issues for CNA 1113 negotiation.	2.10	829.50
6/29/20	ET	Analysis of TAs and pending issues for NUHW 1113 negotiation.	.70	276.50
6/29/20	ET	Prepare for CNA 1113 bargaining.	.10	39.50
6/29/20	ET	Prepare for NUHW 1113 bargaining.	.10	39.50
6/29/20	ET	1113 bargaining with NUHW -- attend as note-taker.	1.40	553.00
6/29/20	ET	Finalize NUHW bargaining notes.	.40	158.00
6/29/20	ET	Review and analysis of pending RFIS.	.50	197.50
6/29/20	ET	Review correspondence with AHMC regarding benefit and bargaining.	.10	39.50
6/29/20	ET	Review and analysis of Local 39 bargaining notes and correspondence from Union regarding open issues.	.20	79.00
6/30/20	ETF	Continue reviewing emails re further requests for information and update inventory and chart.	.40	150.00
6/30/20	ETF	Analyze outstanding requests for information.	.10	37.50
6/30/20	ETF	Draft summary of requests for information.	.20	75.00
6/30/20	ETF	Review follow up inquiries re requests for information.	.20	75.00
6/30/20	LAF	Work on negotiations trackers.	1.50	892.50
6/30/20	ANR	Preparation for negotiations.	.80	476.00
6/30/20	ANR	Attend 1113 CNA negotiations.	1.60	952.00
6/30/20	ANR	Review of bargaining status.	.80	476.00
6/30/20	ANR	Review of costing analysis.	.50	297.50
6/30/20	ANR	Review of EEOC closure and right to sue letter.	.10	59.50
6/30/20	ANR	Review of email from T. Ashford re 1113 negotiations.	.10	59.50
6/30/20	ANR	Reply to email from T. Ashford re negotiations.	.10	59.50
6/30/20	ANR	Review of request for information inventory.	.20	119.00

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Date	Tkpr	Description	Hours	Amount
6/30/20	ET	Review CNA proposals re 1113 negotiation.	.40	158.00
6/30/20	ET	Make additions and revisions to CNA TA's, deletions, and open issues document.	.60	237.00
6/30/20	ET	Review AHMC proposals and RFI list.	.30	118.50
6/30/20	ET	1113 bargaining call with CNA attend as note-taker.	.80	316.00
6/30/20	ET	Caucus call with J. Saito and A. Yeh re CNA bargaining.	1.10	434.50
6/30/20	ET	Prepare for CNA bargaining with AHMC.	.10	39.50
6/30/20	ET	Review and analysis of CNA bargaining notes regarding benefit issues.	.20	79.00
6/30/20	ET	Email D. Ahn re benefit questions from union.	.20	79.00
6/30/20	ET	Review and analysis of Berry subpoena and motion to quash.	.30	118.50
6/30/20	ET	Email correspondence with L. Sanfilippo regarding Berry subpoena and next steps.	.30	118.50
6/30/20	ET	Finalize bargaining notes from CNA bargaining session.	.30	118.50

TOTAL PROFESSIONAL SERVICES RENDERED

\$ 106,286.50

TIMEKEEPER SUMMARY

Name	Rate	Hours	Amount	N/C Hr	N/C \$
Ferguson, Elizabeth T	375.00	10.10	3,787.50	1.70	637.50
Tilman, Elina	395.00	71.20	28,124.00	.00	.00
Fernandez, Louise Ann	595.00	32.90	19,575.50	.00	.00
Ruda, An Nguyen	595.00	92.10	54,799.50	.00	.00
TOTALS		206.30	\$ 106,286.50	1.70	\$ 637.50

TOTAL THIS INVOICE

\$ 106,286.50

Balance is due within 30 days from the date of this invoice.

We reserve the right to charge interest at 10% per annum on amounts not paid within 30 days.

BARTKO ZANKEL BUNZEL

BARTKO ZANKEL BUNZEL & MILLER

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August 5, 2020

Seton Medical Center
601 S. Figueroa Street
Suite 4050
Los Angeles, CA 90017

Invoice #: 126293
Client #: 2765
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Billing Attorney: ANR

For professional services rendered and disbursements advanced through July 31, 2020:

RE: General Labor

DETAIL OF PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
7/01/20	ETF	Review emails regarding RFIs.	.20	75.00
7/01/20	ETF	Update tracker with further information regarding RFIs.	1.30	487.50
7/01/20	ETF	Update inventory of RFI requests and responses.	.40	150.00
7/01/20	LAF	Work on trackers of CBA articles.	2.00	1,190.00
7/01/20	LAF	Participate in NUHW collective bargaining.	1.80	1,071.00
7/01/20	LAF	Review and updates note for NUHW .	.40	238.00
7/01/20	LAF	Participate in Local 20 collective bargaining.	1.50	892.50
7/01/20	LAF	Review and update notes for Local 20.	.50	297.50
7/01/20	LAF	Participate in CNA negotiations.	1.50	892.50
7/01/20	LAF	Review and update notes for CNA.	.40	238.00
7/01/20	ANR	Conference call with Buyer and benefits broker re benefits proposal.	.50	297.50
7/01/20	ANR	Preparation for 1113 negotiations with unions.	1.40	833.00
7/01/20	ANR	Attend 1113 NUHW negotiations and caucus.	1.80	1,071.00
7/01/20	ANR	Attend Local 20 negotiations and caucus.	1.50	892.50
7/01/20	ANR	Attend 1113 CNA negotiations and caucus.	1.50	892.50
7/01/20	ANR	Attend Local 39 costing call.	.50	297.50
7/01/20	ANR	Review of Seton personnel issue.	.10	59.50
7/01/20	ANR	Review of email from Buyer re NUHW side letter.	.10	59.50
7/01/20	ET	Email correspondence with J. Jackson regarding Berry subpoena.	.10	39.50
7/01/20	ET	Call with plaintiff's counsel regarding Berry subpoena.	.10	39.50
7/01/20	ET	Review proposal and documents for AHMC 1113 bargaining.	.50	197.50
7/01/20	ET	Review list and necessary edits to RFI issues for AHMC bargaining.	.10	39.50

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Date	Tkpr	Description	Hours	Amount
7/02/20	LAF	Telephone call with AHMC team re bargaining.	.50	297.50
7/02/20	LAF	Preparation for 1113 negotiations.	1.00	595.00
7/02/20	LAF	Participate in Local 20 negotiation.	2.00	1,190.00
7/02/20	LAF	Participate in CNA negotiations.	.80	476.00
7/02/20	LAF	Participate in CNA caucus.	.20	119.00
7/02/20	LAF	Participate in Local 20 caucus.	.50	297.50
7/02/20	ANR	Preparation for 1113 negotiations.	1.00	595.00
7/02/20	ANR	Attend 1113 negotiations with Local 20 and caucus.	2.50	1,487.50
7/02/20	ANR	Attend 1113 negotiations with CNA and caucus.	1.00	595.00
7/02/20	ANR	Preparation of Local 20 last and best.	1.80	1,071.00
7/02/20	ANR	Review of retirement plan FAQ.	.10	59.50
7/02/20	ANR	Final review of NUHW best and final.	.50	297.50
7/02/20	ANR	Transmit best and final to NUHW.	.10	59.50
7/02/20	ET	Email correspondence with counsel regarding motion to quash and status of Berry subpoena.	.30	118.50
7/02/20	ET	Review sick leave policy.	.10	39.50
7/02/20	ET	Email correspondence with J. Saito regarding sick leave policy.	.10	39.50
7/03/20	LAF	Review notes and issues in preparation for negotiations.	1.00	595.00
7/03/20	LAF	Attend NUHW 1113 negotiations and caucus.	2.00	1,190.00
7/03/20	LAF	Review notes and NUHW proposals.	.80	476.00
7/03/20	LAF	Review of Local 20 information requests to update tracker.	.40	238.00
7/03/20	LAF	Attend Local 20 1113 negotiations and caucus.	2.00	1,190.00
7/03/20	LAF	Review of Local 20 issues.	.20	119.00
7/03/20	ANR	Preparation of NUHW best and final proposal, most favored nation and side letter.	2.30	1,368.50
7/03/20	ANR	Preparation for negotiations.	.80	476.00
7/03/20	ANR	Attend NUHW 1113 negotiations and caucus.	2.00	1,190.00
7/03/20	ANR	Analysis of NUHW counter.	.50	297.50
7/03/20	ANR	Review of Local 20 information request.	.20	119.00
7/03/20	ANR	Attend Local 20 1113 negotiations and caucus.	2.00	1,190.00
7/03/20	ANR	Review of Verity 1113 proposal.	.20	119.00
7/03/20	ANR	Review of Local 20 most favored nation edits.	.20	119.00
7/05/20	ANR	Review of draft 1113 Local 20 proposal.	.50	297.50
7/05/20	ANR	Conference call with Buyer re NUHW best and final.	.80	476.00
7/05/20	ANR	Review of 1113 proposal to NUHW.	.50	297.50
7/05/20	ANR	Review of email from S. Alberts re Local 20 contract status.	.10	59.50
7/05/20	ANR	Telephone call with S. Alberts re 1113 proposals.	.30	178.50
7/05/20	ANR	Email to NUHW re best and final.	.10	59.50

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Date	Tkpr	Description	Hours	Amount
7/05/20	ANR	Review and reply to email from NUHW re best and final.	.10	59.50
7/06/20	ETF	Update inventory of RFI requests and responses.	.30	112.50
7/06/20	LAF	Prepare for negotiations.	.50	297.50
7/06/20	LAF	Negotiations with AHMC and CNA.	.30	178.50
7/06/20	LAF	Debrief re same.	.50	297.50
7/06/20	LAF	Summarize issues re employee loans of PTO and edit same.	.60	357.00
7/06/20	LAF	Analyze local San Mateo sick leave statute.	1.00	595.00
7/06/20	LAF	Call re San Mateo sick leave statute.	.50	297.50
7/06/20	LAF	Work on tracker for RFI for 4 unions.	1.20	714.00
7/06/20	ANR	Attend CNA negotiation.	1.90	1,130.50
7/06/20	ANR	Review of San Mateo Covid-19 sick leave statute.	.50	297.50
7/06/20	ANR	Conference call with client and Dentons re proposed sick leave ordinance.	.30	178.50
7/06/20	ANR	Review of 1113 proposals.	.60	357.00
7/06/20	ANR	Review of PTO donation.	.30	178.50
7/06/20	ANR	Email to CNO re ratification vote.	.10	59.50
7/06/20	ANR	Email to J. Schlant re medi-call pass through.	.10	59.50
7/06/20	ET	Call with J. Saito and A. Yeh regarding CNA bargaining.	.80	316.00
7/06/20	ET	Review bargaining notes and related documents.	.20	79.00
7/07/20	ETF	Draft declaration in support of rejection motion for CBA with CNA based on 12 bargaining sessions.	5.60	2,100.00
7/07/20	ETF	Review multiple emails re outstanding RFIs	.30	112.50
7/07/20	ETF	Update tracker and summary re RFI requests and responses.	1.10	412.50
7/07/20	ETF	Review numerous emails and bargaining notes for declaration.	.30	112.50
7/07/20	LAF	Conference call with S. Alberts re negotiation status.	.40	238.00
7/07/20	LAF	Conference call with AHMC re negotiation status.	.60	357.00
7/07/20	LAF	Update to client re negotiations.	.20	119.00
7/07/20	LAF	Strategy session re revision to CNA last best and final.	.20	119.00
7/07/20	ANR	Conference call with S. Alberts re negotiation status.	.40	238.00
7/07/20	ANR	Conference call with B. Florence re CBA rejection motion.	.30	178.50
7/07/20	ANR	Conference call re CNA holiday pay.	.50	297.50
7/07/20	ANR	Conference call with AHMC re negotiation status.	.60	357.00
7/07/20	ANR	Status update to CNA.	.20	119.00
7/07/20	ANR	Status update to NUHW.	.30	178.50
7/07/20	ANR	Revise of Local 39 proposal.	.40	238.00
7/07/20	ANR	Review of email from J. Ward re 1113 proposal.	.10	59.50
7/07/20	ANR	Review of Local 39 audit request.	.20	119.00
7/07/20	ANR	Correspondence with Local 20 re ratification vote.	.20	119.00

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Date	Tkpr	Description	Hours	Amount
7/07/20	ANR	Status update to client re negotiations.	.20	119.00
7/07/20	ANR	Revision to CNA last best and final.	.50	297.50
7/07/20	ET	Review and analysis of bargaining documents for negotiations.	.20	79.00
7/07/20	ET	Review and analysis of RFI issues.	.20	79.00
7/08/20	ETF	Draft declaration for NUHW negotiations.	4.80	1,800.00
7/08/20	ETF	Draft declaration for Local 20 negotiations.	2.30	862.50
7/08/20	LAF	Conference call with J. Saito re CBA negotiations.	.30	178.50
7/08/20	LAF	Conference call with Buyer and client re 1113 process.	.30	178.50
7/08/20	LAF	Additional call with J. Saito re CNA authority.	.30	178.50
7/08/20	LAF	Review and revise 1113 declarations for 4 unions.	2.10	1,249.50
7/08/20	ANR	Conference call re Local 39 audit requests.	.50	297.50
7/08/20	ANR	Review of audit request.	.20	119.00
7/08/20	ANR	Preparation of inventory email re audit.	.10	59.50
7/08/20	ANR	Conference call with NUHW re ratification vote.	.20	119.00
7/08/20	ANR	Conference call with J. Saito re CBA negotiations.	.30	178.50
7/08/20	ANR	Conference call with Local 20 re ratification vote.	.30	178.50
7/08/20	ANR	Conference call with Buyer and client re 1113 process.	.30	178.50
7/08/20	ANR	Additional call with J. Saito re CNA authority.	.30	178.50
7/08/20	ANR	Review of email from NUHW re 1113 proposal.	.20	119.00
7/08/20	ANR	Review of email from CNA re 1113/1114 settlement.	.10	59.50
7/08/20	ANR	Review of response from S. Alberts re 1113/1114 CNA settlement.	.10	59.50
7/08/20	ANR	Review of various documents per Local 39 audit.	.30	178.50
7/08/20	ET	Review and respond to emails regarding bargaining material and documents.	.20	79.00
7/08/20	ET	Email correspondence with J. Moe and K. Murphy regarding DLSE case inclusion in bar notices.	.20	79.00
7/08/20	ET	Email carrier regarding DLSE case.	.10	39.50
7/09/20	ETF	Finish draft of Local 20 declaration.	2.80	1,050.00
7/09/20	ETF	Coordinate strategy re filing of declarations.	.30	112.50
7/09/20	ETF	Phone call with bk counsel re declarations and summaries.	.20	75.00
7/09/20	ETF	Draft Local 39 declaration and discuss issues re same.	1.20	450.00
7/09/20	ETF	Revise CNA declaration to include today's communication to union	.20	75.00
7/09/20	ETF	Revise declarations.	.90	337.50
7/09/20	ETF	Review and respond to follow up email from bankruptcy counsel re declarations	.20	75.00
7/09/20	ETF	Review strategy re foundational statements in declaration.	.10	37.50
7/09/20	ETF	Review follow up emails re CNA negotiations.	.10	37.50
7/09/20	ETF	Revise declarations based on info discussed with BK counsel.	.20	75.00
7/09/20	ETF	Email bankruptcy counsel re declarations.	.10	37.50

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Date	Tkpr	Description	Hours	Amount
7/09/20	ETF	Discuss filing of declarations with BK counsel.	.10	37.50
7/09/20	ANR	Conference call with buyer and Verity re 1113 process.	.50	297.50
7/09/20	ANR	Discussions with CNA re last and final proposal.	.80	476.00
7/09/20	ANR	Final review of CNA best and final.	.90	535.50
7/09/20	ANR	Telephone call with buyer re last and final CNA proposal.	.30	178.50
7/09/20	ANR	Coordinate with Local 20 re ballot .	.10	59.50
7/09/20	ANR	Review/reply email from J. Jackson re collective bargaining agreement copies.	.10	59.50
7/09/20	ANR	Review of email from buyer re Local 20 vote.	.10	59.50
7/09/20	ANR	Review/reply to email from CNA re proposed PTO accruals.	.10	59.50
7/09/20	ET	Respond to J. Jackson regarding CBAs.	.10	39.50
7/10/20	ETF	Begin drafting sections of motion re bargaining and exhibits.	3.20	1,200.00
7/10/20	ETF	Review and respond to emails from bankruptcy counsel.	.20	75.00
7/10/20	ETF	Continue drafting declaration based on further strategy input from bankruptcy counsel.	2.90	1,087.50
7/10/20	LAF	Review updated 1113 declarations and emails re same.	.60	357.00
7/10/20	ANR	Conference call with Local 20 re vote documents.	.40	238.00
7/10/20	ANR	Discussions with CNA re last and final.	.40	238.00
7/10/20	ANR	Review of draft Ruda declaration.	.80	476.00
7/10/20	ANR	Conference call with J. Saito re last and final proposals.	.30	178.50
7/10/20	ANR	Analysis of Local 39 document audit request.	.50	297.50
7/10/20	ANR	Email to Local 39 attorney re audit.	.10	59.50
7/10/20	ANR	Review of communications with Dentons/Local 20 re 1113 proposal.	.20	119.00
7/10/20	ANR	Further revisions to Ruda declaration for 1113 rejection motions.	.80	476.00
7/10/20	ANR	Review of Local 20 email re pension.	.10	59.50
7/10/20	ANR	Email to J. Schlant re leaves of absences.	.10	59.50
7/10/20	ET	Review and analysis of bargaining notes regarding pending issues for AHMC negotiations.	.30	118.50
7/10/20	ET	Email correspondence with K. Chapman regarding Evancview.	.10	39.50
7/11/20	ETF	Review and collect documents for exhibits to declaration.	1.20	450.00
7/11/20	ETF	Continue drafting declaration in support of motion with reference to exhibits.	4.50	1,687.50
7/11/20	ETF	Draft fact section of motion with reference to declaration and exhibits.	4.10	1,537.50
7/11/20	ANR	Review of email from J. Schlant re buyer data request.	.10	59.50
7/11/20	ANR	Review of email from S. Alberts re motion.	.10	59.50
7/11/20	ANR	Review of T. Moyron email to buyer re 1113 declaration.	.10	59.50
7/11/20	ANR	Continued work on Ruda declaration.	.80	476.00
7/11/20	ANR	Revise fact summary for 1113 motion.	.90	535.50
7/12/20	ETF	Discuss 1113 motion and declaration exhibits with BK counsel.	.30	112.50

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Date	Tkpr	Description	Hours	Amount
7/12/20	ETF	Review and respond to emails from BK counsel re questions on declaration in support of 1113 motion.	.20	75.00
7/12/20	ETF	Review exhibits re 1113 motion.	.10	37.50
7/12/20	ANR	Review of various correspondences and response re 1113 rejection motion.	.60	357.00
7/12/20	ET	Email correspondence with C. Doherty and G. Medina regarding 1113 motion exhibits.	.30	118.50
7/12/20	ET	Compile necessary exhibits for 1113 motion.	.20	79.00
7/12/20	ET	Review bargaining documents.	.20	79.00
7/13/20	ETF	Review status update re NUHW vote and Local 39 and Local follow up.	.30	112.50
7/13/20	ETF	Review exhibits for declaration.	.30	112.50
7/13/20	ETF	Phone call with other counsel to discuss exhibits re declaration.	.10	37.50
7/13/20	ANR	Conference call with Prime, broker and Verity team re benefits transition.	.60	357.00
7/13/20	ANR	Telephone call with NUHW re ratification results.	.20	119.00
7/13/20	ANR	Review email from NUHW re 1113/1114 settlement.	.10	59.50
7/13/20	ANR	Review of email from S. Alberts to Local 20 re pension plan.	.10	59.50
7/13/20	ANR	Status update to Verity and AHMC re NUHW vote results.	.10	59.50
7/13/20	ANR	Telephone call with J. Saito re NUHW vote results.	.20	119.00
7/13/20	ANR	Review of email to Buyer re Local 39 contract status.	.10	59.50
7/13/20	ET	Email correspondence with C. Doherty and T. Morrison regarding 1113 motion.	.20	79.00
7/13/20	ET	Review internal emails regarding status of bargaining.	.10	39.50
7/13/20	ET	Review exhibits in support of 1113 motion, determine confidential information and make necessary redactions.	2.00	790.00
7/13/20	ET	Email correspondence with G. and T. Morrison regarding redactions and exhibits for 1113.	.80	316.00
7/13/20	ET	Review documents to find pertinent correspondence for Exhibits in 1113 motion.	.20	79.00
7/14/20	ETF	Review motion and declaration for errors and cross-check against emails.	2.60	975.00
7/14/20	ETF	Draft email re cross-check of references in motion and declaration.	.10	37.50
7/14/20	ANR	Telephone call with NUHW re 1113 settlement.	.30	178.50
7/14/20	ANR	Email to client and Dentons re NUHW 1113 settlement.	.10	59.50
7/14/20	ANR	Revision to 1113 brief/Ruda declaration.	2.80	1,666.00
7/14/20	ANR	Review of email from NUHW re formal notice of failure to ratify.	.10	59.50
7/14/20	ANR	Review of NUHW grievances.	.30	178.50
7/14/20	ET	Email correspondence with C. Doherty, S. Alberts, G. Medina regarding 1113 motion and exhibits.	.60	237.00
7/14/20	ET	Call with C. Doherty regarding exhibits.	.10	39.50
7/15/20	ETF	Review emails re union votes and inventory same.	.10	37.50
7/15/20	ETF	Review and respond to emails re finalization of declaration.	.10	37.50
7/15/20	LAF	Review 1113 Declarations.	.50	297.50

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Date	Tkpr	Description	Hours	Amount
7/15/20	ANR	Telephone call with J. Saito re negotiation position.	.30	178.50
7/15/20	ANR	Revision to Ruda declaration.	1.20	714.00
7/15/20	ANR	Telephone call with S. Alberts and D. Cook re Local 39 motion.	.30	178.50
7/15/20	ANR	Review of email from NUHW re grievances.	.20	119.00
7/15/20	ET	Review emails regarding bargaining status.	.20	79.00
7/15/20	ET	Review Tandon lawsuit.	.10	39.50
7/15/20	ET	Email correspondence with K. Chapman regarding Tandon lawsuit.	.10	39.50
7/15/20	ET	Email E. Paul and R. Adcock regarding Tandon lawsuit.	.10	39.50
7/16/20	ANR	Communications with CNA re ratification vote.	.90	535.50
7/16/20	ANR	Revision to Ruda 1113 declaration re CNA vote.	.60	357.00
7/16/20	ANR	Email with buyer/client re ratification vote.	.10	59.50
7/16/20	ANR	Communications with Local 39 re new CBA.	.50	297.50
7/16/20	ANR	Communications with buyer re Local 39 CBA.	.30	178.50
7/16/20	ANR	Revise of Local 39 Trust rejection motion.	.90	535.50
7/16/20	ANR	Communications with NUHW re grievance settlement.	.30	178.50
7/16/20	ANR	Revision to Local 39 CBA.	1.20	714.00
7/17/20	ANR	Review of email from J. Saito re Extended Sick Leave.	.10	59.50
7/17/20	ANR	Telephone call with J. Saito re Local 39 agreement.	.30	178.50
7/17/20	ANR	Revision to Local 39 agreement.	.60	357.00
7/17/20	ANR	Telephone call with L. Cheema re grievances.	.30	178.50
7/17/20	ANR	Analysis of NUHW grievances.	.30	178.50
7/20/20	LAF	Review and respond to emails from H Levy re labor issues at SMC.	.30	178.50
7/20/20	LAF	Revise memo from AHMC to employees.	.40	238.00
7/20/20	LAF	Legal research re same.	.30	178.50
7/20/20	ANR	Conference call with Dentons and NUHW re 1113 motion.	.30	178.50
7/20/20	ANR	Review email with Ms. H. Levy-Biehl re workers compensation issues.	.20	119.00
7/20/20	ANR	Review of email from H. Levy-Biehl re pharmacy board issue.	.10	59.50
7/20/20	ANR	Reply to email from H. Levy-Biehl re pharmacy board issue.	.10	59.50
7/20/20	ANR	Review of email from Local 39 re proposed collective bargaining agreement.	.10	59.50
7/21/20	ETF	Review docket re deadlines for filings and provide summary re same.	.20	75.00
7/21/20	ANR	Review of grievances for NUHW settlement.	.50	297.50
7/21/20	ANR	Email to Human Resources re documents for grievance resolution.	.10	59.50
7/22/20	ANR	Conference call re Local 39 agreement finalization.	.40	238.00
7/22/20	ANR	Telephone call with J. Saito re Local 39 agreement.	.30	178.50
7/22/20	ANR	Analysis of NUHW reclassification grievance.	.60	357.00
7/22/20	ANR	Telephone call with Local 20 re labor status.	.30	178.50
7/22/20	ANR	Review of grievances facts.	.30	178.50

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7/23/20	ANR	Telephone call with J. Ward re pending matters.	.30	178.50
7/23/20	ANR	Telephone call with D. Martin re pending labor matters.	.20	119.00
7/23/20	ANR	Telephone call with Local 39 re new CBA.	.30	178.50
7/23/20	ANR	Telephone call with J. Saito re new CBA.	.20	119.00
7/23/20	ANR	Telephone call with V. Coe re grievance settlements.	.40	238.00
7/23/20	ANR	Review of CNA 1113 settlement document.	.50	297.50
7/23/20	ANR	Review of email from Seton re grievance facts.	.20	119.00
7/23/20	ET	Review email threads regarding Local 39 proposals.	.10	39.50
7/23/20	ET	Compare wage scales and draft chart.	.30	118.50
7/24/20	ANR	Email to J. Ward re 1113 settlement.	.10	59.50
7/24/20	ANR	Reply to email from J. Ward re 1113 settlement.	.10	59.50
7/24/20	ANR	Review of email from S. Alberts re Local 20 1113 settlement.	.10	59.50
7/24/20	ANR	Additional email from J. Ward re 1113 settlement.	.10	59.50
7/24/20	ANR	Reply to additional email from J. Ward re 1113 settlement.	.10	59.50
7/24/20	ANR	Review of email from Song re RN agreements; review of agreements.	.30	178.50
7/26/20	ANR	Review of email with C. Doherty re court status update.	.10	59.50
7/26/20	ANR	Email to NUHW re grievance settlements.	.10	59.50
7/26/20	ANR	Email with Seton Human Resources re grievance settlements.	.10	59.50
7/27/20	ANR	Revise of status update to the Court re 1113 stipulations.	.50	297.50
7/27/20	ANR	Review email with Human Resources re grievance settlements.	.20	119.00
7/27/20	ANR	Revisions to settlement agreement.	.50	297.50
7/27/20	ANR	Review of 1113 proposal to Local 39.	.30	178.50
7/27/20	ANR	Conference call with NUHW re grievance settlements.	.20	119.00
7/28/20	ANR	Call with B. Florence re 1113 settlement.	.20	119.00
7/28/20	ANR	Conference call with Human Resources re investigation.	.30	178.50
7/28/20	ANR	Review of Local 39 form of settlement.	.50	297.50
7/28/20	ANR	Settlement discussions with Local 39.	.50	297.50
7/29/20	ANR	Review of email from NUHW re settlement.	.10	59.50
7/29/20	ANR	Reply to email from NUHW re 1113 settlement.	.10	59.50
7/29/20	ANR	Finalize Local 39 draft collective bargaining agreement.	1.50	892.50
7/29/20	ET	Call with K. Chapman regarding SMC claims.	.10	39.50
7/29/20	ET	Review AIG claim chart and other client documents.	.20	79.00
7/29/20	ET	Draft list of claims.	.30	118.50
7/29/20	ET	Email correspondence with K. Chapman regarding SMC claims.	.10	39.50
7/30/20	LAF	Review documents.	.50	297.50
7/30/20	LAF	Prepare questions and interview witness.	1.00	595.00
7/30/20	LAF	Follow up review of additional documents.	.10	59.50

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7/30/20	ANR	Conference call with J. Saito re Local 39 agreement and updates.	.40	238.00
7/30/20	ANR	Review of benefits communication.	.30	178.50
7/31/20	LAF	Telephone call with Hope Levy and Susan Acquino re patient issue.	.30	178.50
7/31/20	LAF	Follow up telephone call re interview.	.20	119.00
7/31/20	LAF	Interview witness.	.50	297.50
7/31/20	LAF	Debrief with A Ruda re same.	.20	119.00
7/31/20	ANR	Conference call with J. Saito re application portal.	.20	119.00
7/31/20	ANR	Review of compliance call.	.10	59.50
7/31/20	ANR	Email to client re NUHW settlement agreement.	.10	59.50

TOTAL PROFESSIONAL SERVICES RENDERED

\$ 82,202.00

TIMEKEEPER SUMMARY

Name	Rate	Hours	Amount	N/C Hr	N/C \$
Ferguson, Elizabeth T	375.00	43.50	16,312.50	.00	.00
Tilman, Elina	395.00	10.00	3,950.00	.00	.00
Fernandez, Louise Ann	595.00	33.40	19,873.00	.00	.00
Ruda, An Nguyen	595.00	70.70	42,066.50	.00	.00
TOTALS		157.60	\$ 82,202.00	.00	\$.00

TOTAL THIS INVOICE

\$ 82,202.00

Balance is due within 30 days from the date of this invoice.

We reserve the right to charge interest at 10% per annum on amounts not paid within 30 days.

BARTKO ZANKEL BUNZEL

BARTKO ZANKEL BUNZEL & MILLER
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September 8, 2020

Seton Medical Center
601 S. Figueroa Street
Suite 4050
Los Angeles, CA 90017

Invoice #: 126667
Client #: 2765
Matter #: 000
Billing Attorney: ANR

For professional services rendered and disbursements advanced through September 4, 2020:

RE: General Labor

DETAIL OF PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
8/03/20	ANR	Review of AWS communication.	.10	59.50
8/03/20	ANR	Telephone call with J. Tran re AWS communication.	.30	178.50
8/03/20	ANR	Telephone call with CNA re AWS communication.	.40	238.00
8/03/20	ANR	Telephone call with J. Saito re AWS communication.	.20	119.00
8/03/20	ANR	Review of email from J. Tran re leave of absence.	.10	59.50
8/04/20	ANR	Conference call with H. Levy-Biehl and L. Compton re compliance matters.	.60	357.00
8/04/20	ANR	Conference call with client re receipt of investigation report.	.30	178.50
8/04/20	ANR	Telephone call with Local 20 re labor matters.	.30	178.50
8/04/20	ANR	Telephone call with NUHW re labor matter.	.30	178.50
8/04/20	ANR	Telephone call with J. Saito re application portal.	.50	297.50
8/04/20	ANR	Telephone call with Seton CEO re rally.	.20	119.00
8/04/20	ANR	Preparation of rally acknowledgement letter.	.60	357.00
8/04/20	ANR	Review of NUHW portal concerns.	.30	178.50
8/04/20	ANR	Review of CNA rate issue.	.30	178.50
8/04/20	ANR	Email to B. Florence re contract.	.30	178.50
8/05/20	ANR	Conference call with J. Saito re various labor matters.	.80	476.00
8/05/20	ANR	Review of CNA grievance matter.	.20	119.00
8/05/20	ANR	Telephone call with NUHW re leaves of absences.	.20	119.00
8/05/20	ANR	Review of materials re NUHW information request.	.30	178.50
8/06/20	LAF	Research regarding definition of CBA.	.50	297.50
8/06/20	LAF	Strategy session re same.	.20	119.00
8/06/20	LAF	Email to AHMC regarding same.	.10	59.50

Client #: 2765
Matter #: 000September 8, 2020
Invoice #: 126667

Date	Tkpr	Description	Hours	Amount
8/06/20	ANR	Settlement discussions with AHMC and CNA re Memorandum of Agreement.	.50	297.50
8/06/20	ANR	Settlement discussions with AHMC and NUHW re Memorandum of Agreement.	.50	297.50
8/06/20	ANR	Grievance settlement discussion with CNA.	.50	297.50
8/06/20	ANR	Analysis of grievance.	.20	119.00
8/06/20	ANR	Preparation of final warning.	.50	297.50
8/06/20	ANR	Review of employee step progression.	.20	119.00
8/06/20	ANR	Preparation of draft MOU for CNA.	1.40	833.00
8/06/20	ANR	Review of part-time hours issue.	.50	297.50
8/06/20	ET	Email correspondence with N. Dulos and P. Osborne regarding policies and CBAs.	.40	158.00
8/06/20	ET	Review and analysis of policies, employee handbook, and identify pertinent portions.	1.00	395.00
8/07/20	LAF	Review issues regarding collectively bargained agreement.	.40	238.00
8/07/20	LAF	Review draft agreement.	.30	178.50
8/07/20	LAF	Review emails from AHMC counsel regarding same.	.20	119.00
8/07/20	LAF	Strategy session regarding response.	.20	119.00
8/07/20	LAF	Telephone call with AHMC and counsel regarding same.	.50	297.50
8/07/20	ANR	Conference call with J. Saito re Memorandum of Understanding revisions.	.40	238.00
8/07/20	ANR	Revisions to Memorandum of Understanding.	.80	476.00
8/07/20	ANR	Administer employee discipline.	.50	297.50
8/07/20	ANR	Additional conference with J. Saito, J. Fuschman and L. Fernandez re Memorandum of Understanding revisions.	.50	297.50
8/07/20	ANR	Telephone call with CNA re Memorandum of Understanding revisions.	.30	178.50
8/07/20	ANR	Conference call with CNA re grievance settlement.	.30	178.50
8/07/20	ANR	Review of full-time/part-time spreadsheet.	.20	119.00
8/07/20	ANR	Finalize CNA Memorandum of Understanding.	.80	476.00
8/07/20	ANR	Additional preparation of NUHW Memorandum of Understanding.	1.20	714.00
8/07/20	ET	Calls with N. Dublos and P. Osborne regarding policies.	.30	118.50
8/07/20	ET	Email correspondence with N. Dublos and P. Osborne regarding policies.	.20	79.00
8/07/20	ET	Review policy documents and make edits.	.30	118.50
8/07/20	CC	Attend video conference to witness administering of employee discipline.	.20	39.00
8/08/20	ANR	Telephone call with J. Saito re NUHW Memorandum of Understanding.	.30	178.50
8/08/20	ANR	Review of fully executed 1113 agreements.	.20	119.00
8/09/20	ANR	Telephone call with J. Saito re NUHW Memorandum of Understanding.	.30	178.50
8/09/20	ANR	Revisions to NUHW Memorandum of Understanding.	1.00	595.00
8/09/20	ANR	Discussions with NUHW re Memorandum of Understanding.	.30	178.50
8/09/20	ANR	Email to NUHW re fully executed settlement agreement.	.10	59.50
8/10/20	ANR	Telephone call with V. Coe re NUHW settlement.	.30	178.50

Client #: 2765
Matter #: 000

September 8, 2020
Invoice #: 126667

Date	Tkpr	Description	Hours	Amount
8/10/20	ANR	Conference call with J. Saito re union issues.	.30	178.50
8/11/20	ANR	Telephone call with S. Sharrer and J. Saito re transition labor matters.	.60	357.00
8/11/20	ANR	Review email from N. Dulos re personnel action request.	.10	59.50
8/12/20	ANR	Review of union flyer.	.10	59.50
8/12/20	ANR	Review of email from NUHW re employee warning.	.10	59.50
8/12/20	ANR	Review from B. Florence re CBA.	.10	59.50
8/14/20	ET	Analysis of fact-gathering issues for litigation.	.10	39.50
8/14/20	ET	Email correspondence with N. Nasu regarding fact-gathering.	.10	39.50
8/14/20	ET	Review coverage letter regarding Evanciew.	.10	39.50
8/14/20	ET	Email correspondence with K. Chapman and J. Moe regarding Evanciew.	.10	39.50
8/17/20	ET	Email correspondence with K. Murphy regarding Evanciew claim.	.10	39.50
8/19/20	ANR	Review of email from B. Florence final CBA.	.10	59.50
8/19/20	ANR	Review of retro check issue.	.30	178.50
8/19/20	ANR	Review of email from L. Cheema re patient ombudsman.	.10	59.50
8/19/20	ANR	Telephone call with J. Saito re transition matters.	.30	178.50
8/19/20	ANR	Review of RN step progression issue.	.40	238.00
8/19/20	ET	Email correspondence with N. Dulos regarding fact-gathering.	.10	39.50
8/27/20	ET	Review and compare Local 20 final version CBA against LBF and make notations regarding inconsistencies/changes needed.	1.90	750.50
9/03/20	ET	Review local 20 agreement for consistency with proposals.	.20	79.00
TOTAL PROFESSIONAL SERVICES RENDERED				\$ 15,659.50

TIMEKEEPER SUMMARY

Name	Rate	Hours	Amount	N/C Hr	N/C \$
Chou, Chet	195.00	.20	39.00	.00	.00
Tilman, Elina	395.00	4.90	1,935.50	.00	.00
Fernandez, Louise Ann	595.00	2.40	1,428.00	.00	.00
Ruda, An Nguyen	595.00	20.60	12,257.00	.00	.00
TOTALS		28.10	\$ 15,659.50	.00	\$.00

TOTAL THIS INVOICE \$ 15,659.50

Client #: 2765
Matter #: 000

September 8, 2020
Invoice #: 126667

*Balance is due within 30 days from the date of this invoice.
We reserve the right to charge interest at 10% per annum on amounts not paid within 30 days.*

EXHIBIT I

BARTKO ZANKEL BUNZEL

BARTKO ZANKEL BUNZEL & MILLER
A Professional Law Corporation

One Embarcadero Center, Ste. 800
San Francisco, CA 94111
p: 415.956.1900
f: 415.956.1152
www.bzbm.com

June 3, 2020

Seton Medical Center
601 S. Figueroa Street
Suite 4050
Los Angeles, CA 90017

Invoice #: 125837
Client #: 2765
Matter #: 001
Billing Attorney: ANR

For professional services rendered and disbursements advanced through May 31, 2020:

RE: Seton Medical Center adv. Mahan

DETAIL OF PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
5/01/20	ETF	Continue analysis re case strategy	.30	112.50
5/04/20	OQD	Analysis of case status report, litigation file, and related outstanding litigation deadlines, tasks, and projects.	.50	297.50

TOTAL PROFESSIONAL SERVICES RENDERED \$ 410.00

TIMEKEEPER SUMMARY

Name	Rate	Hours	Amount	N/C Hr	N/C \$
Ferguson, Elizabeth T	375.00	.30	112.50	.00	.00
Dunlap, Oliver Q	595.00	.50	297.50	.00	.00
TOTALS		.80	\$ 410.00	.00	\$.00

TOTAL THIS INVOICE \$ 410.00

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BARTKO ZANKEL BUNZEL

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September 8, 2020

Seton Medical Center
601 S. Figueroa Street
Suite 4050
Los Angeles, CA 90017

Invoice #: 126668
Client #: 2765
Matter #: 001
Billing Attorney: ANR

For professional services rendered and disbursements advanced through September 4, 2020:

RE: Seton Medical Center adv. Mahan

DETAIL OF PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
8/11/20	ETF	Draft list of documents needed for claim.	.40	150.00
8/11/20	ET	Analysis of fact-gathering.	.30	118.50
8/11/20	ET	Email N. Dubulos regarding pending issues.	.20	79.00
8/14/20	ETF	Review emails re demographic information requested from client.	.10	37.50
8/28/20	ETF	Review email from client re follow up on Mahan email requests.	.10	37.50

TOTAL PROFESSIONAL SERVICES RENDERED \$ 422.50

TIMEKEEPER SUMMARY

Name	Rate	Hours	Amount	N/C Hr	N/C \$
Ferguson, Elizabeth T	375.00	.60	225.00	.00	.00
Tilman, Elina	395.00	.50	197.50	.00	.00
TOTALS		1.10	\$ 422.50	.00	\$.00

TOTAL THIS INVOICE \$ 422.50

Balance is due within 30 days from the date of this invoice.

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EXHIBIT J

BARTKO ZANKEL BUNZEL

BARTKO ZANKEL BUNZEL & MILLER
A Professional Law Corporation

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www.bzbml.com

August 5, 2020

Seton Medical Center
601 S. Figueroa Street
Suite 4050
Los Angeles, CA 90017

Invoice #: 126295
Client #: 2765
Matter #: 002
Billing Attorney: ANR

For professional services rendered and disbursements advanced through July 31, 2020:

RE: VHS of CA adv. Wahidi

DETAIL OF PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
7/28/20	ET	Analysis of next steps regarding case in light of bk procedural issues.	.30	118.50
7/28/20	ET	Review client documents.	.20	79.00
TOTAL PROFESSIONAL SERVICES RENDERED				\$ 197.50

TIMEKEEPER SUMMARY

Name	Rate	Hours	Amount	N/C Hr	N/C \$
Tilman, Elina	395.00	.50	197.50	.00	.00
TOTALS		.50	\$ 197.50	.00	\$.00

TOTAL THIS INVOICE **\$ 197.50**

Balance is due within 30 days from the date of this invoice.

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BARTKO ZANKEL BUNZEL

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A Professional Law Corporation

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September 8, 2020

Seton Medical Center
601 S. Figueroa Street
Suite 4050
Los Angeles, CA 90017

Invoice #: 126669
Client #: 2765
Matter #: 002
Billing Attorney: ANR

For professional services rendered and disbursements advanced through September 4, 2020:

RE: VHS of CA adv. Wahidi

DETAIL OF PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
8/11/20	ET	Email R. Muhen re fact-gathering.	.10	39.50
8/13/20	ET	Review client documents.	.30	118.50
8/13/20	ET	Email correspondence with payroll and S. Sharrer regarding payroll documents.	.20	79.00
TOTAL PROFESSIONAL SERVICES RENDERED				\$ 237.00

TIMEKEEPER SUMMARY

Name	Rate	Hours	Amount	N/C Hr	N/C \$
Tilman, Elina	395.00	.60	237.00	.00	.00
TOTALS		.60	\$ 237.00	.00	\$.00

TOTAL THIS INVOICE \$ 237.00

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EXHIBIT K

BARTKO ZANKEL BUNZEL

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June 3, 2020

Seton Medical Center
601 S. Figueroa Street
Suite 4050
Los Angeles, CA 90017

Invoice #: 125838
Client #: 2765
Matter #: 005
Billing Attorney: ANR

For professional services rendered and disbursements advanced through May 31, 2020:

RE: Atogwe, Oshioakpeme

DETAIL OF PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
5/01/20	ETF	Continue review of documents and summary for case strategy plan.	.80	300.00
5/01/20	ET	Review internal client correspondence and documents.	.30	118.50
5/01/20	ET	Analysis of case issues.	.20	79.00
5/01/20	ET	Respond to S. Sharrer regarding pending issues.	.10	39.50
5/04/20	LAF	Review and respond to various emails re status of LOA .	.30	178.50
5/05/20	ETF	Review further issues for case plan per directives	.30	112.50
5/05/20	ET	Analysis of outstanding issues regarding claims.	.10	39.50
5/06/20	ET	Email correspondence with S. Sharrer regarding pending issues.	.10	39.50
5/06/20	ET	Email DFEH agent regarding charge status.	.10	39.50
5/06/20	ET	Call DFEH agent regarding charge.	.10	39.50
5/06/20	ET	Analysis of pending case issues.	.20	79.00
5/06/20	ET	Review and analysis of client documents.	.60	237.00
5/07/20	ET	Calls with K. Maltez regarding fact-gathering.	1.10	434.50
5/07/20	ET	Analysis of next steps and resolution.	.50	197.50
5/07/20	ET	Call with S. Sharrer regarding pending issues.	.20	79.00
5/07/20	ET	Review and analysis of client documents.	.80	316.00
5/07/20	ET	Draft chronology of events.	1.10	434.50
5/07/20	ET	Draft letter to employee.	.30	118.50
5/07/20	ET	Email S. Sharrer regarding case.	.10	39.50

TOTAL PROFESSIONAL SERVICES RENDERED

\$ 2,921.50

Client #: 2765
Matter #: 005

June 3, 2020
Invoice #: 125838

TIMEKEEPER SUMMARY

Name	Rate	Hours	Amount	N/C Hr	N/C \$
Ferguson, Elizabeth T	375.00	1.10	412.50	.00	.00
Tilman, Elina	395.00	5.90	2,330.50	.00	.00
Fernandez, Louise Ann	595.00	.30	178.50	.00	.00
TOTALS		7.30	\$ 2,921.50	.00	\$.00

TOTAL THIS INVOICE

\$ 2,921.50

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BARTKO ZANKEL BUNZEL

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A Professional Law Corporation

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July 6, 2020

Seton Medical Center
601 S. Figueroa Street
Suite 4050
Los Angeles, CA 90017

Invoice #: 126048
Client #: 2765
Matter #: 005
Billing Attorney: ANR

For professional services rendered and disbursements advanced through June 30, 2020:

RE: Atogwe, Oshioakpemeh

DETAIL OF PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
6/23/20	ET	Call with DFEH investigator regarding case.	.20	79.00
6/23/20	ET	Email correspondence with DFEH investigator regarding claims.	.10	39.50
6/23/20	ET	Review client documents and bankruptcy documents.	.40	158.00
6/23/20	ET	Call with J. Moe regarding strategy for case.	.40	158.00
6/23/20	ET	Email correspondence with N. Dulos regarding case facts.	.20	79.00
6/23/20	ET	Analysis of case.	.30	118.50
6/24/20	ET	Follow-up email to N. Dulos regarding fact-gathering.	.10	39.50
6/24/20	ET	Email DFEH investigator regarding case.	.10	39.50
6/24/20	ET	Review client documents for further production to DFEH.	.20	79.00
6/25/20	ET	Email correspondence with N. Dubulos, A. Estrada and J. Moe regarding bankruptcy issues.	.70	276.50
6/25/20	ET	Call with N. Dulos regarding pending issues.	.10	39.50
6/25/20	ET	Call with J. Moe regarding next steps.	.30	118.50
6/25/20	ET	Email DFEH investigator regarding case.	.20	79.00
6/25/20	ET	Review and make edits to Dentons letter to DFEH.	.20	79.00
6/25/20	ET	Review and analysis of client and bankruptcy POC documents.	.40	158.00
6/25/20	ET	Strategize regarding case.	.20	79.00
6/26/20	ET	Review J. Moe's letter and email to DFEH.	.10	39.50
6/30/20	ET	Review case closure letter from DFEH.	.10	39.50
6/30/20	ET	Email E. Paul and S. Night re case status.	.20	79.00

TOTAL PROFESSIONAL SERVICES RENDERED

\$ 1,777.50

Client #: 2765
Matter #: 005

July 6, 2020
Invoice #: 126048

TIMEKEEPER SUMMARY

Name	Rate	Hours	Amount	N/C Hr	N/C \$
Tilman, Elina	395.00	4.50	1,777.50	.00	.00
TOTALS		4.50	\$ 1,777.50	.00	\$.00

TOTAL THIS INVOICE

\$ 1,777.50

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EXHIBIT L

BARTKO ZANKEL BUNZEL

BARTKO ZANKEL BUNZEL & MILLER

A Professional Law Corporation

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July 6, 2020

Seton Medical Center
601 S. Figueroa Street
Suite 4050
Los Angeles, CA 90017

Invoice #: 126050
Client #: 2765
Matter #: 007
Billing Attorney: ANR

For professional services rendered and disbursements advanced through June 30, 2020:

RE: Jeffrey Bonifacio

DETAIL OF PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
6/22/20	ET	Review response from carrier.	.10	39.50
6/22/20	ET	Email correspondence with N. Dulos regarding documents.	.10	39.50
6/23/20	ET	Review carrier response.	.10	39.50
6/23/20	ET	Email opposing counsel regarding labor code request.	.10	39.50
6/23/20	ET	Email correspondence with Payroll regarding documents.	.10	39.50
6/25/20	ET	Email correspondence with R. Mohun regarding earning history.	.20	79.00
6/25/20	ET	Review client documents.	.20	79.00
6/26/20	ET	Email correspondence with R. Mohun regarding earning history.	.10	39.50
6/26/20	ET	Review client documents.	.20	79.00
6/29/20	ET	Email correspondence with R. Mohun regarding client documents.	.30	118.50
6/29/20	ET	Call with R. Mohun regarding earning history.	.40	158.00
6/29/20	ET	Review and analysis of earning history.	.20	79.00
6/29/20	ET	Email opposing counsel regarding labor code production.	.10	39.50
6/29/20	ET	Strategize regarding case.	.20	79.00

TOTAL PROFESSIONAL SERVICES RENDERED

\$ 948.00

TIMEKEEPER SUMMARY

Name	Rate	Hours	Amount	N/C Hr	N/C \$
Tilman, Elina	395.00	2.40	948.00	.00	.00
TOTALS		2.40	\$ 948.00	.00	\$.00

Client #: 2765
Matter #: 007

July 6, 2020
Invoice #: 126050

TOTAL THIS INVOICE

\$ 948.00

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BARTKO ZANKEL BUNZEL

BARTKO ZANKEL BUNZEL & MILLER

A Professional Law Corporation

One Embarcadero Center, Ste. 800

San Francisco, CA 94111

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www.bzbm.com

August 5, 2020

Seton Medical Center
601 S. Figueroa Street
Suite 4050
Los Angeles, CA 90017

Invoice #: 126296
Client #: 2765
Matter #: 007
Billing Attorney: ANR

For professional services rendered and disbursements advanced through July 31, 2020:

RE: Jeffrey Bonifacio

DETAIL OF PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
7/03/20	ET	Review and analysis of client documents.	.50	197.50
7/08/20	ET	Review client documents and make redactions.	.60	237.00
7/08/20	ET	Finalize labor code production.	.20	79.00
7/08/20	ET	Email opposing counsel regarding production.	.10	39.50
7/08/20	ET	Call and email correspondence with R. Mohun regarding earning history.	.10	39.50
7/15/20	ET	Review client documents and make necessary records.	1.50	592.50
7/15/20	ET	Calls with K. Hands regarding pending issues.	.20	79.00
7/15/20	ET	Email correspondence with K. Hands regarding pending issues.	.20	79.00
7/15/20	ET	Email opposing counsel regarding labor code productions.	.10	39.50
7/15/20	ET	Analysis of legal issues.	.30	118.50
7/17/20	ET	Email correspondence with L. Cheema regarding pending issues.	.10	39.50
7/17/20	ET	Review and analysis of client documents.	.20	79.00
7/17/20	ET	Email opposing counsel regarding labor code production.	.10	39.50
TOTAL PROFESSIONAL SERVICES RENDERED				\$ 1,659.00

TIMEKEEPER SUMMARY

Name	Rate	Hours	Amount	N/C Hr	N/C \$
Tilman, Elina	395.00	4.20	1,659.00	.00	.00
TOTALS		4.20	\$ 1,659.00	.00	\$.00

Client #: 2765
Matter #: 007

August 5, 2020
Invoice #: 126296

TOTAL THIS INVOICE

\$ 1,659.00

*Balance is due within 30 days from the date of this invoice.
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BARTKO ZANKEL BUNZELBARTKO ZANKEL BUNZEL & MILLER
A Professional Law CorporationOne Embarcadero Center, Ste. 800
San Francisco, CA 94111
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September 8, 2020

Seton Medical Center
601 S. Figueroa Street
Suite 4050
Los Angeles, CA 90017Invoice #: 126671
Client #: 2765
Matter #: 007
Billing Attorney: ANR

For professional services rendered and disbursements advanced through September 4, 2020:

RE: Jeffrey Bonifacio**DETAIL OF PROFESSIONAL SERVICES RENDERED**

Date	Tkpr	Description	Hours	Amount
8/04/20	ET	Review client documents.	.30	118.50
8/04/20	ET	Email K. Hands regarding pending issues.	.10	39.50
8/04/20	ET	Email HR, M. Day, Payroll, and pertinent witnesses regarding pending issues.	.30	118.50
8/04/20	ET	Draft internal privileged pleading.	.50	197.50
8/04/20	ET	Email correspondence with R. Muhen and B. Paulsen re pending issues.	.20	79.00

TOTAL PROFESSIONAL SERVICES RENDERED \$ 553.00**TIMEKEEPER SUMMARY**

Name	Rate	Hours	Amount	N/C Hr	N/C \$
Tilman, Elina	395.00	1.40	553.00	.00	.00
TOTALS		1.40	\$ 553.00	.00	\$.00

TOTAL THIS INVOICE \$ 553.00

Balance is due within 30 days from the date of this invoice.
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EXHIBIT M

BARTKO ZANKEL BUNZEL

BARTKO ZANKEL BUNZEL & MILLER
A Professional Law Corporation

One Embarcadero Center, Ste. 800
San Francisco, CA 94111
p: 415.956.1900
f: 415.956.1152
www.bzbm.com

June 3, 2020

Seton Medical Center
601 S. Figueroa Street
Suite 4050
Los Angeles, CA 90017

Invoice #: 125839
Client #: 2765
Matter #: 006
Billing Attorney: ANR

For professional services rendered and disbursements advanced through May 31, 2020:

RE: Investigations

DETAIL OF PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
5/11/20	LAF	Review documents re PACU Investigation.	.50	297.50
5/13/20	LAF	Interview 7 witnesses re PACU investigation.	7.00	4,165.00
5/13/20	LAF	Review and analyze notes re same.	1.10	654.50
5/14/20	LAF	Interview witnesses.	3.00	1,785.00
5/14/20	LAF	Two telephone conferences re same with S Sharer.	.50	297.50
5/14/20	LAF	Review notes of interviews re PACU.	.50	297.50
5/14/20	LAF	Debrief re PACU investigation.	.40	238.00
5/15/20	LAF	Review notes re management investigation.	.60	357.00
5/15/20	LAF	Prepare investigation report re management investigation.	2.00	1,190.00
5/18/20	LAF	Emails to schedule further interviews.	.20	119.00
5/18/20	LAF	Follow up emails re same.	.20	119.00
5/20/20	LAF	Interview 3 witnesses prepare notes re same.	4.00	2,380.00
5/21/20	LAF	Review interview notes.	.50	297.50
5/21/20	LAF	Debrief with S Sharrer re same.	.20	119.00
5/22/20	LAF	Interview witness.	1.00	595.00
5/27/20	LAF	Work on investigation report.	1.50	892.50
5/28/20	LAF	Review notes debrief client.	2.00	1,190.00

TOTAL PROFESSIONAL SERVICES RENDERED

\$ 14,994.00

Client #: 2765
Matter #: 006

June 3, 2020
Invoice #: 125839

TIMEKEEPER SUMMARY

Name	Rate	Hours	Amount	N/C Hr	N/C \$
Fernandez, Louise Ann	595.00	25.20	14,994.00	.00	.00
TOTALS		25.20	\$ 14,994.00	.00	\$.00

TOTAL THIS INVOICE

\$ 14,994.00

*Balance is due within 30 days from the date of this invoice.
We reserve the right to charge interest at 10% per annum on amounts not paid within 30 days.*

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July 6, 2020

Seton Medical Center
601 S. Figueroa Street
Suite 4050
Los Angeles, CA 90017

Invoice #: 126049
Client #: 2765
Matter #: 006
Billing Attorney: ANR

For professional services rendered and disbursements advanced through June 30, 2020:

RE: Investigations

DETAIL OF PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
6/01/20	LAF	Analyze notes of investigation.	2.00	1,190.00
6/01/20	LAF	Prepare report of investigation.	4.00	2,380.00
TOTAL PROFESSIONAL SERVICES RENDERED				\$ 3,570.00

TIMEKEEPER SUMMARY

Name	Rate	Hours	Amount	N/C Hr	N/C \$
Fernandez, Louise Ann	595.00	6.00	3,570.00	.00	.00
TOTALS		6.00	\$ 3,570.00	.00	\$.00

TOTAL THIS INVOICE **\$ 3,570.00**

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September 8, 2020

Seton Medical Center
601 S. Figueroa Street
Suite 4050
Los Angeles, CA 90017

Invoice #: 126670
Client #: 2765
Matter #: 006
Billing Attorney: ANR

For professional services rendered and disbursements advanced through September 4, 2020:

RE: Investigations

DETAIL OF PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
8/04/20	LAF	Telephone call regarding investigation findings.	.50	297.50
8/05/20	LAF	Review notes and documents.	1.00	595.00
8/05/20	LAF	Draft investigation report.	2.50	1,487.50
8/05/20	LAF	Emails to SMC HR regarding policies.	.20	119.00
8/06/20	LAF	Review policies and investigation report.	.60	357.00
8/06/20	LAF	Enter citations to applicable policies.	.30	178.50
8/06/20	LAF	Revise investigation report.	.30	178.50
8/07/20	LAF	Emails with union regarding call.	.20	119.00
8/10/20	LAF	Telephone call with union regarding investigation.	.50	297.50

TOTAL PROFESSIONAL SERVICES RENDERED \$ 3,629.50

TIMEKEEPER SUMMARY

Name	Rate	Hours	Amount	N/C Hr	N/C \$
Fernandez, Louise Ann	595.00	6.10	3,629.50	.00	.00
TOTALS		6.10	\$ 3,629.50	.00	\$.00

TOTAL THIS INVOICE \$ 3,629.50

Client #: 2765
Matter #: 006

September 8, 2020
Invoice #: 126670

*Balance is due within 30 days from the date of this invoice.
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EXHIBIT N

BARTKO ZANKEL BUNZEL

BARTKO ZANKEL BUNZEL & MILLER
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June 8, 2020

Saint Francis Medical Center
601 Figueroa Street
Suite 4050
Los Angeles, CA 90017

Invoice #: 125929
Client #: 2766
Matter #: 000
Billing Attorney: ANR

For professional services rendered and disbursements advanced through May 31, 2020:

RE: General Labor

DETAIL OF PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
5/01/20	LAF	Review proposals; strategy session regarding same.	1.00	595.00
5/01/20	LAF	Represent client at bargaining session.	2.00	1,190.00
5/01/20	ANR	Preparation for UNAC/SEIU bargaining.	3.20	1,904.00
5/01/20	ANR	Caucus with team regarding bargaining.	.80	476.00
5/01/20	ANR	Attend UNAC Bargaining.	1.80	1,071.00
5/01/20	ANR	Attend SEIU 1113 bargaining.	2.10	1,249.50
5/01/20	ANR	Review of email from S. Sharrer regarding employee matter.	.10	59.50
5/01/20	ET	Attend SEIU 1113 negotiations and take notes.	2.40	948.00
5/01/20	ET	Attend a UNAC negotiations and take notes.	.10	39.50
5/01/20	ET	Call with J. Moe regarding pending issues with withdrawal.	.10	39.50
5/01/20	ET	Email D. Delmar regarding Jones subpoena.	.10	39.50
5/03/20	ET	Finalize Jones documents for production.	.30	118.50
5/03/20	ET	Email D. Delmar regarding production.	.10	39.50
5/04/20	LAF	Review requests for information prepare for bargaining.	.40	238.00
5/04/20	ANR	Review of correspondence from SEIU.	.20	119.00
5/04/20	ANR	Email to SEIU re correspondence re information request.	.10	59.50
5/04/20	ET	Email correspondence with L. Vargas regarding Jones subpoena.	.10	39.50
5/04/20	ET	Review pending litigation deadlines for subpoenas.	.10	39.50
5/05/20	LAF	Preparation and strategy sessions with bargaining team re UNAC Bargaining.	1.00	595.00
5/05/20	LAF	Attend UNAC Bargaining and prepare bargaining notes.	1.20	714.00
5/05/20	LAF	Preparation and caucuses with bargaining team for SEIU bargaining.	1.20	714.00
5/05/20	LAF	Attend SEIU negotiations and prepare bargaining notes.	2.30	1,368.50

Client #: 2766
Matter #: 000

June 8, 2020
Invoice #: 125929

Date	Tkpr	Description	Hours	Amount
5/05/20	ANR	Preparation/caucus for UNAC negotiations.	2.20	1,309.00
5/05/20	ANR	Attend UNAC negotiations.	1.20	714.00
5/05/20	ANR	Preparation/caucus for SEIU bargaining.	2.10	1,249.50
5/05/20	ANR	Attend SEIU negotiations.	2.30	1,368.50
5/06/20	LAF	Review bargaining notes and emails make notes re same in connection with preparation of declarations.	1.10	654.50
5/06/20	LAF	Bargaining and caucuses with UNAC.	2.10	1,249.50
5/06/20	ANR	Preparation for bargaining with UNAC.	1.10	654.50
5/06/20	ANR	Attend collective bargaining.	1.00	595.00
5/06/20	ANR	Preparation of response to SEIU, RFI.	1.20	714.00
5/06/20	ANR	Analysis of press release.	.50	297.50
5/06/20	ANR	Conference call regarding confidentiality of 1113 negotiations.	.80	476.00
5/06/20	ANR	Preparation for SEIU bargaining.	1.20	714.00
5/07/20	ETF	Strategize regarding declaration in support of 1113 motion	.60	225.00
5/07/20	ETF	Review emails, correspondence and other documents regarding bargaining negotiations with SEIU and UNAC in preparation for declarations.	2.00	750.00
5/07/20	ETF	Draft declarations re union negotiations in support of 1113 motion	2.90	1,087.50
5/07/20	ANR	Conference call with Dentons and Prime regarding bargaining.	.50	297.50
5/07/20	ANR	Preparation for negotiations.	1.20	714.00
5/07/20	ANR	Revision of responses to request for production.	.40	238.00
5/07/20	ANR	Telephone conversation with S. Sharrer regarding SFMC labor matters.	.20	119.00
5/07/20	ANR	Email to D. Delmar regarding petitions.	.20	119.00
5/07/20	ET	Call with K. Murphy and J. Moe regarding pending litigation.	.20	79.00
5/08/20	ETF	Attend UNAC's bargaining sessions to prepare declaration in support of motion to reject CBA.	1.60	600.00
5/08/20	ETF	Further review of emails and CBA agreements for UNAC and SEIU negotiations and distill information re same in timeline to prepare declaration in support of motion to reject collective bargaining agreement.	3.30	1,237.50
5/08/20	ETF	Review prior declaration re union negotiations and develop strategy re same.	.40	150.00
5/08/20	LAF	Preparation for SEIU 1113 negotiations.	1.80	1,071.00
5/08/20	LAF	Preparation for UNAC Negotiations.	1.80	1,071.00
5/08/20	LAF	Attend SEIU negotiations and caucus.	1.60	952.00
5/08/20	LAF	Attend UNAC negotiations and caucus.	1.60	952.00
5/08/20	LAF	Telephone call with Sam Alberts re declarations.	.20	119.00
5/08/20	LAF	Review and gather documents to be cited in declarations.	.60	357.00
5/08/20	ANR	Preparation for SEIU 1113 negotiations.	1.80	1,071.00
5/08/20	ANR	Preparation for UNAC Negotiations.	1.80	1,071.00
5/08/20	ANR	Attend SEIU negotiations and caucus.	1.60	952.00

Client #: 2766
Matter #: 000

June 8, 2020
Invoice #: 125929

Date	Tkpr	Description	Hours	Amount
5/08/20	ANR	Attend UNAC negotiations and caucus.	1.60	952.00
5/08/20	ANR	Telephone call with S. Sharrer re general labor matter.	.20	119.00
5/09/20	ETF	Draft declaration in support of motion to reject CBA	2.50	937.50
5/09/20	LAF	Work on 1113 declarations.	1.00	595.00
5/09/20	LAF	Strategy session re declarations.	.50	297.50
5/09/20	ANR	Review of declaration re 1113 motion.	.50	297.50
5/10/20	LAF	Work on 1113 declarations.	.80	476.00
5/11/20	ANR	Revisions to information request responses.	1.10	654.50
5/11/20	ANR	Conference call with S. Sharrer re information request responses.	.30	178.50
5/11/20	ANR	Review of information for production in response to RFI.	.30	178.50
5/11/20	ET	Review and finalize UNAC bargaining notes.	.30	118.50
5/11/20	ET	Review and finalize SEIU bargaining notes.	2.60	1,027.00
5/12/20	LAF	Review revisions to information request responses.	.50	297.50
5/12/20	LAF	Conference call with S. Sharrer re information request responses.	.30	178.50
5/12/20	ANR	Email to Prime re request for information.	.30	178.50
5/12/20	ANR	Review of email from Prime re request for information.	.10	59.50
5/12/20	ANR	Review of filed grievance.	.20	119.00
5/12/20	ANR	Review of pending matters re due diligence.	.20	119.00
5/12/20	ANR	Revise of declaration in support of 1113 motion.	.30	178.50
5/12/20	ANR	Revisions to 1113 proposal.	.80	476.00
5/12/20	ET	Review and finalize SEIU bargaining notes.	.90	355.50
5/13/20	ETF	Revise declaration; review exhibits; coordinate further redaction	.40	150.00
5/13/20	ETF	Review SFRNA grievance and corresponding CBA provisions.	.30	112.50
5/13/20	ANR	Conference call with S. Sharrer re labor matters.	.40	238.00
5/13/20	ANR	Further review of 1113 proposal.	1.20	714.00
5/13/20	ANR	Conference call with Prime and Dentons re labor matter.	.30	178.50
5/13/20	ANR	Review of proposed information request language.	.20	119.00
5/13/20	ET	Review docket regarding settlement agreement.	.10	39.50
5/13/20	ET	Email J. Moe regarding withdrawal.	.10	39.50
5/14/20	ETF	Revise declaration for 1113 motion; review emails sent to unions; review 1113 proposal prepared by Dentons.	.80	300.00
5/14/20	LAF	Numerous emails regarding disciplinary records.	.40	238.00
5/14/20	LAF	Telephone call re same with team.	.50	297.50
5/14/20	LAF	Conference call with T Moyron and Kirsten S re mediation and NLRB charge.	.30	178.50
5/14/20	ANR	Review of email from S. Sharrer re investigation.	.20	119.00
5/14/20	ANR	Preparation of to SEIU re information request response re disciplinary records.	.10	59.50
5/14/20	ANR	Preparation of email to UNAC re information request re disciplinary records.	.10	59.50

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June 8, 2020
Invoice #: 125929

Date	Tkpr	Description	Hours	Amount
5/14/20	ET	Finalize bargaining notes.	.20	79.00
5/15/20	ETF	Review response letter from Prime re bargaining negotiations	.20	75.00
5/15/20	ANR	Review of email from J. Kohanski re 1113 rejection.	.10	59.50
5/15/20	ET	Review and analysis of Kaiser letter, court order, and stipulation.	.50	197.50
5/15/20	ET	Email correspondence with E. Paul regarding Kaiser discovery.	.30	118.50
5/15/20	ET	Call with J. Moe regarding fee and agreement issues.	.20	79.00
5/15/20	ET	Email P. Chandran regarding withdrawal.	.10	39.50
5/16/20	ETF	Update declaration with additional exhibit.	.30	112.50
5/17/20	ET	Respond to J. Moe and P. Chandran regarding withdrawal.	.10	39.50
5/18/20	ETF	Review authority re disclosure of employee personal information; draft summary re same.	3.40	1,275.00
5/18/20	ETF	Review multiple emails from Dentons re filing; review further documents; update declaration with information from various documents.	2.40	900.00
5/18/20	LAF	Research re employee privacy issues.	2.00	1,190.00
5/18/20	LAF	Strategy session re issues.	.50	297.50
5/18/20	LAF	Review issues re solicitation, instructions re same.	.50	297.50
5/18/20	LAF	Review reply and revise declarations.	1.30	773.50
5/18/20	ANR	Conference call with Tania and Sam re bargaining strategy.	.40	238.00
5/18/20	ANR	Telephone conference with Prime re bargaining preparations.	.50	297.50
5/18/20	ANR	Additional telephone conference with Dentons re 1113.	.40	238.00
5/18/20	ANR	Revisions to 1113 rejection motion.	1.50	892.50
5/18/20	ANR	Telephone conference with S. Sharrer re bargaining strategy.	.50	297.50
5/18/20	ANR	Revisions to S. Sharrer settlement agreement.	.80	476.00
5/18/20	ANR	Review of email from S. Sharrer re privacy data.	.10	59.50
5/18/20	ANR	Review of research re privacy information.	.50	297.50
5/18/20	ANR	Review of proposed UNAC response.	.30	178.50
5/18/20	ANR	Review of email from SEIU re 1113.	.20	119.00
5/18/20	ANR	Review of UNAC response to S. Alberts letter.	.20	119.00
5/18/20	ET	Review documents and CBA regarding union issues.	.60	237.00
5/18/20	ET	Research and analysis regarding union issues.	3.20	1,264.00
5/18/20	ET	Draft summary regarding case law regarding union issues.	1.20	474.00
5/19/20	ETF	Review further authority re disclosure of personnel information to respond to Prime's request for information and client's request for specific points to be addressed.	2.80	1,050.00
5/19/20	ETF	Draft memo to Prime re legal authority precluding the disclosure of personnel information.	2.50	937.50
5/19/20	ETF	Multiple phone calls and emails to discuss strategy on response to Prime's request for personnel information.	.80	300.00

Client #: 2766
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June 8, 2020
Invoice #: 125929

Date	Tkpr	Description	Hours	Amount
5/19/20	ETF	Review email from co-counsel re declaration; respond to same; revise declaration based on info provided by client.	.30	112.50
5/19/20	LAF	Preparation call re bargaining.	1.00	595.00
5/19/20	LAF	Prepare for and attend bargaining.	2.70	1,606.50
5/19/20	LAF	Review and clean up notes	.20	119.00
5/19/20	LAF	Review and respond to emails re bargaining.	.20	119.00
5/19/20	LAF	Review research re solicitation strategy session re same.	.50	297.50
5/19/20	LAF	Review research re privacy issues for memo and emails re same.	.50	297.50
5/19/20	LAF	Research re privacy protections of demographic information.	1.00	595.00
5/19/20	ANR	Preparation for negotiations.	1.50	892.50
5/19/20	ANR	Attend negotiations with Prime and UNAC.	1.20	714.00
5/19/20	ANR	Review of Sharrer declaration.	.30	178.50
5/19/20	ANR	Review of privacy write up.	.50	297.50
5/19/20	ANR	Review of research re non-solicitation.	.30	178.50
5/19/20	ANR	Final review of 1113 motion.	.50	297.50
5/19/20	ANR	Email to S. Sharrer re data for 1113 motion.	.10	59.50
5/19/20	ANR	Review of draft response re UNAC 1113 letter.	.30	178.50
5/19/20	ANR	Review of SEIU response re disciplinary records.	.20	119.00
5/19/20	ET	Review additional case law regarding labor issues.	.60	237.00
5/19/20	ET	Analysis of labor issues.	.20	79.00
5/19/20	ET	Email correspondence with S. Sharrer regarding labor issues.	.20	79.00
5/19/20	ET	Respond to Dentons regarding CBA issues.	.10	39.50
5/20/20	ETF	Review SEIU CBA re disciplinary record destruction.	.30	112.50
5/20/20	ETF	Review further authority re inquiries re ethnicity, right to privacy claims for memo.	1.20	450.00
5/20/20	ETF	Continue drafting memo to add discussion re right to privacy claims, previous litigation, further discussion re FEHA pre-employment inquires	1.00	375.00
5/20/20	LAF	Review bargaining notes re additional bargaining session prepare email re same.	.30	178.50
5/20/20	ANR	Preparation for Prime/UNAC bargaining.	1.60	952.00
5/20/20	ANR	Conference call with S. Sharrer re negotiation strategy.	.40	238.00
5/20/20	ANR	Review of privacy memorandum.	.50	297.50
5/20/20	ANR	Review of 1113 briefing schedule.	.20	119.00
5/21/20	LAF	Prepare for bargaining.	1.00	595.00
5/21/20	LAF	Attend bargaining sessions.	4.20	2,499.00
5/21/20	LAF	Work on snowball.	2.00	1,190.00
5/21/20	ANR	Conference call with Dentons and S. Sharrer re negotiation update.	.50	297.50
5/21/20	ANR	Preparation for Prime/UNAC negotiation.	2.10	1,249.50
5/21/20	ANR	Attend Prime/UNAC negotiation, including caucus.	4.60	2,737.00

Client #: 2766
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Date	Tkpr	Description	Hours	Amount
5/22/20	LAF	Prepare final snowball document remove internal references.	2.00	1,190.00
5/22/20	ET	Correspondence with K. Murphy regarding new lawsuit.	.10	39.50
5/22/20	ET	Review hold items.	.20	79.00
5/23/20	ANR	Review of correspondence from SEIU re 1113.	.20	119.00
5/23/20	ANR	Review of proposed response to SEIU re 1113.	.30	178.50
5/24/20	ANR	Preparation of side by side comparison of Prime v UNAC economic language.	4.50	2,677.50
5/24/20	ANR	Preparation of side by side comparison of Prime v. UNAC non-economic language.	4.50	2,677.50
5/25/20	ANR	Revisions to Prime/UNAC side by sides.	.50	297.50
5/25/20	ANR	Email with UNAC re next session.	.10	59.50
5/25/20	ANR	Reply to email from S. Alberts re summary of status.	.10	59.50
5/26/20	LAF	Preparation for Prime/UNAC negotiations.	1.60	952.00
5/26/20	LAF	Attend negotiations.	1.50	892.50
5/26/20	LAF	Attend caucuses work on Snowball.	1.30	773.50
5/26/20	LAF	Strategize with Verity Team.	.80	476.00
5/26/20	ANR	Preparation for Prime/UNAC negotiations.	1.60	952.00
5/26/20	ANR	Attend negotiations.	1.50	892.50
5/26/20	ANR	Attend caucuses.	1.20	714.00
5/26/20	ANR	Strategize with Verity Team.	.80	476.00
5/26/20	ANR	Status update re bargaining to client.	.30	178.50
5/26/20	ANR	Review correspondence from SEIU re 1113.	.20	119.00
5/27/20	ETF	Review emails re need for further revisions to declaration	.10	37.50
5/27/20	ET	Email correspondence with S. Sharrer regarding investigation.	.10	39.50
5/27/20	ET	Review needed documents for litigation.	.30	118.50
5/28/20	ETF	Review emails re Denton's need for summary re UNAC negotiations; make multiple revisions to summary; begin draft declaration	2.80	1,050.00
5/28/20	LAF	Review notes and prepare bargaining summary.	2.00	1,190.00
5/28/20	LAF	Review and revise same with based on comments.	.50	297.50
5/28/20	ANR	Review of summary for court report re 1113 status.	.30	178.50
5/29/20	ETF	Review emails re summary for declaration.	.20	75.00
5/29/20	ANR	Review of UNAC objections to 1113.	.50	297.50
5/29/20	ANR	Review of SEIU objections to 1113 motion.	.50	297.50
5/31/20	ANR	Conference call with Dentons re declarations re 1113.	.50	297.50
5/31/20	ANR	Revisions to 1113 declarations.	1.20	714.00

TOTAL PROFESSIONAL SERVICES RENDERED**\$ 95,309.50**

Client #: 2766
Matter #: 000

June 8, 2020
Invoice #: 125929

TIMEKEEPER SUMMARY

Name	Rate	Hours	Amount	N/C Hr	N/C \$
Ferguson, Elizabeth T	375.00	33.10	12,412.50	.00	.00
Tilman, Elina	395.00	15.70	6,201.50	.00	.00
Fernandez, Louise Ann	595.00	51.80	30,821.00	.00	.00
Ruda, An Nguyen	595.00	77.10	45,874.50	.00	.00
TOTALS		177.70	\$ 95,309.50	.00	\$.00

TOTAL THIS INVOICE

\$ 95,309.50

*Balance is due within 30 days from the date of this invoice.
We reserve the right to charge interest at 10% per annum on amounts not paid within 30 days.*

BARTKO ZANKEL BUNZEL

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July 6, 2020

Saint Francis Medical Center
601 Figueroa Street
Suite 4050
Los Angeles, CA 90017

Invoice #: 126051
Client #: 2766
Matter #: 000
Billing Attorney: ANR

For professional services rendered and disbursements advanced through June 30, 2020:

RE: General Labor

DETAIL OF PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
6/01/20	ETF	Research re notice requirements in criminal matter.	1.50	562.50
6/01/20	ETF	Review emails from Dentons.	.20	75.00
6/01/20	ETF	Review all time entries for negotiations for purposes of filings.	1.30	487.50
6/01/20	ETF	Draft report for selection of time entries.	1.90	712.50
6/01/20	ETF	Summarize time entries for declarations.	.30	112.50
6/01/20	ANR	Preparation for resumption of 1113 negotiations.	1.20	714.00
6/01/20	ANR	Revision to 1113 declaration.	1.10	654.50
6/01/20	ANR	Review of communications re 1113 extension.	.50	297.50
6/01/20	ET	Email correspondence with K. Chapman regarding pending mediations.	.10	39.50
6/01/20	ET	Email carrier regarding labor code notification.	.10	39.50
6/02/20	ETF	Further review of authority re criminal case issues.	2.60	975.00
6/02/20	ETF	Draft summary re criminal case issue.	1.40	525.00
6/02/20	LAF	Telephone call w/Dentons re Prime and info request.	.40	238.00
6/02/20	LAF	Review emails re same.	.20	119.00
6/02/20	LAF	Strategy session and for bargaining.	.50	297.50
6/02/20	ANR	Preparation for Prime/UNAC meeting.	1.80	1,071.00
6/02/20	ANR	Facilitate Prime/UNAC meeting.	1.70	1,011.50
6/02/20	ANR	Conference call with S. Sharrer re strategy.	.50	297.50
6/02/20	ANR	Review of PTO accruals.	.20	119.00
6/02/20	ANR	Review of response to UNAC re PTO accruals.	.10	59.50
6/03/20	ETF	Draft memo re analysis on authorization, disclosure and notice issues for criminal case.	1.80	675.00

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Date	Tkpr	Description	Hours	Amount
6/03/20	ETF	Further research and follow up to questions re criminal case.	1.40	525.00
6/03/20	LAF	Prepare for SEIU bargaining.	.50	297.50
6/03/20	ANR	Review of email from D. Delmar re SEIU releases.	.10	59.50
6/03/20	ANR	Review of email from UNAC re application timelines.	.10	59.50
6/03/20	ANR	Telephone call with S. Sharrer re bargaining strategy.	.50	297.50
6/03/20	ANR	Further preparation for bargaining.	.50	297.50
6/03/20	ET	Review subpoena deadlines.	.10	39.50
6/03/20	ET	Email correspondence with K. Chapman and L. Vargas re Corodona subpoena.	.20	79.00
6/03/20	ET	Review Corodona subpoena and responsive documents.	.20	79.00
6/04/20	LAF	Attend SEIU/Prime bargaining as notetaker.	4.00	2,380.00
6/04/20	LAF	Review and proof bargaining notes.	.50	297.50
6/04/20	ANR	Conference call with S. Sharrer and investigator re employee investigation results.	1.00	595.00
6/04/20	ANR	Facilitate negotiation between SEIU and Prime.	4.00	2,380.00
6/04/20	ANR	Review of employee termination.	.10	59.50
6/04/20	ANR	Review of email from BRG re financials.	.20	119.00
6/04/20	ET	Review and analysis of EMG subpoena.	.20	79.00
6/04/20	ET	Email correspondence with L. Vargas, K. Vitale, and E. Ruiz re EMG subpoena.	.50	197.50
6/04/20	ET	Fact-gathering call with E. Ruiz re EMG.	.80	316.00
6/04/20	ET	Review and analysis of documents for EMG subpoena.	1.50	592.50
6/04/20	ET	Analysis of liability issues and follow-up needed re EMG.	.70	276.50
6/04/20	ET	Draft summary to S. Sharrer and H. Biehl re EMG issues.	.80	316.00
6/04/20	ET	Review settlement documents.	.10	39.50
6/04/20	ET	Email J. Moe and K. Murphy re settlement.	.10	39.50
6/05/20	ETF	Review and respond to email from BK counsel re settlement of cases	.10	37.50
6/05/20	ANR	Conference call with Dentons and BRG re financials re negotiation.	.50	297.50
6/05/20	ANR	Facilitate negotiations between Prime and UNAC.	4.00	2,380.00
6/05/20	ANR	Preparation/caucus for negotiations.	2.80	1,666.00
6/05/20	ANR	Review of email from SEIU re employee applications.	.10	59.50
6/05/20	ANR	Review of response from Prime.	.10	59.50
6/05/20	ANR	Status update to team re Prime/UNAC negotiations.	.30	178.50
6/05/20	ET	Review documents for EMG and make necessary redactions for production.	1.10	434.50
6/05/20	ET	Email correspondence with L. Vargas, K. Chapman, B. Carroll, and H. Levy-Biehl re EMG subpoena.	.80	316.00
6/05/20	ET	Call with L. Vargas re EMG subpoena.	.10	39.50
6/05/20	ET	Analysis of issues re EMG.	.30	118.50
6/06/20	ANR	Update declaration re SEIU negotiation status.	.50	297.50
6/06/20	ANR	Update declaration re UNAC negotiation status.	.50	297.50

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Date	Tkpr	Description	Hours	Amount
6/07/20	ANR	Update of SEIU and UNAC negotiation status declaration.	.50	297.50
6/08/20	ETF	Review time spent on negotiations and calculate and summarize same for purposes of updating 1113 declaration.	.80	300.00
6/08/20	LAF	Preparation for Prime/SEIU negotiations.	1.80	1,071.00
6/08/20	LAF	Attend negotiations including caucus.	2.30	1,368.50
6/08/20	LAF	Review of declaration re 1113 motion.	.40	238.00
6/08/20	LAF	Review of UNAC 1113 response.	.20	119.00
6/08/20	LAF	Update bargaining notes.	1.00	595.00
6/08/20	ANR	Preparation for Prime/SEIU negotiations.	1.80	1,071.00
6/08/20	ANR	Attend negotiations including caucus.	2.30	1,368.50
6/08/20	ANR	Revise of declaration re 1113 motion.	1.20	714.00
6/08/20	ANR	Review of transition hiring process.	.20	119.00
6/08/20	ANR	Review of employee accommodation issue.	.20	119.00
6/08/20	ANR	Review of UNAC 1113 response.	.20	119.00
6/08/20	ET	Call with S. Sharrer re pending employment matters.	.10	39.50
6/08/20	ET	Email correspondence with D. Delmar and W. Castillo re EMG.	.30	118.50
6/08/20	ET	Review carrier issues.	.20	79.00
6/08/20	ET	Analysis of EMG issues.	.20	79.00
6/09/20	ETF	Review and strategize re further responses exchanged with unions	1.50	562.50
6/09/20	ETF	Review and summarize responses to information requests provided to unions.	1.10	412.50
6/09/20	ETF	Draft summary of information requests exchanged between unions and debtors/Prime and identify documents.	1.20	450.00
6/09/20	LAF	Conference call with Dentons re 1113 hearing.	.40	238.00
6/09/20	LAF	Additional call with Denton re negotiations and hearing.	.30	178.50
6/09/20	LAF	Update notes from prior bargaining sessions.	1.50	892.50
6/09/20	ANR	Conference call with Dentons re 1113 hearing.	.40	238.00
6/09/20	ANR	Conference call with buyer and Dentons re negotiations.	.60	357.00
6/09/20	ANR	Additional call with Denton re negotiations and hearing.	.30	178.50
6/09/20	ANR	Conference call with S. Sharrer re job classifications	.80	476.00
6/09/20	ANR	Conference call with W. Castillo and D. Delmar re interactive process.	.50	297.50
6/09/20	ANR	Preparation for UNAC negotiations.	1.20	714.00
6/09/20	ANR	Preparation of SEIU negotiations.	1.20	714.00
6/09/20	ANR	Attend UNAC negotiations and caucus.	1.60	952.00
6/09/20	ANR	Attend SEIU negotiations and caucus.	1.40	833.00
6/09/20	ANR	Assist in preparation for 1113 hearing.	1.50	892.50
6/09/20	ANR	Conference call with Buyer re hearing.	.90	535.50
6/09/20	ANR	Review of tentative ruling re 1113.	.80	476.00

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6/09/20	ET	Review documents in preparation for call re EMG.	.10	39.50
6/09/20	ET	Call with S. Sharrer re EMG.	.10	39.50
6/09/20	ET	Call with D. Delmar and W. Castillo re EMG.	.50	197.50
6/09/20	ET	Attend UNAC and Prime bargaining as notetaking support.	1.60	632.00
6/09/20	ET	Review and update UNAC notes.	.80	316.00
6/09/20	ET	Review correspondence and documents related to UNAC bargaining.	.40	158.00
6/09/20	ET	Prepare document for SEIU bargaining.	.10	39.50
6/09/20	ET	Email correspondence with W. Castillo re EMG.	.10	39.50
6/09/20	ET	Review correspondence re bankruptcy status and next steps for bargaining.	.30	118.50
6/09/20	ET	Email correspondence with E. Ruiz and B. Carroll re EMG production.	.20	79.00
6/09/20	ET	Call with SEIU and Prime re bargaining attend as notetaker.	1.40	553.00
6/09/20	ET	Review and update SEIU notes.	1.20	474.00
6/09/20	ET	Review and analysis of EMG documents.	.30	118.50
6/09/20	ET	Email correspondence with K. Vitale regarding EMG status and documents.	.20	79.00
6/10/20	ETF	Strategize re request for information responses.	.20	75.00
6/10/20	ETF	Begin reformatting documents to be presented to unions.	.50	187.50
6/10/20	ANR	Attend motions for 1113 rejection hearing.	1.30	773.50
6/10/20	ANR	Conference call with Local HR re interactive process.	.30	178.50
6/10/20	ANR	Review of interactive process email.	.10	59.50
6/10/20	ANR	Conference call with S. Alberts re hearing.	.20	119.00
6/10/20	ANR	Review of request for information inventory.	.50	297.50
6/10/20	ET	Call with W. Castillo re EMG.	.30	118.50
6/10/20	ET	Review EMG documents.	.30	118.50
6/10/20	ET	Draft email to EMG from HR.	.70	276.50
6/10/20	ET	Email correspondence with L. Vargas regarding case documents.	.10	39.50
6/11/20	ETF	Finish preparing exhibits to be provided to unions.	1.30	487.50
6/11/20	ANR	Review of Request for Information Summary.	.30	178.50
6/11/20	ET	Review and analysis of Burt subpoena and next steps.	.20	79.00
6/11/20	ET	Email correspondence with K. Chapman regarding Burt subpoenas.	.20	79.00
6/12/20	ETF	Participate in phone conference re union requests and responses.	.50	187.50
6/12/20	ETF	Review multiple emails re unions requests and negotiations.	.10	37.50
6/12/20	ETF	Draft email to consultant group re union requests.	.10	37.50
6/12/20	ETF	Review further emails re numerous RFI requests.	.60	225.00
6/12/20	ETF	Draft tracker re each individual RFI request and response for SEIU.	3.40	1,275.00
6/12/20	ANR	Conference call re union information requests with BRG.	.50	297.50
6/12/20	ANR	Email to UNAC re proposed negotiation dates.	.10	59.50
6/12/20	ANR	Email to SEIU re proposed negotiation dates.	.10	59.50

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Date	Tkpr	Description	Hours	Amount
6/12/20	ANR	Review of proposed information request email. -	.20	119.00
6/12/20	ANR	Review of Prime response to UNAC dates.	.10	59.50
6/12/20	ANR	Review of SEIU response to proposed meetings.	.10	59.50
6/12/20	ET	Email correspondence with L. Vargas regarding Burt subpoena.	.20	79.00
6/12/20	ET	Call with process server regarding Burt subpoena.	.30	118.50
6/12/20	ET	Draft email to counsel and SDT regarding Burt subpoena objections and production.	.30	118.50
6/12/20	ET	Review and analysis of Burt documents and make redactions.	.60	237.00
6/13/20	ETF	Continue reviewing SEIU related bargaining notes and emails.	1.50	562.50
6/13/20	ETF	Continue drafting tracker for SEIU.	.80	300.00
6/13/20	ETF	Review bargaining notes and emails for UNAC tracker.	1.60	600.00
6/13/20	ETF	Draft tracker for UNAC requests for information.	.90	337.50
6/14/20	ETF	Finish reviewing bargaining notes and emails.	1.60	600.00
6/14/20	ETF	Continue drafting UNAC tracker.	1.20	450.00
6/14/20	ET	Email L. Vargas and defense counsel regarding Burt subpoena.	.20	79.00
6/15/20	ETF	Update SEIU RFI tracker with further information received from SEIU.	1.30	487.50
6/15/20	ETF	Review email from SEIU's counsel.	.10	37.50
6/15/20	ETF	Strategize re trackers and update same.	.20	75.00
6/15/20	ANR	Conference call re information requests.	1.00	595.00
6/15/20	ANR	Review of update re information requests.	.50	297.50
6/15/20	ANR	Review of email from SEIU re availability for negotiations.	.10	59.50
6/15/20	ANR	Reply to email from SEIU re negotiations.	.10	59.50
6/15/20	ANR	Review of email from Prime re availability.	.10	59.50
6/15/20	ANR	Review of SEIU response to information request issues.	.30	178.50
6/15/20	ANR	Email to Prime re 1113 dates.	.10	59.50
6/15/20	ANR	Review of email from Prime re 1113 dates.	.10	59.50
6/15/20	ANR	Review of proposed response to information request.	.50	297.50
6/15/20	ANR	Review of Prime response to negotiation dates.	.10	59.50
6/15/20	ANR	Review of SEIU information request response.	.20	119.00
6/15/20	ET	Review status of pending subpoenas.	.10	39.50
6/15/20	ET	Email correspondence with Hope and Karen regarding Gonzales matter.	.20	79.00
6/16/20	ETF	Begin reviewing further responses to UNAC requests for information.	.40	150.00
6/16/20	LAF	Review of information request status.	.10	59.50
6/16/20	LAF	Review of information request materials and chronology.	1.00	595.00
6/16/20	LAF	Review of email from C. Doherty re 1113 motions.	.10	59.50
6/16/20	ANR	Review of information request status.	.10	59.50
6/16/20	ANR	Review of information request materials.	.50	297.50

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Date	Tkpr	Description	Hours	Amount
6/16/20	ANR	Review of email from C. Doherty re 1113 motions.	.10	59.50
6/16/20	ANR	Reply to email from C. Doherty re 1113 motions.	.10	59.50
6/16/20	ANR	Review of employee termination supporting documents.	.50	297.50
6/16/20	ANR	Email of analysis re employee termination.	.20	119.00
6/16/20	ANR	Conference call with D. Delmar re employee investigation.	.20	119.00
6/16/20	ANR	Review of email from D. Delmar re step progression.	.10	59.50
6/16/20	ANR	Reply to email from D. Delmar re step progression.	.10	59.50
6/16/20	ANR	Telephone call with client re status update re negotiations.	.50	297.50
6/16/20	ANR	Telephone call with M. Pfeiffer re informational picket.	.30	178.50
6/16/20	ANR	Review of email from J. Si re personnel information request.	.10	59.50
6/16/20	ANR	Reply to email from J. Si re personnel information request.	.10	59.50
6/16/20	ANR	Review of proposed response to information request.	.30	178.50
6/16/20	ANR	Conference call with D. Delmar and W. Castillo re employee separation.	.40	238.00
6/16/20	ANR	Email to UNAC re schedule confirmation.	.10	59.50
6/16/20	ET	Analysis of pending litigation issues.	.30	118.50
6/16/20	ET	Email correspondence with K. Murphy regarding Nguyen CMC.	.10	39.50
6/16/20	ET	Email correspondence with J. Moe regarding pending claims.	.10	39.50
6/16/20	ET	Email correspondence with Hope and Karen regarding Gonzalez subpoena.	.10	39.50
6/17/20	ETF	Continue updating SEIU responses based on further responses provided by Verity and Prime.	2.20	825.00
6/17/20	ETF	Review letter email from Prime re update to RFI responses to SEIU.	.10	37.50
6/17/20	ETF	Update tracker re RFI responses to SEIU.	.10	37.50
6/17/20	LAF	Review of information request responses to UNAC.	.50	297.50
6/17/20	LAF	Review of revised information request responses to SEIU.	.70	416.50
6/17/20	LAF	Review email from carrier re mediation.	.10	59.50
6/17/20	ANR	Review of information request responses to UNAC.	.60	357.00
6/17/20	ANR	Review of revised information request responses to SEIU.	.60	357.00
6/17/20	ANR	Review of employee investigation.	.30	178.50
6/17/20	ANR	Preparation of information picket letter.	.80	476.00
6/17/20	ET	Review and analysis of letters and requests from Bueno WC claim.	.30	118.50
6/17/20	ET	Determine production deadlines for Bueno.	.10	39.50
6/17/20	ET	Multiple email correspondence with K. Vitale, K. Chapman, and L Vargas re Bueno request and next steps.	.50	197.50
6/18/20	ETF	Phone conference with bankruptcy counsel to discuss RFI and pleadings.	.30	112.50
6/18/20	ETF	Exchange emails with repository consultant re responsive documents to RFIs.	.20	75.00
6/18/20	ETF	Review and analyze emails re union negotiations.	.40	150.00
6/18/20	ETF	Review responses to UNAC uploaded on repository.	.80	300.00

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Date	Tkpr	Description	Hours	Amount
6/18/20	ETF	Update tracker re RFI responses.	.60	225.00
6/18/20	ETF	Update email inventory re responses to UNAC RFIs.	.70	262.50
6/18/20	LAF	Preparation for 1113 negotiations.	1.00	595.00
6/18/20	LAF	Attend 1113 negotiations with Prime/UNAC.	1.20	714.00
6/18/20	LAF	Review of information request communications.	.50	297.50
6/18/20	LAF	Review of information request status.	.20	119.00
6/18/20	ANR	Preparation for 1113 negotiations.	1.00	595.00
6/18/20	ANR	Attend 1113 negotiations with Prime/UNAC.	1.20	714.00
6/18/20	ANR	Review of information request communications.	.90	535.50
6/18/20	ANR	Review of information request status.	.50	297.50
6/19/20	ETF	Finish reviewing further responses to RFIs on repository to date	.60	225.00
6/19/20	ETF	Update RFI tracker to prepare for filings.	1.00	375.00
6/19/20	ANR	Review of request for production response.	.20	119.00
6/19/20	ANR	Review of doctor's note re employee accommodation.	.10	59.50
6/19/20	ANR	Reply to client re accommodation request.	.10	59.50
6/19/20	ANR	Review email from UNAC re negotiations.	.10	59.50
6/19/20	ANR	Reply to email from UNAC re negotiations.	.10	59.50
6/19/20	ET	Review EMG document.	.10	39.50
6/19/20	ET	Email correspondence with E. Ruiz regarding EMG.	.10	39.50
6/20/20	ETF	Draft email to BK counsel re RFI tracker.	.10	37.50
6/22/20	ETF	Exchange emails with Dentons re RFIs and Motions	.30	112.50
6/22/20	LAF	Preparation for negotiations.	1.20	714.00
6/22/20	LAF	Attend UNAC negotiations and caucus.	2.50	1,487.50
6/22/20	LAF	Attend SEIU negotiations and caucus.	2.50	1,487.50
6/22/20	LAF	Review of information request status.	.30	178.50
6/22/20	ANR	Preparation for negotiations.	1.20	714.00
6/22/20	ANR	Attend UNAC negotiations and caucus.	2.50	1,487.50
6/22/20	ANR	Attend SEIU negotiations and caucus.	2.50	1,487.50
6/22/20	ANR	Review of information request status.	.30	178.50
6/22/20	ET	Assess issues for bargaining documents.	.20	79.00
6/22/20	ET	Review EMG documents.	.30	118.50
6/22/20	ET	Draft response to EMG.	.50	197.50
6/22/20	ET	Email correspondence with K. Chapman regarding Gonzalez subpoena.	.10	39.50
6/22/20	ET	Analysis of litigation exposure for plan document inclusion.	.30	118.50
6/23/20	ETF	Fact check lengthy reply re 1113 motion and provide revisions and detailed feedback re same.	3.40	1,275.00

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Date	Tkpr	Description	Hours	Amount
6/23/20	ETF	Review further emails exchanged between union and verity in response to RFIs and inventory same.	1.20	450.00
6/23/20	ETF	Email bankruptcy counsel re status of review of reply.	.10	37.50
6/23/20	LAF	Telephone call with S. Alberts re information requests.	.30	178.50
6/23/20	LAF	Preparation for 1113 negotiations.	1.20	714.00
6/23/20	LAF	Attend Prime/UNAC negotiations as notetaker and caucus.	2.70	1,606.50
6/23/20	LAF	Attend SEIU negotiations and caucus.	2.30	1,368.50
6/23/20	LAF	Review of document production update.	.30	178.50
6/23/20	ANR	Telephone call with S. Alberts re information requests.	3.00	1,785.00
6/23/20	ANR	Preparation for 1113 negotiations.	1.20	714.00
6/23/20	ANR	Attend Prime/UNAC negotiations as facilitator and caucus.	2.70	1,606.50
6/23/20	ANR	Attend SEIU negotiations and caucus.	2.30	1,368.50
6/23/20	ANR	Review of document production update.	.40	238.00
6/23/20	ANR	Review of new claims.	.30	178.50
6/23/20	ANR	Status update re 1113 negotiations.	.50	297.50
6/23/20	ANR	Email to W. Castillo and D. Delmar re personnel matters.	.20	119.00
6/23/20	ET	Email correspondence with J. Oviedo regarding Sanchez production.	.20	79.00
6/23/20	ET	Review subpoena for Sanchez and affidavit.	.10	39.50
6/23/20	ET	Review and analysis of Ebias, Valasquez, and Jornacion subpoenas.	.30	118.50
6/23/20	ET	Email L. Vargas regarding Ebias, Valasquez, and Jornacion subpoenas and next steps.	.20	79.00
6/23/20	ET	Review and analysis of pending deadlines regarding litigation.	.30	118.50
6/24/20	ETF	Draft email to bankruptcy counsel re additional RFI set and discrepancy in reply.	.20	75.00
6/24/20	ETF	Review authority re duty to disclose witness statements and investigatory reports.	2.50	937.50
6/24/20	ETF	Begin drafting client memo re witness statements and investigation reports.	.60	225.00
6/24/20	ANR	Conference call re information request response and liability analysis.	.60	357.00
6/24/20	ANR	Email to investigator re personnel matter.	.10	59.50
6/24/20	ET	Email correspondence with carrier regarding protocols.	.10	39.50
6/24/20	ET	Email DA regarding Gonzalez subpoena.	.10	39.50
6/24/20	ET	Call with carrier regarding protocols.	.10	39.50
6/25/20	ETF	Review further authority re accommodation related to RFI of witness statements.	.80	300.00
6/25/20	ETF	Continue drafting memo re witness statements and accommodations to sensitive requests.	.90	337.50
6/25/20	ETF	Further update and inventory of additional RFI responses.	2.00	750.00
6/25/20	ETF	Draft email to bankruptcy counsel re declaration.	.10	37.50
6/25/20	ANR	Revise of debtor response to RFI.	.80	476.00
6/25/20	ANR	Review of email from W. Castillo re request for information.	.10	59.50

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Date	Tkpr	Description	Hours	Amount
6/25/20	ANR	Respond to email from W. Castillo re request for information.	.10	59.50
6/25/20	ANR	Review of Prime response to UNAC.	.20	119.00
6/25/20	ANR	Conference call with investigator.	.20	119.00
6/25/20	ANR	Email with R. Martwick re negotiation dates.	.10	59.50
6/25/20	ET	Review and analysis of pending subpoena.	.20	79.00
6/25/20	ET	Call process server regarding Ebias subpoena.	.10	39.50
6/25/20	ET	Email correspondence with L. Vargas regarding pending subpoenas.	.20	79.00
6/26/20	ETF	Phone conference with bankruptcy counsel to discuss declarations.	.70	262.50
6/26/20	ETF	Review further emails and documents exchanged with union.	.30	112.50
6/26/20	ETF	Review revised reply provided by Dentons to prepare for declaration.	.60	225.00
6/26/20	LAF	Review CNA complaint from NLRB.	.50	297.50
6/26/20	LAF	Conference call re declarations for reply brief.	.50	297.50
6/26/20	LAF	Review draft reply brief.	.50	297.50
6/26/20	ANR	Review of UNAC's Fourth Request for Information.	.50	297.50
6/26/20	ET	Email correspondence with L. Vargas regarding Ebisa subpoena.	.10	39.50
6/26/20	ET	Review Ebisa subpoena.	.10	39.50
6/26/20	ET	Email counsel regarding objections to Ebisa subpoena.	.20	79.00
6/26/20	ET	Review and analysis of Mercado subpoena.	.10	39.50
6/26/20	ET	Email L. Vargas regarding Mercado subpoena.	.20	79.00
6/27/20	ANR	Review of information request response.	.60	357.00
6/28/20	ETF	Draft omnibus declaration for SEIU and UNAC negotiations.	4.70	1,762.50
6/28/20	ANR	Conference call with Dentons and BRG regarding UNAC information request Set 4.	.90	535.50
6/28/20	ET	Review and analysis of EMG doctor's note.	.20	79.00
6/28/20	ET	Analysis of response to EMG note.	.20	79.00
6/29/20	ETF	Make further revisions to declaration in support of reply based on recent communications.	.60	225.00
6/29/20	ETF	Update declaration with further documents and emails exchanged between the parties.	1.00	375.00
6/29/20	ETF	Review and respond to multiple email from client re grievance advice.	.20	75.00
6/29/20	ETF	Review further bargaining notes and emails and update declaration with info re same.	1.40	525.00
6/29/20	LAF	Telephone call with Dentons and opposing counsel.	1.00	595.00
6/29/20	LAF	Review and revise declarations for 1113 motion.	1.50	892.50
6/29/20	ANR	Conference call with H. Levy-Biehl regarding request for employee information.	.50	297.50
6/29/20	ANR	Conference call with UNAC, Dentons and BRG regarding meet and confer regarding information request and stipulation.	.50	297.50

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Date	Tkpr	Description	Hours	Amount
6/29/20	ANR	Review of correspondence between Dentons, UNAC and Prime regarding request for information.	.80	476.00
6/29/20	ANR	Review email from Prime regarding negotiation dates.	.10	59.50
6/29/20	ANR	Email to B. Harland regarding negotiations.	.10	59.50
6/29/20	ANR	Review of extensive reply regarding 1113 motion.	2.20	1,309.00
6/29/20	ET	Email correspondence with E. Ruiz and W. Castillo regarding EMG claim.	.20	79.00
6/29/20	ET	Email correspondence with counsel and L. Vargas regarding Ebias subpoena.	.20	79.00
6/30/20	ETF	Phone call with client re grievance advice.	.30	112.50
6/30/20	ETF	Continue drafting declaration in support of reply and 1113 motion.	2.20	825.00
6/30/20	ETF	Review and respond to numerous emails from bankruptcy counsel seeking evidence in support of reply.	.20	75.00
6/30/20	ETF	Review files and provide further evidence in support of reply.	.20	75.00
6/30/20	LAF	Conference calls with UNAC re 1113.	.50	297.50
6/30/20	LAF	Review and revise notes re same.	.50	297.50
6/30/20	LAF	Review stipulation and reply for revisions.	1.00	595.00
6/30/20	LAF	Work on declaration.	.50	297.50
6/30/20	ANR	Review of reasonable accommodation documents.	.20	119.00
6/30/20	ANR	Conference call with W. Castillo and E. Tilman re accommodation request.	.50	297.50
6/30/20	ANR	Review of paid time off issue.	.20	119.00
6/30/20	ANR	Review of various request for exhibits.	.60	357.00
6/30/20	ANR	Final review of Ruda declaration.	.50	297.50
6/30/20	ANR	Email with D. Delmar re labor issue.	.10	59.50
6/30/20	ANR	Attend UNAC meet and confer re information requests.	.80	476.00
6/30/20	ET	Review and analysis of EMG documents and response to note.	.20	79.00
6/30/20	ET	Call with W. Castillo re EMG claim and next steps.	.30	118.50
6/30/20	ET	Email W. Castillo re EMG claim.	.10	39.50
6/30/20	ET	Review case carrier letters.	.10	39.50
6/30/20	ET	Email correspondence with K. Chapman re carrier letters and next steps.	.10	39.50
TOTAL PROFESSIONAL SERVICES RENDERED				\$ 109,157.50

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TIMEKEEPER SUMMARY

Name	Rate	Hours	Amount	N/C Hr	N/C \$
Ferguson, Elizabeth T	375.00	65.00	24,375.00	.00	.00
Tilman, Elina	395.00	26.80	10,586.00	.00	.00
Fernandez, Louise Ann	595.00	39.20	23,324.00	.00	.00
Ruda, An Nguyen	595.00	85.50	50,872.50	.00	.00
TOTALS		216.50	\$ 109,157.50	.00	\$.00

TOTAL THIS INVOICE

\$ 109,157.50

*Balance is due within 30 days from the date of this invoice.
We reserve the right to charge interest at 10% per annum on amounts not paid within 30 days.*

BARTKO ZANKEL BUNZEL

BARTKO ZANKEL BUNZEL & MILLER
 A Professional Law Corporation

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 San Francisco, CA 94111
 p: 415.956.1900
 f: 415.956.1152
 www.bzblm.com

August 5, 2020

Saint Francis Medical Center
 601 Figueroa Street
 Suite 4050
 Los Angeles, CA 90017

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 Billing Attorney: ANR

For professional services rendered and disbursements advanced through July 31, 2020:

RE: General Labor

DETAIL OF PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
7/01/20	ETF	Make further revisions to declaration and review and respond to numerous emails from bankruptcy counsel re same.	.90	337.50
7/01/20	ANR	Preparation for negotiations.	.80	476.00
7/01/20	ANR	Attend negotiations with SEIU and Prime and caucus.	1.70	1,011.50
7/01/20	ANR	Review of SEIU stipulation of facts in dispute re request for information.	.10	59.50
7/01/20	ANR	Review and reply to email from D. Delmar re SEIU joint labor management meeting.	.10	59.50
7/01/20	ANR	Review and reply to email from D. Delmar re alternative work schedule.	.10	59.50
7/01/20	ANR	Final review of A. Ruda declaration.	.30	178.50
7/02/20	ETF	Further research re SSN issue and discuss same.	1.20	450.00
7/02/20	LAF	Telephone call with H Levy regarding privacy issues.	.50	297.50
7/02/20	LAF	Telephone call with Prime team re outstanding issues.	.50	297.50
7/02/20	ANR	Conference call with H. Levy-Biehl and L. Fernandez re employee issues.	.50	297.50
7/02/20	ANR	Conference call with Verity and Prime re employee benefits issues.	.80	476.00
7/02/20	ANR	Review of email from H. Levy-Biehl re request for information number 4.	.10	59.50
7/02/20	ANR	Review email from M. Pfeiffer re human resources support.	.10	59.50
7/02/20	ANR	Review of additional Prime responses to UNAC information request.	.50	297.50
7/02/20	ET	Email correspondence with W. Castillo regarding EMG claim.	.10	39.50
7/03/20	LAF	Conference call with UNAC/Dentons/Prime/BRG re information requests.	.50	297.50
7/03/20	LAF	Research and prepare write up re privacy issues.	1.00	595.00
7/03/20	ANR	Conference call with UNAC/Dentons/Prime/BRG re information requests.	.50	297.50
7/03/20	ANR	Review of privacy write up.	.30	178.50

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Date	Tkpr	Description	Hours	Amount
7/03/20	ANR	Conference call re Prime information requests.	.50	297.50
7/03/20	ANR	Email with W. Castillo re reasonable accommodation issue.	.20	119.00
7/04/20	ET	Review for privilege and privacy personnel and payroll records and make necessary redactions regarding Velasquez subpoena.	.60	237.00
7/04/20	ET	Email L. Vargas regarding Velasquez subpoena.	.10	39.50
7/04/20	ET	Review and analysis of A. Bueno subpoena and client document for production.	.30	118.50
7/04/20	ET	Email L. Vargas regarding A. Bueno subpoena production.	.10	39.50
7/04/20	ET	Update subpoena master tracker.	.20	79.00
7/04/20	ET	Review and analysis of Ebias client and health documents and identify documents for responsiveness and make necessary redactions.	.80	316.00
7/04/20	ET	Analysis of privacy and relevancy issues regarding Ebias documents.	.20	79.00
7/04/20	ET	Email counsel regarding Ebias subpoena and plaintiff's objections.	.30	118.50
7/04/20	ET	Email L. Vargas regarding Ebias subpoena and employee separation date.	.20	79.00
7/04/20	ET	Email L. Vargas regarding Mercado subpoena.	.10	39.50
7/06/20	ETF	Update RFI responses for SEIU and UNAC and inventory re same.	.30	112.50
7/06/20	ETF	Review and update RFI responses and requests on tracker	.60	225.00
7/06/20	ETF	Exchange multiple emails with BK counsel re strategy and logistics for next set of declarations.	.20	75.00
7/06/20	LAF	Attend SEIU negotiations.	2.00	1,190.00
7/06/20	LAF	Caucus and calls re SEIU negotiations.	1.00	595.00
7/06/20	LAF	Review and revise notes for SEIU negotiations.	.50	297.50
7/06/20	LAF	Review and respond to emails re UNAC RFI re PPEs.	.20	119.00
7/06/20	ANR	Preparation for 1113 negotiations.	1.20	714.00
7/06/20	ANR	Attend SEIU negotiations.	1.80	1,071.00
7/06/20	ET	Strategize regarding ECS claims.	.30	118.50
7/06/20	ET	Call with J. Moe regarding ECS claims.	.10	39.50
7/06/20	ET	Call with L. Vargas regarding subpoenas.	.30	118.50
7/06/20	ET	Email correspondence with L. Vargas regarding Ignacio, Mercado, and Ebias subpoena.	.30	118.50
7/06/20	ET	Finalize Ignacio documents for production.	.20	79.00
7/06/20	ET	Email counsel regarding Ebias subpoena.	.10	39.50
7/06/20	ET	Review and analysis of Mercado subpoenaed documents.	.70	276.50
7/06/20	ET	Review and analysis of Ebias subpoenaed documents and make redactions.	.60	237.00
7/06/20	ET	Analysis of pending litigation and subpoena deadlines and update tracking chart.	.20	79.00
7/07/20	ETF	Review emails re status of SEIU and UNAC negotiations and tentative ruling re rejection motion.	.20	75.00
7/07/20	LAF	Preparation for UNAC/Prime/SEIU negotiations.	1.20	714.00
7/07/20	LAF	Attend UNAC/Prime negotiations and caucus.	2.30	1,368.50

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7/07/20	LAF	Attend UNAC/SEIU negotiations and caucus.	2.20	1,309.00
7/07/20	LAF	Review of UNAC reply brief.	.30	178.50
7/07/20	LAF	Review of SEIU reply brief.	.30	178.50
7/07/20	LAF	Update Prime SEIU Notes.	.40	238.00
7/07/20	LAF	Update Prime UNAC notes.	.30	178.50
7/07/20	LAF	Review of emails re RFI re PPEs.	.20	119.00
7/07/20	ANR	Preparation for UNAC/Prime/SEIU negotiations.	1.20	714.00
7/07/20	ANR	Attend UNAC/Prime negotiations and caucus.	2.30	1,368.50
7/07/20	ANR	Attend UNAC/SEIU negotiations and caucus.	2.20	1,309.00
7/07/20	ANR	Review of UNAC reply brief (.5); review of SEIU reply brief.	.30	178.50
7/07/20	ANR	Review of email from S. Marques re grievances.	.10	59.50
7/07/20	ET	Call with J. Moe regarding litigation and bankruptcy issues.	.20	79.00
7/07/20	ET	Email correspondence with J. Moe regarding pending issues.	.10	39.50
7/07/20	ET	Finalize Bueno documents.	.10	39.50
7/07/20	ET	Email correspondence with L. Vargas regarding subpoenas.	.20	79.00
7/07/20	ET	Update subpoena chart.	.10	39.50
7/07/20	ET	Email correspondence with K. Murphy regarding names for plan notice inclusion.	.20	79.00
7/07/20	ET	Review documents regarding EMG claims.	.30	118.50
7/07/20	ET	Email correspondence with G. Darlymple and W. Castillo regarding EMG claims.	.20	79.00
7/07/20	ET	Review and analysis of next steps regarding EMG claims.	.30	118.50
7/07/20	ET	Call with W. Castillo, department, and E. Ruiz regarding EMG claims and necessary accommodations.	1.10	434.50
7/08/20	ANR	Attend hearing re rejection of CBAs telephonically.	.90	535.50
7/08/20	ANR	Review of accommodation request.	.30	178.50
7/08/20	ANR	Review/reply to email from S. Alberts re severance.	.10	59.50
7/08/20	ET	Email correspondence with G. Dalryple regarding employee accommodation.	.10	39.50
7/09/20	ETF	Phone call with client to discuss grievance issues.	.70	262.50
7/09/20	LAF	Pre call with TPA re information requested by Prime.	.40	238.00
7/09/20	LAF	Review issues to Prepare ULP Answer.	.60	357.00
7/09/20	ANR	Conference call with Human Resources re information requests and other labor matters.	.50	297.50
7/09/20	ANR	Review of request for benefits information.	.50	297.50
7/09/20	ANR	Conference call with M. Pfeiffer re employee matter.	.50	297.50
7/09/20	ANR	Review/reply of email from St. Francis Human Resources re interactive process request.	.10	59.50
7/09/20	ANR	Review of SEIU request for effects bargaining.	.10	59.50
7/09/20	ANR	Review/reply to email from UNAC re cancellation grievance.	.10	59.50

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Date	Tkpr	Description	Hours	Amount
7/09/20	ET	Analysis of next steps regarding EMG claim.	.20	79.00
7/09/20	ET	Draft response from E. Ruiz to EMG regarding accommodation.	.40	158.00
7/09/20	ET	Email correspondence with E. Ruiz and G. Dalrymple regarding EMG claims.	.20	79.00
7/09/20	ET	Review EMG documents.	.10	39.50
7/10/20	LAF	Conference call re information requests from Prime TPA.	.50	297.50
7/10/20	ANR	Revisions to mediation brief.	1.70	1,011.50
7/10/20	ANR	Conference call with H. Levy-Biehl and Dentons re authority.	.30	178.50
7/10/20	ANR	Conference call with Prime, Verity and broker teams re health plans.	.90	535.50
7/10/20	ANR	Conference call with W. Castillo re reinstatement letter.	.30	178.50
7/10/20	ANR	Review email from W. Castillo re request for information re grievances.	.10	59.50
7/10/20	ET	Email correspondence with L. Vargas regarding Bueno subpoena.	.10	39.50
7/10/20	ET	Email counsel regarding Ebias subpoena.	.10	39.50
7/10/20	ET	Update master chart regarding pending subpoenas.	.20	79.00
7/10/20	ET	Finalize Ebias subpoenaed documents.	.30	118.50
7/10/20	ET	Review and analysis of Singleton subpoena.	.10	39.50
7/10/20	ET	Email L. Vargas and K. Chapman regarding Singleton subpoena.	.10	39.50
7/13/20	LAF	Review and revise employee authorization.	.40	238.00
7/13/20	LAF	Telephone call with Prime and client regarding employee transition issues.	.40	238.00
7/13/20	ANR	Review of revisions to employee authorization.	.30	178.50
7/13/20	ANR	Telephone call with H. Levy-Biehl re employee authorization.	.30	178.50
7/13/20	ANR	Review of email from UNAC re vacation cashout.	.10	59.50
7/13/20	ANR	Review of UNAC grievance re travelers.	.30	178.50
7/13/20	ANR	Review of revised employee authorization.	.20	119.00
7/13/20	ANR	Email to investigator re status.	.10	59.50
7/13/20	ET	Review and analysis of J. Felipe subpoena.	.10	39.50
7/13/20	ET	Email L. Vargas regarding J. Felipe subpoena.	.10	39.50
7/13/20	ET	Email L. Vargas regarding pending SFMC subpoenas.	.10	39.50
7/14/20	LAF	Review time line and respond to emails.	.50	297.50
7/14/20	ET	Email correspondence with L. Vargas regarding subpoenas.	.10	39.50
7/14/20	ET	Correspondence with counsel regarding Ebias subpoena.	.10	39.50
7/15/20	ANR	Review of UNAC Fifth Information Request.	.20	119.00
7/15/20	ANR	Review of SFMC response to UNAC Fifth Information Request.	.10	59.50
7/15/20	ET	Email correspondence with E. Ruiz regarding EMG claim.	.20	79.00
7/15/20	ET	Email counsel regarding Ebias subpoena.	.10	39.50
7/15/20	ET	Review medical documents for Ebias subpoena and make necessary redactions.	.30	118.50
7/17/20	ANR	Email to W. Castillo re personnel matter.	.10	59.50
7/17/20	ANR	Reply to email from W. Castillo re personnel matter.	.10	59.50

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Date	Tkpr	Description	Hours	Amount
7/17/20	ET	Email correspondence with E. Ruiz and K. Vitale regarding EMG return to work and workers compensation proceedings.	.20	79.00
7/17/20	ET	Review EMG workers compensation proceeding notice.	.10	39.50
7/17/20	ET	Update master chart of pending subpoenas.	.10	39.50
7/20/20	ANR	Review of email to W. Castillo re litigation matters.	.20	119.00
7/20/20	ET	Review emails from W. Castillo and G. Luna regarding EMG claims.	.10	39.50
7/20/20	ET	Review client documents regarding EMG claims.	.30	118.50
7/20/20	ET	Email correspondence with E. Ruiz and W. Castillo regarding EMG claims.	.20	79.00
7/21/20	LAF	Review emails from H Levy and release forms.	.40	238.00
7/21/20	LAF	Respond to same.	.20	119.00
7/21/20	LAF	Review emails to Union re 1113 issues.	.20	119.00
7/21/20	ANR	Review of email from W. Castillo re personnel request.	.30	178.50
7/21/20	ET	Review client documents regarding Wolferd claim.	.20	79.00
7/21/20	ET	Email correspondence with J. Moe regarding Wolferd claim.	.20	79.00
7/21/20	ET	Email correspondence with K. Murphy regarding Duong subpoena.	.10	39.50
7/22/20	LAF	Telephone call re employee releases with team.	.40	238.00
7/22/20	ANR	Conference call with Dentons and H. Levy-Biehl re authorizations.	.30	178.50
7/22/20	ANR	Review of email from UNAC re arbitration.	.10	59.50
7/22/20	ANR	Review of correspondence from M. Carbuccia re application deadlines.	.10	59.50
7/22/20	ET	Email correspondence W. Castillo regarding J. Felipe subpoena.	.10	39.50
7/22/20	ET	Review and analysis of Mano subpoenas.	.20	79.00
7/22/20	ET	Email W. Castillo regarding Mano subpoenas, responsive records, and objections.	.30	118.50
7/22/20	ET	Analysis of pending SFMC subpoenas and update master chart.	.20	79.00
7/22/20	ET	Review and analysis of Duong subpoena.	.10	39.50
7/22/20	ET	Email W. Castillo regarding Duong subpoena production and needed follow-up.	.30	118.50
7/22/20	ET	Email correspondence with K. Chapman regarding Duong subpoena.	.10	39.50
7/22/20	ET	Send meet and confer email to counsel regarding Manaco subpoena.	.20	79.00
7/23/20	LAF	Conference call with H. Levy-Biehl and L. Fernandez re labor issues.	.50	297.50
7/23/20	ANR	Telephone call with Human Resources and M. Pfeiffer re pending labor matters.	.50	297.50
7/23/20	ANR	Review of Prime correspondence to UNAC.	.10	59.50
7/23/20	ANR	Revision to correspondence to SEIU re effects bargaining demand.	.20	119.00
7/23/20	ANR	Review of email from W. Castillo re information request.	.10	59.50
7/23/20	ANR	Reply to email from W. Castillo re information request.	.10	59.50
7/23/20	ET	Review Felipe documents.	.20	79.00
7/23/20	ET	Email Y. Bernarez regarding Felipe subpoena.	.10	39.50
7/23/20	ET	Review and analysis of Otto subpoena.	.10	39.50
7/23/20	ET	Multiple emails to Y. Bernardez and E. Ruiz regarding Otto subpoena.	.40	158.00

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Date	Tkpr	Description	Hours	Amount
7/23/20	ET	Email counsel regarding Otto subpoena extension and objections.	.20	79.00
7/23/20	ET	Email correspondence with counsel regarding Manaco subpoena.	.10	39.50
7/24/20	ANR	Review of email from P. Chadwick re payments.	.10	59.50
7/24/20	ANR	Review of additional email from P. Chadwick re subpoenas and personnel file storage.	.10	59.50
7/24/20	ANR	Review of email from W. Castillo re personnel issues.	.10	59.50
7/24/20	ANR	Review of additional email from W. Castillo re releases.	.10	59.50
7/24/20	ANR	Review of UNAC correspondence re HIPAA release.	.20	119.00
7/24/20	ANR	Preparation of response to UNAC correspondence.	.50	297.50
7/24/20	ET	Review new Duong subpoena.	.10	39.50
7/24/20	ET	Email K. Chapman regarding Duong subpoena.	.10	39.50
7/25/20	ANR	Analysis of release/authorization.	.50	297.50
7/26/20	LAF	Review emails from Dentons re employee authorizations.	.30	178.50
7/26/20	LAF	Review responses re same.	.20	119.00
7/26/20	ANR	Preparation of general communication re authorizations.	.30	178.50
7/26/20	ANR	Preparation of UNAC response.	.30	178.50
7/27/20	LAF	Review emails from Dentons re employee release issues.	.30	178.50
7/27/20	ANR	Mediation of Prime/SEIU contract discussions.	3.80	2,261.00
7/27/20	ANR	Response to UNAC re release and authorizations.	.50	297.50
7/27/20	ANR	Review of email from S. Marques re hiring process.	.10	59.50
7/27/20	ET	Review and analysis of Garcia withdrawal of objections.	.10	39.50
7/27/20	ET	Review docket history for Garcia case.	.10	39.50
7/27/20	ET	Email Y. Bernardez, K. Chapman, J. Oviedo, and H. Biehl regarding Garcia PMK deposition.	.30	118.50
7/27/20	ET	Email correspondence with Y. Bernardez regarding Alma subpoena.	.10	39.50
7/27/20	ET	Review status of SFMC subpoenas and update master chart.	.20	79.00
7/27/20	ET	Call with counsel regarding Garcia subpoena.	.10	39.50
7/27/20	ET	Review subpoena documents for Garcia and assess issues.	.30	118.50
7/27/20	ET	Review Plaza subpoenas.	.20	79.00
7/27/20	ET	Email correspondence with K. Chapman, J. Oviedo, Y. Bernardez, and N. Nasu regarding Plaza subpoena.	.30	118.50
7/27/20	ET	Call J. Oviedo regarding Plaza subpoena.	1.00	395.00
7/27/20	ET	Call with K. Chapman and Y. Bernardez regarding subpoena issues.	.40	158.00
7/27/20	ET	Call with N. Nasu regarding Plaza subpoena.	.10	39.50
7/27/20	ET	Meet and confer regarding objections with counsel regarding Plaza subpoena.	.70	276.50
7/27/20	ET	Review statute regarding 1198.5 and litigation.	.10	39.50
7/27/20	ET	Call process server regarding Plaza subpoena.	.10	39.50

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Date	Tkpr	Description	Hours	Amount
7/27/20	ET	Email correspondence with Y. Bernardez regarding Felipe, Duong, and Monoco subpoenas.	.20	79.00
7/27/20	ET	Review and analysis of Batory documents for subpoena and compile responsive records.	1.10	434.50
7/27/20	ET	Complete declaration page for Batory subpoena.	.10	39.50
7/27/20	ET	Email L. Ho and J. Oviedo regarding Batory subpoena.	.10	39.50
7/27/20	ET	Review and analysis of Felipe client documents for production.	1.20	474.00
7/27/20	ET	Complete declaration page for Felipe subpoena.	.10	39.50
7/27/20	ET	Email Y. Bernardez and W. Castillo regarding issues with Felipe subpoena.	.10	39.50
7/28/20	ANR	Facilitate CBA settlement with between SEIU and Prime.	2.80	1,666.00
7/28/20	ET	Email correspondence with process server and Y. Bernardez regarding Felipe subpoena.	.20	79.00
7/28/20	ET	Review emails regarding Bueno subpoena.	.10	39.50
7/28/20	ET	Email correspondence with Y. Bernard, W. Castillo, and B. Paulsen regarding Bueno subpoena.	.30	118.50
7/28/20	ET	Review Manaco subpoena and correspondence with Y. Bernardez regarding same.	.10	39.50
7/28/20	ET	Review and analysis of Felipe client documents for production.	.80	316.00
7/29/20	ETF	Phone call to discuss subpoena protocol.	.10	37.50
7/29/20	ANR	Mediate collective bargaining agreement between SEIU and Prime.	6.30	3,748.50
7/29/20	ANR	Review of email from W. Castillo re request for production.	.10	59.50
7/29/20	ET	Email correspondence with counsel regarding Garcia PMK deposition.	.20	79.00
7/29/20	ET	Email correspondence with counsel and Y. Bernardez regarding Manaco subpoena.	.20	79.00
7/29/20	ET	Email correspondence with B. Bernardez regarding Felipe subpoena.	.10	39.50
7/29/20	ET	Email correspondence with B. Paulsen regarding Bueno productions.	.20	79.00
7/29/20	ET	Email correspondence with E. Ruiz regarding Otto subpoena.	.10	39.50
7/29/20	ET	Email J. Oviedo and H. Biehel regarding Garcia subpoena.	.20	79.00
7/30/20	ANR	Facilitate collective bargaining discussions between Prime and UNAC.	2.90	1,725.50
7/30/20	ANR	Review of email from W. Castillo re investigation pictures.	.10	59.50
7/30/20	ANR	Email to Human Resources re SEIU bargaining team releases.	.10	59.50
7/30/20	ANR	Review of email from M. Pfeiffer re labor issue.	.10	59.50
7/30/20	ANR	Reply to email from M. Pfeiffer re labor issue.	.10	59.50
7/30/20	ET	Email correspondence with J. Oviedo, H. Biehel, and counsel re Garcia PMK deposition.	.20	79.00
7/30/20	ET	Review Bueno production documents.	.10	39.50
7/30/20	ET	Email correspondence with Y. Bernardez regarding Bueno production.	.30	118.50
7/30/20	ET	Email correspondence with Y. Bernardez re Felipe production.	.20	79.00
7/30/20	ET	Review and analysis of C. Plaza records and make redactions.	1.30	513.50
7/30/20	ET	Review Plaza subpoena.	.10	39.50

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Date	Tkpr	Description	Hours	Amount
7/30/20	ET	Draft declaration for C. Plaza subpoena.	.10	39.50
7/30/20	ET	Email Y. Bernardez regarding Plaza production.	.10	39.50
7/30/20	ET	Email correspondence with Y. Bernardez regarding litigation documents.	.20	79.00
7/30/20	ET	Finalize Filipe part 2 subpoena production.	.10	39.50
7/30/20	ET	Email process server re Felipe production.	.10	39.50
7/30/20	ET	Analysis of pending issues regarding litigation.	.10	39.50
7/31/20	ETF	Review emails re proposals exchanged with union and provide same for bargaining session.	.20	75.00
7/31/20	LAF	Draft proposals and assist with mediation of bargaining disputes.	5.00	2,975.00
7/31/20	ANR	Facilitate Prime/UNAC collective bargaining agreement discussions.	10.20	6,069.00
7/31/20	ANR	Review of 401k communication.	.20	119.00
7/31/20	ANR	Review of leave of absence request.	.10	59.50
7/31/20	ET	Email and call counsel regarding Garcia subpoena.	.10	39.50
7/31/20	ET	Review status of Zikoor motion to compel and email C. Mullen re same.	.10	39.50
7/31/20	ET	Email correspondence with Y. Bernardez regarding Plaza subpoena status	.10	39.50
7/31/20	ET	Call J. Oviedo regarding Garcia subpoena.	.10	39.50

TOTAL PROFESSIONAL SERVICES RENDERED

\$ 60,110.50

TIMEKEEPER SUMMARY

Name	Rate	Hours	Amount	N/C Hr	N/C \$
Ferguson, Elizabeth T	375.00	4.40	1,650.00	.00	.00
Tilman, Elina	395.00	28.70	11,336.50	.00	.00
Fernandez, Louise Ann	595.00	23.70	14,101.50	.00	.00
Ruda, An Nguyen	595.00	55.50	33,022.50	.00	.00
TOTALS		112.30	\$ 60,110.50	.00	\$.00

TOTAL THIS INVOICE

\$ 60,110.50

*Balance is due within 30 days from the date of this invoice.
We reserve the right to charge interest at 10% per annum on amounts not paid within 30 days.*

BARTKO ZANKEL BUNZEL

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September 8, 2020

Saint Francis Medical Center
601 Figueroa Street
Suite 4050
Los Angeles, CA 90017

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Billing Attorney: ANR

For professional services rendered and disbursements advanced through September 4, 2020:

RE: General Labor

DETAIL OF PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
8/01/20	ANR	Facilitate settlement between Prime and UNAC.	10.30	6,128.50
8/02/20	LAF	Create redline of CBA based on Memorandum of Understanding.	1.00	595.00
8/03/20	ETF	Review strategy re employees in anticipation of hospital sale.	.30	112.50
8/03/20	LAF	Telephone call re redline and approach with A Ruda.	.30	178.50
8/03/20	LAF	Revise redline based on Memorandum of Understanding.	.50	297.50
8/03/20	LAF	Email transmission regarding Memorandum of Understanding.	.20	119.00
8/03/20	ANR	Review of CBA revise; review of email from S. Marques re hiring process.	.10	59.50
8/03/20	ANR	Reply to email from S. Marques re hiring process.	.10	59.50
8/03/20	ANR	Review of email from H. Levy-Biehl re transition issues.	.10	59.50
8/03/20	ET	Email correspondence with W. Castillo re subpoena issues.	.20	79.00
8/03/20	ET	Email counsel regarding Garcia subpoena.	.10	39.50
8/03/20	ET	Call counsel regarding Garcia subpoena.	.10	39.50
8/03/20	ET	Call with J. Oviedo regarding Garcia subpoena.	.10	39.50
8/03/20	ET	Analysis of next steps regarding Garcia subpoena.	.10	39.50
8/03/20	ET	Email correspondence with J. Oviedo and K. Chapman regarding Garcia subpoena.	.20	79.00
8/03/20	ET	Review Otto letter.	.10	39.50
8/03/20	ET	Email correspondence with Y. Bernardez regarding Otto subpoena.	.20	79.00
8/03/20	ET	Email correspondence with counsel regarding Manaco subpoena and other issues.	.20	79.00
8/03/20	ET	Email correspondence with K. Vitale and Y. Bernardez regarding Manaco subpoena.	.20	79.00
8/03/20	ET	Update master chart regarding subpoenas.	.10	39.50
8/04/20	ANR	Review charge of discrimination.	.20	119.00

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Date	Tkpr	Description	Hours	Amount
8/04/20	ANR	Review of post offer authorizations.	.30	178.50
8/04/20	ANR	Review of hotline complaint.	.20	119.00
8/04/20	ET	Email correspondence with Y. Bernardez regarding Otto subpoena.	.10	39.50
8/04/20	ET	Review Y. Bernardez emails regarding Manaco subpoena.	.10	39.50
8/04/20	ET	Email correspondence with counsel and Y. Bernardez regarding Garcia PMK deposition.	.50	197.50
8/04/20	ET	Call with Y. Bernardez and opposing counsel regarding Garcia subpoena.	.20	79.00
8/04/20	ET	Review responsive records regarding Garcia subpoena.	.10	39.50
8/04/20	ET	Review and complete declaration for Garcia case.	.10	39.50
8/05/20	ANR	Review of full-time guarantee issues and possible resolution.	2.80	1,666.00
8/05/20	ANR	Telephone call with V. Chavez re full-time guarantee.	.30	178.50
8/05/20	ANR	Telephone call with V. Chavez and N. Guzman re full-time guarantee.	.50	297.50
8/05/20	ANR	Review of payroll transition issues.	.60	357.00
8/05/20	ANR	Review of email from W. Castillo re information request.	.10	59.50
8/05/20	ANR	Reply to email from W. Castillo re information request.	.10	59.50
8/05/20	ANR	Review of email from Human Resources re personnel files.	.10	59.50
8/05/20	ANR	Respond to email from Human Resources per personnel files.	.10	59.50
8/05/20	ANR	Review of traveler grievance exposure.	.30	178.50
8/05/20	ANR	Email to Unions re application portal.	.10	59.50
8/05/20	ANR	Email to NUHW re various portal concerns.	.10	59.50
8/05/20	ET	Email correspondence with Y. Bernardez and J. Oviedo regarding Garcia subpoena.	.40	158.00
8/05/20	ET	Preliminary review of Chukwuzemie charge.	.10	39.50
8/05/20	ET	Make changes to respondent portal for Chukwuzemie charge.	.20	79.00
8/05/20	ET	Call with counsel regarding Garcia subpoena.	.10	39.50
8/05/20	ET	Email correspondence with counsel regarding Garcia subpoena.	.20	79.00
8/05/20	ET	Email correspondence with W. Castillo regarding Nkongho subpoena.	.10	39.50
8/05/20	ET	Complete declaration for Nkongho subpoena.	.10	39.50
8/05/20	ET	Review emails from K. Chapman and L. Ho regarding employee information.	.10	39.50
8/05/20	ET	Review voicemail from process server regarding Otto subpoena.	.10	39.50
8/05/20	ET	Review client documents and determine responsiveness for Otto subpoena.	.90	355.50
8/05/20	ET	Email process server and Y.. Bernardez regarding Otto production.	.20	79.00
8/05/20	ET	Complete declaration for Otto subpoena.	.10	39.50
8/05/20	ET	Correspondence with Y. Bernardez regarding pending subpoena issues.	.10	39.50
8/05/20	ET	Email correspondence with L. Ho regarding Castro employment information.	.10	39.50
8/05/20	ET	Review Lopez subpoenas and call with K. Murphy regarding same.	.10	39.50
8/05/20	ET	Review and analysis of Elizondo and Castro subpoenas.	.20	79.00

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Date	Tkpr	Description	Hours	Amount
8/05/20	ET	Email Y. Bernardez regarding Elizonda and Castro documents for subpoena.	.20	79.00
8/05/20	ET	Update tracking master chart of subpoenas.	.10	39.50
8/06/20	ETF	Review documents regarding wage garnishment.	.30	112.50
8/06/20	ETF	Draft response for client regarding wage garnishment.	.90	337.50
8/06/20	ANR	Settlement discussions with SEIU re full-time guarantee.	2.60	1,547.00
8/06/20	ANR	Telephone call with S. Marques re UNAC grievances.	.30	178.50
8/06/20	ANR	Review of email from SEIU re dues deductions.	.10	59.50
8/06/20	ANR	Review of final paycheck delivery.	.50	297.50
8/06/20	ET	Call with counsel regarding Garcia deposition and complaint.	.20	79.00
8/06/20	ET	Email correspondence with Y. Bernardez and counsel regarding Garcia deposition.	.30	118.50
8/06/20	ET	Email process server regarding Otto subpoena.	.10	39.50
8/06/20	ET	Review Garcia complaint.	.20	79.00
8/07/20	ETF	Exchange emails with client re wage garnishment employee.	.10	37.50
8/07/20	ANR	Conference call with J. Moe and E. Tilman re settlement.	.50	297.50
8/07/20	ANR	Write up of settlement recommendation.	.30	178.50
8/07/20	ANR	Review of individual employee settlement.	.30	178.50
8/07/20	ANR	Continued settlement discussions re SEIU settlement.	1.80	1,071.00
8/07/20	ET	Email correspondence with Y. Bernardez regarding Garcia deposition.	.10	39.50
8/07/20	ET	Prep call with S. Flores regarding Garcia deposition and document review.	.70	276.50
8/07/20	ET	Attend Garcia deposition.	.50	197.50
8/07/20	ET	Follow-up call with S. Flores regarding Garcia deposition.	.10	39.50
8/07/20	ET	Email counsel regarding Garcia production.	.10	39.50
8/07/20	ET	Review garnishment subpoenas.	.20	79.00
8/07/20	ET	Email court reporter regarding Garcia deposition.	.10	39.50
8/07/20	ET	Review summary of wage garnishment.	.20	79.00
8/07/20	ET	Email W. Castillo regarding Porter garnishment.	.10	39.50
8/08/20	ANR	Review of Prime information requests re data.	.50	297.50
8/08/20	ANR	Review of employee settlement agreement.	.50	297.50
8/09/20	ANR	Conference call with client and Dentons re information authorizations.	.50	297.50
8/09/20	ANR	Final review employee settlement agreement.	.50	297.50
8/09/20	ET	Email N. Nasu and Y. Bernardez regarding Manaco subpoena.	.10	39.50
8/09/20	ET	Review client documents for Manaco subpoena production.	1.20	474.00
8/09/20	ET	Assess privacy issues and make redactions to Manaco subpoena production.	.30	118.50
8/10/20	ETF	Phone call to Los Angeles County Sheriff's Office to verify mailing address.	.10	37.50
8/10/20	ETF	Draft email to client re wage garnishment with new address info.	.10	37.50
8/10/20	ETF	Review and provide settlement agreements for St. Francis cases.	.10	37.50
8/10/20	ANR	Telephone call with S. Marques re UNAC settlements.	.30	178.50

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Date	Tkpr	Description	Hours	Amount
8/10/20	ANR	Telephone call with M. Carbuccia re union grievance settlement.	.30	178.50
8/10/20	ANR	Telephone call with J. Moe re grievance settlements.	.20	119.00
8/10/20	ANR	Finalize SEIU settlement document.	.70	416.50
8/10/20	ANR	Review of email from payroll re settlement payment.	.20	119.00
8/10/20	ANR	Review of EEOC charge.	.50	297.50
8/10/20	ANR	Review email from H. Levy-Biehl re union grievances.	.10	59.50
8/10/20	ANR	Reply to email from H. Levy-Biehl re union grievances.	.10	59.50
8/10/20	ET	Email correspondence with N. Nasu regarding Manaco documents.	.10	39.50
8/10/20	ET	Review Manaco documents for subpoena.	.30	118.50
8/10/20	ET	Call Y. Bernardez regarding Manaco subpoena.	.10	39.50
8/10/20	ET	Finalize Manaco subpoena production.	.50	197.50
8/10/20	ET	Email process server and W. Castillo regarding Manaco subpoena.	.20	79.00
8/11/20	ETF	Review and analyze issues re layoffs.	.70	262.50
8/11/20	ETF	Review documents prepared for layoffs to prepare for notices to be issued tomorrow.	.20	75.00
8/11/20	ANR	Review of final paycheck amounts.	.30	178.50
8/11/20	ANR	Review of research re state and federal withholding.	.30	178.50
8/11/20	ANR	Review of grievance status.	.60	357.00
8/11/20	ANR	Review of request for documents.	.30	178.50
8/11/20	ANR	Review of employee communication.	.50	297.50
8/11/20	ET	Strategize regarding ligation cases and fact-gathering.	.40	158.00
8/11/20	ET	Email W. Castillo re Aragon, Nguyen, Wahidi, and Ahinasi case documents.	.40	158.00
8/11/20	ET	Email Y. Bernardez regarding Manaco subpoena.	.10	39.50
8/11/20	ET	Review notice from CT Corp and make acknowledgements.	.10	39.50
8/12/20	ANR	Review of email from M. Pfeiffer re employee issue.	.20	119.00
8/12/20	ANR	Review of email from R. Adcock re employee issue.	.10	59.50
8/12/20	ANR	Review of final employment documents.	.50	297.50
8/12/20	ANR	Review of email from S. Marques re UNAC settlement.	.10	59.50
8/12/20	ANR	Review of NLRB notice.	.20	119.00
8/12/20	ANR	Review of email from UNAC re settlement.	.20	119.00
8/12/20	ANR	Review of employee notice.	.10	59.50
8/12/20	ANR	Review of the email from H. Levy-Biehl re transaction.	.10	59.50
8/13/20	ANR	Review of email from S. Marques re employment verification.	.10	59.50
8/13/20	ANR	Reply to email from S. Marques re employment verification.	.10	59.50
8/13/20	ANR	Review of email from S. Marques re final paycheck errors.	.10	59.50
8/13/20	ANR	Review of email from B. Harland re notice of change of status.	.10	59.50
8/13/20	ANR	Reply to email from B. Harland re notice of change of status.	.10	59.50

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Date	Tkpr	Description	Hours	Amount
8/13/20	ET	Analysis of pending subpoenas issues.	.20	79.00
8/13/20	ET	Email Y. Bernardez and W. Castillo regarding final subpoena issues for the Hospital.	.30	118.50
8/13/20	ET	Analysis of fact-gathering issues for litigation.	.60	237.00
8/13/20	ET	Review N. Nasu emails and documents regarding payroll information for SFMC litigation matters.	.30	118.50
8/13/20	ET	Call with court reporter regarding Flores deposition.	.10	39.50
8/13/20	ET	Email J. Oviedo regarding Garcia declaration and production.	.10	39.50
8/13/20	ET	Draft Xue internal pleading.	.10	39.50
8/13/20	ET	Email N. Nasu and W. Castillo regarding Xue pleading.	.10	39.50
8/13/20	ET	Draft Chukwumezie internal pleading.	.30	118.50
8/13/20	ET	Email Nasu, W. Castillo, E. Ruiz, L. Manuel regarding internal pleading.	.10	39.50
8/14/20	ANR	Review of email from S. Marques for W-2's.	.10	59.50
8/14/20	ANR	Reply to email from S. Marques re W-2's.	.10	59.50
8/17/20	ANR	Review of email from S. Marques re COBRA.	.10	59.50
8/17/20	ANR	Review of email from Walter re COBRA.	.10	59.50
8/17/20	ET	Analysis of subpoenas and litigation post-transaction.	.20	79.00
8/18/20	ANR	Review of tuition reimbursement issues raised by UNAC.	.90	535.50
8/18/20	ET	Review USC notice regarding contact production.	.10	39.50
8/18/20	ET	Email K. Chapman and E. Paul regarding USC issue.	.10	39.50
8/19/20	ANR	Review of email from S. Marques re tuition reimbursement.	.10	59.50
8/19/20	ANR	Review of email from W. Castillo re personnel file requests.	.10	59.50
8/19/20	ANR	Review of email from M. Pfeiffer re personnel file requests.	.10	59.50
8/19/20	ANR	Telephone call with S. Marques re tuition reimbursement.	.30	178.50
8/19/20	ANR	Review of various personnel file requests.	.10	59.50
8/19/20	ANR	Review of email from W. Castillo re workers compensation issue.	.10	59.50
8/19/20	ANR	Review of email from W. Castillo re employment verification.	.10	59.50
8/19/20	ANR	Review of email from S. Marques re employment verification.	.10	59.50
8/19/20	ANR	Review email from H. Levy-Biehl re transition matter.	.10	59.50
8/19/20	ANR	Review of welfare fraud investigation issue.	.10	59.50
8/19/20	ANR	Telephone call with H. Levy-Biehl re personnel file requests.	.60	357.00
8/19/20	ANR	Review of email to SEIU re personnel file request.	.10	59.50
8/19/20	ET	Review correspondence regarding personnel file requests and transition.	.20	79.00
8/19/20	ET	Analysis of retention issues.	.30	118.50
8/19/20	ET	Review and analysis of APA and employment record issues.	.50	197.50
8/19/20	ET	Review Mares labor code request.	.10	39.50
8/19/20	ET	Email W. Castillo and B. Harland regarding SEIU labor code requests.	.20	79.00

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Date	Tkpr	Description	Hours	Amount
8/20/20	ET	Strategize regarding fact-gathering for ECS litigation.	.10	39.50
8/20/20	ET	Call with J. Moe regarding grievances issues.	.10	39.50
8/20/20	ET	Review grievance documentation.	.10	39.50
8/20/20	ET	Review letter from court reporter regarding Garcia matter and Flores deposition.	.10	39.50
8/20/20	ET	Calls with court reporter regarding Flores deposition transcript.	.20	79.00
8/20/20	ET	Analysis of Flores deposition.	.10	39.50
8/20/20	ET	Email correspondence with W. Castillo regarding labor code requests.	.10	39.50
8/20/20	ET	Review correspondence regarding investigations and new litigation issues.	.20	79.00
8/20/20	ET	Email K. Chapman and E. Paul regarding Lourdes Mares labor code request and pending issues.	.20	79.00
8/20/20	ET	Analysis of USC discovery issues.	.10	39.50
8/20/20	ET	Email correspondence with E. Paul and H. Biehl regarding USC discovery issues.	.20	79.00
8/21/20	ET	Correspondence with court reporter regarding Flores deposition.	.10	39.50
8/21/20	ET	Preliminary review and analysis of Flores transcript.	.30	118.50
8/21/20	ET	Correspondence with W. Castillo re personnel records request.	.50	197.50
8/21/20	ET	Call with counsel's assistant re contract disclosure discovery in USC case.	.10	39.50
8/21/20	ET	Email meet and confer to USC counsel re SFMC contracts.	.30	118.50
8/21/20	ET	Call with J. Moe re grievance issues.	.10	39.50
8/21/20	ET	Analysis of pending subpoena issues.	.10	39.50
8/21/20	ET	Email W. Castillo re subpoenas.	.10	39.50
8/21/20	ET	Correspondence with E. Paul re USC contract issue.	.10	39.50
8/21/20	ET	Review letter from LA County re employment verification and email from W. Castillo.	.20	79.00
8/21/20	ET	Analysis of labor code and litigation process issues.	.50	197.50
8/21/20	ET	Review and analysis of Phan letter from counsel.	.20	79.00
8/21/20	ET	Email correspondence with K. Chapman, L. Ho, W. Castillo, and K. Vitale re Phan workers comp letter and production.	.40	158.00
8/21/20	ET	Email E. Opp re reporting Williams case.	.10	39.50
8/24/20	ET	Respond to counsel regarding contract production for USC.	.10	39.50
8/24/20	ET	Email correspondence with J. Si regarding employment verification.	.10	39.50
8/24/20	ET	Email correspondence with R. Dino regarding Nguyen payment.	.10	39.50
8/24/20	ET	Review correspondence from carrier regarding Mares matter.	.10	39.50
8/24/20	ET	Email L. Ho regarding Mares information.	.10	39.50
8/24/20	ET	Determine pending issues for Mares production.	.10	39.50
8/24/20	ET	Email W. Castillo regarding Flores deposition.	.20	79.00
8/24/20	ET	Review Flores record and stipulation.	.30	118.50
8/24/20	ET	Analysis of pending issues with labor code requests, subpoenas, and litigation.	.20	79.00

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Date	Tkpr	Description	Hours	Amount
8/24/20	ET	Email H. Biehler and E. Paul regarding process issues.	.20	79.00
8/24/20	ET	Review emails regarding Phan matter.	.10	39.50
8/24/20	ET	Email K. Vitale regarding Phan matter and next steps.	.10	39.50
8/25/20	ET	Email correspondence with K. Vitali, K. Chapman, A. Brown, H. Biehler, and L. Ho regarding Phatty Phan matter.	.40	158.00
8/25/20	ET	Determine deadlines for Phan matter.	.10	39.50
8/25/20	ET	Analysis of pending issues regarding counsel's letter.	.10	39.50
8/25/20	ET	Analysis of pending issues regarding Morales county request.	.10	39.50
8/25/20	ET	Email W. Castillo regarding Morales response.	.10	39.50
8/25/20	ET	Correspondence with H. Biehler regarding LOA transitional documents.	.10	39.50
8/26/20	ET	Review correspondence regarding LOA issues.	.10	39.50
8/26/20	ET	Prepare for call regarding process issues.	.20	79.00
8/26/20	ET	Strategy call with H. Biehler and K. Chapman regarding transition issues.	1.00	395.00
8/27/20	ET	Review notice from Welfare regarding H. Morales.	.10	39.50
8/27/20	ET	Call Welfare investigator regarding Morales.	.10	39.50
8/27/20	ET	Email correspondence with payroll regarding Morales documentation.	.10	39.50
8/27/20	ET	Email correspondence with payroll regarding Lourdes payroll and employment information.	.20	79.00
8/27/20	ET	Email correspondence with payroll, M. Phiefer, and K. Vitali regarding Phan request.	.20	79.00
8/27/20	ET	Preliminary review of Phan earning history.	.10	39.50
8/27/20	ET	Draft letter to Welfare investigator regarding Morales matter.	.40	158.00
8/27/20	ET	Complete forms and documentation for Welfare investigator regarding Morales.	.30	118.50
8/27/20	ET	Review CT corporation information for Morales matter.	.10	39.50
8/31/20	ET	Review Phan client documents and labor code request.	.20	79.00
8/31/20	ET	Email Pham's counsel meet and confer re labor code requests, production, and sale issues.	.40	158.00
9/01/20	ET	Review bankruptcy pleadings from HR.	.20	79.00
9/01/20	ET	Email J. Moe regarding bankruptcy pleadings.	.10	39.50
9/01/20	ET	Preliminary review of Zavala labor code request.	.10	39.50
9/01/20	ET	Email correspondence with K. Chapman regarding Zavala facts.	.10	39.50
9/01/20	ET	Review issues regarding SEIU grievances.	.10	39.50
9/02/20	ET	Review and analysis of Zavala request.	.10	39.50
9/02/20	ET	Email carrier and K. Chapman regarding Zavala labor code request.	.10	39.50
9/02/20	ET	Review client documents regarding Zavala.	.10	39.50
9/02/20	ET	Email correspondence with IT regarding retention issues.	.10	39.50
9/02/20	ET	Review documents regarding Davalos.	.10	39.50
9/02/20	ET	Email K. Vitale regarding Davalos update.	.10	39.50

Client #: 2766
Matter #: 000

September 8, 2020
Invoice #: 126672

Date	Tkpr	Description	Hours	Amount
9/03/20	ET	Email correspondence with S. Sharrer regarding HD claims.	.10	39.50
9/03/20	ET	Call with J. Moe regarding bankruptcy notices sent to HR.	.10	39.50
9/03/20	ET	Review Mares earning history.	.20	79.00
9/03/20	ET	Emails to counsel regarding Mares labor code production.	.20	79.00
9/04/20	ET	Email correspondence with opposing counsel re Lourdes labor code request.	.20	79.00
9/04/20	ET	Review coverage letter re Lourdes claim.	.10	39.50
9/04/20	ET	Make revisions to Morales letter and exhibits.	.20	79.00
9/04/20	ET	Email correspondence with B. Paulsen re email searches.	.10	39.50
9/04/20	ET	Analysis of pending labor code request issues.	.10	39.50

TOTAL PROFESSIONAL SERVICES RENDERED **\$ 34,518.50**

TIMEKEEPER SUMMARY

Name	Rate	Hours	Amount	N/C Hr	N/C \$
Ferguson, Elizabeth T	375.00	2.80	1,050.00	.00	.00
Tilman, Elina	395.00	29.90	11,810.50	.00	.00
Fernandez, Louise Ann	595.00	2.00	1,190.00	.00	.00
Ruda, An Nguyen	595.00	34.40	20,468.00	.00	.00
TOTALS		69.10	\$ 34,518.50	.00	\$.00

TOTAL THIS INVOICE **\$ 34,518.50**

*Balance is due within 30 days from the date of this invoice.
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EXHIBIT O

BARTKO ZANKEL BUNZEL

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A Professional Law Corporation

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June 3, 2020

Saint Francis Medical Center
601 Figueroa Street
Suite 4050
Los Angeles, CA 90017

Invoice #: 125847
Client #: 2766
Matter #: 011
Billing Attorney: ANR

For professional services rendered and disbursements advanced through May 31, 2020:

RE: Investigations**DETAIL OF PROFESSIONAL SERVICES RENDERED**

Date	Tkpr	Description	Hours	Amount
5/13/20	ET	Call with S. Sharrer regarding investigation of Employee S.	.30	118.50
5/13/20	ET	Email correspondence with D. Delmar regarding investigation of Employee S.	.20	79.00
5/13/20	ET	Review and analysis of documents for investigation regarding Employee S.	1.60	632.00
5/13/20	ET	Draft questions for investigation interviews regarding Employee S.	.90	355.50
5/13/20	ET	Analysis of issues for investigation regarding Employee S.	.40	158.00
5/14/20	ET	Prepare for investigatory interviews by reviewing documents and draft additional questions for three interviews.	1.50	592.50
5/14/20	ET	Investigatory call with D. Delmar.	1.10	434.50
5/14/20	ET	Investigatory call with L. Vargas.	.50	197.50
5/14/20	ET	Investigatory call with W. Castillo.	2.00	790.00
5/14/20	ET	Analysis of next steps regarding investigation and needed documents.	.30	118.50
5/14/20	ET	Email S. Sharrer and D. Delmar regarding pending issues.	.20	79.00
5/15/20	ET	Email correspondence with K. Chapman and S. Sharrer regarding documents.	.30	118.50
5/15/20	ET	Assess further follow-up needed.	.30	118.50
5/15/20	ET	Email correspondence with W. Castillo and D. Delmar regarding follow-up.	.40	158.00
5/15/20	ET	Call L. Vargas regarding documents.	.10	39.50
5/15/20	ET	Email correspondence with B. Paulsen regarding documents.	.20	79.00
5/15/20	ET	Call with D. Delmar regarding investigation.	.70	276.50
5/15/20	ET	Calls with L. Vargas regarding investigations.	.40	158.00
5/15/20	ET	Review documents.	.20	79.00
5/17/20	ET	Review investigation documents.	.10	39.50
5/17/20	ET	Email correspondence with S. Sharrer regarding documents.	.10	39.50

Client #: 2766
Matter #: 011

June 3, 2020
Invoice #: 125847

Date	Tkpr	Description	Hours	Amount
5/18/20	ET	Call with B. Paulsen regarding searches.	.20	79.00
5/18/20	ET	Email S. Sharrer regarding pending documents.	.10	39.50
5/18/20	ET	Analysis of pending issues regarding investigation.	.20	79.00
5/20/20	ET	Call with S. Sharrer regarding investigation.	.10	39.50
TOTAL PROFESSIONAL SERVICES RENDERED				\$ 4,898.00

TIMEKEEPER SUMMARY

Name	Rate	Hours	Amount	N/C Hr	N/C \$
Tilman, Elina	395.00	12.40	4,898.00	.00	.00
TOTALS		12.40	\$ 4,898.00	.00	\$.00

TOTAL THIS INVOICE \$ 4,898.00

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In Account With

BARTKO ZANKEL BUNZEL

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July 6, 2020

Saint Francis Medical Center
601 Figueroa Street
Suite 4050
Los Angeles, CA 90017

Invoice #: 126057
Client #: 2766
Matter #: 011
Billing Attorney: ANR

For professional services rendered and disbursements advanced through June 30, 2020:

RE: Investigations

DETAIL OF PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
6/01/20	ET	Email correspondence with S. Sharrer and P. Paulsen re investigation of Employee S matter.	.40	158.00
6/01/20	ET	Analysis of pending issues re Employee S. matter.	.30	118.50
6/02/20	ET	Review client documents for investigation re matter S.	1.20	474.00
6/02/20	ET	Email S. Sharrer re follow-up for matter S investigation.	.10	39.50
6/03/20	LAF	Review emails re investigation.	.30	178.50
6/03/20	LAF	Prepare email to employee's counsel.	.20	119.00
6/03/20	LAF	Call with S Sharrer re next steps.	.20	119.00
6/04/20	ET	Review documents in preparation for call re investigation.	.80	316.00
6/04/20	ET	Draft outline for call re investigation.	1.20	474.00
6/04/20	ET	Call with S. Sharrer re investigation concerning matter S.	.90	355.50
6/15/20	LAF	Respond to email from Williams Counsel.	.30	178.50
6/15/20	LAF	Strategy session re same.	.20	119.00
6/25/20	LAF	Telephone call re case.	.10	59.50
6/25/20	LAF	Email to William's counsel.	.10	59.50

TOTAL PROFESSIONAL SERVICES RENDERED

\$ 2,768.50

Client #: 2766
Matter #: 011

July 6, 2020
Invoice #: 126057

TIMEKEEPER SUMMARY

Name	Rate	Hours	Amount	N/C Hr	N/C \$
Tilman, Elina	395.00	4.90	1,935.50	.00	.00
Fernandez, Louise Ann	595.00	1.40	833.00	.00	.00
TOTALS		6.30	\$ 2,768.50	.00	\$.00

TOTAL THIS INVOICE

\$ 2,768.50

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August 5, 2020

Saint Francis Medical Center
601 Figueroa Street
Suite 4050
Los Angeles, CA 90017

Invoice #: 126306
Client #: 2766
Matter #: 011
Billing Attorney: ANR

For professional services rendered and disbursements advanced through July 31, 2020:

RE: Investigations

DETAIL OF PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
7/06/20	LAF	Review and transmit info to Williams counsel.	.50	297.50
7/24/20	LAF	Prepare and typed notes re witness interviews.	2.50	1,487.50
7/28/20	LAF	Telephone call regarding investigation and background.	.30	178.50
TOTAL PROFESSIONAL SERVICES RENDERED				\$ 1,963.50

TIMEKEEPER SUMMARY

Name	Rate	Hours	Amount	N/C Hr	N/C \$
Fernandez, Louise Ann	595.00	3.30	1,963.50	.00	.00
TOTALS		3.30	\$ 1,963.50	.00	\$.00

TOTAL THIS INVOICE **\$ 1,963.50**

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September 8, 2020

Saint Francis Medical Center
601 Figueroa Street
Suite 4050
Los Angeles, CA 90017

Invoice #: 126680
Client #: 2766
Matter #: 011
Billing Attorney: ANR

For professional services rendered and disbursements advanced through September 4, 2020:

RE: Investigations**DETAIL OF PROFESSIONAL SERVICES RENDERED**

Date	Tkpr	Description	Hours	Amount
8/03/20	LAF	Multiple emails to and from W Castillo regarding investigation documents.	.20	119.00
8/03/20	LAF	Email to investigator regarding investigation.	.10	59.50
8/05/20	LAF	Follow up emails to SFMC HR and investigator.	.30	178.50
TOTAL PROFESSIONAL SERVICES RENDERED				\$ 357.00

TIMEKEEPER SUMMARY

Name	Rate	Hours	Amount	N/C Hr	N/C \$
Fernandez, Louise Ann	595.00	.60	357.00	.00	.00
TOTALS		.60	\$ 357.00	.00	\$.00

TOTAL THIS INVOICE **\$ 357.00**

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EXHIBIT P

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June 3, 2020

Saint Francis Medical Center
601 Figueroa Street
Suite 4050
Los Angeles, CA 90017

Invoice #: 125841
Client #: 2766
Matter #: 001
Billing Attorney: ANR

For professional services rendered and disbursements advanced through May 31, 2020:

RE: St. Francis adv. Nguyen

DETAIL OF PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
5/26/20	ET	Draft pleading.	.20	79.00
5/26/20	ET	Review client documents.	.10	39.50
5/26/20	ET	Email E. Paul re pleading.	.20	79.00
TOTAL PROFESSIONAL SERVICES RENDERED				\$ 197.50

TIMEKEEPER SUMMARY

Name	Rate	Hours	Amount	N/C Hr	N/C \$
Tilman, Elina	395.00	.50	197.50	.00	.00
TOTALS		.50	\$ 197.50	.00	\$.00

TOTAL THIS INVOICE **\$ 197.50**

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August 5, 2020

Saint Francis Medical Center
601 Figueroa Street
Suite 4050
Los Angeles, CA 90017

Invoice #: 126298
Client #: 2766
Matter #: 001
Billing Attorney: ANR

For professional services rendered and disbursements advanced through July 31, 2020:

RE: St. Francis adv. Nguyen

DETAIL OF PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
7/01/20	ET	Review Dentons CMS and respond to K. Murphy regarding CMC.	.10	39.50
7/03/20	ET	Draft CMS for CMC.	.20	79.00
7/06/20	ET	Finalize CMS.	.10	39.50
7/06/20	ET	Email correspondence with J. Moe regarding CMS.	.10	39.50
7/20/20	LAF	Review emails re status.	.20	119.00
7/20/20	ET	Review CMS in preparation for CMS.	.10	39.50
7/20/20	ET	Review status of case and correspondence with opposing counsel and K. Murphy.	.10	39.50
7/20/20	ET	Attend CMC.	.20	79.00

TOTAL PROFESSIONAL SERVICES RENDERED \$ 474.50

TIMEKEEPER SUMMARY

Name	Rate	Hours	Amount	N/C Hr	N/C \$
Tilman, Elina	395.00	.90	355.50	.00	.00
Fernandez, Louise Ann	595.00	.20	119.00	.00	.00
TOTALS		1.10	\$ 474.50	.00	\$.00

DISBURSEMENTS ADVANCED

Date	Description	Amount
	ACC Court Service & Filing Fee	33.20

Client #: 2766
Matter #: 001

August 5, 2020
Invoice #: 126298

TOTAL DISBURSEMENTS ADVANCED \$ 33.20

TOTAL THIS INVOICE \$ 507.70

*Balance is due within 30 days from the date of this invoice.
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September 8, 2020

Saint Francis Medical Center
601 Figueroa Street
Suite 4050
Los Angeles, CA 90017

Invoice #: 126673
Client #: 2766
Matter #: 001
Billing Attorney: ANR

For professional services rendered and disbursements advanced through September 4, 2020:

RE: St. Francis adv. Nguyen

DETAIL OF PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
8/21/20	ET	Review correspondence regarding Morataya and email correspondence with K. Chapman re same.	.10	39.50
8/27/20	GT	Review court docket and update deadline tracker.	.10	19.50
TOTAL PROFESSIONAL SERVICES RENDERED				\$ 59.00

TIMEKEEPER SUMMARY

Name	Rate	Hours	Amount	N/C Hr	N/C \$
Torres, Gloria	195.00	.10	19.50	.00	.00
Tilman, Elina	395.00	.10	39.50	.00	.00
TOTALS		.20	\$ 59.00	.00	\$.00

TOTAL THIS INVOICE \$ 59.00

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EXHIBIT Q

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www.bzbm.com

July 6, 2020

Saint Francis Medical Center
601 Figueroa Street
Suite 4050
Los Angeles, CA 90017

Invoice #: 126052
Client #: 2766
Matter #: 002
Billing Attorney: ANR

For professional services rendered and disbursements advanced through June 30, 2020:

RE: St. Francis adv. Ahinasi

DETAIL OF PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
6/09/20	MLR	Review client document in preparation to prepare client document	.80	316.00
6/09/20	MLR	Prepare record keeping request document	.40	158.00
6/25/20	ET	Review case docket.	.10	39.50
6/25/20	ET	Email J. Moe and K. Murphy regarding CMC.	.10	39.50
6/28/20	ET	Review CMS.	.10	39.50
6/28/20	ET	Respond to K. Murphy's email.	.10	39.50
6/30/20	ET	Draft Hospital's CMS.	.10	39.50
6/30/20	ET	Email J. More re joinder CMS.	.10	39.50
6/30/20	ET	Analysis of pending issues regarding litigation.	.20	79.00

TOTAL PROFESSIONAL SERVICES RENDERED

\$ 790.00

TIMEKEEPER SUMMARY

Name	Rate	Hours	Amount	N/C Hr	N/C \$
Tilman, Elina	395.00	.80	316.00	.00	.00
Raymond, Marcia L.	395.00	1.20	474.00	.00	.00
TOTALS		2.00	\$ 790.00	.00	\$.00

TOTAL THIS INVOICE

\$ 790.00

Client #: 2766
Matter #: 002

July 6, 2020
Invoice #: 126052

*Balance is due within 30 days from the date of this invoice.
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BARTKO ZANKEL BUNZEL

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www.bzbm.com

August 5, 2020

Saint Francis Medical Center
601 Figueroa Street
Suite 4050
Los Angeles, CA 90017

Invoice #: 126299
Client #: 2766
Matter #: 002
Billing Attorney: ANR

For professional services rendered and disbursements advanced through July 31, 2020:

RE: St. Francis adv. Ahinasi

DETAIL OF PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
7/01/20	ET	Analysis of pending issues and necessary filings.	.10	39.50
7/06/20	ET	Call and email correspondence with J. Moe regarding CMC.	.10	39.50
7/13/20	ET	Review opposing counsel's CMS.	.10	39.50
7/13/20	ET	Email correspondence with K. Murphy regarding CMC.	.10	39.50
TOTAL PROFESSIONAL SERVICES RENDERED				\$ 158.00

TIMEKEEPER SUMMARY

Name	Rate	Hours	Amount	N/C Hr	N/C \$
Tilman, Elina	395.00	.40	158.00	.00	.00
TOTALS		.40	\$ 158.00	.00	\$.00

TOTAL THIS INVOICE \$ 158.00

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BARTKO ZANKEL BUNZEL

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September 8, 2020

Saint Francis Medical Center
601 Figueroa Street
Suite 4050
Los Angeles, CA 90017

Invoice #: 126674
Client #: 2766
Matter #: 002
Billing Attorney: ANR

For professional services rendered and disbursements advanced through September 4, 2020:

RE: St. Francis adv. Ahinasi

DETAIL OF PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
8/09/20	ET	Review client documents.	.30	118.50
8/09/20	ET	Draft internal pleading.	.30	118.50
8/09/20	ET	Email W. Castillo, Y. Bernardez, and N. Nasu regarding pending issues.	.20	79.00
8/11/20	ET	Email correspondence with M. Day re pending issues.	.10	39.50
8/11/20	ET	Analysis of client documents.	.30	118.50
8/27/20	GT	Review court docket and update deadline tracker.	.10	19.50

TOTAL PROFESSIONAL SERVICES RENDERED

\$ 493.50

TIMEKEEPER SUMMARY

Name	Rate	Hours	Amount	N/C Hr	N/C \$
Torres, Gloria	195.00	.10	19.50	.00	.00
Tilman, Elina	395.00	1.20	474.00	.00	.00
TOTALS		1.30	\$ 493.50	.00	\$.00

TOTAL THIS INVOICE

\$ 493.50

Balance is due within 30 days from the date of this invoice.

Client #: 2766
Matter #: 002

September 8, 2020
Invoice #: 126674

We reserve the right to charge interest at 10% per annum on amounts not paid within 30 days.

EXHIBIT R

BARTKO ZANKEL BUNZEL

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August 5, 2020

Saint Francis Medical Center
601 Figueroa Street
Suite 4050
Los Angeles, CA 90017

Invoice #: 126300
Client #: 2766
Matter #: 003
Billing Attorney: ANR

For professional services rendered and disbursements advanced through July 31, 2020:

RE: St. Francis adv. Aragon

DETAIL OF PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
7/22/20	ET	Review case status on docket.	.10	39.50
7/22/20	ET	Email correspondence with K. Murphy regarding CMC.	.10	39.50
7/22/20	ET	Draft SFMC's CMC.	.10	39.50
7/22/20	ET	Review client documents.	.10	39.50
7/23/20	ET	Correspondence with J. Moe regarding pending issues.	.10	39.50
7/28/20	ET	Review complaint.	.10	39.50
7/28/20	ET	Analysis of fact-gathering issues.	.30	118.50
7/28/20	ET	Email Y. Bernardez and N. Nasu regarding client documents.	.10	39.50
7/29/20	ET	Email correspondence with E. Ruiz, Y. Bernardez, and K. Chapman regarding documents.	.30	118.50
7/29/20	ET	Review client documents.	.10	39.50
7/29/20	ET	Call with K. Chapman regarding fact-gathering.	.10	39.50
7/30/20	ET	Review client documents.	.20	79.00
7/30/20	ET	Email correspondence with Y. Bernardez re client documents.	.10	39.50
7/31/20	ET	Email correspondence with Y. Bernardez regarding fact-gathering.	.10	39.50

TOTAL PROFESSIONAL SERVICES RENDERED

\$ 750.50

BARTKO ZANKEL BUNZEL & MILLER

Client #: 2766
Matter #: 003

August 5, 2020
Invoice #: 126300

TIMEKEEPER SUMMARY

Name	Rate	Hours	Amount	N/C Hr	N/C \$
Tilman, Elina	395.00	1.90	750.50	.00	.00
TOTALS		1.90	\$ 750.50	.00	\$.00

TOTAL THIS INVOICE

\$ 750.50

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September 8, 2020

Saint Francis Medical Center
601 Figueroa Street
Suite 4050
Los Angeles, CA 90017

Invoice #: 126675
Client #: 2766
Matter #: 003
Billing Attorney: ANR

For professional services rendered and disbursements advanced through September 4, 2020:

RE: St. Francis adv. Aragon

DETAIL OF PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
8/03/20	ET	Email correspondence with Y. Bernardez regarding client documents.	.10	39.50
8/05/20	ET	Review status of case and email correspondence with K. Murphy regarding same.	.10	39.50
8/27/20	GT	Review court docket and update deadline tracker.	.10	19.50
TOTAL PROFESSIONAL SERVICES RENDERED				\$ 98.50

TIMEKEEPER SUMMARY

Name	Rate	Hours	Amount	N/C Hr	N/C \$
Torres, Gloria	195.00	.10	19.50	.00	.00
Tilman, Elina	395.00	.20	79.00	.00	.00
TOTALS		.30	\$ 98.50	.00	\$.00

TOTAL THIS INVOICE **\$ 98.50**

Balance is due within 30 days from the date of this invoice.

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EXHIBIT S

BARTKO ZANKEL BUNZEL

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June 3, 2020

Saint Francis Medical Center
601 Figueroa Street
Suite 4050
Los Angeles, CA 90017

Invoice #: 125843
Client #: 2766
Matter #: 004
Billing Attorney: ANR

For professional services rendered and disbursements advanced through May 31, 2020:

RE: St. Francis adv. Harris

DETAIL OF PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
5/04/20	ET	Review case pleadings.	.10	39.50
5/04/20	ET	Respond to carrier regarding pending issues.	.10	39.50
5/06/20	ET	Review documents concerning carrier's question.	.20	79.00
5/06/20	ET	Email carrier regarding pending issues.	.10	39.50
5/12/20	ET	Email correspondence with mediator and S. Sharrer regarding mediation issues.	.20	79.00
5/12/20	ET	Review case docket.	.10	39.50
5/12/20	ET	Analysis of mediation issues.	.10	39.50
5/13/20	ET	Email correspondence with S. Sharrer, carrier, mediator, and opposing counsel regarding mediation.	.40	158.00
5/15/20	ET	Email correspondence with carrier regarding pending issues.	.20	79.00
5/18/20	ET	Call with J. Moe regarding pending issues.	.10	39.50
5/18/20	ET	Respond to carrier.	.10	39.50
5/18/20	ET	Review docket for applicable orders.	.20	79.00
5/19/20	ET	Email correspondence with carrier regarding case.	.10	39.50
5/19/20	ET	Review and analysis of court deadlines regarding CMC and CMS.	.10	39.50
5/19/20	ET	Analysis of pending issues and documents.	.30	118.50
5/20/20	ANR	Conference call with carrier re case status.	.90	535.50
5/20/20	ET	Review documents for call with carrier.	.30	118.50
5/20/20	ET	Call with carrier regarding case.	.90	355.50
5/20/20	ET	Analysis of next steps.	.30	118.50
5/20/20	ET	Email S. Sharrer regarding pending issues.	.10	39.50
5/21/20	ET	Review and analysis of client documents.	.20	79.00

BARTKO ZANKEL BUNZEL & MILLER

Client #: 2766
Matter #: 004

June 3, 2020
Invoice #: 125843

Date	Tkpr	Description	Hours	Amount
5/21/20	ET	Email correspondence with carrier and J. Si regarding pending issues.	.20	79.00
5/22/20	ANR	Conference call with J. Moe re bankruptcy defenses.	.30	178.50
5/22/20	ET	Call with K. Murphy and J. Moe regarding pending issues.	.30	118.50
5/22/20	ET	Review client documents and pleadings.	.30	118.50
TOTAL PROFESSIONAL SERVICES RENDERED				\$ 2,689.00

TIMEKEEPER SUMMARY

Name	Rate	Hours	Amount	N/C Hr	N/C \$
Tilman, Elina	395.00	5.00	1,975.00	.00	.00
Ruda, An Nguyen	595.00	1.20	714.00	.00	.00
TOTALS		6.20	\$ 2,689.00	.00	\$.00

TOTAL THIS INVOICE \$ 2,689.00

*Balance is due within 30 days from the date of this invoice.
We reserve the right to charge interest at 10% per annum on amounts not paid within 30 days.*

BARTKO ZANKEL BUNZEL

BARTKO ZANKEL BUNZEL & MILLER

A Professional Law Corporation

One Embarcadero Center, Ste. 800

San Francisco, CA 94111

p: 415.956.1900

f: 415.956.1152

www.bzbm.com

July 6, 2020

Saint Francis Medical Center
601 Figueroa Street
Suite 4050
Los Angeles, CA 90017

Invoice #: 126053
Client #: 2766
Matter #: 004
Billing Attorney: ANR

For professional services rendered and disbursements advanced through June 30, 2020:

RE: St. Francis adv. Harris

DETAIL OF PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
6/03/20	ANR	Review of email from carrier re budget.	.10	59.50
6/03/20	ET	Analysis of case and next steps.	.60	237.00
6/03/20	ET	Review client documents.	.50	197.50
6/03/20	ET	Call with J. Moe re pending issues.	.30	118.50
6/03/20	ET	Email S. Sharrer re pending issues.	.10	39.50
6/03/20	ET	Email correspondence with J. Moe re pending issues.	.10	39.50
6/03/20	ET	Email correspondence with J. Moe and A. Estrada re pending issues.	.20	79.00
6/05/20	ET	Strategize regarding case.	.30	118.50
6/05/20	ET	Respond to carrier re case.	.10	39.50
6/08/20	ET	Review status re CMS.	.10	39.50
6/08/20	ET	Email correspondence with carrier re pending issues.	.10	39.50
6/08/20	ET	Email correspondence with opposing counsel re CMS and mediation issues.	.30	118.50
6/08/20	ET	Analysis of pending issues.	.30	118.50
6/08/20	ET	Call with J. Moe re pending issues.	.20	79.00
6/08/20	ET	Email correspondence with witness re fact-gathering.	.30	118.50
6/08/20	ET	Draft stipulation re CMC and order.	1.10	434.50
6/08/20	ET	Make edits to stipulation re CMC.	.20	79.00
6/08/20	ET	Review case pleadings and orders.	.40	158.00
6/08/20	ET	Email J. Moe re CMC.	.10	39.50
6/09/20	ANR	Review of stipulation to continue case management conference.	.20	119.00
6/09/20	ET	Email correspondence with opposing counsel and J. Moe re stipulation.	.20	79.00
6/09/20	ET	Finalize stipulation for filing.	.10	39.50

Client #: 2766
Matter #: 004

July 6, 2020
Invoice #: 126053

Date	Tkpr	Description	Hours	Amount
6/09/20	ET	Strategize regarding case.	.20	79.00
6/10/20	ANR	Conference call with J. Moe re bankruptcy defenses.	.40	238.00
6/10/20	ET	Call with J. Moe re pending issues.	.40	158.00
6/10/20	ET	Email correspondence with L. Vargas re pending issues.	.10	39.50
6/12/20	LAF	Review update to exposure analysis.	.10	59.50
6/12/20	LAF	Telephone call with E Tilman re exposure analysis.	.20	119.00
6/12/20	ET	Review and analysis of documents.	.50	197.50
6/12/20	ET	Draft update to carrier.	.20	79.00
6/15/20	ET	Review status of stipulation and CMC.	.10	39.50
6/15/20	ET	Review client documents.	.30	118.50
6/15/20	ET	Email carrier update regarding case status.	.10	39.50
6/16/20	ET	Email correspondence with carrier regarding pending issues.	.10	39.50
6/16/20	ET	Check status on docket regarding CMC and stipulation.	.10	39.50
6/17/20	ANR	Review email from carrier re mediation.	.10	59.50
6/18/20	LAF	Review of case management statement.	.20	119.00
6/18/20	ANR	Review of case management statement.	.20	119.00
6/18/20	ET	Email correspondence with J. Moe, K. Karleen, and opposing counsel regarding CMC.	.30	118.50
6/18/20	ET	Call with J. Moe regarding case status.	.10	39.50
6/18/20	ET	Review plaintiff's CMS.	.10	39.50
6/18/20	ET	Review bankruptcy issues.	.30	118.50
6/18/20	ET	Draft CMS for Defendants.	1.20	474.00
6/18/20	ET	Email J. Moe regarding CMS.	.10	39.50
6/19/20	ET	Call with J. Moe regarding CMC.	.10	39.50
6/19/20	ET	Email correspondence with J. Moe regarding CMC.	.10	39.50
6/19/20	ET	Finalize CMS.	.10	39.50
6/19/20	ET	Review client documents.	.20	79.00
6/22/20	ET	Email correspondence with K. Murphy regarding case.	.10	39.50
6/22/20	ET	Call with K. Murphy regarding bk CMS.	.10	39.50
6/22/20	ET	Review bk status report.	.10	39.50
6/23/20	LAF	Review status conference documents.	.50	297.50
6/23/20	LAF	Represent client at status conference.	.50	297.50
6/23/20	LAF	Prepare update re same.	.20	119.00
6/24/20	ET	Email correspondence with carrier regarding pending issues.	.20	79.00
6/24/20	ET	Review K. Murphy's email regarding mediation and CMC.	.10	39.50
6/24/20	ET	Email correspondence with K. Chapman regarding mediation.	.10	39.50
6/24/20	ET	Email correspondence with opposing counsel regarding mitigation.	.10	39.50

BARTKO ZANKEL BUNZEL & MILLER

Client #: 2766
Matter #: 004

July 6, 2020
Invoice #: 126053

Date	Tkpr	Description	Hours	Amount
6/24/20	ET	Review client documents.	.10	39.50
6/24/20	ET	Review carrier letter.	.10	39.50
6/24/20	ET	Draft response to carrier regarding factual questions.	.20	79.00
6/24/20	ET	Email D. Delmar regarding pending issues.	.10	39.50
6/25/20	ET	Email correspondence with D. Delmar regarding pending issues.	.10	39.50
6/25/20	ET	Email carrier regarding pending issues.	.20	79.00
6/26/20	ANR	Review of case management conference status update.	.10	59.50
6/26/20	ANR	Review email from carrier re mediation.	.10	59.50
6/26/20	ET	Review internal client emails and from carrier regarding case and mediation.	.20	79.00
6/26/20	ET	Analysis of pending issues.	.10	39.50

TOTAL PROFESSIONAL SERVICES RENDERED

\$ 6,544.50

TIMEKEEPER SUMMARY

Name	Rate	Hours	Amount	N/C Hr	N/C \$
Tilman, Elina	395.00	12.20	4,819.00	.00	.00
Fernandez, Louise Ann	595.00	1.70	1,011.50	.00	.00
Ruda, An Nguyen	595.00	1.20	714.00	.00	.00
TOTALS		15.10	\$ 6,544.50	.00	\$.00

DISBURSEMENTS ADVANCED

Date	Description	Amount
	ACC Court Service & Filing Fee	108.00

TOTAL DISBURSEMENTS ADVANCED

\$ 108.00

TOTAL THIS INVOICE

\$ 6,652.50

*Balance is due within 30 days from the date of this invoice.
We reserve the right to charge interest at 10% per annum on amounts not paid within 30 days.*

BARTKO ZANKEL BUNZEL

BARTKO ZANKEL BUNZEL & MILLER

A Professional Law Corporation

One Embarcadero Center, Ste. 800

San Francisco, CA 94111

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f: 415.956.1152

www.bzbm.com

August 5, 2020

Saint Francis Medical Center
601 Figueroa Street
Suite 4050
Los Angeles, CA 90017

Invoice #: 126301
Client #: 2766
Matter #: 004
Billing Attorney: ANR

For professional services rendered and disbursements advanced through July 31, 2020:

RE: St. Francis adv. Harris

DETAIL OF PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
7/06/20	ANR	Telephone call with carrier re mediation.	.30	178.50
7/06/20	ET	Email correspondence with mediator's assistant regarding mediation.	.10	39.50
7/06/20	ET	Email correspondence with opposing counsel regarding case facts.	.10	39.50
7/06/20	ET	Email correspondence with K. Chapman regarding pending issues.	.10	39.50
7/06/20	ET	Review client documents.	.20	79.00
7/07/20	LAF	Conference call with J. Moe re bankruptcy defenses.	.50	297.50
7/07/20	ANR	Conference call with J. Moe re bankruptcy defenses.	.50	297.50
7/07/20	ET	Review and analysis of client documents.	.60	237.00
7/07/20	ET	Review and assess necessary redactions for client documents.	.10	39.50
7/07/20	ET	Email correspondence with K. Chapman regarding policy info.	.10	39.50
7/07/20	ET	Call with J. Moe regarding pending issues.	.50	197.50
7/08/20	ET	Analysis of client documents.	.60	237.00
7/08/20	ET	Strategize regarding case argument for mediation.	.50	197.50
7/08/20	ET	Email L. Vargas regarding fact-gathering.	.10	39.50
7/08/20	ET	Research regarding plaintiff's causes of action for defenses and prima facie cases.	1.80	711.00
7/08/20	ET	Draft mediation brief.	3.40	1,343.00
7/09/20	ET	Strategize regarding positions for mediation.	.60	237.00
7/09/20	ET	Email opposing counsel regarding mediation issues.	.10	39.50
7/09/20	ET	Call with J. Moe regarding pending issues.	.10	39.50
7/09/20	ET	Draft mediation brief.	5.20	2,054.00
7/09/20	ET	Review and analysis of client documents.	1.50	592.50
7/10/20	GT	Prepare employee evaluation chart to reflect overall rating.	.70	136.50

Client #: 2766
Matter #: 004August 5, 2020
Invoice #: 126301

Date	Tkpr	Description	Hours	Amount
7/10/20	LAF	Review and comment on mediation brief.	.50	297.50
7/10/20	LAF	Conference call with client re settlement authority.	.40	238.00
7/10/20	LAF	Conference call with H. Levy-Biehl and Dentons re authority.	.30	178.50
7/10/20	ANR	Conference call with client re settlement authority.	.40	238.00
7/10/20	ET	Research regarding causes of action and defenses.	1.20	474.00
7/10/20	ET	Review and analysis of client documents.	.70	276.50
7/10/20	ET	Draft mediation brief.	2.20	869.00
7/10/20	ET	Review and make edits to mediation brief.	.80	316.00
7/10/20	ET	Review and analysis of DFEH charge and defenses.	.40	158.00
7/10/20	ET	Email correspondence with counsel regarding pending issues.	.20	79.00
7/10/20	ET	Call with D. Drake regarding fact-gathering.	.20	79.00
7/10/20	ET	Analysis of pending issues.	.20	79.00
7/10/20	ET	Email correspondence with W. Castillo regarding necessary follow-ups.	.30	118.50
7/10/20	ET	Email correspondence with L. Vargas regarding fact-gathering.	.20	79.00
7/10/20	ET	Call with J. Moe regarding bankruptcy brief.	.10	39.50
7/10/20	ET	Preliminary review of bankruptcy brief.	.10	39.50
7/14/20	ANR	Review of email from client re settlement authority.	.10	59.50
7/14/20	ET	Review and analysis of Dentons' mediation brief.	.20	79.00
7/14/20	ET	Call with J. Moe regarding revisions to bankruptcy brief.	.30	118.50
7/14/20	ET	Email correspondence with W. Castillo regarding pending issues.	.10	39.50
7/14/20	ET	Review client documents.	1.20	474.00
7/14/20	ET	Determine and identify mediation exhibits and make necessary redactions.	.90	355.50
7/14/20	ET	Make additions to mediation brief.	1.30	513.50
7/14/20	ET	Review case law for mediation brief.	.50	197.50
7/14/20	ET	Email mediator and carrier regarding mediation.	.20	79.00
7/14/20	ET	Review updated memorandum of law regarding bankruptcy issues for mediation.	.10	39.50
7/14/20	ET	Email correspondence with G. Spratt regarding Denton's mediation brief.	.10	39.50
7/15/20	ET	Email mediator assistant regarding mediation.	.10	39.50
7/15/20	ET	Email E. Estrada regarding pending documents.	.10	39.50
7/15/20	ET	Analysis of pending issues.	.10	39.50
7/15/20	ET	Call with J. Moe regarding agreements.	.10	39.50
7/15/20	ET	Email correspondence with carrier regarding mediation.	.10	39.50
7/17/20	LAF	Represent client at mediation.	8.70	5,176.50
7/17/20	LAF	Review settlement agreement.	.20	119.00
7/17/20	ANR	Preparation for mediation.	.80	476.00
7/17/20	ANR	Attend all day mediation.	8.70	5,176.50
7/17/20	ET	Review client documents.	.60	237.00

Client #: 2766
Matter #: 004

August 5, 2020
Invoice #: 126301

Date	Tkpr	Description	Hours	Amount
7/17/20	ET	Analysis of bk issues for settlement agreement.	.30	118.50
7/17/20	ET	Draft settlement agreement.	1.50	592.50
7/17/20	ET	Review statutes regarding confidentiality in light of complaint allegations.	.40	158.00
7/20/20	ET	Call with J. Moe regarding settlement agreement payment.	.10	39.50
7/20/20	ET	Review settlement agreement terms.	.30	118.50
7/20/20	ET	Draft settlement terms email to P. Chadwick.	.20	79.00
7/20/20	ET	Analysis of payment issues.	.10	39.50
7/23/20	ET	Finalize settlement and payment instructions.	.10	39.50
7/30/20	ET	Call T. Coughlan and update re case resolutions.	.10	39.50
7/30/20	ET	Call with W. Castillo re pending issues.	.10	39.50
7/30/20	ET	Email B. Resaul re case.	.10	39.50
7/31/20	ET	Review pending hearing and next steps.	.20	79.00
7/31/20	ET	Email V. Del Castillo regarding case settlements.	.10	39.50

TOTAL PROFESSIONAL SERVICES RENDERED

\$ 25,470.00

TIMEKEEPER SUMMARY

Name	Rate	Hours	Amount	N/C Hr	N/C \$
Torres, Gloria	195.00	.70	136.50	.00	.00
Tilman, Elina	395.00	31.90	12,600.50	.00	.00
Fernandez, Louise Ann	595.00	10.60	6,307.00	.00	.00
Ruda, An Nguyen	595.00	10.80	6,426.00	.00	.00
TOTALS		54.00	\$ 25,470.00	.00	\$.00

DISBURSEMENTS ADVANCED

Date	Description	Amount
	ACC Court Service & Filing Fee	73.20

TOTAL DISBURSEMENTS ADVANCED

\$ 73.20

TOTAL THIS INVOICE

\$ 25,543.20

*Balance is due within 30 days from the date of this invoice.
We reserve the right to charge interest at 10% per annum on amounts not paid within 30 days.*

Client #: 2766
Matter #: 004

August 5, 2020
Invoice #: 126301

BARTKO ZANKEL BUNZEL

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 www.bzbm.com

September 8, 2020

Saint Francis Medical Center
 601 Figueroa Street
 Suite 4050
 Los Angeles, CA 90017

Invoice #: 126676
 Client #: 2766
 Matter #: 004
 Billing Attorney: ANR

For professional services rendered and disbursements advanced through September 4, 2020:

RE: St. Francis adv. Harris

DETAIL OF PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
8/05/20	ET	Draft Notice of Settlement.	.30	118.50
8/05/20	ET	Call with counsel regarding proceedings.	.10	39.50
8/05/20	ET	Email correspondence with counsel regarding pending issues.	.20	79.00
8/05/20	ET	Review settlement terms.	.10	39.50
8/05/20	ET	Email correspondence with K. Murphy regarding CMC.	.10	39.50
8/05/20	ET	Email P. Chadwick regarding payment instructions.	.20	79.00
8/06/20	ET	Draft position statement.	.20	79.00
8/10/20	ET	Email correspondence P. Chadwick and opposing counsel regarding settlement payment.	.40	158.00
8/13/20	ET	Email correspondence with counsel regarding hearing and payment.	.10	39.50
8/13/20	ET	Review client documents.	.10	39.50
8/13/20	ET	Email correspondence with payroll regarding settlement check.	.10	39.50
8/14/20	ET	Review and make edits to withdrawal.	.10	39.50
8/14/20	ET	Email correspondence with J. Moe, C. Devera, and opposing counsel regarding payment and withdrawal.	.30	118.50
8/17/20	ANR	Review of dismissal status.	.20	119.00
8/17/20	ET	Review withdrawal.	.10	39.50
8/17/20	ET	Email correspondence with opposing counsel and J. Moe regarding withdrawal and dismissal.	.10	39.50
8/24/20	ET	Email correspondence with opposing counsel regarding settlement payment.	.10	39.50
8/25/20	ET	Email correspondence with opposing counsel and J. Moe regarding settlement and withdrawals.	.30	118.50
8/25/20	ET	Analysis of issues with dismissal.	.10	39.50

Client #: 2766
Matter #: 004

September 8, 2020
Invoice #: 126676

Date	Tkpr	Description	Hours	Amount
8/25/20	ET	Review settlement agreement terms for dismissal.	.10	39.50
8/27/20	GT	Review court docket and update deadline tracker.	.10	19.50
TOTAL PROFESSIONAL SERVICES RENDERED				\$ 1,363.00

TIMEKEEPER SUMMARY

Name	Rate	Hours	Amount	N/C Hr	N/C \$
Torres, Gloria	195.00	.10	19.50	.00	.00
Tilman, Elina	395.00	3.10	1,224.50	.00	.00
Ruda, An Nguyen	595.00	.20	119.00	.00	.00
TOTALS		3.40	\$ 1,363.00	.00	\$.00

TOTAL THIS INVOICE **\$ 1,363.00**

*Balance is due within 30 days from the date of this invoice.
We reserve the right to charge interest at 10% per annum on amounts not paid within 30 days.*

EXHIBIT T

BARTKO ZANKEL BUNZEL

BARTKO ZANKEL BUNZEL & MILLER

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San Francisco, CA 94111

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f: 415.956.1152

www.bzbm.com

July 6, 2020

Saint Francis Medical Center
601 Figueroa Street
Suite 4050
Los Angeles, CA 90017

Invoice #: 126054
Client #: 2766
Matter #: 005
Billing Attorney: ANR

For professional services rendered and disbursements advanced through June 30, 2020;

RE: St. Francis adv. Carcamo

DETAIL OF PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
6/09/20	ETF	Review exchanged with insurance carrier re exposure report.	.20	75.00
6/09/20	ANR	Review of email from T. Knets re mediation.	.10	59.50
6/09/20	ANR	Reply to email from T. Knets re mediation.	.10	59.50
6/10/20	ETF	Calculate updated exposure damages and fees since last report.	.80	300.00
6/10/20	ETF	Summarize exposure damages and fees.	1.00	375.00
6/11/20	ETF	Review and respond to emails from mediator's office.	.20	75.00
6/11/20	ETF	Review email from Plaintiff's counsel re mediation and follow up re same.	.10	37.50
6/11/20	ETF	Draft exposure analysis letter to carrier.	1.50	562.50
6/11/20	ETF	Revise same to include information re mitigation.	.40	150.00
6/15/20	LAF	Review and respond to emails re mediation.	.50	297.50
6/16/20	ETF	Revise strategy re request for updated information.	.10	37.50
6/16/20	ETF	Draft email to carrier with information re request for updated information.	.30	112.50
6/16/20	ETF	Draft joint stipulation for CMC.	1.20	450.00
6/16/20	ETF	Review BK stipulation and order re relief from automatic stay.	.20	75.00
6/16/20	ET	Correspondence with opposing counsel and K. Murphy and J. Moe regarding case status and next steps.	.30	118.50
6/18/20	ETF	Email to mediator's office re pre-mediation conference.	.10	37.50
6/18/20	LAF	Review exposure analysis update.	.30	178.50
6/18/20	LAF	Review file re backpay issues.	.50	297.50
6/18/20	ANR	Review of updated exposure analysis.	.20	119.00
6/19/20	ET	Respond to opposing counsel regarding stipulation for CMC next steps.	.10	39.50
6/20/20	ETF	Draft email to mediator re further details re pre-mediation conference.	.10	37.50

Client #: 2766
Matter #: 005

July 6, 2020
Invoice #: 126054

Date	Tkpr	Description	Hours	Amount
6/22/20	ETF	Review email from mediator's office re Carcamo.	.10	37.50
6/22/20	ETF	Review email re client participation in mediation and coordinate same.	.10	37.50
6/22/20	ANR	Email to D. Delmar re mediation.	.10	59.50
6/23/20	ETF	Exchange emails with bankruptcy counsel draft of CMC statement for approval and provide same to opposing counsel.	.20	75.00
6/23/20	ETF	Review files re Carcamo mediation brief and prepare finalization of same.	.30	112.50
6/23/20	ETF	Email mediator's office re requested format of mediation.	.10	37.50
6/24/20	ETF	Draft email to mediator's office in response to inquiry re DocuSign	.10	37.50
6/24/20	ETF	Finalize brief and email copy to client.	.40	150.00
6/24/20	LAF	Email with carrier re mediation.	.10	59.50
6/24/20	LAF	Update of mediation brief.	.40	238.00
6/24/20	ANR	Email with carrier re mediation.	.10	59.50
6/24/20	ANR	Review of mediation brief.	.50	297.50
6/25/20	ETF	Exchange emails with mediator's office re confidentiality agreement.	.20	75.00
6/25/20	ANR	Email to T. Knets re authority.	.10	59.50
6/25/20	ANR	Review email from T. Knets re authority.	.10	59.50
6/26/20	ANR	Review of email from carrier re mediation.	.10	59.50
6/29/20	ETF	Draft settlement agreement for Carcamo mediation.	.90	337.50
6/29/20	LAF	Pre-mediation call.	.50	297.50
6/29/20	ANR	Pre-mediation call with mediator.	.80	476.00
6/29/20	ANR	Preparation for mediation.	1.80	1,071.00
6/29/20	ANR	Pre-settlement calls with Plaintiff's attorney.	.80	476.00
6/29/20	ANR	Status update to carrier.	.10	59.50
6/30/20	ETF	Revise settlement agreement.	.40	150.00
6/30/20	ETF	Review court filing issued re case management conference.	.10	37.50
6/30/20	ETF	Review and respond to multiple emails from bankruptcy counsel re status of mediation and case management.	.20	75.00
6/30/20	ANR	Negotiate settlement.	3.80	2,261.00
6/30/20	ANR	Revision to settlement agreement.	.80	476.00
TOTAL PROFESSIONAL SERVICES RENDERED				\$ 10,666.50

Client #: 2766
Matter #: 005

July 6, 2020
Invoice #: 126054

TIMEKEEPER SUMMARY

Name	Rate	Hours	Amount	N/C Hr	N/C \$
Ferguson, Elizabeth T	375.00	9.30	3,487.50	.00	.00
Tilman, Elina	395.00	.40	158.00	.00	.00
Fernandez, Louise Ann	595.00	2.30	1,368.50	.00	.00
Ruda, An Nguyen	595.00	9.50	5,652.50	.00	.00
TOTALS		21.50	\$ 10,666.50	.00	\$.00

TOTAL THIS INVOICE

\$ 10,666.50

*Balance is due within 30 days from the date of this invoice.
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BARTKO ZANKEL BUNZEL

BARTKO ZANKEL BUNZEL & MILLER

A Professional Law Corporation

One Embarcadero Center, Ste. 800

San Francisco, CA 94111

p: 415.956.1900

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www.bzbm.com

August 5, 2020

Saint Francis Medical Center
601 Figueroa Street
Suite 4050
Los Angeles, CA 90017

Invoice #: 126302
Client #: 2766
Matter #: 005
Billing Attorney: ANR

For professional services rendered and disbursements advanced through July 31, 2020:

RE: St. Francis adv. Carcamo

DETAIL OF PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
7/02/20	ETF	Appear for defendants at case management conference in Carcamo matter.	.70	262.50
7/06/20	ETF	Review and revise final Carcamo settlement agreement.	.60	225.00
7/06/20	ANR	Approve revisions to draft settlement agreement.	.10	59.50
7/06/20	ANR	Review email from plaintiff's counsel re draft settlement agreement.	.10	59.50
7/08/20	ETF	Exchange emails with opposing counsel re settlement.	.20	75.00
7/08/20	ETF	Draft email re payment instructions re settlement agreement	.20	75.00
7/08/20	ETF	Draft email for Verity's signature on settlement agreement.	.10	37.50
7/08/20	ANR	Review of final agreement.	.30	178.50
7/09/20	ANR	Review/reply of email from carrier re draft settlement agreement.	.10	59.50
7/10/20	ANR	Review of email from carrier re allocation of settlement.	.10	59.50
7/14/20	ET	Review voicemail from co-counsel regarding settlement.	.10	39.50
7/16/20	ETF	Calculate due date for settlement payments.	.10	37.50
7/16/20	ETF	Draft email to client re payment instructions for settlement agreement.	.20	75.00
7/16/20	ETF	Draft email to opposing counsel re settlement payment and request for dismissal.	.10	37.50
7/16/20	ANR	Draft payment instructions.	.30	178.50
7/17/20	ET	Review settlement agreement.	.10	39.50
7/17/20	ET	Email correspondence with S. Roberts regarding terms.	.20	79.00
7/23/20	ETF	Review checks provided by client and forms provided by Plaintiff against items needed per settlement agreement.	.20	75.00
7/23/20	ETF	Draft email to opposing counsel re settlement payments; and review response re same.	.10	37.50
7/23/20	ETF	Review and respond to email from bankruptcy counsel re status of settlement payment.	.10	37.50

Client #: 2766
Matter #: 005

August 5, 2020
Invoice #: 126302

Date	Tkpr	Description	Hours	Amount
7/23/20	ETF	Coordinate further logistics re payment of settlement checks.	.20	75.00
7/24/20	ETF	Exchange emails with opposing counsel re follow up on settlement payment.	.20	75.00
7/24/20	ETF	Draft email to bankruptcy counsel to provide update re status of settlement checks.	.10	37.50
7/24/20	ETF	Phone call and email with opposing counsel re filing	.20	75.00
7/28/20	ETF	Review issues re basis for motion to compel and plan for same.	.50	187.50
7/29/20	ETF	Review email from client re reimbursement check	.10	37.50
7/29/20	ETF	Review docket and status of OSC hearing and coordinate follow up actions re same.	.20	75.00

TOTAL PROFESSIONAL SERVICES RENDERED **\$ 2,290.50**

TIMEKEEPER SUMMARY

Name	Rate	Hours	Amount	N/C Hr	N/C \$
Ferguson, Elizabeth T	375.00	4.10	1,537.50	.00	.00
Tilman, Elina	395.00	.40	158.00	.00	.00
Ruda, An Nguyen	595.00	1.00	595.00	.00	.00
TOTALS		5.50	\$ 2,290.50	.00	\$.00

TOTAL THIS INVOICE **\$ 2,290.50**

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September 8, 2020

Saint Francis Medical Center
601 Figueroa Street
Suite 4050
Los Angeles, CA 90017

Invoice #: 126677
Client #: 2766
Matter #: 005
Billing Attorney: ANR

For professional services rendered and disbursements advanced through September 4, 2020:

RE: St. Francis adv. Carcamo

DETAIL OF PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
8/20/20	ETF	Review litigation chart re status of Carcamo arbitration against settlement arbitration provision.	.20	75.00
8/20/20	ETF	Draft summary of issue re arbitration and grievance issue for further follow up.	.10	37.50
8/27/20	ANR	Review of email from T. Knets re dismissal.	.10	59.50
8/27/20	ANR	Reply to email from T. Knets re dismissal.	.10	59.50

TOTAL PROFESSIONAL SERVICES RENDERED \$ 231.50

TIMEKEEPER SUMMARY

Name	Rate	Hours	Amount	N/C Hr	N/C \$
Ferguson, Elizabeth T	375.00	.30	112.50	.00	.00
Ruda, An Nguyen	595.00	.20	119.00	.00	.00
TOTALS		.50	\$ 231.50	.00	\$.00

DISBURSEMENTS ADVANCED

Date	Description	Amount
	ACC Court Service & Filing Fee	126.00

TOTAL DISBURSEMENTS ADVANCED \$ 126.00

TOTAL THIS INVOICE \$ 357.50

Client #: 2766
Matter #: 005

September 8, 2020
Invoice #: 126677

*Balance is due within 30 days from the date of this invoice.
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EXHIBIT U

BARTKO ZANKEL BUNZEL

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June 3, 2020

Saint Francis Medical Center
601 Figueroa Street
Suite 4050
Los Angeles, CA 90017

Invoice #: 125846
Client #: 2766
Matter #: 007
Billing Attorney: ANR

For professional services rendered and disbursements advanced through May 31, 2020:

RE: adv. Sorto, Cynthia

DETAIL OF PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
5/01/20	MLR	Revise discovery requests.	1.10	434.50
5/01/20	MLR	Revise deposition notice.	.50	197.50
5/01/20	MLR	Review emails from client regarding discovery.	.20	79.00
5/01/20	MLR	Respond to emails from client regarding discovery.	.20	79.00
5/04/20	MLR	Review emails from client regarding plaintiff's discovery requests.	.40	158.00
5/04/20	MLR	Respond to emails from client regarding plaintiff's discovery requests.	.40	158.00
5/04/20	MLR	Prepare emails to client regarding witness interviews.	.20	79.00
5/04/20	MLR	Revise MR interview questions.	.40	158.00
5/04/20	MLR	Revise SJ interview questions.	.30	118.50
5/04/20	MLR	Review minute order regarding CMC hearing.	.10	39.50
5/05/20	LAF	Strategy session and discussion of documents needed for Response to RFPs.	.50	297.50
5/05/20	MLR	Review and respond to emails from client regarding scheduling interview of witness.	.20	79.00
5/05/20	MLR	Review emails regarding client document production.	.30	118.50
5/05/20	MLR	Revise deposition notice.	.20	79.00
5/05/20	MLR	Review investigatory report in preparation for interviews of WC, MR, and SJ.	.20	79.00
5/05/20	MLR	Review plaintiff emails in preparation for interviews of WC, MR and SJ.	.30	118.50
5/05/20	MLR	Review court minute order regarding CMC.	.10	39.50
5/05/20	MLR	Review MR emails in preparation for interview.	.30	118.50
5/06/20	MLR	Review and respond to email from client regarding scheduling interview of witness.	.20	79.00
5/06/20	MLR	Review email regarding upcoming CMC.	.10	39.50

Client #: 2766
Matter #: 007

June 3, 2020
Invoice #: 125846

Date	Tkpr	Description	Hours	Amount
5/06/20	MLR	Review emails of MR in preparation to respond to plaintiff's discovery requests.	1.40	553.00
5/06/20	MLR	Review emails of SJ in preparation to respond to plaintiff's discovery requests.	1.60	632.00
5/06/20	MLR	Strategize regarding response to discovery requests.	.30	118.50
5/06/20	MLR	Revise document inventory in preparation to meet with client regarding discovery requests.	.30	118.50
5/07/20	MLR	Attend the deposition of WC	.70	276.50
5/07/20	MLR	Interview MR	.90	355.50
5/07/20	MLR	Prepare memorandum summarizing the interview of WC	.60	237.00
5/07/20	MLR	Prepare memorandum summarizing the interview of MR	.70	276.50
5/07/20	MLR	Continue review emails of MR in preparation to respond to plaintiff's discovery requests	1.20	474.00
5/07/20	MLR	Review emails of CN in preparation to respond to plaintiff's discovery requests	1.80	711.00
5/07/20	MLR	Review emails of WC in preparation to respond to plaintiff's discovery requests	1.10	434.50
5/07/20	MLR	Revise document list for Leslie V in preparation to respond to document production	.20	79.00
5/07/20	MLR	Emails to/from Leslie V. regarding document review	.20	79.00
5/08/20	MLR	Interview SJ	1.00	395.00
5/08/20	MLR	Prepare summary of interview of SJ	.90	355.50
5/08/20	MLR	Telephone conference with LV regarding discovery requests	.40	158.00
5/08/20	MLR	Continue review emails of WC	1.20	474.00
5/08/20	MLR	Review emails of SS	1.50	592.50
5/11/20	MLR	Research discovery statute and prepare associated memorandum	.60	237.00
5/11/20	MLR	Prepare for and prepare analysis document	4.00	1,580.00
5/12/20	MLR	Research complaint causes of action in preparation to prepare analysis document	1.00	395.00
5/12/20	MLR	Continue prepare case analysis document	3.70	1,461.50
5/13/20	MLR	Email to Leslie V. regarding client documents	.10	39.50
5/13/20	MLR	Review client documents in preparation to respond to discovery request	1.00	395.00
5/13/20	MLR	Continue review SS emails	.60	237.00
5/13/20	MLR	Continue Review CN emails	.80	316.00
5/14/20	MLR	Emails to/ from Leslie V. regarding client documents	.40	158.00
5/14/20	MLR	Review client documents in preparation to respond to discovery request	2.40	948.00
5/15/20	MLR	Email to/from Leslie V regarding client documents	.20	79.00
5/15/20	MLR	Revise case analysis document	1.00	395.00
5/18/20	MLR	Email to/from Leslie V. regarding witness interviews	.30	118.50
5/18/20	MLR	Revise case analysis memo	1.00	395.00
5/19/20	ANR	Review of preliminary analysis.	.30	178.50
5/19/20	MLR	Revise analysis memo	1.00	395.00

Client #: 2766
Matter #: 007

June 3, 2020
Invoice #: 125846

Date	Tkpr	Description	Hours	Amount
5/19/20	MLR	Emails to/from Leslie regarding client documents	.40	158.00
5/19/20	MLR	Review updated client document memo from Leslie V.	.10	39.50
5/20/20	MLR	Emails to/from Leslie V regarding client documents	.30	118.50
5/20/20	MLR	Review revised document production list from Leslie V.	.10	39.50
5/20/20	MLR	Analysis of and strategize regarding case	1.00	395.00
5/20/20	MLR	Review client documents	1.00	395.00
5/20/20	MLR	Prepare responses to discovery	1.20	474.00
5/20/20	MLR	Revise analysis memo	.50	197.50
5/21/20	MLR	Email to/from SS regarding interview	.30	118.50
5/21/20	MLR	Emails to/from Leslie V regarding client documents	.40	158.00
5/21/20	MLR	Review client documents in preparation to respond to discovery requests	1.00	395.00
5/21/20	MLR	Revise discovery responses	.30	118.50
5/22/20	MLR	Email to/from SS regarding interview	.20	79.00
5/22/20	MLR	Interview SS	1.00	395.00
5/22/20	MLR	Prepare memorandum regarding interview of SS	.70	276.50
5/22/20	MLR	Prepare updated client document	.30	118.50
5/22/20	MLR	Prepare email to client regarding updated client document	.10	39.50
5/22/20	MLR	Review client documents in preparation to respond to discovery requests	.70	276.50
5/26/20	MLR	Emails to/from LV	.20	79.00
5/28/20	LAF	Review and revise CMC statement and follow up re same.	.50	297.50
5/28/20	MLR	Email to/from Plaintiff's counsel regarding discovery response extension	.30	118.50
5/28/20	MLR	Revise CMC statement	.30	118.50
5/28/20	MLR	Meet and confer with plaintiff's counsel regarding CMC	.20	79.00
5/29/20	MLR	Review client documents	.40	158.00

TOTAL PROFESSIONAL SERVICES RENDERED

\$ 20,839.50

TIMEKEEPER SUMMARY

Name	Rate	Hours	Amount	N/C Hr	N/C \$
Raymond, Marcia L.	395.00	50.80	20,066.00	.00	.00
Fernandez, Louise Ann	595.00	1.00	595.00	.00	.00
Ruda, An Nguyen	595.00	.30	178.50	.00	.00
TOTALS		52.10	\$ 20,839.50	.00	\$.00

TOTAL THIS INVOICE

\$ 20,839.50

Client #: 2766
Matter #: 007

June 3, 2020
Invoice #: 125846

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BARTKO ZANKEL BUNZEL

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San Francisco, CA 94111

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www.bzbm.com

July 6, 2020

Saint Francis Medical Center
601 Figueroa Street
Suite 4050
Los Angeles, CA 90017

Invoice #: 126055
Client #: 2766
Matter #: 007
Billing Attorney: ANR

For professional services rendered and disbursements advanced through June 30, 2020:

RE: adv. Sorto, Cynthia

DETAIL OF PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
6/01/20	MLR	Continue respond to discover requests	.50	197.50
6/01/20	MLR	Email carrier regarding coverage letter	.10	39.50
6/02/20	MLR	Email to carrier regarding coverage letter	.10	39.50
6/02/20	MLR	Emails to/from plaintiff's counsel regarding depositions	.20	79.00
6/03/20	LAF	Review Sorto emails.	1.00	595.00
6/03/20	MLR	Review CS emails in preparation to respond to discovery requests	.50	197.50
6/03/20	MLR	Email to/from Leslie re client documents	.50	197.50
6/03/20	MLR	Review W-2s in preparation to respond to discovery requests	.30	118.50
6/03/20	MLR	Review roster in preparation to respond to discovery requests	.20	79.00
6/03/20	MLR	Review payroll documents in preparation to respond to discovery requests	.30	118.50
6/04/20	MLR	Call to carrier re coverage letter	.10	39.50
6/04/20	MLR	Email from/to carrier regarding insurance	.20	79.00
6/04/20	MLR	Review prior claims research	.40	158.00
6/04/20	MLR	Continue prepare document production	.40	158.00
6/05/20	MLR	Emails to/from carrier re document responsive to documents request	.30	118.50
6/05/20	MLR	Review insurance document in preparation to respond to discovery requests	.20	79.00
6/05/20	MLR	Update response to discovery requests with insurance information	.30	118.50
6/08/20	MLR	Continue prepare responses to plaintiff's discovery responses	.20	79.00
6/08/20	MLR	Continue prepare documents to be produced in response to discovery requests	.20	79.00
6/08/20	MLR	Prepare chart of complaints in past 5 years	.40	158.00
6/09/20	MLR	Review plaintiff's responses to requests for documents	.30	118.50
6/09/20	MLR	Review plaintiff's responses to employment form interrogatories	.20	79.00

Client #: 2766
Matter #: 007July 6, 2020
Invoice #: 126055

Date	Tkpr	Description	Hours	Amount
6/09/20	MLR	Review plaintiff's responses to special interrogatories	.40	158.00
6/09/20	MLR	Review plaintiff's responses to general form interrogatories	.20	79.00
6/10/20	MLR	Email to/from plaintiff's counsel regarding deposition schedule	.20	79.00
6/10/20	MLR	Continue prepare documents to be produced in response to discovery requests	.20	79.00
6/11/20	MLR	Review and finalize documents to be produced in response to document production request	.20	79.00
6/11/20	MLR	Revise case management statement	.20	79.00
6/12/20	MLR	Email to/from plaintiff's counsel regarding deposition of CN	.20	79.00
6/15/20	LAF	Prepare emails re exposure analysis and next steps.	.40	238.00
6/17/20	LAF	Review of case management conference statement.	.20	119.00
6/17/20	ANR	Review of case management conference statement.	.20	119.00
6/18/20	LAF	Status update to client.	.50	297.50
6/18/20	LAF	Telephone call to opposing counsel.	.50	297.50
6/18/20	ANR	Status update to client.	.50	297.50
6/18/20	ET	Review client documents for Dentons' inquiry.	.20	79.00
6/18/20	ET	Respond to J. Moe regarding pending issues.	.10	39.50
6/19/20	LAF	Review amended discovery responses from Plaintiff.	.50	297.50
6/19/20	ET	Review carrier letter.	.10	39.50
6/19/20	ET	Respond to J. Moe question.	.10	39.50
6/29/20	ANR	Review of litigation status.	.50	297.50

TOTAL PROFESSIONAL SERVICES RENDERED**\$ 5,718.50****TIMEKEEPER SUMMARY**

Name	Rate	Hours	Amount	N/C Hr	N/C \$
Tilman, Elina	395.00	.50	197.50	.00	.00
Raymond, Marcia L.	395.00	7.50	2,962.50	.00	.00
Fernandez, Louise Ann	595.00	3.10	1,844.50	.00	.00
Ruda, An Nguyen	595.00	1.20	714.00	.00	.00
TOTALS		12.30	\$ 5,718.50	.00	\$.00

DISBURSEMENTS ADVANCED

Date	Description	Amount
	ACCO Court Service & Filing Fee	35.60

TOTAL DISBURSEMENTS ADVANCED**\$ 35.60**

Client #: 2766
Matter #: 007

July 6, 2020
Invoice #: 126055

TOTAL THIS INVOICE

\$ 5,754.10

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August 5, 2020

Saint Francis Medical Center
601 Figueroa Street
Suite 4050
Los Angeles, CA 90017

Invoice #: 126303
Client #: 2766
Matter #: 007
Billing Attorney: ANR

For professional services rendered and disbursements advanced through July 31, 2020:

RE: adv. Sorto, Cynthia

DETAIL OF PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
7/03/20	LAF	Finalize exposure analysis.	.30	178.50
7/09/20	LAF	Draft reinstatement letter.	.30	178.50
7/09/20	LAF	Review and respond to emails re same.	.20	119.00
7/09/20	ANR	Revise of reinstatement correspondence.	.20	119.00
7/09/20	ANR	Email to St. Francis re reinstatement.	.10	59.50
7/10/20	ANR	Review of reinstatement letter final form.	.20	119.00
7/13/20	ETF	Review exposure analysis; deposition notices; analyze authority on potential objections re same; review correspondence with opposing counsel; summarize issues for further review.	2.30	862.50
7/20/20	ETF	Review and analyze strategy re deposition objections.	.20	75.00
7/20/20	ETF	Draft objection to deposition notice.	.40	150.00
7/20/20	ETF	Review and analyze further strategy re deposition notices.	.60	225.00
7/20/20	LAF	Work on objections to discovery.	.30	178.50
7/20/20	LAF	Emails re same.	.20	119.00
7/20/20	ANR	Review of email from W. Castillo re employee status.	.10	59.50
7/20/20	ANR	Reply to email from W. Castillo re employee.	.10	59.50
7/27/20	ETF	Draft objections for depositions for Castillo, Redding, and Johnson.	.40	150.00
7/27/20	ETF	Review discovery responses and files responsive to same to identify missing information.	.80	300.00
7/27/20	ETF	Review Marcia's emails exchange with opposing counsel re status of discovery	.30	112.50
7/28/20	ETF	Review responses to supplemental form rogs and draft conclusion re same.	.20	75.00
7/28/20	ETF	Brief review of status of response production issues.	.20	75.00
7/28/20	ETF	Review authority re interrogatory requests from opposing counsel.	1.20	450.00

Client #: 2766
Matter #: 007

August 5, 2020
Invoice #: 126303

Date	Tkpr	Description	Hours	Amount
7/29/20	ETF	Review status of document collection for production and coordinate logistics re same.	.20	75.00
7/29/20	ETF	Review email from opposing counsel re BK claim, extension of motion to compel deadlines, and reinstatement offer	.10	37.50
7/29/20	ETF	Identify previous response re reinstatement and forward same to provide to opposing counsel.	.10	37.50
7/29/20	ETF	Review declarations and prepare redacted copy re same.	.30	112.50
7/29/20	ETF	Review authority re discovery of insurance policy.	.40	150.00
7/29/20	ETF	Review production file against checklist and documents provided by client to determine documents missing from production and summarize same.	.90	337.50
7/29/20	LAF	Follow up re document production.	.30	178.50
7/29/20	LAF	Emails with opposing counsel re settlement and discovery.	.60	357.00
7/29/20	LAF	Review discovery responses in connection with meet and confer.	.50	297.50
7/30/20	ETF	Review and analyze strategy re additional production response.	.20	75.00
7/30/20	ETF	Review additional files to produce and prepare same for production	.40	150.00
7/30/20	ETF	Draft follow up email to client re production requests	.10	37.50
7/30/20	ETF	Add additional document provided by client to missing production file and finalize same.	.20	75.00
7/30/20	LAF	Emails re documents needed for discovery responses.	.20	119.00
TOTAL PROFESSIONAL SERVICES RENDERED				\$ 5,704.50

TIMEKEEPER SUMMARY

Name	Rate	Hours	Amount	N/C Hr	N/C \$
Ferguson, Elizabeth T	375.00	9.50	3,562.50	.00	.00
Fernandez, Louise Ann	595.00	2.90	1,725.50	.00	.00
Ruda, An Nguyen	595.00	.70	416.50	.00	.00
TOTALS		13.10	\$ 5,704.50	.00	\$.00

TOTAL THIS INVOICE **\$ 5,704.50**

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September 8, 2020

Saint Francis Medical Center
601 Figueroa Street
Suite 4050
Los Angeles, CA 90017

Invoice #: 126678
Client #: 2766
Matter #: 007
Billing Attorney: ANR

For professional services rendered and disbursements advanced through September 4, 2020:

RE: adv. Sorto, Cynthia

DETAIL OF PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
8/03/20	ETF	Review further issues re additional documents to produce.	.60	225.00
8/03/20	ETF	Review issues re reinstatement offer and production.	.10	37.50
8/03/20	ETF	Review documents produced.	2.50	937.50
8/04/20	ETF	Further coordination re production of documents to opposing counsel.	.20	75.00
8/05/20	ETF	Email to plaintiff's counsel re meet and confer.	.10	37.50
8/05/20	LAF	Draft response to email from opposing counsel.	.30	178.50
8/05/20	LAF	Work on response to meet and confer letters.	.30	178.50
8/05/20	ANR	Review of status update.	.20	119.00
8/06/20	LAF	Prepare response regarding unconditional offer.	.20	119.00
8/06/20	LAF	Send response regarding unconditional offer.	.10	59.50
8/07/20	ETF	Review re privacy issues.	1.80	675.00
8/07/20	ETF	Review authority re discovery issues.	1.00	375.00
8/07/20	ETF	Review authority re other discovery issues.	1.00	375.00
8/07/20	ETF	Draft analysis of positions re discovery requests.	1.50	562.50
8/07/20	ETF	Review email from opposing counsel re discovery.	.10	37.50
8/07/20	ETF	Phone call with opposing counsel re discovery.	.10	37.50
8/07/20	ETF	Review strategy re meet and confer with plaintiff's counsel.	.20	75.00
8/10/20	ETF	Review issues re meet and confer discussion.	.20	75.00
8/10/20	ETF	Meet and confer with opposing counsel re discovery requests.	.50	187.50
8/10/20	ETF	Draft privilege log for production of documents.	1.40	525.00
8/10/20	ETF	Phone call re discovery responses.	.20	75.00
8/10/20	ETF	Summarize issues re discovery response and privilege log.	.10	37.50

Client #: 2766
Matter #: 007

September 8, 2020
Invoice #: 126678

Date	Tkpr	Description	Hours	Amount
8/10/20	LAF	Prepare for meet and confer re discovery.	.50	297.50
8/10/20	LAF	Research re discovery issues.	.70	416.50
8/10/20	LAF	Meet and confer call with opposing counsel.	.80	476.00
8/11/20	ETF	Draft summary re protective order issue.	.20	75.00
8/11/20	ETF	Review authority re protective order for Los Angeles cases.	.40	150.00
8/11/20	ETF	Draft protective order.	.80	300.00
8/11/20	ETF	Draft email to client re information needed for discovery responses.	.20	75.00
8/11/20	ETF	Review email from opposing counsel re meet and confer discussions, extension on motion to compel deadline, and stipulation and protective order.	.10	37.50
8/11/20	ETF	Draft email to opposing counsel re discovery requests.	.20	75.00
8/11/20	ETF	Draft inventory of documents received and needed for claim.	.80	300.00
8/11/20	ETF	Review further issues re Sorto discovery.	.40	150.00
8/12/20	ETF	Review issues re production of further documents.	.20	75.00
8/12/20	ETF	Draft email to client to request info and advise re same.	.20	75.00
8/12/20	LAF	Emails re discovery issues.	.30	178.50
8/14/20	LAF	Telephone call with Ms Levi regarding discovery issues.	.30	178.50
8/17/20	ETF	Exchange emails with opposing counsel re protective order.	.10	37.50
8/17/20	ETF	Review proposed stipulation and protective order provided by opposing counsel.	.20	75.00
8/17/20	ETF	Review strategy re supplemental production and protective order.	.20	75.00
8/17/20	ETF	Identify further documents for supplemental production.	.60	225.00
8/17/20	ETF	Review email re documents for production.	.10	37.50
8/18/20	ETF	Finalize supplemental production and privilege log.	.80	300.00
8/18/20	ETF	Exchange emails with opposing counsel re request for name of BK counsel and update re policy under protective order.	.10	37.50
8/18/20	ETF	Revise plaintiff's proposed stipulation and protective order.	.20	75.00
8/18/20	ETF	Summarize changes to plaintiff's proposed stipulation and protective order.	.10	37.50
8/18/20	LAF	Telephone call with insurer re discovery issues.	.10	59.50
8/18/20	LAF	Review supplemental production.	.50	297.50
8/19/20	LAF	Telephone call with insurance representative.	.10	59.50
8/20/20	ETF	Review and analyze strategy re further discovery issues.	.20	75.00
8/20/20	ETF	Redact private information on documents for production.	1.00	375.00
8/20/20	ETF	Continue redacting confidential information on document production.	.20	75.00
8/20/20	ETF	Review documents for further production.	.10	37.50
8/20/20	ETF	Review further info needed for discovery responses.	.10	37.50
8/20/20	ETF	Review status of protective order.	.10	37.50
8/20/20	ANR	Review of various discovery searches.	.80	476.00
8/21/20	ETF	Review strategy re further discovery responses.	.10	37.50

Client #: 2766
Matter #: 007September 8, 2020
Invoice #: 126678

Date	Tkpr	Description	Hours	Amount
8/21/20	ETF	Draft email to opposing counsel re stipulation agreement.	.10	37.50
8/21/20	ETF	Review correspondence from Plaintiff's counsel re unconditional offer	.10	37.50
8/21/20	ETF	Review spreadsheet re claims.	.10	37.50
8/24/20	ETF	Review authority re opposing counsel's claims re correspondence.	2.50	937.50
8/24/20	ETF	Draft letter to opposing counsel.	1.00	375.00
8/24/20	ETF	Further review of claims from opposing counsel re client communication.	.10	37.50
8/24/20	ETF	Review strategy re response to opposing counsel re client communications.	.20	75.00
8/25/20	ETF	Exchange emails with opposing counsel to follow up on stipulation and protective order.	.20	75.00
8/25/20	ETF	Draft email to opposing counsel with revised stipulation and protective order.	.10	37.50
8/25/20	ETF	Draft email to client re response letter to opposing counsel re client communications.	.10	37.50
8/25/20	ETF	Revise stipulation and protective order based on feedback from opposing counsel.	.10	37.50
8/25/20	ANR	Review of status update to client.	.30	178.50
8/26/20	ETF	Draft letter to opposing counsel re Motion for Sanctions.	1.20	450.00
8/26/20	ETF	Review and analyze strategy re motion for sanctions.	.30	112.50
8/26/20	ETF	Review Motion for Sanctions.	.20	75.00
8/26/20	ETF	Review authority re meet and confer requirements for Motion for Sanctions.	1.80	675.00
8/26/20	ANR	Review of motion for protective order.	.80	476.00
8/26/20	ANR	Review of draft correspondence in response to motion for protective order.	.50	297.50
8/26/20	ANR	Status update to client re motion.	.20	119.00
8/27/20	GT	Review court docket and update deadline tracker.	.10	19.50
8/27/20	ETF	Revise letter to opposing counsel to add info re previous litigation.	.10	37.50
8/27/20	ETF	Review authority re safe harbor procedure and summarize same.	.50	187.50
8/27/20	ETF	Draft letter re Motion to Compel.	1.10	412.50
8/27/20	ETF	Review strategy re responses to opposing counsel.	.30	112.50
8/27/20	ETF	Review Motion to Compel Special Interrogatories.	.20	75.00
8/27/20	ETF	Review and prepare documents for further production.	.40	150.00
8/27/20	ETF	Draft supplemental responses to interrogatories and verification.	1.10	412.50
8/27/20	ETF	Draft supplemental responses to requests for production and verification for same.	1.00	375.00
8/27/20	ETF	Review authority re supplemental discovery responses.	.50	187.50
8/27/20	ANR	Review of final version response to motion for protective order.	.40	238.00
8/27/20	ANR	Review of motions to compel filed.	.50	297.50
8/28/20	ETF	Revise letter re Motion to Compel and follow up on same.	.20	75.00
8/28/20	ETF	Review email from client re case records.	.10	37.50
8/28/20	ETF	Coordinate further response to opposing counsel's office re discovery issues.	.10	37.50

Client #: 2766
Matter #: 007

September 8, 2020
Invoice #: 126678

Date	Tkpr	Description	Hours	Amount
8/28/20	ETF	Review correspondence from opposing counsel re Motion for Protective Order and Sanctions.	.10	37.50
8/28/20	ETF	Review email from opposing counsel re Motion to Compel.	.10	37.50
8/28/20	ETF	Summarize status of discovery issues.	.50	187.50
8/28/20	ETF	Review records related to discovery requests.	1.50	562.50
9/01/20	ETF	Review email from opposing counsel re Stipulation and Protective Order.	.10	37.50
9/02/20	ETF	Draft further supplemental responses to requests for production.	1.10	412.50
9/02/20	ETF	Review further documents responsive to discovery requests pursued in Motion to Compel.	2.80	1,050.00
9/03/20	LAF	Prepare emails to opposing counsel.	.20	119.00
9/03/20	ANR	Review of meet and confer response to Plaintiff's counsel.	.30	178.50
9/04/20	LAF	Prepare responsive emails.	.20	119.00
9/04/20	LAF	Follow up re discovery.	.30	178.50
TOTAL PROFESSIONAL SERVICES RENDERED				\$ 20,015.00

TIMEKEEPER SUMMARY

Name	Rate	Hours	Amount	N/C Hr	N/C \$
Torres, Gloria	195.00	.10	19.50	.00	.00
Ferguson, Elizabeth T	375.00	39.20	14,700.00	.00	.00
Fernandez, Louise Ann	595.00	4.90	2,915.50	.00	.00
Ruda, An Nguyen	595.00	4.00	2,380.00	.00	.00
TOTALS		48.20	\$ 20,015.00	.00	\$.00

DISBURSEMENTS ADVANCED

Date	Description	Amount
	ACC Court Service & Filing Fee	94.00
TOTAL DISBURSEMENTS ADVANCED		\$ 94.00
TOTAL THIS INVOICE		\$ 20,109.00

*Balance is due within 30 days from the date of this invoice.
We reserve the right to charge interest at 10% per annum on amounts not paid within 30 days.*

Client #: 2766
Matter #: 007

September 8, 2020
Invoice #: 126678

EXHIBIT V

BARTKO ZANKEL BUNZEL

BARTKO ZANKEL BUNZEL & MILLER
A Professional Law Corporation

One Embarcadero Center, Ste. 800
San Francisco, CA 94111
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www.bzbm.com

August 5, 2020

Saint Francis Medical Center
601 Figueroa Street
Suite 4050
Los Angeles, CA 90017

Invoice #: 126304
Client #: 2766
Matter #: 008
Billing Attorney: ANR

For professional services rendered and disbursements advanced through July 31, 2020:

RE: adv. Capizzi, Renee

DETAIL OF PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
7/17/20	ANR	Review of email from Plaintiff's counsel re resolution.	.10	59.50
7/17/20	ANR	Reply to email from Plaintiff's counsel re resolution.	.10	59.50
TOTAL PROFESSIONAL SERVICES RENDERED				\$ 119.00

TIMEKEEPER SUMMARY

Name	Rate	Hours	Amount	N/C Hr	N/C \$
Ruda, An Nguyen	595.00	.20	119.00	.00	.00
TOTALS		.20	\$ 119.00	.00	\$.00

TOTAL THIS INVOICE \$ 119.00

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September 8, 2020

Saint Francis Medical Center
601 Figueroa Street
Suite 4050
Los Angeles, CA 90017

Invoice #: 126679
Client #: 2766
Matter #: 008
Billing Attorney: ANR

For professional services rendered and disbursements advanced through September 4, 2020:

RE: adv. Capizzi, Renee

DETAIL OF PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
8/13/20	ET	Review and analysis of client documents and bankruptcy filings.	.40	158.00
8/13/20	ET	Analysis of pending issues.	.20	79.00
8/17/20	ANR	Conference call with K. Mahoney re possible settlement.	.60	357.00
8/20/20	LAF	Review documents including WC deposition.	2.00	1,190.00
8/20/20	LAF	Analyze issues.	.50	297.50
8/20/20	LAF	Prepare memo re case.	.50	297.50
8/20/20	ANR	Review of case memorandum to client.	.50	297.50
8/27/20	ET	Review and analysis of client documents for data searches.	.20	79.00

TOTAL PROFESSIONAL SERVICES RENDERED \$ 2,755.50

TIMEKEEPER SUMMARY

Name	Rate	Hours	Amount	N/C Hr	N/C \$
Tilman, Elina	395.00	.80	316.00	.00	.00
Fernandez, Louise Ann	595.00	3.00	1,785.00	.00	.00
Ruda, An Nguyen	595.00	1.10	654.50	.00	.00
TOTALS		4.90	\$ 2,755.50	.00	\$.00

TOTAL THIS INVOICE \$ 2,755.50

Client #: 2766
Matter #: 008

September 8, 2020
Invoice #: 126679

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EXHIBIT W

BARTKO ZANKEL BUNZEL

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July 6, 2020

Saint Francis Medical Center
601 Figueroa Street
Suite 4050
Los Angeles, CA 90017

Invoice #: 126056
Client #: 2766
Matter #: 009
Billing Attorney: ANR

For professional services rendered and disbursements advanced through June 30, 2020:

RE: adv. Aliazis, Tricia

DETAIL OF PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
6/22/20	ET	Assess claims.	.20	79.00
6/22/20	ET	Email L. Vargas regarding fact-gathering.	.10	39.50
TOTAL PROFESSIONAL SERVICES RENDERED				\$ 118.50

TIMEKEEPER SUMMARY

Name	Rate	Hours	Amount	N/C Hr	N/C \$
Tilman, Elina	395.00	.30	118.50	.00	.00
TOTALS		.30	\$ 118.50	.00	\$.00

TOTAL THIS INVOICE

\$ 118.50

Balance is due within 30 days from the date of this invoice.

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BARTKO ZANKEL BUNZEL

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August 5, 2020

Saint Francis Medical Center
601 Figueroa Street
Suite 4050
Los Angeles, CA 90017

Invoice #: 126305
Client #: 2766
Matter #: 009
Billing Attorney: ANR

For professional services rendered and disbursements advanced through July 31, 2020:

RE: adv. Aliazis, Tricia

DETAIL OF PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
7/05/20	ET	Email DFEH investigator regarding case status.	.10	39.50
7/06/20	ET	Email correspondence with DFEH investigator regarding case.	.10	39.50
7/06/20	ET	Review DFEH case closure.	.10	39.50
7/06/20	ET	Email E. Paula and K. Murphy regarding case status.	.10	39.50
TOTAL PROFESSIONAL SERVICES RENDERED				\$ 158.00

TIMEKEEPER SUMMARY

Name	Rate	Hours	Amount	N/C Hr	N/C \$
Tilman, Elina	395.00	.40	158.00	.00	.00
TOTALS		.40	\$ 158.00	.00	\$.00

TOTAL THIS INVOICE

\$ 158.00

Balance is due within 30 days from the date of this invoice.

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EXHIBIT X

BARTKO ZANKEL BUNZEL

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June 3, 2020

Saint Francis Medical Center
601 Figueroa Street
Suite 4050
Los Angeles, CA 90017

Invoice #: 125849
Client #: 2766
Matter #: 013
Billing Attorney: ANR

For professional services rendered and disbursements advanced through May 31, 2020:

RE: Nguyen, Natalie

DETAIL OF PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
5/26/20	ET	Review client documents.	.10	39.50
5/26/20	ET	Draft pleading.	.30	118.50
5/26/20	ET	Email E. Paul re pleading.	.10	39.50
TOTAL PROFESSIONAL SERVICES RENDERED				\$ 197.50

TIMEKEEPER SUMMARY

Name	Rate	Hours	Amount	N/C Hr	N/C \$
Tilman, Elina	395.00	.50	197.50	.00	.00
TOTALS		.50	\$ 197.50	.00	\$.00

TOTAL THIS INVOICE \$ 197.50

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In Account With

BARTKO ZANKEL BUNZEL

BARTKO ZANKEL BUNZEL & MILLER

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July 6, 2020

Saint Francis Medical Center
601 Figueroa Street
Suite 4050
Los Angeles, CA 90017

Invoice #: 126058
Client #: 2766
Matter #: 013
Billing Attorney: ANR

For professional services rendered and disbursements advanced through June 30, 2020:

RE: Nguyen, Natalie

DETAIL OF PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
6/05/20	ET	Email correspondence with K. Murphy and S. Sharer re CMS.	.10	39.50
6/06/20	ET	Review revised CMS.	.10	39.50
6/06/20	ET	Email K. Murphy re edits to CMS.	.10	39.50
6/08/20	ET	Email correspondence with K. Murphy and J. Moe re CMS.	.20	79.00
6/23/20	ET	Review internal correspondence and complaint.	.20	79.00
6/23/20	ET	Email J. Moe and E. Paul regarding lawsuit.	.20	79.00
6/23/20	ET	Email carrier regarding new lawsuit.	.10	39.50
6/23/20	ET	Respond to K. Chaman regarding small claims hearing.	.10	39.50
6/24/20	ET	Call and email correspondence with J. Moe regarding responsive pleading.	.10	39.50
6/25/20	ET	Review correspondence from carrier regarding lawsuit and email K. Chapman and J. Moe regarding same.	.10	39.50
6/26/20	ET	Review new lawsuit filed through CT.	.10	39.50
6/26/20	ET	Review case docket.	.10	39.50
6/26/20	ET	Email correspondence with K. Chapman regarding lawsuit.	.10	39.50
6/28/20	ET	Email correspondence with K. Murphy regarding case status.	.10	39.50

TOTAL PROFESSIONAL SERVICES RENDERED**\$ 671.50**

Client #: 2766
Matter #: 013

July 6, 2020
Invoice #: 126058

TIMEKEEPER SUMMARY

Name	Rate	Hours	Amount	N/C Hr	N/C \$
Tilman, Elina	395.00	1.70	671.50	.00	.00
TOTALS		1.70	\$ 671.50	.00	\$.00

TOTAL THIS INVOICE

\$ 671.50

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August 5, 2020

Saint Francis Medical Center
601 Figueroa Street
Suite 4050
Los Angeles, CA 90017

Invoice #: 126307
Client #: 2766
Matter #: 013
Billing Attorney: ANR

For professional services rendered and disbursements advanced through July 31, 2020:

RE: Nguyen, Natalie

DETAIL OF PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
7/06/20	ET	Review case docket regarding case status and email J. Moe regarding necessity of need for stay of proceedings.	.10	39.50
7/08/20	ET	Review status of case and correspondence with J. Moe regarding same.	.10	39.50
7/14/20	ET	Preliminary review of motion to stay filing.	.10	39.50
7/14/20	ET	Call with K. Murphy regarding case status and next steps.	.20	79.00
7/28/20	ET	Analysis of fact-gathering issues.	.10	39.50
7/28/20	ET	Email Y. Bernardez and N. Nasu regarding client documents.	.10	39.50
7/29/20	ET	Email correspondence with N. Nasu regarding pending issues.	.20	79.00
7/30/20	ET	Email correspondence with K. Murphy and J. Moe re case status.	.20	79.00
7/31/20	ET	Email correspondence with J. Moe re stay.	.10	39.50
7/31/20	ET	Call with J. Moe and K. Murphy re CMC and next steps re cases.	.40	158.00

TOTAL PROFESSIONAL SERVICES RENDERED \$ 632.00

TIMEKEEPER SUMMARY

Name	Rate	Hours	Amount	N/C Hr	N/C \$
Tilman, Elina	395.00	1.60	632.00	.00	.00
TOTALS		1.60	\$ 632.00	.00	\$.00

TOTAL THIS INVOICE \$ 632.00

Client #: 2766
Matter #: 013

August 5, 2020
Invoice #: 126307

***Balance is due within 30 days from the date of this invoice.
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In Account With

BARTKO ZANKEL BUNZEL

BARTKO ZANKEL BUNZEL & MILLER

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September 8, 2020

Saint Francis Medical Center
601 Figueroa Street
Suite 4050
Los Angeles, CA 90017

Invoice #: 126681
Client #: 2766
Matter #: 013
Billing Attorney: ANR

For professional services rendered and disbursements advanced through September 4, 2020:

RE: Nguyen, Natalie

DETAIL OF PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
8/03/20	ET	Review tentative ruling from court.	.10	39.50
8/03/20	ET	Review small claims docket.	.10	39.50
8/03/20	ET	Email J. Moe and K. Chapman regarding response to court ruling.	.20	79.00
8/03/20	ET	Call with J. Moe and K. Murphy regarding response to court.	.20	79.00
8/03/20	ET	Email correspondence with K. Chapman re carrier issues and Y. Bernardez regarding client documents.	.10	39.50
8/04/20	ET	Email correspondence with K Murphy regarding response to BK court ruling.	.10	39.50
8/04/20	ET	Review tentative ruling from BK court.	.10	39.50
8/05/20	ET	Email correspondence with K. Murphy regarding pending filings.	.20	79.00
8/05/20	ET	Review response to small claims court re case status.	.20	79.00
8/06/20	ET	Email correspondence with J. Moe and K. Murphy regarding case status and next steps.	.20	79.00
8/06/20	ET	Calls with J. Moe regarding pending issues.	.20	79.00
8/07/20	ET	Review client documents and bankruptcy pleadings.	.40	158.00
8/07/20	ET	Email correspondence with N. Nasu regarding pending issues.	.20	79.00
8/07/20	ET	Call with J. Moe regarding next steps.	.50	197.50
8/07/20	ET	Analysis of payment issues.	.20	79.00
8/08/20	ET	Draft settlement agreement.	1.20	474.00
8/08/20	ET	Review client documents.	.10	39.50
8/08/20	ET	Email J. Moe and R. Adcock regarding settlement terms.	.20	79.00
8/09/20	ET	Calls with J. Moe regarding pending issues.	.40	158.00
8/09/20	ET	Review emails from J. Moe regarding agreement.	.10	39.50

Client #: 2766
Matter #: 013

September 8, 2020
Invoice #: 126681

Date	Tkpr	Description	Hours	Amount
8/09/20	ET	Review and make edits to agreement.	.20	79.00
8/09/20	ET	Email P. Chadwick regarding payment information.	.20	79.00
8/09/20	ET	Review payment deadlines.	.10	39.50
8/09/20	ET	Respond to K. Chapman's email regarding hearing.	.10	39.50
8/10/20	ET	Review correspondence regarding payment.	.10	39.50
8/11/20	ET	Email correspondence with K. Murphy re dismissal and filing in small claims.	.20	79.00
8/11/20	ET	Email W. Castillo regarding fact-gathering.	.20	79.00
8/11/20	ET	Email correspondence with K. Chapman re client documents.	.20	79.00
8/11/20	ET	Respond to carrier re case defense.	.10	39.50
8/14/20	ET	Review coverage letter.	.10	39.50
8/14/20	ET	Email carrier regarding case closures.	.10	39.50
8/14/20	ET	Review court's notice regarding small claims matter and hearing.	.10	39.50
8/14/20	ET	Email correspondence with K. Murphy and J. Moe regarding payment.	.10	39.50
8/21/20	ET	Call with A. Brown and R. Dino re payments.	.20	79.00
8/21/20	ET	Email R. Dino and A. Brown re payment issues.	.10	39.50
8/21/20	ET	Calls with J. Moe re status of matter.	.10	39.50
8/21/20	ET	Review settlement terms.	.10	39.50
8/26/20	ET	Email correspondence with R. Dino and J. Moe regarding settlement checks and next steps.	.10	39.50
8/27/20	GT	Review court docket and update deadline tracker.	.10	19.50

TOTAL PROFESSIONAL SERVICES RENDERED

\$ 2,942.50

TIMEKEEPER SUMMARY

Name	Rate	Hours	Amount	N/C Hr	N/C \$
Torres, Gloria	195.00	.10	19.50	.00	.00
Tilman, Elina	395.00	7.40	2,923.00	.00	.00
TOTALS		7.50	\$ 2,942.50	.00	\$.00

TOTAL THIS INVOICE

\$ 2,942.50

*Balance is due within 30 days from the date of this invoice.
We reserve the right to charge interest at 10% per annum on amounts not paid within 30 days.*

EXHIBIT Y

BARTKO ZANKEL BUNZEL

BARTKO ZANKEL BUNZEL & MILLER
A Professional Law Corporation

One Embarcadero Center, Ste. 800
San Francisco, CA 94111
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www.bzbm.com

September 8, 2020

Saint Francis Medical Center
601 Figueroa Street
Suite 4050
Los Angeles, CA 90017

Invoice #: 126682
Client #: 2766
Matter #: 014
Billing Attorney: ANR

For professional services rendered and disbursements advanced through September 4, 2020:

RE: Martin, Joan

DETAIL OF PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
8/11/20	ETF	Draft documents needed re claim.	.30	112.50
TOTAL PROFESSIONAL SERVICES RENDERED				\$ 112.50

TIMEKEEPER SUMMARY

Name	Rate	Hours	Amount	N/C Hr	N/C \$
Ferguson, Elizabeth T	375.00	.30	112.50	.00	.00
TOTALS		.30	\$ 112.50	.00	\$.00

TOTAL THIS INVOICE \$ 112.50

*Balance is due within 30 days from the date of this invoice.
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EXHIBIT Z

BARTKO ZANKEL BUNZEL

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June 3, 2020

Saint Francis Medical Center
601 Figueroa Street
Suite 4050
Los Angeles, CA 90017

Invoice #: 125850
Client #: 2766
Matter #: 017
Billing Attorney: ANR

For professional services rendered and disbursements advanced through May 31, 2020:

RE: Raj, Aaron

DETAIL OF PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
5/01/20	ETF	Revise analysis re case strategy	.20	75.00
5/04/20	OQD	Analysis of case status report, litigation file, and related outstanding litigation deadlines, tasks, and projects.	.30	178.50

TOTAL PROFESSIONAL SERVICES RENDERED \$ 253.50

TIMEKEEPER SUMMARY

Name	Rate	Hours	Amount	N/C Hr	N/C \$
Ferguson, Elizabeth T	375.00	.20	75.00	.00	.00
Dunlap, Oliver Q	595.00	.30	178.50	.00	.00
TOTALS		.50	\$ 253.50	.00	\$.00

TOTAL THIS INVOICE \$ 253.50

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July 6, 2020

Saint Francis Medical Center
601 Figueroa Street
Suite 4050
Los Angeles, CA 90017

Invoice #: 126059
Client #: 2766
Matter #: 017
Billing Attorney: ANR

For professional services rendered and disbursements advanced through June 30, 2020:

RE: Raj, Aaron

DETAIL OF PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
6/25/20	ET	Review of DLSE claim and strategize regarding response.	.60	237.00
6/25/20	ET	Review client documents.	.30	118.50
6/25/20	ET	Email A. Estrada, K. Chapman, and J. Moe regarding case.	.30	118.50
6/25/20	ET	Call with J. Moe regarding case.	.10	39.50
6/25/20	ET	Send update regarding case to E. Paul and P. Chadwick.	.20	79.00
6/26/20	ET	Review client documents and past DLSE exhibits.	.20	79.00
6/26/20	ET	Draft portions of letter to DLSE.	.20	79.00
6/26/20	ET	Email J. Moe regarding letter to DLSE regarding bankruptcy defenses.	.20	79.00
6/26/20	ET	Review and analysis of claim.	.10	39.50
6/26/20	ET	Email correspondence with L. Vargas regarding facts.	.10	39.50
6/26/20	ET	Call with J. Moe regarding case.	.10	39.50
6/26/20	ET	Complete workers certification form.	.20	79.00
6/26/20	ET	Email L. Ho and I. Golomic regarding workers compensation certificate.	.10	39.50
6/29/20	ET	Email correspondence with I. Golomeic, J. Moe, and L. Vargas regarding claims and worker's comp form.	.20	79.00
6/30/20	ET	Review and analysis of J. Moe's letter to DLSE and make revisions.	.30	118.50
6/30/20	ET	Email correspondence with D. Delmar and K. Vitale re workers comp form.	.20	79.00
6/30/20	ET	Review workers compensation documents.	.10	39.50
6/30/20	ET	Finalize workers comp certification.	.10	39.50
6/30/20	ET	Email J. Davis re workers comp certification.	.10	39.50
6/30/20	ET	Email DLSE officer regarding claim and workers compensation certification.	.20	79.00

TOTAL PROFESSIONAL SERVICES RENDERED

\$ 1,540.50

BARTKO ZANKEL BUNZEL & MILLER

Client #: 2766
Matter #: 017

July 6, 2020
Invoice #: 126059

TIMEKEEPER SUMMARY

Name	Rate	Hours	Amount	N/C Hr	N/C \$
Tilman, Elina	395.00	3.90	1,540.50	.00	.00
TOTALS		3.90	\$ 1,540.50	.00	\$.00

TOTAL THIS INVOICE

\$ 1,540.50

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BARTKO ZANKEL BUNZEL

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August 5, 2020

Saint Francis Medical Center
601 Figueroa Street
Suite 4050
Los Angeles, CA 90017

Invoice #: 126308
Client #: 2766
Matter #: 017
Billing Attorney: ANR

For professional services rendered and disbursements advanced through July 31, 2020:

RE: Raj, Aaron

DETAIL OF PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
7/03/20	ET	Review DLSE letters regarding closure and jurisdiction.	.20	79.00
7/03/20	ET	Make additions and revisions to response letter to Denton's letter to DLSE regarding necessity of dismissal of claims.	.80	316.00
7/05/20	ET	Finalize exhibits for DLSE dismissal letter.	.10	39.50
7/05/20	ET	Email J. Moe regarding dismissal letter.	.10	39.50
7/08/20	ET	Call and email correspondence with J. Moe regarding DLSE letter.	.10	39.50
7/10/20	ET	Review and analysis of DLSE letter.	.10	39.50
7/10/20	ET	Email J. Moe regarding DLSE letter.	.10	39.50
7/13/20	ET	Review DLSE letters and exhibits.	.20	79.00
7/13/20	ET	Email correspondence with J. Moe regarding DLSE response and lawsuit defenses.	.30	118.50

TOTAL PROFESSIONAL SERVICES RENDERED \$ 790.00

TIMEKEEPER SUMMARY

Name	Rate	Hours	Amount	N/C Hr	N/C \$
Tilman, Elina	395.00	2.00	790.00	.00	.00
TOTALS		2.00	\$ 790.00	.00	\$.00

TOTAL THIS INVOICE \$ 790.00

BARTKO ZANKEL BUNZEL & MILLER

Client #: 2766
Matter #: 017

August 5, 2020
Invoice #: 126308

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BARTKO ZANKEL BUNZEL

BARTKO ZANKEL BUNZEL & MILLER

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San Francisco, CA 94111

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www.bzbm.com

September 8, 2020

Saint Francis Medical Center
601 Figueroa Street
Suite 4050
Los Angeles, CA 90017

Invoice #: 126683
Client #: 2766
Matter #: 017
Billing Attorney: ANR

For professional services rendered and disbursements advanced through September 4, 2020:

RE: Raj, Aaron

DETAIL OF PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
8/11/20	ETF	Draft list of documents needed re claim.	.30	112.50
8/18/20	ET	Email correspondence with J. Moe, K. Murphy, and DLSE officer regarding case status.	.30	118.50
8/18/20	ET	Call with J. Moe regarding case.	.10	39.50
8/18/20	ET	Review client documents.	.10	39.50
8/19/20	ET	Email correspondence with J. Moe and DLSE hearing officer regarding case status.	.20	79.00
8/20/20	ET	Email H. Biehel and R. Adcock regarding case closures.	.10	39.50
8/20/20	ET	Call with J. Moe regarding pending issues.	.10	39.50
8/27/20	ET	Email correspondence with P. Opp regarding claim.	.20	79.00

TOTAL PROFESSIONAL SERVICES RENDERED

\$ 547.00

TIMEKEEPER SUMMARY

Name	Rate	Hours	Amount	N/C Hr	N/C \$
Ferguson, Elizabeth T	375.00	.30	112.50	.00	.00
Tilman, Elina	395.00	1.10	434.50	.00	.00
TOTALS		1.40	\$ 547.00	.00	\$.00

TOTAL THIS INVOICE

\$ 547.00

Client #: 2766
Matter #: 017

September 8, 2020
Invoice #: 126683

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EXHIBIT AA

BARTKO ZANKEL BUNZEL

BARTKO ZANKEL BUNZEL & MILLER
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September 8, 2020

Saint Francis Medical Center
601 Figueroa Street
Suite 4050
Los Angeles, CA 90017

Invoice #: 126684
Client #: 2766
Matter #: 019
Billing Attorney: ANR

For professional services rendered and disbursements advanced through September 4, 2020:

RE: Priscilla C. Chukwumezie

DETAIL OF PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
8/10/20	ET	Review and analysis of charge documents.	.10	39.50
8/10/20	ET	Email carrier regarding case.	.10	39.50
8/10/20	ET	Email correspondence with K. Chapman and J. Moe regarding claim.	.20	79.00
8/10/20	ET	Email R. Adcock and H. Biehl regarding pending issues.	.20	79.00
8/11/20	ET	Analysis of next steps.	.30	118.50
8/13/20	ET	Call with W. Castillo regarding pending issues.	.10	39.50
8/13/20	ET	Email correspondence with W. Castillo, N. Nasu, K. Chapman, and M. Lazano, and L. Ho regarding fact-gathering.	.40	158.00
8/13/20	ET	Review and analysis of client documents.	.20	79.00
8/13/20	ET	Analysis of case.	.20	79.00
8/13/20	ET	Call with M. Lazano regarding case.	.30	118.50
8/13/20	ET	Draft summary regarding issues.	.10	39.50
8/13/20	ET	Draft Chukwumezie internal pleading.	.30	118.50
8/13/20	ET	Email Nasu, W. Castillo, E. Ruiz, L. Manuel regarding internal pleading.	.10	39.50
8/21/20	ET	Email with carrier re case assignment.	.10	39.50
8/24/20	ET	Review correspondence from N. Nasu regarding pending issues.	.10	39.50
8/24/20	ET	Review charge documents.	.10	39.50
8/24/20	ET	Email EEOC officer regarding position statement.	.10	39.50
8/24/20	ET	Draft letter to EEOC regarding charge.	.20	79.00
8/24/20	ET	Analysis of case and needed fact-gathering.	.50	197.50
8/26/20	ET	Email correspondence with EEOC officer and investigative officer regarding position statement issues.	.50	197.50

BARTKO ZANKEL BUNZEL & MILLER

Client #: 2766
Matter #: 019

September 8, 2020
Invoice #: 126684

Date	Tkpr	Description	Hours	Amount
8/26/20	ET	Review items on respondent portal and respond regarding mediation.	.20	79.00
8/26/20	ET	Analysis of next steps.	.20	79.00
8/26/20	ET	Call with J. Moe regarding bankruptcy issues.	.10	39.50
8/26/20	ET	Draft letter to EEOC appealing denial regarding position statement request.	.50	197.50
8/27/20	ET	Review correspondence from EEOC regarding extension.	.10	39.50
9/04/20	ET	Review coverage letter from AIG.	.10	39.50

TOTAL PROFESSIONAL SERVICES RENDERED

\$ 2,133.00

TIMEKEEPER SUMMARY

Name	Rate	Hours	Amount	N/C Hr	N/C \$
Tilman, Elina	395.00	5.40	2,133.00	.00	.00
TOTALS		5.40	\$ 2,133.00	.00	\$.00

TOTAL THIS INVOICE

\$ 2,133.00

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EXHIBIT AB

BARTKO ZANKEL BUNZEL

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San Francisco, CA 94111
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June 3, 2020

Saint Francis Medical Center
601 Figueroa Street
Suite 4050
Los Angeles, CA 90017

Invoice #: 125851
Client #: 2766
Matter #: 018
Billing Attorney: ANR

For professional services rendered and disbursements advanced through May 31, 2020:

RE: Gonzalez, Eddie - Labor File

DETAIL OF PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
5/01/20	ET	Finalize labor code production.	.30	118.50
5/01/20	ET	Finalize earning history production.	.40	158.00
5/01/20	ET	Email correspondence with N. Nasu regarding pending issues.	.10	39.50
5/01/20	ET	Call N. Nasu regarding pending issues.	.10	39.50
5/01/20	ET	Email opposing counsel regarding labor code request.	.10	39.50

TOTAL PROFESSIONAL SERVICES RENDERED \$ 395.00

TIMEKEEPER SUMMARY

Name	Rate	Hours	Amount	N/C Hr	N/C \$
Tilman, Elina	395.00	1.00	395.00	.00	.00
TOTALS		1.00	\$ 395.00	.00	\$.00

TOTAL THIS INVOICE \$ 395.00

Balance is due within 30 days from the date of this invoice.

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EXHIBIT AC

BARTKO ZANKEL BUNZEL

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A Professional Law Corporation

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San Francisco, CA 94111
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www.bzbm.com

June 3, 2020

Verity Health Systems
601 S. Figueroa St.
Suite 4050
Los Angeles, CA 90017

Invoice #: 125813
Client #: 2728
Matter #: 001
Billing Attorney: ANR

For professional services rendered and disbursements advanced through May 31, 2020:

RE: General Labor**DETAIL OF PROFESSIONAL SERVICES RENDERED**

Date	Tkpr	Description	Hours	Amount
5/01/20	ET	Draft IC agreement.	.20	79.00
5/01/20	ET	Correspondence with S. Sharrer and R. Robinson regarding IC agreement.	.30	118.50
5/01/20	ET	Email correspondence with S. Sharrer regarding subpoena follow-up and agreement.	.20	79.00
5/03/20	ET	Email correspondence with S. Sharrer regarding agreements.	.20	79.00
5/03/20	ET	Analysis of issues with employee agreements.	.40	158.00
5/03/20	ET	Review bankruptcy motion and related former agreements.	.40	158.00
5/03/20	ET	Make additions to employee agreement.	.60	237.00
5/04/20	KLD	Analyze applicability of executive order providing new paid leave benefits, and interrelation with other leave benefits.	.30	118.50
5/04/20	ET	Call with S. Sharrer regarding agreements.	.10	39.50
5/04/20	ET	Email correspondence with S. Sharrer regarding agreement and case status.	.20	79.00
5/04/20	ET	Finalize employee agreement.	.10	39.50
5/04/20	ET	Review bankruptcy motion for agreement parameters.	.10	39.50
5/04/20	ET	Call process server re Watson subpoena.	.10	39.50
5/04/20	ET	Research regarding LOA issues.	1.30	513.50
5/04/20	ET	Draft summary of issues regarding LOA for S. Sharrer.	.40	158.00
5/04/20	ET	Review and analysis of Vasquez subpoena and docket activity.	.40	158.00
5/04/20	ET	Email E. Paul, K. Chapman, and S. Sharrer regarding proposed plan for Vasquez subpoena.	.20	79.00
5/04/20	ET	Email L. Ho regarding Vasquez subpoena information.	.10	39.50
5/05/20	ETF	Review authority re background checks and summarize same.	2.10	787.50
5/05/20	ANR	Conference call with client re bargaining status.	.40	238.00

Client #: 2728
Matter #: 001

June 3, 2020
Invoice #: 125813

Date	Tkpr	Description	Hours	Amount
5/05/20	ANR	Review of research re background checks.	.20	119.00
5/05/20	ET	Calls to process server regarding Watson subpoena.	.10	39.50
5/05/20	ET	Email process server regarding Watson subpoena.	.10	39.50
5/05/20	ET	Send update to S. Sharrer regarding Watson subpoena.	.10	39.50
5/05/20	ET	Email S. Sharrer regarding new KERP and KEIP agreements.	.20	79.00
5/05/20	ET	Review client documents for update to agreements.	.30	118.50
5/05/20	ET	Make additions and revisions to KEIP agreement.	.60	237.00
5/05/20	ET	Review and make additions to KERP agreement.	.20	79.00
5/06/20	ETF	Review and analyze authority re privacy issues re personnel files and review BK filings	1.80	675.00
5/06/20	LAF	Group call re 1113 process and strategy.	.80	476.00
5/06/20	ANR	Conference call regarding bargaining status with Dentons and leadership team.	.80	476.00
5/06/20	ET	Calls with S. Sharrer regarding agreements.	.30	118.50
5/06/20	ET	Make revisions to employee KEIP Plan agreement.	.70	276.50
5/06/20	ET	Analysis of issues with agreements.	.20	79.00
5/06/20	ET	Email correspondence with S. Sharrer and L. Ho re Vasquez subpoena.	.20	79.00
5/06/20	MLR	Analyze and strategize regarding case reports in assigned litigation matters with LF.	.40	158.00
5/07/20	ETF	Review authority re citations to unreported district court cases in connection with personnel files issue	.30	112.50
5/07/20	LAF	Conference call with Verity Leadership and Dentons re bargaining status.	.50	297.50
5/07/20	LAF	Review emails regarding bargaining questions and legal issues.	.20	119.00
5/07/20	LAF	Respond to emails regarding bargaining questions and legal issues.	.30	178.50
5/07/20	ANR	Conference call with Verity Leadership and Dentons regarding bargaining status.	.50	297.50
5/07/20	ANR	Conference call with S. Sharrer regarding various labor matters.	.50	297.50
5/08/20	KLD	Analyze requirements, eligibility, and processes for CA workshare plans.	.80	316.00
5/08/20	ETF	Attend SEIU bargaining sessions to prepare declaration in support of motion to reject CBA.	1.20	450.00
5/11/20	KLD	Draft analysis regarding employee workshare issues, and send to S. Sharrer.	2.30	908.50
5/11/20	ETF	Review emails re declaration; coordinate prep of further exhibits for same.	.40	150.00
5/11/20	ANR	Conference call with S. Sharrer re pending investigations and litigation.	1.20	714.00
5/11/20	ET	Analysis of case status and subpoenas.	.30	118.50
5/12/20	ETF	Update declaration with additional exhibits and prepare same.	.60	225.00
5/12/20	LAF	Weekly labor call.	.80	476.00
5/12/20	LAF	Conference call with S. Sharrer regarding pending investigation.	.40	238.00
5/12/20	LAF	Conference call with S. Sharrer regarding pending litigation.	.40	238.00
5/12/20	ANR	Weekly labor call.	.80	476.00
5/12/20	ET	Email correspondence with S. Sharrer regarding agreements and investigation.	.60	237.00

Client #: 2728
Matter #: 001

June 3, 2020
Invoice #: 125813

Date	Tkpr	Description	Hours	Amount
5/12/20	ET	Email correspondence with K. Chapman regarding chart.	.10	39.50
5/12/20	ET	Review carrier chart and compare to case documents to determine facility and closed/open characterization.	.70	276.50
5/12/20	ET	Calls with K. Chapman regarding litigation issues.	.40	158.00
5/12/20	ET	Email K. Chapman regarding closed/open status of cases.	.10	39.50
5/12/20	ET	Draft 19 KERP plan agreements.	2.60	1,027.00
5/12/20	ET	Draft IC agreement.	.20	79.00
5/12/20	ET	Review Plan documents.	.10	39.50
5/13/20	ANR	Telephone call with S. Sharrer re employee matters.	.40	238.00
5/13/20	ET	Finalize discretionary agreements.	.10	39.50
5/13/20	ET	Email S. Sharrer and P. Chadwick regarding agreements.	.20	79.00
5/13/20	ET	Email K. Chapman regarding case designations.	.10	39.50
5/13/20	ET	Analysis of case designations.	.10	39.50
5/13/20	ET	Review new subpoena regarding medical record.	.10	39.50
5/13/20	ET	Contact process server re access to subpoena.	.10	39.50
5/13/20	ET	Multiple email correspondence with client regarding new medical subpoena for SOAR and next steps.	.30	118.50
5/13/20	ET	Email defense and plaintiff's counsel regarding SOAR subpoena.	.20	79.00
5/13/20	ET	Review and analysis of hold issues.	.20	79.00
5/14/20	ANR	Conference call with S. Sharrer re labor matters.	.40	238.00
5/14/20	ANR	Additional call with S. Sharrer re labor matters.	.50	297.50
5/14/20	ET	Email correspondence with J. Moe and K. Murphy regarding application of subpoena.	.10	39.50
5/14/20	ET	Email correspondence with P. Chadwick and S. Sharer regarding exhibit.	.10	39.50
5/15/20	ET	Email correspondence with S. Sharrer and L. Vargas regarding exhibit and agreement.	.10	39.50
5/15/20	ET	Make edits to exhibit and finalize agreement.	.20	79.00
5/20/20	ANR	Conference call with S. Sharrer re labor matters.	.50	297.50
5/20/20	ET	Review litigation chart for document issues.	.30	118.50
5/20/20	ET	Correspondence with K. Murphy, K. Chapman, and S. Sharrer regarding medical subpoena.	.20	79.00
5/22/20	KLD	Analyze new Covid-19 related city ordinances and DOL guidance for potential impact to client.	.40	158.00
5/22/20	ET	Review CBA and carrier issues.	.20	79.00
5/22/20	ET	Call with K. Murphy regarding pending litigation issues.	.10	39.50
5/22/20	ET	Email correspondence with K. Murphy regarding pending litigation issues.	.20	79.00
5/22/20	ET	Review status of subpoenas.	.10	39.50
5/24/20	ET	Review notice from CT Corp and related documents.	.10	39.50

Client #: 2728
Matter #: 001

June 3, 2020
Invoice #: 125813

Date	Tkpr	Description	Hours	Amount
5/24/20	ET	Make acknowledgment regarding subpoenas and email K. Murphy regarding same.	.10	39.50
5/26/20	ANR	Review of email from Lockton re carrier position.	.10	59.50
5/26/20	ET	Review Sanford lawsuit.	.10	39.50
5/26/20	ET	Review former correspondence with opposing counsel re lawsuit and client documents re Sanford lawsuit.	.70	276.50
5/26/20	ET	Analysis of pending issues and deadlines re Sanford lawsuit.	.50	197.50
5/26/20	ET	Send update to E. Paul. K. Chapman, and internal group re Sanford lawsuit and next steps.	.30	118.50
5/26/20	ET	Analysis of litigation chart and needed follow-up and updates.	.90	355.50
5/26/20	ET	Review client documents re insurance coverage.	.20	79.00
5/27/20	GT	Review transferred litigation files and organize for review.	1.50	292.50
5/27/20	LAF	Weekly labor call.	.60	357.00
5/27/20	ANR	Weekly labor call.	.60	357.00
5/27/20	ET	Review correspondence from carrier and email with K. Chaman regarding same.	.10	39.50
5/27/20	ET	Email correspondence with N. Nam and S. Sharrer regarding litigation.	.20	79.00
5/28/20	ET	Strategize regarding litigation and document issues.	.30	118.50
5/29/20	ANR	Conference call with H. Levy and S. Sharrer re employee protected information.	.60	357.00
5/29/20	ANR	Review of employment subpoenas and process memo.	.40	238.00
5/29/20	ANR	Review of independent contractor revisions.	.20	119.00
5/29/20	ANR	Review of email from T. Moyron re personnel statement.	.10	59.50
5/29/20	ANR	Reply to email from T. Moyron re personnel statement.	.10	59.50
5/29/20	ET	Email correspondence with S. Sharer re labor issues.	.20	79.00
5/29/20	ET	Call with E. Paul and Hope re protocols.	.40	158.00
5/29/20	ET	Draft summary of protocols.	.90	355.50
5/29/20	ET	Assess pending litigation issues.	.20	79.00
5/29/20	ET	Email E. Paul and Hope re protocols.	.10	39.50
5/30/20	ANR	Review of email from H. Levy-Biehl re personnel records.	.10	59.50
5/30/20	ANR	Reply to email from H. Levy-Biehl re personnel records.	.10	59.50

TOTAL PROFESSIONAL SERVICES RENDERED

\$ 20,360.50

Client #: 2728
Matter #: 001

June 3, 2020
Invoice #: 125813

TIMEKEEPER SUMMARY

Name	Rate	Hours	Amount	N/C Hr	N/C \$
Torres, Gloria	195.00	1.50	292.50	.00	.00
Ferguson, Elizabeth T	375.00	6.40	2,400.00	.00	.00
Duffy, Kerry L.	395.00	3.80	1,501.00	.00	.00
Tilman, Elina	395.00	21.70	8,571.50	.00	.00
Raymond, Marcia L.	395.00	.40	158.00	.00	.00
Fernandez, Louise Ann	595.00	4.00	2,380.00	.00	.00
Ruda, An Nguyen	595.00	8.50	5,057.50	.00	.00
TOTALS		46.30	\$ 20,360.50	.00	\$.00

TOTAL THIS INVOICE

\$ 20,360.50

*Balance is due within 30 days from the date of this invoice.
We reserve the right to charge interest at 10% per annum on amounts not paid within 30 days.*

In Account With

BARTKO ZANKEL BUNZEL

BARTKO ZANKEL BUNZEL & MILLER

A Professional Law Corporation

One Embarcadero Center, Ste. 800

San Francisco, CA 94111

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July 6, 2020

Verity Health Systems
601 S. Figueroa St.
Suite 4050
Los Angeles, CA 90017

Invoice #: 126029
Client #: 2728
Matter #: 001
Billing Attorney: ANR

For professional services rendered and disbursements advanced through June 30, 2020:

RE: General Labor**DETAIL OF PROFESSIONAL SERVICES RENDERED**

Date	Tkpr	Description	Hours	Amount
6/01/20	ANR	Conference call with legal professionals re request for information.	.80	476.00
6/01/20	ANR	Status update to E. Paul re litigation.	.50	297.50
6/01/20	ET	Make additions and revisions to IC agreement.	.70	276.50
6/01/20	ET	Email correspondence with S. Sharer regarding agreement.	.10	39.50
6/01/20	ET	Email correspondence with E. Paul re protocols and carrier notices re WARN.	.20	79.00
6/01/20	ET	Review client documents to assess carrier notification and other issues with litigation.	.50	197.50
6/01/20	ET	Review and analysis of Sanchez subpoena and related documents.	.30	118.50
6/01/20	ET	Review and analysis of code section and applicability of notice to Sanchez subpoena.	.40	158.00
6/01/20	ET	Call with DA re Sanchez re subpoena parameters.	.20	79.00
6/01/20	ET	Email correspondence with Hope and Karen re Sanchez subpoena and next steps.	.40	158.00
6/01/20	ET	Emails to DA re meet and confer re Sanchez subpoena.	.20	79.00
6/01/20	ET	Review research re CCP requirements to criminal subpoenas.	.20	79.00
6/02/20	ET	Email correspondence with P. Opp re cases.	.10	39.50
6/02/20	ET	Review research regarding criminal subpoenas and code references.	.30	118.50
6/03/20	ANR	Review of email from client re privacy information.	.10	59.50
6/03/20	ANR	Reply to email from client re privacy information.	.10	59.50
6/03/20	ET	Review Sanchez subpoena.	.10	39.50
6/03/20	ET	Email DA re Sanchez subpoena.	.10	39.50
6/03/20	ET	Call with DA re further meet and confer of Sanchez subpoena.	.40	158.00
6/03/20	ET	Review codes and isolated statutes re subpoena research.	.70	276.50

Client #: 2728
Matter #: 001

July 6, 2020
Invoice #: 126029

Date	Tkpr	Description	Hours	Amount
6/03/20	ET	Review writeup re subpoena research response and make edits.	.70	276.50
6/03/20	ET	Analysis of recommendation re subpoenas.	.40	158.00
6/03/20	ET	Email to Hope re Sanchez subpoena.	.60	237.00
6/03/20	ET	Email correspondence with Hope and Karen re Sanchez subpoena.	.20	79.00
6/03/20	ET	Review and analysis of Sanchez subpoena and supporting documents.	.20	79.00
6/04/20	ANR	Conference call with S. Sharrer re labor strategy.	.60	357.00
6/04/20	ANR	Review of subpoena issue re employee.	.10	59.50
6/05/20	ANR	Daily labor call with S. Sharrer.	.50	297.50
6/05/20	ET	Review Scott documents.	.10	39.50
6/05/20	ET	Make redactions to Scott documents.	.10	39.50
6/05/20	ET	Email correspondence with process server re Scott documents.	.20	79.00
6/05/20	ET	Review documents for carrier information and fact-gathering.	.50	197.50
6/05/20	ET	Email correspondence with T. Mercado regarding subpoenas.	.20	79.00
6/08/20	ET	Review status of subpoenas.	.10	39.50
6/08/20	ET	Email correspondence with P. Opp re protocol for claims.	.10	39.50
6/08/20	ET	Analysis of case protocols.	.30	118.50
6/10/20	ANR	Conference call with S. Sharrer re labor strategy.	.20	119.00
6/10/20	ET	Review J. Moe's email and letter from Glasser re Sanford.	.10	39.50
6/10/20	ET	Call with K. Murphy regarding litigation.	.50	197.50
6/10/20	ET	Analysis of representation issues re new lawsuit.	.20	79.00
6/10/20	ET	Review CT and K. Chapman emails.	.20	79.00
6/10/20	ET	Email correspondence with H. Levy-Biehl re pending issues.	.10	39.50
6/10/20	CC	Prepare chart re VHS carriers.	1.00	195.00
6/12/20	ET	Strategize regarding pending litigation regarding Sanford and Sorto.	.20	79.00
6/16/20	ANR	Attend weekly labor call.	.50	297.50
6/17/20	ET	Email correspondence with K. Chapman re pending claims.	.20	79.00
6/17/20	ET	Review documents re lawsuits and carrier information.	.20	79.00
6/17/20	ET	Call with J. Moe and K. Murphy re pending lawsuits at facilities.	1.10	434.50
6/18/20	ET	Email correspondence with L. Ho regarding leave.	.20	79.00
6/18/20	ET	Email correspondence with E. Paul regarding pending issues.	.20	79.00
6/19/20	ANR	Email from P. Opp re coverage limits.	.20	119.00
6/19/20	ANR	Review of AIG covered claims.	.30	178.50
6/19/20	ET	Email correspondence with J. Moe and K. Murphy regarding bankruptcy Plan filing and case evaluations.	.20	79.00
6/19/20	ET	Call with K. Murphy regarding subpoena issues.	.20	79.00
6/19/20	ET	Analysis of pending litigation deadlines and tracker sheet.	.20	79.00
6/19/20	ET	Preliminary review and analysis of AIG mass litigation inquiries.	.30	118.50

Client #: 2728
Matter #: 001

July 6, 2020
Invoice #: 126029

Date	Tkpr	Description	Hours	Amount
6/19/20	ET	Email correspondence with K. Chapman regarding litigation issues,	.20	79.00
6/19/20	ET	Review client documents for plan evaluation.	.20	79.00
6/22/20	ANR	Review of litigation status and subpoenas.	1.00	595.00
6/22/20	ET	Call with J. Moe regarding Plan disclosures.	.10	39.50
6/22/20	ET	Analysis of bankruptcy defenses in Sanford.	.30	118.50
6/22/20	ET	Email correspondence with H. Biehl and E. Paul regarding protocols.	.20	79.00
6/22/20	ET	Update and finalize protocol list.	.20	79.00
6/22/20	ET	Analysis of pending litigation issues.	.20	79.00
6/22/20	ET	Analysis of EMF's claims and defenses.	.30	118.50
6/22/20	ET	Email L. Ho regarding EMF claim fact-gathering.	.10	39.50
6/23/20	LAF	Conference call with J. Moe and K. Murphy re litigation status.	.30	178.50
6/23/20	LAF	Attend weekly labor call.	.50	297.50
6/23/20	LAF	Conference call with R. Adcock and H. Levy re personnel matters.	.50	297.50
6/23/20	ANR	Conference call with J. Moe and K. Murphy re litigation status.	.30	178.50
6/23/20	ANR	Attend weekly labor call.	.50	297.50
6/23/20	ANR	Conference call with R. Adcock and H. Levy re personnel matters.	.50	297.50
6/23/20	ET	Call with J. Moe regarding claim liability and disclosures.	.60	237.00
6/23/20	ET	Email correspondence with K. Murphy regarding Fayfel claim.	.10	39.50
6/23/20	ET	Email carrier regarding Fayfel claim.	.10	39.50
6/23/20	ET	Email correspondence with L. Vargas and L. Ho regarding employee information.	.20	79.00
6/23/20	ET	Analysis of pending issues regarding litigation.	.30	118.50
6/24/20	ETF	Update Seton RFI tracker with new requests from NUHW.	.10	37.50
6/24/20	LAF	Review of employment practices claims chart.	.30	178.50
6/24/20	ANR	Review of new employment practices claims.	.30	178.50
6/24/20	ET	Analysis of pending deadlines regarding litigation and subpoenas.	.20	79.00
6/25/20	ANR	Review of DFEH claim.	.20	119.00
6/25/20	ET	Correspondence with K. Chapman regarding carrier issues.	.20	79.00
6/25/20	ET	Review and analysis of master chart of pending CMC and mediations.	.40	158.00
6/25/20	ET	Strategize regarding litigation and carrier issues.	.50	197.50
6/25/20	ET	Review and analysis of Gordon medical record request.	.30	118.50
6/25/20	ET	Email correspondence with K. Chapman regarding Gordon subpoena.	.20	79.00
6/26/20	ANR	Review of insurance reporting matters.	.30	178.50
6/26/20	ANR	Review of email from P. Chadwick re witness reimbursement.	.10	59.50
6/26/20	ANR	Reply to email from P. Chadwick re witness reimbursement.	.10	59.50
6/26/20	ET	Email with H. Biehl and M. Kwok regarding Gordon subpoena.	.10	39.50
6/26/20	ET	Email with P. Ogg and E. Paul regarding reporting forms.	.20	79.00
6/29/20	LAF	Telephone call with Dentons re litigation status.	.50	297.50

BARTKO ZANKEL BUNZEL & MILLER

Client #: 2728
Matter #: 001

July 6, 2020
Invoice #: 126029

Date	Tkpr	Description	Hours	Amount
6/29/20	ANR	Conference call with J. Moe regarding litigation list and estimates.	.50	297.50
6/29/20	ANR	Additional call with J. Moe regarding litigation list and estimates.	.50	297.50
6/29/20	ANR	Email regarding retention of investigator.	.20	119.00
6/29/20	ET	Call with J. Moe regarding employment cases and necessary information for Plan documents.	1.60	632.00
6/29/20	ET	Analysis of CMS and necessary joinders.	.20	79.00
6/30/20	LAF	Attend weekly labor call with Dentons to discuss outstanding matters.	.50	297.50
6/30/20	ANR	Attend weekly labor call.	.50	297.50
6/30/20	ET	Email correspondence with E. Paul re carrier issues.	.10	39.50

TOTAL PROFESSIONAL SERVICES RENDERED

\$ 14,896.00

TIMEKEEPER SUMMARY

Name	Rate	Hours	Amount	N/C Hr	N/C \$
Chou, Chet	195.00	1.00	195.00	.00	.00
Ferguson, Elizabeth T	375.00	.10	37.50	.00	.00
Tilman, Elina	395.00	19.80	7,821.00	.00	.00
Fernandez, Louise Ann	595.00	2.60	1,547.00	.00	.00
Ruda, An Nguyen	595.00	8.90	5,295.50	.00	.00
TOTALS		32.40	\$ 14,896.00	.00	\$.00

TOTAL THIS INVOICE

\$ 14,896.00

*Balance is due within 30 days from the date of this invoice.
We reserve the right to charge interest at 10% per annum on amounts not paid within 30 days.*

BARTKO ZANKEL BUNZEL

BARTKO ZANKEL BUNZEL & MILLER
A Professional Law Corporation

One Embarcadero Center, Ste. 800
San Francisco, CA 94111
p: 415.956.1900
f: 415.956.1152
www.bzbm.com

August 5, 2020

Verity Health Systems
601 S. Figueroa St.
Suite 4050
Los Angeles, CA 90017

Invoice #: 126271
Client #: 2728
Matter #: 001
Billing Attorney: ANR

For professional services rendered and disbursements advanced through July 31, 2020:

RE: General Labor

DETAIL OF PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
7/01/20	ET	Review and analysis of exhibits and make necessary redactions for privacy and confidentiality for Omnibus Reply and Supplemental Brief in Support of Motions Under § 1113 regarding St. Francis Medical Center.	2.90	1,145.50
7/01/20	ET	Email correspondence with G. Medina and T. Morrison regarding exhibit edits for Reply.	.50	197.50
7/02/20	ET	Email correspondence with K. Chapman and N. Nguyen regarding subpoena costs and protocols.	.20	79.00
7/02/20	ET	Email correspondence with E. Paul and R. Adcock regarding carrier forms and reporting.	.20	79.00
7/06/20	ANR	Review of personnel matter.	.20	119.00
7/07/20	LAF	Attend weekly labor call.	.50	297.50
7/07/20	ANR	Attend weekly labor call.	.50	297.50
7/07/20	ANR	Review of investigator engagement letter.	.20	119.00
7/10/20	ANR	Conference call with Lockton re claims status.	.30	178.50
7/13/20	ET	Review status of subpoenas and labor code requests and update chart.	.30	118.50
7/13/20	ET	Review CT Corp emails regarding subpoenas and make necessary acknowledgements.	.10	39.50
7/14/20	ANR	Attend weekly labor call.	.80	476.00
7/14/20	ANR	Telephone call with R. Adcock re labor status.	.20	119.00
7/14/20	ET	Review status regarding Sanford case.	.10	39.50
7/14/20	ET	Review voicemail from carrier regarding insurance issues.	.10	39.50
7/14/20	ET	Review master chart regarding litigation.	.10	39.50
7/15/20	ET	Review hold list.	.10	39.50

Client #: 2728
Matter #: 001

August 5, 2020
Invoice #: 126271

Date	Tkpr	Description	Hours	Amount
7/15/20	ET	Email correspondence with M. Day, Hope, and E. Paul regarding hold list.	.20	79.00
7/17/20	ET	Review and analysis of Sonyson subpoena notice of intent.	.10	39.50
7/17/20	ET	Email correspondence with L. Ho, K. Chapman, and K. Murphy regarding Sonyson subpoena.	.40	158.00
7/17/20	ET	Email Compex regarding Sonyson subpoena.	.10	39.50
7/17/20	ET	Email N. Koffman regarding transaction dates and employment records.	.20	79.00
7/17/20	ET	Email correspondence with L. Ho and K. Chapman regarding Manaco subpoena.	.30	118.50
7/17/20	ET	Review and analysis of Manaco subpoenas.	.20	79.00
7/20/20	ET	Analysis of hold issues.	.10	39.50
7/20/20	ET	Email correspondence with W. Castillo and L. Chine regarding hold issues.	.30	118.50
7/21/20	ET	Email correspondence with opposing counsel regarding Thompson claim.	.10	39.50
7/21/20	ET	Email correspondence with K. Murphy regarding Sanford claim.	.10	39.50
7/21/20	ET	Call with J. Moe regarding lawsuits.	.40	158.00
7/22/20	ET	Email correspondence with M. Day and B. Paulsen regarding hold issues.	.20	79.00
7/22/20	ET	Review various carrier coverage letters.	.10	39.50
7/23/20	ANR	Conference call with Dentons, H. Levy-Biehl and client re pending grievances, union/labor status and other personnel matters.	1.10	654.50
7/23/20	ANR	Conference call with H. Levy-Biehl and L. Fernandez re labor issues.	.50	297.50
7/23/20	ET	Analysis of class action issues.	.20	79.00
7/23/20	ET	Update master tracking chart of subpoenas.	.10	39.50
7/24/20	ET	Analysis of class actions.	.10	39.50
7/24/20	ET	Email correspondence with J. Moe regarding class actions.	.10	39.50
7/27/20	ET	Review chart and pleadings regarding class actions and bk issues.	.30	118.50
7/27/20	ET	Email J. Moe regarding class actions.	.20	79.00
7/28/20	ANR	Weekly labor call.	.40	238.00
7/28/20	ANR	Review of email from P. Chadwick re releases.	.10	59.50
7/28/20	ANR	Review of release templates.	.50	297.50
7/28/20	ANR	Review of employee complaint.	.50	297.50
7/28/20	ANR	Telephone call with investigator.	.30	178.50
7/28/20	ANR	Telephone call with H. Levy Biehl re various employee issues.	.40	238.00
7/28/20	ET	Draft reduction in force agreements over 40 and under 40.	2.20	869.00
7/28/20	ET	Review code provisions for RIF agreement.	.30	118.50
7/28/20	ET	Analysis of PTO and KERP/KEIP issues for severance agreement.	.40	158.00
7/28/20	ET	Call with J. Moe regarding PTO issues.	.20	79.00
7/28/20	ET	Email to P. Chadwick regarding agreement issues.	.40	158.00
7/28/20	ET	Draft IC agreement.	.50	197.50
7/28/20	ET	Review KERP and KEIP agreements.	.30	118.50

Client #: 2728
Matter #: 001

August 5, 2020
Invoice #: 126271

Date	Tkpr	Description	Hours	Amount
7/29/20	LAF	Weekly labor call.	.40	238.00
7/29/20	ANR	Telephone call with K. Chapman re litigation status.	.30	178.50
7/29/20	ANR	Review of investigation.	.20	119.00
7/29/20	ANR	Review of email from S. Alberts re open collective bargaining agreements.	.10	59.50
7/29/20	ANR	Review of email from H. Levy-Biehl re compliance.	.10	59.50
7/29/20	ET	Email correspondence with M. Day regarding transitional issues.	.20	79.00
7/29/20	ET	Respond to H. Biehl regarding pending issues.	.10	39.50
7/29/20	ET	Review carrier and policy information.	.20	79.00
7/29/20	ET	Analysis of email retention issues.	.20	79.00
7/30/20	ANR	Conference call with client, H. Levy-Biel and T. Moyron re employment matter.	.30	178.50
7/30/20	ANR	Review of employee release.	.50	297.50
7/30/20	ANR	Review investigation status.	.20	119.00
7/30/20	ET	Draft RIF agreement for EDF.	.60	237.00
7/30/20	ET	Review internal emails related to RIF agreement for specific employee.	.10	39.50
7/30/20	ET	Review CT correspondence and make necessary subpoena acknowledgement.	.10	39.50
7/30/20	ET	Respond to H. Biehl's email re litigation call.	.10	39.50
7/30/20	ET	Updated master subpoena chart.	.10	39.50
7/30/20	ET	Review documents regarding EFD.	.10	39.50
7/30/20	ET	Email correspondence with EDF regarding agreement.	.10	39.50
7/30/20	ET	Draft release agreement for EDF.	.70	276.50
7/30/20	ET	Email P. Chadwick regarding EDF agreement.	.10	39.50
7/30/20	ET	Analysis of terms for agreement re EDF.	.10	39.50
7/31/20	LAF	Telephone call re litigation matters.	.60	357.00
7/31/20	ANR	Telephone call with H. Levy-Biehl and P. Chadwick re separation logistics.	.50	297.50
7/31/20	ANR	Conference call with client re ongoing litigation update.	.60	357.00
7/31/20	ET	Review master chart regarding litigation and update with case progress.	1.10	434.50
7/31/20	ET	Call with E. Paul and H. Biehl and J. Moe re transition.	.50	197.50

TOTAL PROFESSIONAL SERVICES RENDERED

\$ 12,883.00

TIMEKEEPER SUMMARY

Name	Rate	Hours	Amount	N/C Hr	N/C \$
Tilman, Elina	395.00	17.10	6,754.50	.00	.00
Fernandez, Louise Ann	595.00	1.50	892.50	.00	.00
Ruda, An Nguyen	595.00	8.80	5,236.00	.00	.00
TOTALS		27.40	\$ 12,883.00	.00	\$.00

BARTKO ZANKEL BUNZEL & MILLER

Client #: 2728
Matter #: 001

August 5, 2020
Invoice #: 126271

TOTAL THIS INVOICE

\$ 12,883.00

*Balance is due within 30 days from the date of this invoice.
We reserve the right to charge interest at 10% per annum on amounts not paid within 30 days.*

BARTKO ZANKEL BUNZEL

BARTKO ZANKEL BUNZEL & MILLER
A Professional Law Corporation

One Embarcadero Center, Ste. 800
San Francisco, CA 94111
p: 415.956.1900
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www.bzbm.com

September 8, 2020

Verity Health Systems
601 S. Figueroa St.
Suite 4050
Los Angeles, CA 90017

Invoice #: 126663
Client #: 2728
Matter #: 001
Billing Attorney: ANR

For professional services rendered and disbursements advanced through September 4, 2020:

RE: General Labor

DETAIL OF PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
8/03/20	ANR	Conference call with internal team re releases and employee transition document.	.50	297.50
8/03/20	ET	Analysis of needed agreements for transaction close.	.10	39.50
8/04/20	ANR	Weekly labor call.	.20	119.00
8/04/20	ANR	Review of investigation status.	.20	119.00
8/05/20	ANR	Review of Department of Labor Standard Enforcement Response.	.40	238.00
8/05/20	ET	Review status of litigation and update chart.	.10	39.50
8/05/20	ET	Review client documents for Sanford case.	.20	79.00
8/06/20	LAF	Research and review issues regarding direct deposit.	1.00	595.00
8/06/20	LAF	Review memo regarding direct deposit issues.	.50	297.50
8/06/20	ET	Email correspondence with P. Chadwick regarding agreements.	.20	79.00
8/06/20	ET	Analysis of issues regarding agreements.	.10	39.50
8/06/20	ET	Email correspondence with K. Chapman regarding policy issues.	.30	118.50
8/06/20	ET	Draft summary regarding final pay issues.	1.30	513.50
8/06/20	ET	Research regarding final pay issues.	1.80	711.00
8/06/20	ET	Analysis regarding final pay issues.	.40	158.00
8/07/20	ET	Strategize regarding final pay issues.	.40	158.00
8/07/20	ET	Draft summary regarding final pay.	.80	316.00
8/07/20	ET	Review DLSE material regarding final pay.	.40	158.00
8/07/20	ET	Email L. Ho regarding Burmedez garnishment.	.10	39.50
8/07/20	ET	Review Burmedez notice.	.10	39.50
8/07/20	ET	Research regarding wages and payments methods.	.70	276.50
8/07/20	ET	Analysis of pending issues regarding payments	.20	79.00

Client #: 2728
Matter #: 001September 8, 2020
Invoice #: 126663

Date	Tkpr	Description	Hours	Amount
8/08/20	ANR	Review of closing and final pay issue.	.50	297.50
8/10/20	ANR	Telephone call with S. Sharrer re transaction payroll and final paychecks.	.40	238.00
8/10/20	ANR	Review of independent contractor agreements.	1.10	654.50
8/10/20	ET	Email correspondence with L. Ho regarding wage garnishment issues.	.10	39.50
8/10/20	ET	Review IC agreement.	.10	39.50
8/10/20	ET	Make revisions to IC agreement templates.	.90	355.50
8/10/20	ET	Draft payment letters.	.20	79.00
8/10/20	ET	Analysis of pending issues regarding IC agreements.	.50	197.50
8/10/20	ET	Strategize regarding Thomson litigation.	.30	118.50
8/10/20	ET	Email correspondence with E. Paul regarding protocol issues.	.20	79.00
8/10/20	ET	Analysis of settlement agreement and case closure issues.	.20	79.00
8/10/20	ET	Email D. Tran regarding case closures and settlement agreements.	.10	39.50
8/11/20	ANR	Telephone call with S. Sharrer re transition labor matters.	.60	357.00
8/11/20	ANR	Additional call with S. Sharrer re final paychecks.	.50	297.50
8/11/20	ANR	Call with S. Sharrer re separation agreements.	.50	297.50
8/11/20	ANR	Review of independent contractor template.	1.30	773.50
8/11/20	ANR	Review of employee list.	.30	178.50
8/11/20	ANR	Review of investigation status.	.20	119.00
8/11/20	ET	Review current guidance re separation paperwork.	.30	118.50
8/11/20	ET	Email P. Chadwick re separation pamphlets.	.10	39.50
8/11/20	ET	Draft separation agreements over and under 40.	2.20	869.00
8/11/20	ET	Make revisions to IC agreements.	.50	197.50
8/11/20	ET	Email S. Sharrer and P. Chadwick regarding agreements.	.40	158.00
8/11/20	ET	Draft independent contractor separation agreements.	.70	276.50
8/11/20	ET	Review ADEA requirements.	.40	158.00
8/11/20	ET	Analysis of issues regarding RIF agreements.	.50	197.50
8/11/20	ET	Analysis of master litigation chart.	.40	158.00
8/11/20	ET	Email correspondence with L. Ho re EKJ.	.10	39.50
8/12/20	ANR	Telephone call with S. Sharrer re transition matters.	.50	297.50
8/13/20	ANR	Telephone call with S. Sharrer re final payroll.	.80	476.00
8/13/20	ANR	Telephone call with S. Marques re SFMC payroll issues.	.30	178.50
8/13/20	ANR	Additional telephone call with S. Sharrer re final payroll issues.	.30	178.50
8/13/20	ANR	Review of final paycheck issues.	.60	357.00
8/13/20	ANR	Review of status update re employee investigation.	.30	178.50
8/13/20	ET	Email correspondence with M. Day and N. Nasu regarding pending holds.	.20	79.00
8/14/20	ANR	Conference call with S. Sharrer re employee transition.	.40	238.00
8/14/20	ANR	Telephone call with P. Chadwick re payroll issues.	.20	119.00

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Date	Tkpr	Description	Hours	Amount
8/14/20	ANR	Compile outstanding pay issues.	1.20	714.00
8/17/20	ANR	Telephone call with R. Adcock and P. Chadwick re transition issues.	.30	178.50
8/17/20	ANR	Review of email from T. Moyron re information request.	.10	59.50
8/17/20	ANR	Status update re final pay matter.	.40	238.00
8/17/20	ET	Analysis of litigation fact-gathering issues.	.20	79.00
8/18/20	ANR	Email to P. Chadwick re severance.	.10	59.50
8/18/20	ANR	Review email from P. Chadwick re severance.	.10	59.50
8/18/20	ANR	Review of email from S. Marques re COBRA notice.	.10	59.50
8/18/20	ANR	Review of email from H. Levy-Biehl re employee files.	.10	59.50
8/18/20	ANR	Reply to email from H. Levy-Biehl re employee files.	.10	59.50
8/18/20	ANR	Review of email from St. Francis Human Resources re employee files.	.10	59.50
8/18/20	ANR	Reply to email from SFMC human resources re employee file.	.10	59.50
8/18/20	ANR	Review of email from H. Levy-Biehl re regulatory inquiry.	.10	59.50
8/18/20	ANR	Reply to email from H. Levy-Biehl re regulatory inquiry.	.10	59.50
8/18/20	ANR	Review of email from J. Richlin re transition issues.	.10	59.50
8/18/20	ANR	Email to P. Chadwick re severance.	.10	59.50
8/18/20	ANR	Review of COBRA notice list.	.10	59.50
8/18/20	ANR	Email to E. Paul and H. Levy-Biehl re litigation process.	.10	59.50
8/19/20	ANR	Review of investigator status update.	.20	119.00
8/19/20	ET	Call with J. Moe regarding pending litigation issues.	.10	39.50
8/20/20	ANR	Review of email from P. Chadwick re payroll fix.	.10	59.50
8/20/20	ANR	Review of email from P. Chadwick re union severance.	.10	59.50
8/20/20	ANR	Review of 1113 agreements re severance and other payouts.	.50	297.50
8/20/20	ANR	Review of email from J. Lagman re payments.	.10	59.50
8/20/20	ANR	Review of KEIP/KERP severance agreement.	.40	238.00
8/20/20	ET	Call with S. Sharrer regarding employment agreements.	.10	39.50
8/20/20	ET	Review employment agreements.	.10	39.50
8/20/20	ET	Email P. Chadwick regarding pending issues with employment agreements.	.30	118.50
8/21/20	ANR	Review of pending labor code requests.	.30	178.50
8/21/20	ANR	Review of welfare fraud investigation request.	.10	59.50
8/21/20	ANR	Review of pending subpoena requests.	.60	357.00
8/21/20	ANR	Review of PTO payouts.	.30	178.50
8/21/20	ANR	Review of email from E. Paul re benefits vendor.	.10	59.50
8/21/20	ANR	Reply to email from E. Paul re benefits vendor.	.10	59.50
8/21/20	ANR	Preparation of list for consideration of ongoing employment matters for liquidating trustee.	.90	535.50
8/21/20	ANR	Email to AHMC re step progression for nurse.	.10	59.50

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Date	Tkpr	Description	Hours	Amount
8/21/20	ET	Update litigation chart.	.10	39.50
8/24/20	ANR	Review of email from P. Chadwick re severance.	.20	119.00
8/24/20	ET	Review internal emails regarding polices and retention.	.10	39.50
8/24/20	ET	Review policy correspondence and pleadings regarding Morataya matter.	.20	79.00
8/24/20	ET	Review carrier correspondence regarding Williams and analysis of next steps.	.10	39.50
8/24/20	ET	Review client documents regarding Williams matter.	.10	39.50
8/25/20	ANR	Review of email from K. Vitale re workers compensation request.	.10	59.50
8/25/20	ANR	Review of email from K. Chapman re workers compensation request; review of payroll errors.	.10	59.50
8/25/20	ANR	Review of email from ombudsman.	.10	59.50
8/25/20	ANR	Review of 1113 settlements re payments.	.30	178.50
8/25/20	ANR	Review of investigation status for employee.	.20	119.00
8/25/20	ET	Review carrier responses for Williams and Mortaya.	.10	39.50
8/25/20	ET	Analysis of process issues with transactions.	.50	197.50
8/25/20	ET	Draft chart information for carrier submissions on employment matters.	.20	79.00
8/25/20	ET	Email E. Paul and H. Biehl regarding process issues and deadlines.	.20	79.00
8/26/20	ANR	Conference call re file transition and various protocols with H. Biehl, P. Chadwick and S. Sharrer.	1.00	595.00
8/26/20	ANR	Review of labor code requests, subpoenas and other custodian of record issues.	.60	357.00
8/26/20	ANR	Review of 1113 settlement issues.	.20	119.00
8/27/20	ANR	Conference call re transition matters with S. Sharrer.	.60	357.00
8/27/20	ANR	Conference call re transition and file requests with S. Sharrer, Hope Levy-Biehl and with facility.	1.00	595.00
8/27/20	ANR	Review of email from P. Chadwick re independent contractor agreements.	.10	59.50
8/27/20	ANR	Email to NUHW re personnel reclassification.	.10	59.50
8/27/20	ANR	Reply to email from Seton ombudsman.	.20	119.00
8/27/20	ANR	Analysis re O'Connor grievances and priority payments re collective bargaining agreement alleged breaches.	1.00	595.00
8/27/20	ET	Review and update master chart regarding litigation and carrier submissions.	.30	118.50
8/27/20	ET	Review P. Chadwick's email regarding agreements and analysis regarding agreement issues.	.20	79.00
8/27/20	ET	Analysis of litigation searches.	.20	79.00
8/27/20	ET	Email M. Day list of litigation searches for pending cases.	.50	197.50
8/28/20	ANR	Review of email from S. Marques re UNAC pay errors.	.30	178.50
8/28/20	ANR	Telephone call with S. Marques re UNAC pay errors.	.30	178.50
8/28/20	ANR	Telephone call with M. Carbuccia re UNAC pay errors.	.20	119.00
8/28/20	ANR	Telephone call with P. Chadwick, S. Sharrer and H. Biehl-Levy re transition matters.	.90	535.50

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Date	Tkpr	Description	Hours	Amount
8/28/20	ANR	Review of email from P. Chadwick re employee records transition.	.10	59.50
8/28/20	ANR	Review of transition call recap.	.20	119.00
8/28/20	ANR	Telephone call with S. Sharrer re retirement transition.	.20	119.00
8/28/20	ET	Review agreements and identify questions for internal conference call.	.20	79.00
8/28/20	ET	Conference call with P. Chadwick, S. Sharrer, and H. Biehel re various employment agreements and releases.	.90	355.50
8/28/20	ET	Draft recap email re employment transitional issues.	.20	79.00
8/28/20	ET	Email correspondence with M. Day re data searches.	.10	39.50
8/28/20	ET	Email correspondence with H. Biehel re litigation matters and archived material.	.20	79.00
8/31/20	GT	Preparation of each separate independent contractor agreement.	3.50	682.50
8/31/20	ANR	Review of email from P. Chadwick re form of contract re independent contractor agreements.	.10	59.50
8/31/20	ANR	Telephone call with S. Sharrer re independent contractor agreements.	.30	178.50
8/31/20	ANR	Review of independent contractor template.	.80	476.00
8/31/20	ANR	Review of KEIP/KERP severance templates.	.80	476.00
8/31/20	ANR	Review of email from S. Sharrer re independent contractor agreements.	.10	59.50
8/31/20	ANR	Review of email from H. Levy-Biehl re personnel files.	.10	59.50
8/31/20	ANR	Review of UNAC pay issues email.	.30	178.50
8/31/20	ANR	Review of email from T. Myron re KEIP/KERP payment.	.10	59.50
8/31/20	ANR	Reply to email from T. Moyron re KEIP/KERP payments.	.10	59.50
8/31/20	ANR	Review of email from M. Pfeiffer re former employee files.	.10	59.50
8/31/20	ET	Email P. Chadwick regarding agreement status.	.10	39.50
8/31/20	ET	Draft summary of outstanding information to S. Sharrer re employment transitional agreements.	.20	79.00
8/31/20	ET	Analysis of process issues regarding litigation.	.30	118.50
8/31/20	ET	Review emails from P. Chadwick and S. Sharrer re transitional agreements.	.20	79.00
8/31/20	ET	Review client documents re transition issues.	.30	118.50
8/31/20	ET	Make revisions and finalize IC agreements.	.30	118.50
8/31/20	ET	Analysis of IC issues, KERP and KEIP agreements.	.50	197.50
8/31/20	ET	Email S. Sharrer re IC agreements, severance agreements, and KEIP/KERP agreement information.	.60	237.00
8/31/20	ET	Call with S. Sharrer re IC agreement and KERP/KEIP issues.	.20	79.00
8/31/20	ET	Call and email N. Koffman re KERP Plan.	.10	39.50
8/31/20	ET	Review and analysis of KERP Plan.	.50	197.50
8/31/20	ET	Review bankruptcy court docket re KERP and KEIP filings.	.20	79.00
8/31/20	ET	Call with J. Moe re Plan Effective date issues.	.10	39.50
8/31/20	ET	Review prior KERP agreements.	.40	158.00
8/31/20	ET	Review completed IC agreements for 60 plus employees and make necessary edits.	1.60	632.00

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Date	Tkpr	Description	Hours	Amount
8/31/20	ET	Draft KERP final payment agreement template.	1.80	711.00
8/31/20	ET	Further analysis issues with KERP agreement.	.20	79.00
8/31/20	ET	Review and analysis of KEIP Plan.	.30	118.50
8/31/20	ET	Draft KEIP final payment agreement template.	1.20	474.00
8/31/20	ET	Analysis of pending issues re employment separation agreements.	.20	79.00
8/31/20	ET	Finalize severance agreements RIF under and over 40 years old.	.40	158.00
9/01/20	ETF	Review multiple emails re severance agreements.	.20	75.00
9/01/20	ETF	Exchange emails with client re severance agreements.	.10	37.50
9/01/20	ETF	Further follow up re protocol on severance agreements.	.10	37.50
9/01/20	ANR	Telephone call with S. Sharrer re transition items.	.40	238.00
9/01/20	ANR	Additional telephone call with S. Sharrer re KEIP/KERP releases.	.30	178.50
9/01/20	ANR	Telephone call with Dentons re grievance settlements.	.20	119.00
9/01/20	ANR	Review of status re KEIP/KERP releases.	.80	476.00
9/01/20	ANR	Analysis of KERP release parameters.	.70	416.50
9/01/20	ANR	Email to T. Moyron re carrier settlement document.	.10	59.50
9/01/20	ET	Multiple email correspondence with S. Sharrer regarding KERP/KEIP agreements, independent contractor agreement issues.	.40	158.00
9/01/20	ET	Review independent contractor agreements corrections.	.20	79.00
9/01/20	ET	Email P. Chadwick update regarding independent contractor agreements.	.10	39.50
9/01/20	ET	Call with S. Sharrer regarding employment agreements.	.20	79.00
9/01/20	ET	Analysis of severance issues and RIF agreements.	.30	118.50
9/01/20	ET	Resolve outstanding issues with agreement signatures.	.10	39.50
9/02/20	ETF	Review and respond to emails re severance agreements.	.10	37.50
9/02/20	ETF	Revise severance agreements based on input from client.	.20	75.00
9/02/20	ETF	Begin review re authority for severance agreement notifications re eligibility factors for participants.	.30	112.50
9/02/20	ANR	Telephone call with S. Sharrer re various transition issues.	.40	238.00
9/02/20	ANR	Review of release distribution process.	.40	238.00
9/02/20	ANR	Follow up with payroll re settlement checks.	.20	119.00
9/02/20	ET	Multiple email correspondence with S. Sharrer regarding severance agreements, KERP/KEIP agreement, and IC agreements.	.70	276.50
9/02/20	ET	Review and analysis of Exhibit A.	.20	79.00
9/02/20	ET	Review independent contractor agreement.	.10	39.50
9/02/20	ET	Email correspondence with K. Chapman regarding carrier responses.	.10	39.50
9/02/20	ET	Email correspondence with L. Ho regarding employee information for agreements.	.20	79.00
9/02/20	ET	Review outstanding issues with separation and KERP/KEIP agreements and severance agreements.	.50	197.50
9/02/20	ET	Draft KERP agreement for P. 2.	.30	118.50

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Date	Tkpr	Description	Hours	Amount
9/02/20	ET	Finalize templates for KERP and KEIP release agreements.	1.00	395.00
9/02/20	ET	Calls with S. Sharrer regarding agreement issues.	.60	237.00
9/02/20	ET	Draft summary regarding payments to S. Sharrer.	.30	118.50
9/02/20	ET	Review prior KERP/KEIP agreements.	.20	79.00
9/02/20	ET	Review KERP and KEIP Plans.	.10	39.50
9/02/20	ET	Draft KERP/KEIP agreements for 15 employees.	2.90	1,145.50
9/02/20	ET	Analysis of Exhibit A issues for severance agreements.	.40	158.00
9/03/20	ETF	Phone meeting re severance agreements with client.	.40	150.00
9/03/20	ETF	Review authority re content of waiver notifications with respect to nuances regarding eligibility and selection criteria.	2.50	937.50
9/03/20	ETF	Draft waiver notification for severance agreements based on employee eligibility and selection criteria.	1.20	450.00
9/03/20	ETF	Review authority re age entitlement to waivers based on time of execution and time of termination.	1.20	450.00
9/03/20	ETF	Draft summary of authority re waiver entitlement and content for eligibility and participation in severance agreements.	1.30	487.50
9/03/20	ETF	Further review and analysis of language for severance agreement waivers.	.70	262.50
9/03/20	ANR	Telephone call with Verity team re Exhibit A to Older Worker Protection Act releases and data needed.	.90	535.50
9/03/20	ANR	Review of various release issues.	.50	297.50
9/03/20	ANR	Review of email from S. Sharrer re Local 39 settlement.	.10	59.50
9/03/20	ANR	Review of email from S. Sharrer re grievance settlement.	.10	59.50
9/03/20	ANR	Review of email from T. Moyron re case settlement agreement.	.10	59.50
9/03/20	ANR	Review of email from R. Martinez re COBRA.	.10	59.50
9/03/20	ANR	Review and reply to additional email from S. Sharrer re grievance settlement.	.10	59.50
9/03/20	ANR	Preparation of email to T. Knets.	.10	59.50
9/03/20	ET	Call with S. Sharrer and J. Si regarding agreement data.	.40	158.00
9/03/20	ET	Email correspondence with L. Ho regarding employee data.	.10	39.50
9/03/20	ET	Email J. Si re chart with employee data.	.10	39.50
9/03/20	ET	Make additions to master chart regarding IC data.	.20	79.00
9/03/20	ET	Email correspondence with S. Sharrer regarding rate issues.	.10	39.50
9/03/20	ET	Analysis of exhibit A and ADEA issues.	.70	276.50
9/03/20	ET	Make revisions and updates to KERP/KEIP employee agreements.	.70	276.50
9/03/20	ET	Email with S. Sharrer regarding KERP/KEIP agreements.	.10	39.50
9/03/20	ET	Call with S. Sharrer regarding KERP/KEIP revisions.	.10	39.50
9/03/20	ET	Research and analysis regarding OWBPA requirements.	.60	237.00
9/03/20	ET	Review internal client correspondence regarding document protocols.	.10	39.50
9/04/20	ETF	Review severance agreement issues.	.30	112.50

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Date	Tkpr	Description	Hours	Amount
9/04/20	ETF	Revise severance agreements.	1.10	412.50
9/04/20	ANR	Review of Exhibit A draft to severance agreements.	.50	297.50
9/04/20	ANR	Review and reply to email from B. Harland re COBRA.	.10	59.50
9/04/20	ANR	Review of St. Francis employee census as of close date.	.20	119.00
9/04/20	ANR	Review of email from Seton employee re Extended Sick Time cash out.	.20	119.00
9/04/20	ANR	Review of email from S. Sharrer re COBRA notice.	.10	59.50
9/04/20	ANR	Emails with Payroll re final pay processing.	.10	59.50
9/04/20	ANR	Review of severance eligibility issues.	.50	297.50
9/04/20	ET	Analysis client documents re Exhibit A and applicable filters.	.50	197.50
9/04/20	ET	Review and analysis of severance exclusion criteria.	.20	79.00
9/04/20	ET	Email correspondence with J. Si re Exhibit A.	.20	79.00
9/04/20	ET	Call with S. Sharrer re pending labor issues.	.10	39.50
9/04/20	ET	Emails to S. Sharrer re pending labor issues.	.10	39.50
9/04/20	ET	Analysis of eligibility criteria and KERP Plan.	.40	158.00
9/04/20	ET	Analysis of OWCPB requirements.	.90	355.50
9/04/20	ET	Analysis of Exhibit A language for severance agreements.	.40	158.00
9/04/20	ET	Email correspondence with K. Chapman re Morataya claim.	.20	79.00
9/04/20	ET	Call with J. Moe re Morataya case.	.20	79.00
9/04/20	ET	Email correspondence with S. Sharrer and P. Chadwick re agreements.	.20	79.00
9/04/20	ET	Review EBB IC agreement.	.10	39.50

TOTAL PROFESSIONAL SERVICES RENDERED

\$ 44,425.50

TIMEKEEPER SUMMARY

Name	Rate	Hours	Amount	N/C Hr	N/C \$
Torres, Gloria	195.00	3.50	682.50	.00	.00
Ferguson, Elizabeth T	375.00	9.70	3,637.50	.00	.00
Tilman, Elina	395.00	46.10	18,209.50	.00	.00
Fernandez, Louise Ann	595.00	1.50	892.50	.00	.00
Ruda, An Nguyen	595.00	35.30	21,003.50	.00	.00
TOTALS		96.10	\$ 44,425.50	.00	\$.00

TOTAL THIS INVOICE

\$ 44,425.50

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*Balance is due within 30 days from the date of this invoice.
We reserve the right to charge interest at 10% per annum on amounts not paid within 30 days.*

EXHIBIT AD

In Account With

BARTKO ZANKEL BUNZEL

BARTKO ZANKEL BUNZEL & MILLER
A Professional Law Corporation

One Embarcadero Center, Ste. 800
San Francisco, CA 94111
p: 415.956.1900
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www.bzbm.com

June 3, 2020

Verity Health Systems
601 S. Figueroa St.
Suite 4050
Los Angeles, CA 90017

Invoice #: 125814
Client #: 2728
Matter #: 002
Billing Attorney: ANR

For professional services rendered and disbursements advanced through May 31, 2020:

RE: Mesha Sanford

DETAIL OF PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
5/04/20	MLR	Revise document request, general and employment form interrogatories discovery propounded to plaintiff.	1.20	474.00
5/04/20	MLR	Revise CMC statement and attachment.	.30	118.50
5/26/20	ANR	Review of complaint.	.50	297.50
5/27/20	LAF	Review client documents.	1.00	595.00
5/27/20	LAF	Review and analyze complaint.	.50	297.50

TOTAL PROFESSIONAL SERVICES RENDERED \$ 1,782.50

TIMEKEEPER SUMMARY

Name	Rate	Hours	Amount	N/C Hr	N/C \$
Raymond, Marcia L.	395.00	1.50	592.50	.00	.00
Fernandez, Louise Ann	595.00	1.50	892.50	.00	.00
Ruda, An Nguyen	595.00	.50	297.50	.00	.00
TOTALS		3.50	\$ 1,782.50	.00	\$.00

TOTAL THIS INVOICE \$ 1,782.50

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In Account With

BARTKO ZANKEL BUNZEL

BARTKO ZANKEL BUNZEL & MILLER

A Professional Law Corporation

One Embarcadero Center, Ste. 800

San Francisco, CA 94111

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July 6, 2020

Verity Health Systems
601 S. Figueroa St.
Suite 4050
Los Angeles, CA 90017

Invoice #: 126030
Client #: 2728
Matter #: 002
Billing Attorney: ANR

For professional services rendered and disbursements advanced through June 30, 2020:

RE: Mesha Sanford

DETAIL OF PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
6/02/20	LAF	Review issues re individual defendant.	.50	297.50
6/02/20	LAF	Telephone call w/ Steve Sharrer re individual defendant.	.20	119.00
6/03/20	MLR	Research presiding judge biography	.40	158.00
6/03/20	MLR	Prepare memorandum regarding judge biography	.40	158.00
6/03/20	MLR	Prepare VHS's responsive pleading	1.00	395.00
6/03/20	MLR	Prepare MS answer	.80	316.00
6/15/20	LAF	Respond to email re individual defendant.	.30	178.50
6/17/20	LAF	Review complaint and issues re individual defendants.	.40	238.00
6/18/20	LAF	Telephone call with individual defendant about case and facts.	1.00	595.00
6/19/20	KLD	Analysis regarding Answer and potential claims.	.50	197.50
6/22/20	KLD	Calls with J. Moe regarding case strategy.	.50	197.50
6/22/20	KLD	Work on drafting the Answer.	.90	355.50
6/22/20	KLD	Send J. Moe summary relating to pertinent case orders and status.	.30	118.50
6/23/20	KLD	Analyze requirements and procedures for remote deposition.	.30	118.50
6/24/20	KLD	Draft deposition notice for remote Sanford deposition.	.80	316.00
6/25/20	KLD	Communicate with plaintiffs' counsel regarding case issues and deposition scheduling.	.30	118.50
6/29/20	KLD	Draft engagement letter and conflict waiver form for M.S. and prepare related documents.	.60	237.00

TOTAL PROFESSIONAL SERVICES RENDERED

\$ 4,114.00

BARTKO ZANKEL BUNZEL & MILLER

Client #: 2728
Matter #: 002

July 6, 2020
Invoice #: 126030

TIMEKEEPER SUMMARY

Name	Rate	Hours	Amount	N/C Hr	N/C \$
Duffy, Kerry L.	395.00	4.20	1,659.00	.00	.00
Raymond, Marcia L.	395.00	2.60	1,027.00	.00	.00
Fernandez, Louise Ann	595.00	2.40	1,428.00	.00	.00
TOTALS		9.20	\$ 4,114.00	.00	\$.00

TOTAL THIS INVOICE

\$ 4,114.00

*Balance is due within 30 days from the date of this invoice.
We reserve the right to charge interest at 10% per annum on amounts not paid within 30 days.*

BARTKO ZANKEL BUNZEL

BARTKO ZANKEL BUNZEL & MILLER

A Professional Law Corporation

One Embarcadero Center, Ste. 800

San Francisco, CA 94111

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www.bzbm.com

August 5, 2020

Verity Health Systems
601 S. Figueroa St.
Suite 4050
Los Angeles, CA 90017

Invoice #: 126272
Client #: 2728
Matter #: 002
Billing Attorney: ANR

For professional services rendered and disbursements advanced through July 31, 2020:

RE: Mesha Sanford

DETAIL OF PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
7/01/20	KLD	Strategize concerning case and service issues.	.30	118.50
7/10/20	KLD	Draft CMC statement.	.60	237.00
7/10/20	KLD	Meet and confer with plaintiff's counsel regarding CMC and case issues.	.30	118.50
7/10/20	KLD	Contact J. Moe regarding CMC.	.10	39.50
7/13/20	KLD	Finalize and file CMS statement.	.20	79.00
7/13/20	LAF	Review and revise CMC statement.	.30	178.50
7/14/20	KLD	Correspondence from plaintiff's counsel regarding dismissal of 10th cause of action.	.10	39.50
7/14/20	LAF	Emails re representation of individuals.	.40	238.00
7/15/20	LAF	Follow up emails regarding individuals.	.20	119.00
7/21/20	KLD	Call with J. Moe to strategize regarding case.	.20	79.00
7/21/20	KLD	Coordinate with plaintiff's counsel regarding service on Schweitzer.	.20	79.00
7/21/20	LAF	Review and respond to emails re individual defendant from Dentons.	.20	119.00
7/22/20	KLD	Coordinate with K. Murphy regarding upcoming CMC.	.20	79.00
7/28/20	KLD	Strategize with L. Fernandez regarding case developments.	.40	158.00
7/29/20	KLD	Analysis of case file and claims.	.90	355.50

TOTAL PROFESSIONAL SERVICES RENDERED

\$ 2,037.00

Client #: 2728
Matter #: 002

August 5, 2020
Invoice #: 126272

TIMEKEEPER SUMMARY

Name	Rate	Hours	Amount	N/C Hr	N/C \$
Duffy, Kerry L.	395.00	3.50	1,382.50	.00	.00
Fernandez, Louise Ann	595.00	1.10	654.50	.00	.00
TOTALS		4.60	\$ 2,037.00	.00	\$.00

DISBURSEMENTS ADVANCED

Date	Description	Amount
	ACC Court Service & Filing Fee	544.90
	TOTAL DISBURSEMENTS ADVANCED	\$ 544.90
	TOTAL THIS INVOICE	\$ 2,581.90

*Balance is due within 30 days from the date of this invoice.
We reserve the right to charge interest at 10% per annum on amounts not paid within 30 days.*

BARTKO ZANKEL BUNZEL

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September 8, 2020

Verity Health Systems
 601 S. Figueroa St.
 Suite 4050
 Los Angeles, CA 90017

Invoice #: 126664
 Client #: 2728
 Matter #: 002
 Billing Attorney: ANR

For professional services rendered and disbursements advanced through September 4, 2020:

RE: Mesha Sanford

DETAIL OF PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
8/03/20	KLD	Draft request for production of documents to plaintiff Sanford.	2.50	987.50
8/03/20	KLD	Prepare Form Interrogatories - Employment to Plaintiff Sanford.	.50	197.50
8/03/20	LAF	Emails to opposing counsel regarding depositions and discovery.	.30	178.50
8/03/20	LAF	Strategy session with K Duffy regarding discovery and approach.	.30	178.50
8/03/20	LAF	Review of investigation report.	.40	238.00
8/04/20	KLD	Prepare Form Interrogatories - General to plaintiff Sanford.	.60	237.00
8/04/20	KLD	Contact plaintiff's counsel regarding discovery and deposition scheduling.	.20	79.00
8/04/20	KLD	Develop search term criteria for ediscovery collection.	.60	237.00
8/05/20	KLD	Work on collection of PST files for discovery.	.70	276.50
8/25/20	KLD	Prepare Answer for individual defendant Michael Schweitzer.	.50	197.50
8/26/20	KLD	Factual analysis of case files.	1.60	632.00
8/27/20	KLD	Research issues impacting causes of action for exposure analysis.	1.40	553.00
8/27/20	GT	Review court docket and update deadline tracker.	.10	19.50
8/28/20	KLD	Work on drafting exposure analysis.	2.10	829.50
8/31/20	KLD	Continued work on exposure analysis.	1.80	711.00
9/01/20	KLD	Research relating to case defenses.	1.50	592.50
9/01/20	KLD	Draft analysis of claims and defense.	2.30	908.50
9/02/20	KLD	Update exposure analysis.	2.00	790.00
9/03/20	KLD	Analyze defenses for individual defendant Answer.	.40	158.00
9/04/20	KLD	Finalize individual defendant Answer.	.30	118.50
9/04/20	KLD	Respond to email from plaintiff's counsel regarding discovery.	.20	79.00
9/04/20	LAF	Review answer.	.20	119.00

Client #: 2728
Matter #: 002

September 8, 2020
Invoice #: 126664

Date	Tkpr	Description	Hours	Amount
9/04/20	LAF	Email re answer.	.20	119.00
TOTAL PROFESSIONAL SERVICES RENDERED				\$ 8,436.50

TIMEKEEPER SUMMARY

Name	Rate	Hours	Amount	N/C Hr	N/C \$
Torres, Gloria	195.00	.10	19.50	.00	.00
Duffy, Kerry L.	395.00	19.20	7,584.00	.00	.00
Fernandez, Louise Ann	595.00	1.40	833.00	.00	.00
TOTALS		20.70	\$ 8,436.50	.00	\$.00

TOTAL THIS INVOICE **\$ 8,436.50**

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EXHIBIT AE

In Account With

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June 3, 2020

Verity Health Systems
601 S. Figueroa St.
Suite 4050
Los Angeles, CA 90017

Invoice #: 125815
Client #: 2728
Matter #: 003
Billing Attorney: ANR

For professional services rendered and disbursements advanced through May 31, 2020:

RE: adv. Dahl

DETAIL OF PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
5/04/20	OQD	Analysis of case status report and litigation file, and related analysis and strategy with M. Raymond regarding upcoming litigation deadlines, tasks, and projects.	.70	416.50
5/04/20	MLR	Review contracts between PE and client in preparation to revise case report.	.40	158.00
5/04/20	MLR	Review hold in preparation to revise case report.	.10	39.50
5/04/20	MLR	Analyze and strategize litigation matters with O. Dunlap.	.70	276.50

TOTAL PROFESSIONAL SERVICES RENDERED \$ 890.50

TIMEKEEPER SUMMARY

Name	Rate	Hours	Amount	N/C Hr	N/C \$
Raymond, Marcia L.	395.00	1.20	474.00	.00	.00
Dunlap, Oliver Q	595.00	.70	416.50	.00	.00
TOTALS		1.90	\$ 890.50	.00	\$.00

TOTAL THIS INVOICE \$ 890.50

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July 6, 2020

Verity Health Systems
601 S. Figueroa St.
Suite 4050
Los Angeles, CA 90017

Invoice #: 126031
Client #: 2728
Matter #: 003
Billing Attorney: ANR

For professional services rendered and disbursements advanced through June 30, 2020:

RE: adv. Dahl

DETAIL OF PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
6/19/20	LAF	Check status email to E Tilman re same.	.10	59.50
6/19/20	ET	Email correspondence with J. Moe and K. Murphy regarding case status.	.20	79.00
6/21/20	ET	Review Dentons CMS regarding bankruptcy status in case.	.10	39.50
6/21/20	ET	Email correspondence with K. Murphy regarding CMS edits.	.10	39.50
6/22/20	ET	Email correspondence with J. Moe and K. Murphy regarding edits to CMS.	.20	79.00
6/22/20	ET	Respond to carrier regarding case status.	.10	39.50
6/25/20	ET	Review minute order and plaintiff's filings.	.20	79.00
6/25/20	ET	Email J. Moe regarding case status.	.20	79.00
6/25/20	ET	Analysis of next steps.	.20	79.00
6/26/20	ET	Email correspondence with J. Moe regarding pending issues.	.10	39.50
6/29/20	ET	Email correspondence with K. Murphy regarding case status.	.20	79.00
6/30/20	LAF	Review status prior to call.	.20	119.00
TOTAL PROFESSIONAL SERVICES RENDERED				\$ 810.50

TIMEKEEPER SUMMARY

Name	Rate	Hours	Amount	N/C Hr	N/C \$
Tilman, Elina	395.00	1.60	632.00	.00	.00
Fernandez, Louise Ann	595.00	.30	178.50	.00	.00
TOTALS		1.90	\$ 810.50	.00	\$.00

BARTKO ZANKEL BUNZEL & MILLER

Client #: 2728
Matter #: 003

July 6, 2020
Invoice #: 126031

TOTAL THIS INVOICE

\$ 810.50

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August 5, 2020

Verity Health Systems
601 S. Figueroa St.
Suite 4050
Los Angeles, CA 90017

Invoice #: 126273
Client #: 2728
Matter #: 003
Billing Attorney: ANR

For professional services rendered and disbursements advanced through July 31, 2020:

RE: adv. Dahl

DETAIL OF PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
7/01/20	ET	Conference call with J. Moe and K. Murphy regarding case and next steps.	.40	158.00
7/07/20	LAF	Analysis of case status	.20	119.00
7/07/20	ET	Email correspondence with K. Murphy regarding case.	.10	39.50
7/07/20	ET	Analysis of next steps.	.20	79.00
7/08/20	ET	Review pleadings.	.10	39.50
7/10/20	ANR	Preparation of email to client re settlement and release.	.50	297.50
7/10/20	ET	Review and analysis of client documents.	.20	79.00
7/13/20	ANR	Review of email from Plaintiff's counsel re release.	.10	59.50
7/13/20	ANR	Email to client re release.	.10	59.50
7/13/20	ANR	Review email from client re release.	.10	59.50
7/13/20	ET	Correspondence with K. Murphy regarding case.	.10	39.50
7/14/20	ANR	Review of email from K. Murphy re release.	.10	59.50
7/14/20	ANR	Reply to email from K. Murphy re release.	.10	59.50
7/14/20	ANR	Review of mutual release re Plaintiff.	.50	297.50
7/14/20	ET	Email correspondence with K. Murphy regarding settlement.	.10	39.50

TOTAL PROFESSIONAL SERVICES RENDERED

\$ 1,485.50

Client #: 2728
Matter #: 003

August 5, 2020
Invoice #: 126273

TIMEKEEPER SUMMARY

Name	Rate	Hours	Amount	N/C Hr	N/C \$
Tilman, Elina	395.00	1.20	474.00	.00	.00
Fernandez, Louise Ann	595.00	.20	119.00	.00	.00
Ruda, An Nguyen	595.00	1.50	892.50	.00	.00
TOTALS		2.90	\$ 1,485.50	.00	\$.00

TOTAL THIS INVOICE

\$ 1,485.50

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EXHIBIT AF

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June 3, 2020

Verity Health Systems
601 S. Figueroa St.
Suite 4050
Los Angeles, CA 90017

Invoice #: 125817
Client #: 2728
Matter #: 008
Billing Attorney: ANR

For professional services rendered and disbursements advanced through May 31, 2020:

RE: Pellerin, Phillip

DETAIL OF PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
5/05/20	ETF	Finish review and analysis of docs for case plan.	1.80	675.00
5/06/20	LAF	Review DFEH Letter.	.20	119.00
5/06/20	LAF	Analyze statute of limitations issue.	.30	178.50
5/06/20	ET	Email correspondence with DFEH agent re charge.	.20	79.00
5/06/20	ET	Review notice regarding charge from DFEH.	.10	39.50
5/06/20	ET	Email S. Sharrer update regarding charge.	.10	39.50

TOTAL PROFESSIONAL SERVICES RENDERED

\$ 1,130.50

TIMEKEEPER SUMMARY

Name	Rate	Hours	Amount	N/C Hr	N/C \$
Ferguson, Elizabeth T	375.00	1.80	675.00	.00	.00
Tilman, Elina	395.00	.40	158.00	.00	.00
Fernandez, Louise Ann	595.00	.50	297.50	.00	.00
TOTALS		2.70	\$ 1,130.50	.00	\$.00

TOTAL THIS INVOICE

\$ 1,130.50

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June 3, 2020

Verity Health Systems
601 S. Figueroa St.
Suite 4050
Los Angeles, CA 90017

Invoice #: 125812
Client #: 2728
Matter #: 000
Billing Attorney: ANR

For professional services rendered and disbursements advanced through May 31, 2020:

RE: Bankruptcy Applications

DETAIL OF PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
5/22/20	KLD	Call from J. Moe regarding March fee application and notice.	.20	79.00
5/22/20	ET	Call with J. Moe regarding application and fees.	.20	79.00
5/26/20	KLD	Coordinate with J. Moe regarding monthly interim fee application.	.30	118.50
5/27/20	KLD	Analyze and work of monthly interim fee application.	2.80	1,106.00
5/28/20	KLD	Analyze and work on fee application and supporting documentation/exhibits.	2.60	1,027.00
5/29/20	KLD	Call with K. Howard regarding fee application.	.20	79.00
5/29/20	KLD	Work on monthly interim bankruptcy fee application.	1.00	395.00

TOTAL PROFESSIONAL SERVICES RENDERED

\$ 2,883.50

TIMEKEEPER SUMMARY

Name	Rate	Hours	Amount	N/C Hr	N/C \$
Duffy, Kerry L.	395.00	7.10	2,804.50	.00	.00
Tilman, Elina	395.00	.20	79.00	.00	.00
TOTALS		7.30	\$ 2,883.50	.00	\$.00

TOTAL THIS INVOICE

\$ 2,883.50

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July 6, 2020

Verity Health Systems
601 S. Figueroa St.
Suite 4050
Los Angeles, CA 90017

Invoice #: 126028
Client #: 2728
Matter #: 000
Billing Attorney: ANR

For professional services rendered and disbursements advanced through June 30, 2020:

RE: Bankruptcy Applications

DETAIL OF PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
6/01/20	KLD	Finalize bankruptcy fee application.	.30	118.50
6/01/20	ANR	Review of independent contractor revisions.	.20	119.00
6/05/20	ET	Analysis of next steps re litigation.	.40	158.00
6/24/20	KLD	Analyze and work on monthly fee application.	3.40	1,343.00
6/25/20	KLD	Analyze and work on monthly fee application and supporting documents.	2.80	1,106.00
6/25/20	GT	Continue review of court dockets re various matters and update hearing dates/deadlines changed due to Coronavirus closures.	.50	97.50
6/30/20	KLD	Analysis and preparation of BZBM's first interim fee application for the January - April 2020 time period.	4.70	1,856.50

TOTAL PROFESSIONAL SERVICES RENDERED

\$ 4,798.50

TIMEKEEPER SUMMARY

Name	Rate	Hours	Amount	N/C Hr	N/C \$
Torres, Gloria	195.00	.50	97.50	.00	.00
Duffy, Kerry L.	395.00	11.20	4,424.00	.00	.00
Tilman, Elina	395.00	.40	158.00	.00	.00
Ruda, An Nguyen	595.00	.20	119.00	.00	.00
TOTALS		12.30	\$ 4,798.50	.00	\$.00

TOTAL THIS INVOICE

\$ 4,798.50

Client #: 2728
Matter #: 000

July 6, 2020
Invoice #: 126028

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August 5, 2020

Verity Health Systems
601 S. Figueroa St.
Suite 4050
Los Angeles, CA 90017

Invoice #: 126270
Client #: 2728
Matter #: 000
Billing Attorney: ANR

For professional services rendered and disbursements advanced through July 31, 2020:

RE: Bankruptcy Applications**DETAIL OF PROFESSIONAL SERVICES RENDERED**

Date	Tkpr	Description	Hours	Amount
7/01/20	KLD	Coordinate with J. Moe regarding monthly fee application.	.30	118.50
7/01/20	KLD	Finalize monthly fee application.	.20	79.00
7/01/20	KLD	Email U.S. Trustee the LEDES Statements.	.20	79.00
7/01/20	KLD	Analysis and drafting of BZBM's first interim fee application.	3.90	1,540.50
7/02/20	KLD	Analyze invoices and prepare detail concerning work performed for each client matter for BZBM's first interim fee application, with break-out of hours and total fees.	4.90	1,935.50
7/06/20	KLD	Analysis of case law for BZBM's First Interim Fee Application.	2.00	790.00
7/07/20	ANR	Revision to quarterly fee application.	.80	476.00
7/07/20	ET	Review and make edits to BZBM's first interim application for fees and expenses.	.50	197.50
7/08/20	KLD	Revise and work on supporting exhibits to BZBM's interim fee application.	2.70	1,066.50
7/08/20	GT	Prepare invoice exhibits for fee application.	1.30	253.50
7/08/20	ET	Review and analysis of BZBM fee application.	.30	118.50
7/09/20	KLD	Prepare client declaration in support of fee application.	.50	197.50
7/09/20	KLD	Prepare declaration of An Ruda in support of fee application.	1.20	474.00
7/09/20	KLD	Contact J. Moe regarding fee application.	.10	39.50
7/14/20	KLD	Follow-up call with J. Moe regarding interim fee app.	.30	118.50
7/14/20	KLD	Revise and finalize interim fee application.	1.90	750.50
7/14/20	ET	Review issues with fee app.	.20	79.00
7/21/20	KLD	Coordinate regarding finalization of client declaration.	.10	39.50
7/27/20	KLD	Analyze and prepare monthly bankruptcy fee application.	3.20	1,264.00
7/28/20	KLD	Analyze and prepare supporting exhibits for bankruptcy fee application.	2.80	1,106.00

Client #: 2728
Matter #: 000

August 5, 2020
Invoice #: 126270

Date	Tkpr	Description	Hours	Amount
7/28/20	KLD	Coordinate with J. Moe regarding fee application	.10	39.50
7/29/20	KLD	Finalize bankruptcy fee application.	.50	197.50
7/29/20	KLD	Finalize LEDES reports and send to Trustee.	.30	118.50
7/29/20	KLD	Prepare for and attend CMC hearing.	.40	158.00
TOTAL PROFESSIONAL SERVICES RENDERED				\$ 11,236.50

TIMEKEEPER SUMMARY

Name	Rate	Hours	Amount	N/C Hr	N/C \$
Torres, Gloria	195.00	1.30	253.50	.00	.00
Duffy, Kerry L.	395.00	25.60	10,112.00	.00	.00
Tilman, Elina	395.00	1.00	395.00	.00	.00
Ruda, An Nguyen	595.00	.80	476.00	.00	.00
TOTALS		28.70	\$ 11,236.50	.00	\$.00

TOTAL THIS INVOICE **\$ 11,236.50**

*Balance is due within 30 days from the date of this invoice.
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September 8, 2020

Verity Health Systems
601 S. Figueroa St.
Suite 4050
Los Angeles, CA 90017

Invoice #: 126662
Client #: 2728
Matter #: 000
Billing Attorney: ANR

For professional services rendered and disbursements advanced through September 4, 2020:

RE: Bankruptcy Applications

DETAIL OF PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
8/04/20	KLD	Evaluate court's tentative.	.20	79.00
8/04/20	KLD	Contact Clerk to submit on court's tentative.	.20	79.00
8/04/20	KLD	Call from J. Moe regarding First Interim fee application.	.20	79.00
8/05/20	KLD	Provide requested information to Dentons for the Order on the Interim Fee application.	.30	118.50
8/07/20	ETF	Draft response advice for another garnishment case.	.50	187.50
8/10/20	KLD	Provide edits to J. Moe for the submission.	.30	118.50
8/10/20	ETF	Review and respond to email from client re second wage garnishment employee info.	.20	75.00
8/19/20	KLD	Work on BZBM July monthly fee application.	2.70	1,066.50
8/25/20	KLD	Work on exhibits to BZBM July monthly fee application.	2.50	987.50
8/27/20	KLD	Prepare monthly fee application.	1.60	632.00
8/28/20	KLD	Call with J. Moe regarding monthly fee application submission and case matters.	.30	118.50
8/28/20	KLD	Finalize July monthly fee application for filing.	.20	79.00
8/28/20	KLD	Prepare LEDES file for Trustee.	.20	79.00
9/03/20	KLD	Call with J. Moe regarding case and fee applications.	.20	79.00
9/03/20	KLD	Analysis and work on August monthly fee application.	2.80	1,106.00

TOTAL PROFESSIONAL SERVICES RENDERED

\$ 4,884.00

Client #: 2728
Matter #: 000

September 8, 2020
Invoice #: 126662

TIMEKEEPER SUMMARY

Name	Rate	Hours	Amount	N/C Hr	N/C \$
Ferguson, Elizabeth T	375.00	.70	262.50	.00	.00
Duffy, Kerry L.	395.00	11.70	4,621.50	.00	.00
TOTALS		12.40	\$ 4,884.00	.00	\$.00

TOTAL THIS INVOICE

\$ 4,884.00

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July 6, 2020

Verity Health Systems
601 S. Figueroa St.
Suite 4050
Los Angeles, CA 90017

Invoice #: 126032
Client #: 2728
Matter #: 015
Billing Attorney: ANR

For professional services rendered and disbursements advanced through June 30, 2020:

RE: Mike Fayfel

DETAIL OF PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
6/25/20	ET	Review carrier letter.	.10	39.50
6/25/20	ET	Email correspondence with K. Chapman regarding coverage.	.10	39.50
TOTAL PROFESSIONAL SERVICES RENDERED				\$ 79.00

TIMEKEEPER SUMMARY

Name	Rate	Hours	Amount	N/C Hr	N/C \$
Tilman, Elina	395.00	.20	79.00	.00	.00
TOTALS		.20	\$ 79.00	.00	\$.00

TOTAL THIS INVOICE **\$ 79.00**

Balance is due within 30 days from the date of this invoice.

We reserve the right to charge interest at 10% per annum on amounts not paid within 30 days.

EXHIBIT AI

BARTKO ZANKEL BUNZEL

BARTKO ZANKEL BUNZEL & MILLER
A Professional Law Corporation

One Embarcadero Center, Ste. 800
San Francisco, CA 94111
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f: 415.956.1152
www.bzbm.com

June 3, 2020

Verity Health Systems
601 S. Figueroa St.
Suite 4050
Los Angeles, CA 90017

Invoice #: 125816
Client #: 2728
Matter #: 006
Billing Attorney: ANR

For professional services rendered and disbursements advanced through May 31, 2020:

RE: Garcia, Esmerelda

DETAIL OF PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
5/01/20	ETF	Continue summarizing and analyzing docs for case plan.	1.10	412.50
5/05/20	ETF	Continue review and analysis of docs for case plan summary	.40	150.00

TOTAL PROFESSIONAL SERVICES RENDERED

\$ 562.50

TIMEKEEPER SUMMARY

Name	Rate	Hours	Amount	N/C Hr	N/C \$
Ferguson, Elizabeth T	375.00	1.50	562.50	.00	.00
TOTALS		1.50	\$ 562.50	.00	\$.00

TOTAL THIS INVOICE

\$ 562.50

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EXHIBIT AJ

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August 5, 2020

Verity Health Systems
601 S. Figueroa St.
Suite 4050
Los Angeles, CA 90017

Invoice #: 126274
Client #: 2728
Matter #: 016
Billing Attorney: ANR

For professional services rendered and disbursements advanced through July 31, 2020:

RE: Ramona Webb

DETAIL OF PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
7/15/20	ET	Review Webb EEOC charge and letters.	.20	79.00
7/15/20	ET	Email correspondence with K. Chapman and L. Ho regarding Webb charge and information.	.30	118.50
7/15/20	ET	Analysis of indemnity issues regarding Kforce.	.20	79.00
7/15/20	ET	Update information on respondent portal.	.10	39.50
7/17/20	ET	Analysis of next steps regarding Webb Charge.	.20	79.00
7/17/20	ET	Review carrier response regarding Webb Charge.	.10	39.50
7/20/20	ET	Review carrier's response regarding Webb Charge.	.10	39.50
7/20/20	ET	Respond to carrier regarding Webb Charge.	.10	39.50
7/20/20	ET	Email correspondence with E. Paul and R. Adcock regarding new charge and next steps.	.40	158.00
7/20/20	ET	Review charge documents.	.10	39.50
7/22/20	ET	Review and analysis of Kforce agreements.	.20	79.00
7/22/20	ET	Email correspondence with N. Nguyen, E. Paul, and L. Ho regarding Kforce agreements.	.20	79.00
7/22/20	ET	Draft tender letter to Kforce.	.50	197.50
7/22/20	ET	Review Kforce website for pertinent contact information.	.10	39.50
7/22/20	ET	Identify and assemble exhibits to Kforce tender letter.	.20	79.00
7/22/20	ET	Email R. Adcock and E. Paul regarding Webb charge.	.20	79.00
7/23/20	ET	Email correspondence with R. Adcock and E. Paul regarding tender.	.10	39.50
7/24/20	ET	Finalize tender letter and exhibits.	.10	39.50

TOTAL PROFESSIONAL SERVICES RENDERED

\$ 1,343.00

BARTKO ZANKEL BUNZEL & MILLER

Client #: 2728
Matter #: 016

August 5, 2020
Invoice #: 126274

TIMEKEEPER SUMMARY

Name	Rate	Hours	Amount	N/C Hr	N/C \$
Tilman, Elina	395.00	3.40	1,343.00	.00	.00
TOTALS		3.40	\$ 1,343.00	.00	\$.00

TOTAL THIS INVOICE

\$ 1,343.00

Inception To Date Information (Including Current Invoice)

Fees Billed	\$ 1,343.00
Expenses Billed	\$.00

*Balance is due within 30 days from the date of this invoice.
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BARTKO ZANKEL BUNZEL

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www.bzbm.com

September 8, 2020

Verity Health Systems
601 S. Figueroa St.
Suite 4050
Los Angeles, CA 90017

Invoice #: 126666
Client #: 2728
Matter #: 016
Billing Attorney: ANR

For professional services rendered and disbursements advanced through September 4, 2020:

RE: Ramona Webb

DETAIL OF PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
8/13/20	ET	Review and analysis of charge.	.10	39.50
8/13/20	ET	Draft internal pleading.	.30	118.50
8/13/20	ET	Email L. Ho, E. Ruiz, N. Nasu, and W. Castillo, and V. Hopson regarding internal pleading.	.20	79.00
8/14/20	ET	Email correspondence with M. Day regarding hold issues.	.10	39.50
8/18/20	ET	Email correspondence with A. Brown regarding pending issues.	.10	39.50
8/31/20	ET	Review case closure letter from EEOC.	.10	39.50
8/31/20	ET	Respond to W. Castillo's email re EEOC letter.	.10	39.50
9/02/20	ET	Review EEOC correspondence.	.10	39.50
9/02/20	ET	Email E. Paul and R. Adcock status update.	.10	39.50

TOTAL PROFESSIONAL SERVICES RENDERED

\$ 474.00

TIMEKEEPER SUMMARY

Name	Rate	Hours	Amount	N/C Hr	N/C \$
Tilman, Elina	395.00	1.20	474.00	.00	.00
TOTALS		1.20	\$ 474.00	.00	\$.00

TOTAL THIS INVOICE

\$ 474.00

BARTKO ZANKEL BUNZEL & MILLER

Client #: 2728
Matter #: 016

September 8, 2020
Invoice #: 126666

OUTSTANDING INVOICES

Invoice Number	Date	Invoice Total	Payments Received	Ending Balance
126274	8/05/20	1,343.00	.00	1,343.00
Previous Balance				<u>\$ 1,343.00</u>
TOTAL BALANCE DUE				<u>\$ 1,817.00</u>

Inception To Date Information (Including Current Invoice)

Fees Billed	\$ 1,817.00
Expenses Billed	\$.00

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EXHIBIT AK

BARTKO ZANKEL BUNZEL

BARTKO ZANKEL BUNZEL & MILLER

A Professional Law Corporation

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September 8, 2020

Verity Health Systems
601 S. Figueroa St.
Suite 4050
Los Angeles, CA 90017

Invoice #: 126732
Client #: 2728
Matter #: 017
Billing Attorney: ANR

For professional services rendered and disbursements advanced through September 4, 2020:

RE: Linda Williams

DISBURSEMENTS ADVANCED

Date	Description	Amount
7/22/20	JACKSON LEWIS P.C., Expert Services Rendered, 7588405	5,074.31
8/17/20	JACKSON LEWIS P.C., Expert Services Rendered, 7601233	5,335.00
TOTAL DISBURSEMENTS ADVANCED		\$ 10,409.31
TOTAL THIS INVOICE		\$ 10,409.31

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EXHIBIT AL

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June 3, 2020

OConnor Hospital
601 S. Figueroa Street
Suite 4050
Los Angeles, CA 90017

Invoice #: 125856
Client #: 2768
Matter #: 000
Billing Attorney: ANR

For professional services rendered and disbursements advanced through May 31, 2020:

RE: General Labor

DETAIL OF PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
5/04/20	ET	Email County regarding Rodriguez subpoena.	.10	39.50
5/05/20	ET	Analysis of Watson subpoena and objection grounds.	.20	79.00
5/05/20	ET	Call with S. Sharrer regarding Vasquez subpoena.	.10	39.50
5/05/20	ET	Email correspondence with S. Sharrer and L. Ho regarding Vasquez subpoena.	.30	118.50
5/05/20	ET	Provide update to team regarding Vasquez subpoena narrowing.	.10	39.50
5/05/20	ET	Meet and confer call with C. Childs regarding Vasquez subpoena.	.20	79.00
5/05/20	ET	Meet and confer email to C. Child and Vasquez's attorney regarding subpoena.	.20	79.00
5/05/20	ET	Complete declaration explanation for custodian regarding records.	.10	39.50
5/21/20	ET	Email correspondence with Hope regarding Vasquez subpoena.	.20	79.00
5/21/20	ET	Email counsel and process server regarding custodian declaration for Vasquez subpoena.	.20	79.00
5/22/20	ET	Call with process server regarding Vasquez custodian declaration.	.10	39.50
5/22/20	ET	Email process server regarding declaration.	.10	39.50

TOTAL PROFESSIONAL SERVICES RENDERED

\$ 750.50

TIMEKEEPER SUMMARY

Name	Rate	Hours	Amount	N/C Hr	N/C \$
Tilman, Elina	395.00	1.90	750.50	.00	.00
TOTALS		1.90	\$ 750.50	.00	\$.00

Client #: 2768
Matter #: 000

June 3, 2020
Invoice #: 125856

TOTAL THIS INVOICE

\$ 750.50

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In Account With

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July 6, 2020

OConnor Hospital
601 S. Figueroa Street
Suite 4050
Los Angeles, CA 90017

Invoice #: 126064
Client #: 2768
Matter #: 000
Billing Attorney: ANR

For professional services rendered and disbursements advanced through June 30, 2020:

RE: General Labor

DETAIL OF PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
6/02/20	ET	Review subpoena documents for McDonald.	.10	39.50
6/02/20	ET	Email L. Ho and S. Sharrer re McDonald subpoena.	.10	39.50
6/22/20	ET	Review and analysis of Makem claim and internal correspondence.	.40	158.00
6/22/20	ET	Respond to S. Burdick regarding tender of Makem claim.	.10	39.50
6/22/20	ET	Email J. Moe regarding Makem claim and next steps.	.20	79.00
6/22/20	ET	Email carrier regarding Makem claim.	.10	39.50
6/23/20	ET	Email correspondence with A. Estrada and L. Ho regarding documents for Makem.	.30	118.50
6/23/20	ET	Email correspondence with E. Paul and S. Burdick regarding Makem.	.40	158.00
6/23/20	ET	Review Makem documents.	.20	79.00
6/23/20	ET	Analysis of next steps regarding Makem claim.	.20	79.00
6/23/20	ET	Call with J. Moe regarding Makem matter.	.20	79.00
6/23/20	ET	Email correspondence with R. Adcock regarding Makem claims.	.20	79.00

TOTAL PROFESSIONAL SERVICES RENDERED

\$ 987.50

TIMEKEEPER SUMMARY

Name	Rate	Hours	Amount	N/C Hr	N/C \$
Tilman, Elina	395.00	2.50	987.50	.00	.00
TOTALS		2.50	\$ 987.50	.00	\$.00

Client #: 2768
Matter #: 000

July 6, 2020
Invoice #: 126064

TOTAL THIS INVOICE

\$ 987.50

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September 8, 2020

OConnor Hospital
601 S. Figueroa Street
Suite 4050
Los Angeles, CA 90017

Invoice #: 126689
Client #: 2768
Matter #: 000
Billing Attorney: ANR

For professional services rendered and disbursements advanced through September 4, 2020:

RE: General Labor

DETAIL OF PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
8/19/20	ET	Preliminary review of Pierini labor code request.	.10	39.50
8/19/20	ET	Call counsel regarding Pierini labor code request.	.10	39.50
8/19/20	ET	Analysis of next steps regarding Pierini request.	.10	39.50
8/19/20	ET	Email L. Ho regarding Pierini information.	.10	39.50
8/20/20	ET	Review Janice Pierini labor code request and determine deadlines.	.20	79.00
8/20/20	ET	Email correspondence with A. Logon regarding Janice Pierini request and pending issues.	.30	118.50
8/20/20	ET	Email carrier regarding Janice Pierini claim.	.10	39.50
8/20/20	ET	Email K. Chapman regarding Janice Pierini labor code request.	.10	39.50
8/21/20	ET	Review chart of grievances.	.10	39.50
8/24/20	ET	Review pending issues with Pierini labor code request.	.10	39.50
8/24/20	ET	Review correspondence from carrier regarding Pierini matter.	.10	39.50
8/25/20	ANR	Conference call with carrier re case status.	.30	178.50
8/25/20	ET	Email A. Longan regarding Pierini fact-gathering.	.10	39.50
8/25/20	ET	Review new letter from counsel regarding Pierini and email K. Chapman and H. Biehel regarding same.	.10	39.50
8/25/20	ET	Email opposing counsel regarding labor code requests and pending issues regarding Pierini.	.20	79.00
8/26/20	ET	Review and analysis of grievance chart.	.20	79.00
8/26/20	ET	Review POCs and N. Koffaman's email.	.10	39.50
8/26/20	ET	Review notification and letter regarding Pierini labor code request.	.10	39.50
8/26/20	ET	Email K. Chapman and A. Brown regarding pending issues with Pierini request.	.10	39.50
8/26/20	ET	Call counsel regarding Pierini labor code request.	.10	39.50

Client #: 2768
Matter #: 000

September 8, 2020
Invoice #: 126689

Date	Tkpr	Description	Hours	Amount
8/27/20	ET	Email correspondence with payroll regarding Pierini requests.	.20	79.00
8/27/20	ET	Email correspondence with N. Koffman regarding grievance issues.	.20	79.00
8/27/20	ET	Review grievance documents regarding CNA.	.20	79.00
8/27/20	ET	Call with N. Koffman regarding grievances, settlement status, and priority designation.	.20	79.00
8/31/20	ET	Email correspondence with County Counsel re Janie Pierini labor request.	.20	79.00
9/01/20	ET	Email carrier regarding settlement demand.	.10	39.50
9/01/20	ET	Review settlement demand letter.	.20	79.00
9/01/20	ET	Email E. Paul, J. Moe, and R. Adcock, and County counsel regarding settlement demand and other pending issues.	.40	158.00
9/02/20	ET	Email correspondence with carrier regarding case status.	.10	39.50
9/02/20	ET	Review email from county counsel regarding next steps.	.10	39.50
9/02/20	ET	Email correspondence with S. Sharrer regarding case.	.10	39.50
9/04/20	ET	Email correspondence with opposing counsel, K. Murphy, and carrier re Pierini labor code request.	.30	118.50
9/04/20	ET	Review AIG letter re Pierini claim.	.10	39.50

TOTAL PROFESSIONAL SERVICES RENDERED

\$ 2,074.50

TIMEKEEPER SUMMARY

Name	Rate	Hours	Amount	N/C Hr	N/C \$
Tilman, Elina	395.00	4.80	1,896.00	.00	.00
Ruda, An Nguyen	595.00	.30	178.50	.00	.00
TOTALS		5.10	\$ 2,074.50	.00	\$.00

TOTAL THIS INVOICE

\$ 2,074.50

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EXHIBIT AM

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June 3, 2020

OConnor Hospital
601 S. Figueroa Street
Suite 4050
Los Angeles, CA 90017

Invoice #: 125857
Client #: 2768
Matter #: 001
Billing Attorney: ANR

For professional services rendered and disbursements advanced through May 31, 2020:

RE: OConnor Hospital adv. Greenwood

DETAIL OF PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
5/01/20	OQD	Analysis of case file, DFEH response, and case calendaring and status.	.70	416.50
5/04/20	ET	Case of pending issues in case.	.20	79.00
TOTAL PROFESSIONAL SERVICES RENDERED				\$ 495.50

TIMEKEEPER SUMMARY

Name	Rate	Hours	Amount	N/C Hr	N/C \$
Tilman, Elina	395.00	.20	79.00	.00	.00
Dunlap, Oliver Q	595.00	.70	416.50	.00	.00
TOTALS		.90	\$ 495.50	.00	\$.00

TOTAL THIS INVOICE **\$ 495.50**

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In Account With

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A Professional Law Corporation

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July 6, 2020

OConnor Hospital
601 S. Figueroa Street
Suite 4050
Los Angeles, CA 90017

Invoice #: 126065
Client #: 2768
Matter #: 001
Billing Attorney: ANR

For professional services rendered and disbursements advanced through June 30, 2020:

RE: OConnor Hospital adv. Greenwood

DETAIL OF PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
6/17/20	ET	Review correspondence from opposing counsel.	.10	39.50
6/17/20	ET	Email J. Moe re pending issues.	.10	39.50
6/17/20	ET	Review opposing counsel's email.	.10	39.50
6/17/20	ET	Email J. Moe re status.	.10	39.50
6/17/20	ET	Call with J. Moe re case.	.20	79.00
6/18/20	ANR	Review of correspondence with opposing counsel re case.	.10	59.50
6/18/20	ET	Email correspondence with J. Park and J. Moe regarding case.	.30	118.50
6/22/20	ET	Assess pending issues.	.10	39.50
6/22/20	ET	Email carrier regarding case.	.10	39.50
6/23/20	ET	Email correspondence with carrier regarding case status.	.10	39.50
6/25/20	ET	Draft update to carrier.	.40	158.00
6/29/20	ET	Analysis of communication with opposing counsel and strategize regarding next steps.	.20	79.00
6/30/20	ANR	Review of email from Plaintiff's counsel re possible mediation.	.10	59.50
6/30/20	ANR	Reply to email from same re possible mediation.	.10	59.50
6/30/20	ET	Email carrier case update.	.20	79.00

TOTAL PROFESSIONAL SERVICES RENDERED

\$ 968.50

BARTKO ZANKEL BUNZEL & MILLER

Client #: 2768
Matter #: 001

July 6, 2020
Invoice #: 126065

TIMEKEEPER SUMMARY

Name	Rate	Hours	Amount	N/C Hr	N/C \$
Tilman, Elina	395.00	2.00	790.00	.00	.00
Ruda, An Nguyen	595.00	.30	178.50	.00	.00
TOTALS		2.30	\$ 968.50	.00	\$.00

TOTAL THIS INVOICE

\$ 968.50

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August 5, 2020

OConnor Hospital
601 S. Figueroa Street
Suite 4050
Los Angeles, CA 90017

Invoice #: 126310
Client #: 2768
Matter #: 001
Billing Attorney: ANR

For professional services rendered and disbursements advanced through July 31, 2020:

RE: OConnor Hospital adv. Greenwood

DETAIL OF PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
7/01/20	ANR	Review and reply to email from J. Park re claim.	.10	59.50
7/06/20	ET	Email carrier regarding case status.	.10	39.50
7/08/20	ANR	Email to carrier re plaintiff's counsel.	.10	59.50
7/08/20	ET	Review correspondence from carrier.	.10	39.50
7/08/20	ET	Respond to carrier regarding cost.	.10	39.50
7/13/20	ANR	Telephone call with A. Zhao of AIG re matter and Plaintiff's counsel request.	.50	297.50
7/13/20	ET	Call with carrier regarding case status.	.60	237.00
7/17/20	ET	Review and analysis of carrier letter.	.10	39.50
7/17/20	ET	Review client documents.	.30	118.50
7/17/20	ET	Email carrier regarding coverage letter.	.10	39.50
7/22/20	ET	Email carrier regarding pending issues.	.10	39.50
7/28/20	ET	Email carrier regarding pending issues.	.10	39.50
7/29/20	ET	Review charge timeframe.	.10	39.50
7/29/20	ET	Email correspondence with carrier regarding case.	.10	39.50
7/31/20	ANR	Review of email from J. Moe re SIR.	.10	59.50

TOTAL PROFESSIONAL SERVICES RENDERED

\$ 1,187.00

Client #: 2768
Matter #: 001

August 5, 2020
Invoice #: 126310

TIMEKEEPER SUMMARY

Name	Rate	Hours	Amount	N/C Hr	N/C \$
Tilman, Elina	395.00	1.80	711.00	.00	.00
Ruda, An Nguyen	595.00	.80	476.00	.00	.00
TOTALS		2.60	\$ 1,187.00	.00	\$.00

TOTAL THIS INVOICE

\$ 1,187.00

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September 8, 2020

OConnor Hospital
601 S. Figueroa Street
Suite 4050
Los Angeles, CA 90017

Invoice #: 126690
Client #: 2768
Matter #: 001
Billing Attorney: ANR

For professional services rendered and disbursements advanced through September 4, 2020:

RE: OConnor Hospital adv. Greenwood

DETAIL OF PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
8/17/20	ET	Email correspondence with K. Murphy regarding coverage issues.	.10	39.50
8/18/20	ET	Review client documents.	.10	39.50
8/18/20	ET	Correspondence with J. Moe regarding coverage.	.10	39.50
9/03/20	ET	Email counsel regarding Janice Pierini labor code request and settlement demand.	.40	158.00

TOTAL PROFESSIONAL SERVICES RENDERED \$ 276.50

TIMEKEEPER SUMMARY

Name	Rate	Hours	Amount	N/C Hr	N/C \$
Tilman, Elina	395.00	.70	276.50	.00	.00
TOTALS		.70	\$ 276.50	.00	\$.00

TOTAL THIS INVOICE \$ 276.50

Balance is due within 30 days from the date of this invoice.

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EXHIBIT AN

BARTKO ZANKEL BUNZEL

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June 3, 2020

OConnor Hospital
601 S. Figueroa Street
Suite 4050
Los Angeles, CA 90017

Invoice #: 125858
Client #: 2768
Matter #: 002
Billing Attorney: ANR

For professional services rendered and disbursements advanced through May 31, 2020:

RE: OConnor Hospital adv. Sydney Thomson

DETAIL OF PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
5/01/20	ETF	Continue analysis re case strategy	.20	75.00
5/22/20	ETF	Review issues re status of stipulation for continuance of CMC on mediation	.20	75.00
5/29/20	ETF	Update stipulation; email opposing counsel to follow up on same.	.30	112.50
TOTAL PROFESSIONAL SERVICES RENDERED				\$ 262.50

TIMEKEEPER SUMMARY

Name	Rate	Hours	Amount	N/C Hr	N/C \$
Ferguson, Elizabeth T	375.00	.70	262.50	.00	.00
TOTALS		.70	\$ 262.50	.00	\$.00

TOTAL THIS INVOICE \$ 262.50

Balance is due within 30 days from the date of this invoice.

We reserve the right to charge interest at 10% per annum on amounts not paid within 30 days.

In Account With

TAX ID No. 94-2542676

BARTKO ZANKEL BUNZEL

BARTKO ZANKEL BUNZEL & MILLER
A Professional Law Corporation

One Embarcadero Center, Ste. 800
San Francisco, CA 94111
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f: 415.956.1152
www.bzbm.com

July 6, 2020

OConnor Hospital
601 S. Figueroa Street
Suite 4050
Los Angeles, CA 90017

Invoice #: 126066
Client #: 2768
Matter #: 002
Billing Attorney: ANR

For professional services rendered and disbursements advanced through June 30, 2020:

RE: OConnor Hospital adv. Sydney Thomson

DETAIL OF PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
6/01/20	ETF	Review emails re proposed mediator and stipulation.	.10	37.50
6/01/20	ETF	Phone call with opposing counsel re proposed mediator and stipulation.	.10	37.50
6/01/20	ETF	Review proposed mediator bios.	.20	75.00
6/03/20	ETF	Review and respond to email from bankruptcy counsel re status of mediation stipulation.	.10	37.50
6/03/20	ETF	Phone calls with other defense counsel.	.10	37.50
6/03/20	ETF	Follow up email re stipulation.	.20	75.00
6/04/20	ETF	Phone call to other defense counsel to follow up on stipulation.	.10	37.50
6/04/20	ETF	Finalize stipulation for filing.	.10	37.50
6/05/20	ETF	Review and respond to emails re clerk scheduling of hearing.	.20	75.00
6/08/20	ETF	Review emails re Thompson.	.10	37.50
6/08/20	ETF	Update report re Thompson.	.10	37.50
6/08/20	ETF	Draft status summary re Thompson.	.10	37.50
6/18/20	ETF	Strategy re mediators.	.20	75.00
6/18/20	ETF	Draft email to co-defense counsel re mediators.	.10	37.50
6/24/20	ETF	Exchange emails with defense counsel re proposed mediators.	.10	37.50
6/29/20	ETF	Phone call with Plaintiffs' counsel to discuss discovery requests.	.10	37.50
6/29/20	ETF	Email to defendants' counsel to follow up on mediator selection.	.10	37.50
6/29/20	ETF	Review and respond to reply email re mediator selection.	.10	37.50
TOTAL PROFESSIONAL SERVICES RENDERED				\$ 825.00

Client #: 2768
Matter #: 002

July 6, 2020
Invoice #: 126066

TIMEKEEPER SUMMARY

Name	Rate	Hours	Amount	N/C Hr	N/C \$
Ferguson, Elizabeth T	375.00	2.20	825.00	.00	.00
TOTALS		2.20	\$ 825.00	.00	\$.00

DISBURSEMENTS ADVANCED

Date	Description	Amount
	ACC Court Service & Filing Fee	54.00
TOTAL DISBURSEMENTS ADVANCED		\$ 54.00
TOTAL THIS INVOICE		\$ 879.00

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August 5, 2020

OConnor Hospital
601 S. Figueroa Street
Suite 4050
Los Angeles, CA 90017

Invoice #: 126311
Client #: 2768
Matter #: 002
Billing Attorney: ANR

For professional services rendered and disbursements advanced through July 31, 2020:

RE: OConnor Hospital adv. Sydney Thomson

DETAIL OF PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
7/02/20	ETF	Review docket re mediation.	.10	37.50
7/02/20	ETF	Draft email to plaintiffs' counsel to discuss mediation and discovery issues.	.10	37.50
7/08/20	ETF	Phone call to plaintiffs' counsel re discovery requests and mediator.	.10	37.50
7/08/20	ETF	Review response email from opposing counsel.	.10	37.50
7/13/20	ETF	Exchange multiple emails with mediators' offices re mediation.	.20	75.00
7/13/20	ETF	Review profiles of proposed mediators and provide to opposing counsel and counsel for co-defendants.	.30	112.50
7/13/20	ANR	Review of mediators.	.20	119.00
7/15/20	ETF	Review profiles of second set of proposed mediators.	.10	37.50
7/20/20	LAF	Review judges profiles.	.30	178.50
7/21/20	ETF	Phone call to defense counsel for other defendant re mediators.	.10	37.50
7/22/20	ETF	Draft email to other defendant's counsel re mediators.	.10	37.50
7/23/20	ETF	Phone call with other defendant's counsel re mediators and strategy.	.20	75.00
7/23/20	ETF	Summarize information provided by other defendant's counsel re strategy	.10	37.50
7/23/20	ETF	Review mediator issue.	.10	37.50
7/23/20	ETF	Respond to other defendant's counsel re mediator issue.	.10	37.50
7/23/20	ANR	Review of mediation status.	.20	119.00
7/27/20	ETF	Review email from opposing counsel re mediators.	.10	37.50
7/30/20	ETF	Review email from opposing counsel re mediators' schedule.	.10	37.50
7/30/20	ETF	Review order re mediation status conference and note info re same.	.10	37.50

TOTAL PROFESSIONAL SERVICES RENDERED

\$ 1,166.50

Client #: 2768
Matter #: 002

August 5, 2020
Invoice #: 126311

TIMEKEEPER SUMMARY

Name	Rate	Hours	Amount	N/C Hr	N/C \$
Ferguson, Elizabeth T	375.00	2.00	750.00	.00	.00
Fernandez, Louise Ann	595.00	.30	178.50	.00	.00
Ruda, An Nguyen	595.00	.40	238.00	.00	.00
TOTALS		2.70	\$ 1,166.50	.00	\$.00

TOTAL THIS INVOICE

\$ 1,166.50

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www.bzbm.com

September 8, 2020

OConnor Hospital
601 S. Figueroa Street
Suite 4050
Los Angeles, CA 90017

Invoice #: 126691
Client #: 2768
Matter #: 002
Billing Attorney: ANR

For professional services rendered and disbursements advanced through September 4, 2020:

RE: OConnor Hospital adv. Sydney Thomson

DETAIL OF PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
8/03/20	ETF	Exchange emails with carrier re case status update.	.20	75.00
8/03/20	ETF	Review Thomson case file re docs available.	.10	37.50
8/04/20	ETF	Follow up on issues re mediators and scheduling.	.10	37.50
8/05/20	ETF	Review email from other defense counsel re mediation	.10	37.50
8/06/20	ETF	Review email from opposing counsel re mediation.	.10	37.50
8/06/20	ETF	Draft email to client re mediation schedule.	.10	37.50
8/06/20	ETF	Review reservation of rights letter re claim.	.20	75.00
8/06/20	ETF	Review strategy for mediation.	.10	37.50
8/06/20	ETF	Follow up on further information needed for claim.	.20	75.00
8/06/20	ET	Analysis of client documents.	.40	158.00
8/07/20	ETF	Exchange emails with carrier re mediation and status.	.20	75.00
8/07/20	ET	Correspondence with K. Chapman and K. Conway regarding Thomson claim.	.10	39.50
8/10/20	ETF	Review strategy re mediation issues.	.30	112.50
8/10/20	ETF	Draft email to other counsel re mediation.	.10	37.50
8/10/20	ETF	Review email from other defense counsel re mediation.	.10	37.50
8/10/20	ETF	Review plaintiff background and claim.	.60	225.00
8/10/20	ETF	Review strategy re further information for claim.	.50	187.50
8/10/20	ETF	Review strategy re information gathering.	.50	187.50
8/10/20	ETF	Review documents received re claim.	.30	112.50
8/10/20	ETF	Draft stipulation to extend mediation date.	.40	150.00
8/10/20	ETF	Follow up on mediation dates.	.10	37.50
8/10/20	ETF	Draft document related to anticipated mediation.	1.60	600.00

Client #: 2768
Matter #: 002September 8, 2020
Invoice #: 126691

Date	Tkpr	Description	Hours	Amount
8/10/20	LAF	Review documents.	2.00	1,190.00
8/10/20	LAF	Work on strategy.	.40	238.00
8/10/20	LAF	Arrange calls with Vituity counsel.	.20	119.00
8/10/20	ANR	Conference call re case with K. Chapman and K. Conway.	1.10	654.50
8/10/20	ANR	Separate call with K. Chapman re case.	.20	119.00
8/10/20	ANR	Review of email from K. Conway re retention.	.10	59.50
8/10/20	ANR	Reply to email from K. Conway re retention.	.10	59.50
8/11/20	ETF	Phone call with other defense counsel.	.10	37.50
8/11/20	ETF	Exchange emails with carrier re mediation dates.	.10	37.50
8/11/20	ETF	Finish drafting document related to mediation.	.60	225.00
8/11/20	ETF	Exchange emails with client re new mediation dates.	.20	75.00
8/11/20	ETF	Draft email to opposing counsel and other defense counsel re mediation dates.	.10	37.50
8/11/20	ETF	Draft list of documents needed for claim and update list with new doc received.	.40	150.00
8/11/20	ETF	Begin drafting status report for carrier.	.20	75.00
8/11/20	ETF	Phone call with Sarah Robertson re case issues.	.90	337.50
8/11/20	LAF	Continued review of documents.	.40	238.00
8/11/20	LAF	Legal research re joint employment issues.	.70	416.50
8/11/20	LAF	Telephone call with Vituity counsel.	.70	416.50
8/11/20	ANR	Review of mediation status.	.20	119.00
8/12/20	ETF	Review and respond to email from opposing counsel re mediation.	.10	37.50
8/12/20	ETF	Review documents for further information needed by carrier.	.20	75.00
8/12/20	ETF	Continue drafting status report to carrier.	3.10	1,162.50
8/13/20	ETF	Finish drafting status report to carrier with detailed analysis of each claim alleged against client.	6.70	2,512.50
8/17/20	ETF	Review final revision of letter to carrier provided to client.	.20	75.00
8/17/20	ETF	Review email from BK counsel re insurance status of claim.	.10	37.50
8/17/20	ETF	Review information related to further investigation of claims.	.10	37.50
8/17/20	ETF	Draft email to carrier re status report.	.10	37.50
8/17/20	ETF	Review update re status report.	.10	37.50
8/17/20	LAF	Emails to OCH re documents.	.20	119.00
8/17/20	ANR	Telephone call with K. Chapman re case status.	.20	119.00
8/17/20	ANR	Review of policy limits demand.	.30	178.50
8/18/20	ETF	Review email from carrier re response to status report update.	.10	37.50
8/18/20	ETF	Provide further documents and information re case plan and interviews.	.30	112.50
8/18/20	ETF	Review file documents needed for investigation.	.40	150.00
8/18/20	ETF	Phone calls with other defense counsel re mediation date and status conference.	.20	75.00

Client #: 2768
Matter #: 002September 8, 2020
Invoice #: 126691

Date	Tkpr	Description	Hours	Amount
8/18/20	ETF	Draft email to other defense counsel to follow up on mediation dates proposed by plaintiff.	.10	37.50
8/18/20	LAF	Strategy session with A Ruda.	.20	119.00
8/18/20	LAF	Emails to county counsel.	.10	59.50
8/18/20	ANR	Conference call with carrier re matter.	.50	297.50
8/18/20	ANR	Review of litigation status.	.30	178.50
8/18/20	ANR	Review of incident report.	.20	119.00
8/18/20	ANR	Email to Plaintiff's counsel re case status.	.10	59.50
8/18/20	ET	Analysis of fact-gathering issues regarding Thomson litigation.	.30	118.50
8/19/20	ETF	Review and respond to emails from counsel for Nantworks re mediation.	.10	37.50
8/19/20	ETF	Review multiple emails re case strategy and respond to same.	.20	75.00
8/19/20	LAF	Emails to county counsel.	.20	119.00
8/19/20	ANR	Telephone call with Dentons re bankruptcy and insurance.	.60	357.00
8/19/20	ANR	Review of email from County re litigation materials.	.10	59.50
8/19/20	ANR	Review of insurance status report.	.30	178.50
8/20/20	ETF	Revise stipulation to continue mediation date.	.20	75.00
8/20/20	ETF	Review strategy re mediation scheduling and status hearing date.	.10	37.50
8/20/20	ETF	Phone call with other defense counsel's office re mediation.	.10	37.50
8/20/20	ETF	Update stipulation agreement based on mediation dates provided by other defense counsel.	.10	37.50
8/20/20	ETF	Review and analyze issues re mediation and stipulation for same.	.10	37.50
8/20/20	ETF	Further revisions to status report upon review of further authority and case strategy.	2.20	825.00
8/20/20	ETF	Review strategy re employment claims.	.10	37.50
8/20/20	ANR	Review of email from Plaintiff's counsel re settlement call.	.10	59.50
8/20/20	ANR	Review of email from E. Paul re case status.	.10	59.50
8/21/20	ETF	Draft email to carrier re mediation date.	.10	37.50
8/21/20	ETF	Email stipulation to other counsel to move mediation status conference date.	.10	37.50
8/21/20	ETF	Review strategy re mediation.	.10	37.50
8/21/20	ETF	Review authority relevant to employment claims.	.10	37.50
8/21/20	ANR	Conference call with Plaintiff's counsel re case.	.50	297.50
8/24/20	ETF	Phone calls with counsel for Vituity re stipulation.	.10	37.50
8/24/20	ETF	Exchange emails with other counsel re stipulation.	.20	75.00
8/24/20	ETF	Draft email to other defense counsel and plaintiff's counsel re status of stipulation.	.10	37.50
8/24/20	ANR	Review of email from carrier re mediation date.	.10	59.50
8/25/20	ETF	Review calendar deadlines for filings.	.10	37.50
8/25/20	ETF	Review further authority re employment law issues.	1.80	675.00

Client #: 2768
Matter #: 002

September 8, 2020
Invoice #: 126691

Date	Tkpr	Description	Hours	Amount
8/25/20	ETF	Draft status report to carrier re premises liability claims.	1.20	450.00
8/26/20	ETF	Continue reviewing authority re premises liability claims.	1.50	562.50
8/26/20	ETF	Continue reviewing authority re premises liability claims.	1.70	637.50
8/26/20	ETF	Review order for continuance of mediation status conference.	.10	37.50
8/26/20	ETF	Draft email to opposing counsel and other defense counsel re continuance of mediation status conference hearing.	.10	37.50
8/26/20	ETF	Review email from opposing counsel's office requesting further info from Vituity re mediation.	.10	37.50
8/27/20	GT	Review court docket and update deadline tracker.	.10	19.50
8/27/20	ETF	Review further authority re premises liability claims.	1.70	637.50
8/27/20	ETF	Continue drafting status report to premises liability claims.	.30	112.50
8/28/20	ETF	Review email from Vituity's counsel re mediation date.	.10	37.50
9/01/20	ETF	Review email re follow up on mediation dates.	.10	37.50
9/01/20	ANR	Revise of status letter to carrier.	.50	297.50
9/01/20	ANR	Email to Plaintiff's counsel re settlement privileged documents.	.10	59.50
9/02/20	ETF	Revise status report to carrier for premises liability policy.	.40	150.00
9/02/20	ETF	Review strategy re premises liability issues.	.10	37.50
9/02/20	ETF	Revise carrier report re employment-related claims.	.70	262.50
9/02/20	ANR	Review of email from Plaintiff's counsel re status of settlement documents.	.10	59.50
9/03/20	ETF	Review email from carrier re status update.	.10	37.50
9/03/20	ETF	Provide list of potential witnesses for interviews.	.10	37.50
9/03/20	ANR	Review of email from carrier.	.10	59.50
9/03/20	ANR	Reply to email from carrier.	.10	59.50
9/04/20	ETF	Exchange emails with carrier re status report.	.10	37.50
9/04/20	LAF	Telephone call with OCH regarding witnesses and documents.	.50	297.50

TOTAL PROFESSIONAL SERVICES RENDERED

\$ 20,212.50

TIMEKEEPER SUMMARY

Name	Rate	Hours	Amount	N/C Hr	N/C \$
Torres, Gloria	195.00	.10	19.50	.00	.00
Ferguson, Elizabeth T	375.00	34.60	12,975.00	.00	.00
Tilman, Elina	395.00	.80	316.00	.00	.00
Fernandez, Louise Ann	595.00	5.60	3,332.00	.00	.00
Ruda, An Nguyen	595.00	6.00	3,570.00	.00	.00
TOTALS		47.10	\$ 20,212.50	.00	\$.00

Client #: 2768
Matter #: 002

September 8, 2020
Invoice #: 126691

TOTAL THIS INVOICE

\$ 20,212.50

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EXHIBIT AO

BARTKO ZANKEL BUNZEL

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July 6, 2020

OConnor Hospital
601 S. Figueroa Street
Suite 4050
Los Angeles, CA 90017

Invoice #: 126067
Client #: 2768
Matter #: 004
Billing Attorney: ANR

For professional services rendered and disbursements advanced through June 30, 2020:

RE: Christina Makem

DETAIL OF PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
6/24/20	ET	Analysis of liability regarding Makem.	.20	79.00
6/24/20	ET	Email A. Estrada regarding bankruptcy issues.	.10	39.50
6/24/20	ET	Respond to K. Murphy and J. Moe regarding carrier coverage.	.10	39.50
6/24/20	ET	Email correspondence with L. Ho, E. Paul, and S. Burdick regarding case.	.40	158.00
6/25/20	ET	Email correspondence with A. Estrada regarding bankruptcy issues.	.30	118.50
6/25/20	ET	Calls with J. Moe regarding claim.	.30	118.50
6/25/20	ET	Review carrier letter.	.10	39.50
6/25/20	ET	Email correspondence with K. Champan regarding carrier letter.	.10	39.50
6/25/20	ET	Email correspondence with DFEH investigator regarding charge.	.40	158.00
6/25/20	ET	Send E. Paul update regarding case.	.20	79.00
6/26/20	ET	Review correspondence from carrier and compare to prior letter.	.10	39.50
6/26/20	ET	Email K. Chapman regarding carrier letters.	.10	39.50
6/26/20	ET	Email carrier regarding coverage position.	.10	39.50
6/28/20	ET	Email correspondence with K. Champan and K. Murphy regarding case.	.10	39.50
6/29/20	ET	Email correspondence with S. Burdick regarding claim and documents.	.20	79.00

TOTAL PROFESSIONAL SERVICES RENDERED

\$ 1,106.00

BARTKO ZANKEL BUNZEL & MILLER

Client #: 2768
Matter #: 004

July 6, 2020
Invoice #: 126067

TIMEKEEPER SUMMARY

Name	Rate	Hours	Amount	N/C Hr	N/C \$
Tilman, Elina	395.00	2.80	1,106.00	.00	.00
TOTALS		2.80	\$ 1,106.00	.00	\$.00

TOTAL THIS INVOICE

\$ 1,106.00

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August 5, 2020

OConnor Hospital
601 S. Figueroa Street
Suite 4050
Los Angeles, CA 90017

Invoice #: 126312
Client #: 2768
Matter #: 004
Billing Attorney: ANR

For professional services rendered and disbursements advanced through July 31, 2020:

RE: Christina Makem

DETAIL OF PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
7/01/20	ET	Email correspondence with carrier regarding coverage.	.10	39.50
7/02/20	ET	Email correspondence with SCC and L. Ho regarding client documents.	.10	39.50
7/02/20	ET	Review additional carrier letter and correspondence with K. Chapman regarding same.	.10	39.50
7/27/20	LAF	Review DFEH charge re Makem.	.30	178.50
7/27/20	LAF	Review personnel documents.	.70	416.50
7/28/20	ET	Analysis of case and response to charge.	.40	158.00
TOTAL PROFESSIONAL SERVICES RENDERED				\$ 871.50

TIMEKEEPER SUMMARY

Name	Rate	Hours	Amount	N/C Hr	N/C \$
Tilman, Elina	395.00	.70	276.50	.00	.00
Fernandez, Louise Ann	595.00	1.00	595.00	.00	.00
TOTALS		1.70	\$ 871.50	.00	\$.00

TOTAL THIS INVOICE

\$ 871.50

BARTKO ZANKEL BUNZEL & MILLER

Client #: 2768
Matter #: 004

August 5, 2020
Invoice #: 126312

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BARTKO ZANKEL BUNZEL

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San Francisco, CA 94111

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www.bzbm.com

September 8, 2020

OConnor Hospital
601 S. Figueroa Street
Suite 4050
Los Angeles, CA 90017

Invoice #: 126692
Client #: 2768
Matter #: 004
Billing Attorney: ANR

For professional services rendered and disbursements advanced through September 4, 2020:

RE: Christina Makem

DETAIL OF PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
8/05/20	ET	Review and analysis of client documents.	.80	316.00
8/05/20	ET	Analysis of needed information.	.10	39.50
8/05/20	ET	Email L. Ho regarding fact-gathering.	.20	79.00
8/05/20	ET	Review and analysis of charge and DFEH correspondence.	.20	79.00
8/06/20	ANR	Review of facts re position statement.	.30	178.50
8/06/20	ET	Call with S. Burdick regarding pending issues.	.10	39.50
8/06/20	ET	Email correspondence with S. Burdick regarding pending issues.	.20	79.00
8/06/20	ET	Email correspondence with J. Si, L. Ho, and P. Ycaro regarding fact-gathering.	.50	197.50
8/06/20	ET	Call J. Si regarding fact-gathering.	.10	39.50
8/06/20	ET	Analysis of client documents.	.30	118.50
8/06/20	ET	Strategize regarding case.	.40	158.00
8/06/20	ET	Analysis of APA.	.20	79.00
8/06/20	ET	Email correspondence with DFEH officer regarding position statement.	.10	39.50
8/07/20	ET	Call with P. Burdick regarding case.	.10	39.50
8/07/20	ET	Email correspondence with P. Burdick regarding case.	.10	39.50
8/07/20	ET	Review client documents.	.20	79.00
8/07/20	ET	Analysis of pending issues.	.20	79.00
8/07/20	ET	Email correspondence with E. Paul regarding case status.	.40	158.00
8/10/20	ET	Review and analysis of client documents and APA.	1.30	513.50
8/10/20	ET	Draft position statement.	4.90	1,935.50
8/10/20	ET	Email correspondence with S. Burdick regarding pending issues.	.10	39.50
8/11/20	ANR	Review of DLSE position statement.	.30	178.50

Client #: 2768
Matter #: 004

September 8, 2020
Invoice #: 126692

Date	Tkpr	Description	Hours	Amount
8/11/20	ET	Calls with J. Moe re position statement and exhibits.	.30	118.50
8/11/20	ET	Make additions and edits to position statement.	1.10	434.50
8/11/20	ET	Email E. Paul and R. Adcock re position statement.	.30	118.50
8/11/20	ET	Analysis of pending issues.	.20	79.00
8/11/20	ET	Determine exhibits for position statement.	.80	316.00
8/11/20	ET	Review and analysis of client documents.	.70	276.50
8/13/20	ET	Analysis of pending issues.	.20	79.00
8/13/20	ET	Email correspondence with E. Paul regarding position statement.	.10	39.50
8/13/20	ET	Review exhibits and make necessary redactions.	.70	276.50
8/13/20	ET	Finalize position statement.	.30	118.50
8/13/20	ET	Finalize exhibits to position statement.	.10	39.50
8/13/20	ET	Email DFEH officer regarding position statement.	.10	39.50
8/14/20	ET	Email correspondence with DFEH officer regarding position statement.	.10	39.50
8/17/20	ET	Draft hold letter to County counsel.	.70	276.50
8/17/20	ET	Email S. Burdick regarding hold.	.10	39.50
8/17/20	ET	Analysis of pending issues.	.10	39.50
9/02/20	ET	Respond to carrier regarding case status.	.10	39.50

TOTAL PROFESSIONAL SERVICES RENDERED

\$ 6,874.50

TIMEKEEPER SUMMARY

Name	Rate	Hours	Amount	N/C Hr	N/C \$
Tilman, Elina	395.00	16.50	6,517.50	.00	.00
Ruda, An Nguyen	595.00	.60	357.00	.00	.00
TOTALS		17.10	\$ 6,874.50	.00	\$.00

TOTAL THIS INVOICE

\$ 6,874.50

*Balance is due within 30 days from the date of this invoice.
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EXHIBIT AP

BARTKO ZANKEL BUNZEL

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June 3, 2020

Richard Adcock and Steven Sharrer
 Verity Health Systems of California
 601 S. Figueroa Street, Suite 4050
 Los Angeles, CA 90017

Invoice #: 125865
 Client #: 2786
 Matter #: 000
 Billing Attorney: ANR

For professional services rendered and disbursements advanced through May 31, 2020:

RE: California Nurses Association v. Verity Health Systems of California, et al.

DETAIL OF PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
5/01/20	MLQ	Review Verity's opposition to withdrawal motion, and prepare opposition for R. Adcock and S. Sharrer.	5.20	3,094.00
5/01/20	LAF	Review motion to withdraw reference and review cases cited.	1.20	714.00
5/01/20	LAF	Review SVMC's opposition and review cited cases.	1.10	654.50
5/01/20	ANR	Review of dispute resolution options.	.20	119.00
5/01/20	ANR	Review of opposition to withdrawal.	.30	178.50
5/02/20	LAF	Further research regarding withdrawal of reference.	3.00	1,785.00
5/02/20	LAF	Emails regarding withdrawal of reference.	.30	178.50
5/02/20	MLR	Review and analyze case law.	1.20	474.00
5/03/20	MLQ	Evaluate additional arguments and review caselaw of opposition to withdrawal of reference motion.	1.60	952.00
5/03/20	LAF	Revise Adcock and Sharrer Opposition.	.60	357.00
5/03/20	LAF	Emails regarding Adcock and Sharrer Opposition.	.20	119.00
5/04/20	LAF	Review VHS Brief.	.50	297.50
5/04/20	LAF	Review and revise individual defendant's brief.	.50	297.50
5/04/20	LAF	Telephone call with Tania Moyron.	.30	178.50
5/04/20	LAF	Implement suggestions from Dentons.	.50	297.50
5/04/20	LAF	Review and respond to multiple emails re brief.	.60	357.00
5/04/20	ANR	Review of final draft of opposition.	.80	476.00
5/08/20	MLQ	Attend to filing of notices of appearance.	.30	178.50
5/11/20	MLQ	Review reply brief from CNA and file notices of appearance.	.70	416.50
5/12/20	MLQ	Receipt and review of CNA opposition brief.	.40	238.00

Client #: 2786
Matter #: 000

June 3, 2020
Invoice #: 125865

Date	Tkpr	Description	Hours	Amount
5/18/20	MLQ	Attend to reply brief for motion to dismiss and coordinate with L. Fernandez re: same.	2.80	1,666.00
5/19/20	MLQ	Prepare reply brief.	4.20	2,499.00
5/19/20	LAF	Review and analyze opposition.	.50	297.50
5/20/20	MLQ	Prepare reply brief.	2.30	1,368.50
5/20/20	LAF	Review and revise reply.	.50	297.50
5/21/20	MLQ	Prepare reply brief and coordinate with L. Fernandez and Dentons re: same.	4.60	2,737.00
5/21/20	LAF	Finalize reply and review same.	.30	178.50
5/21/20	ANR	Review of possible mediators.	.50	297.50
5/21/20	ANR	Review of CNA briefing and of draft reply.	1.00	595.00
5/22/20	MLQ	Prepare and file reply brief for motion to dismiss, including review and incorporation of Debtors' reply brief.	2.10	1,249.50
5/22/20	ANR	Email to Lockton re status.	.10	59.50
5/22/20	ANR	Review of Dentons reply brief.	.50	297.50
5/26/20	MLQ	Coordinate with Dentons to postpone hearing dates in bankruptcy and district court actions to accommodate mediation.	.20	119.00
5/26/20	ANR	Email to carrier re status update.	.10	59.50
5/27/20	ANR	Review of case status and timelines.	.60	357.00
5/28/20	MLQ	Coordinate with Dentons to stay bankruptcy court action to accommodate mediation.	.20	119.00
5/29/20	ANR	Status update to T. Knets re case.	.30	178.50
5/29/20	ANR	Review of stipulation timelines.	.40	238.00

TOTAL PROFESSIONAL SERVICES RENDERED

\$ 23,976.50

TIMEKEEPER SUMMARY

Name	Rate	Hours	Amount	N/C Hr	N/C \$
Raymond, Marcia L.	395.00	1.20	474.00	.00	.00
Quazzo, Marco L.	595.00	24.60	14,637.00	.00	.00
Fernandez, Louise Ann	595.00	10.10	6,009.50	.00	.00
Ruda, An Nguyen	595.00	4.80	2,856.00	.00	.00
TOTALS		40.70	\$ 23,976.50	.00	\$.00

DISBURSEMENTS ADVANCED

Date	Description	Amount
	ACC Federal Express Charges	34.48

TOTAL DISBURSEMENTS ADVANCED

\$ 34.48

Client #: 2786
Matter #: 000

June 3, 2020
Invoice #: 125865

TOTAL THIS INVOICE

\$ 24,010.98

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In Account With

BARTKO ZANKEL BUNZEL

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July 6, 2020

Richard Adcock and Steven Sharrer
 Verity Health Systems of California
 601 S. Figueroa Street, Suite 4050
 Los Angeles, CA 90017

Invoice #: 126073
 Client #: 2786
 Matter #: 000
 Billing Attorney: ANR

For professional services rendered and disbursements advanced through June 30, 2020:

RE: California Nurses Association v. Verity Health Systems of California, et al.

DETAIL OF PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
6/01/20	ANR	Review of mediators.	.20	119.00
6/01/20	ANR	Email to carrier re proposed mediator.	.10	59.50
6/02/20	ANR	Review email from T. Knets re mediation dates.	.10	59.50
6/02/20	ANR	Reply to email from T. Knets re mediation dates.	.10	59.50
6/03/20	ANR	Review of email from T. Knets re motion papers.	.10	59.50
6/03/20	ANR	Reply to email from T. Knets re motion papers.	.10	59.50
6/04/20	ANR	Review of coverage position.	.50	297.50
6/05/20	ANR	Review of emails with Dentons re mediation date.	.10	59.50
6/05/20	ANR	Email with T. Knets re mediation dates.	.10	59.50
6/08/20	ANR	Review of confirmation re mediation.	.10	59.50
6/10/20	LAF	Review documents to identify documents/pleadings requested by Insurer.	2.50	1,487.50
6/10/20	LAF	Follow up on questions raised by insurer.	.50	297.50
6/15/20	LAF	Review documents requested by carrier.	1.00	595.00
6/15/20	LAF	Prepare responses to questions from carrier.	.50	297.50
6/16/20	ANR	Review of broker email re carrier information.	.10	59.50
6/17/20	MLQ	Prepare exposure analysis for mediation.	.50	297.50
6/17/20	LAF	Review of emails from CNA re mediation.	.10	59.50
6/17/20	LAF	Review of email from Dentons re mediation.	.10	59.50
6/17/20	ANR	Review of emails from CNA re mediation.	.10	59.50
6/17/20	ANR	Review of email from Dentons re mediation.	.10	59.50
6/17/20	ANR	Review of mediation statement.	.10	59.50
6/18/20	MLQ	Prepare exposure analysis for mediation and attend to pre-mediation conference.	.80	476.00

Client #: 2786
Matter #: 000

July 6, 2020
Invoice #: 126073

Date	Tkpr	Description	Hours	Amount
6/18/20	LAF	Finalize email to carrier in response to questions.	.20	119.00
6/18/20	LAF	Review additional documents and correspondence to send to carrier.	.50	297.50
6/18/20	LAF	Review of mediation questionnaire response.	.20	119.00
6/18/20	ANR	Review of mediation questionnaire response.	.20	119.00
6/19/20	MLQ	Prepare exposure analysis for mediation and teleconference with A. Ruda and L. Fernandez re: same.	1.50	892.50
6/19/20	LAF	Review exposure analysis.	.50	297.50
6/19/20	LAF	Strategy call re same with M Quazzo and A Ruda.	.40	238.00
6/22/20	MLQ	Prepare preliminary exposure analysis and investigate comparable jury verdicts.	2.20	1,309.00
6/22/20	LAF	Revisions to preliminary exposure analysis.	.50	297.50
6/22/20	ANR	Revisions to preliminary exposure analysis.	2.50	1,487.50
6/24/20	LAF	Review of finalized exposure analysis.	.50	297.50
6/24/20	LAF	Review emails re same.	.20	119.00
6/24/20	LAF	Pre mediation conference call with Mediator.	.90	535.50
6/24/20	LAF	Prepare for same.	.50	297.50
6/24/20	ANR	Review of finalized exposure analysis.	1.00	595.00
6/25/20	LAF	Review of emails re continuance of mediation.	.20	119.00
6/26/20	ANR	Review of rescheduled mediation dates.	.30	178.50
6/29/20	LAF	Read and review emails re continuance of Mediation.	.30	178.50

TOTAL PROFESSIONAL SERVICES RENDERED

\$ 12,197.50

TIMEKEEPER SUMMARY

Name	Rate	Hours	Amount	N/C Hr	N/C \$
Quazzo, Marco L.	595.00	5.00	2,975.00	.00	.00
Fernandez, Louise Ann	595.00	9.60	5,712.00	.00	.00
Ruda, An Nguyen	595.00	5.90	3,510.50	.00	.00
TOTALS		20.50	\$ 12,197.50	.00	\$.00

TOTAL THIS INVOICE

\$ 12,197.50

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Client #: 2786
Matter #: 000

July 6, 2020
Invoice #: 126073

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August 5, 2020

Richard Adcock and Steven Sharrer
 Verity Health Systems of California
 601 S. Figueroa Street, Suite 4050
 Los Angeles, CA 90017

Invoice #: 126316
 Client #: 2786
 Matter #: 000
 Billing Attorney: ANR

For professional services rendered and disbursements advanced through July 31, 2020:

RE: California Nurses Association v. Verity Health Systems of California, et al.

DETAIL OF PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
7/10/20	ANR	Review of mediation agreement.	.20	119.00
7/10/20	ANR	Email to Dentons re mediation brief draft.	.10	59.50
7/12/20	LAF	Review Denton's mediation statement.	.40	238.00
7/12/20	LAF	Research re mediation statement issues.	1.00	595.00
7/12/20	LAF	Draft mediation statement.	5.00	2,975.00
7/12/20	ANR	Preparation of fact section of mediation brief.	1.80	1,071.00
7/12/20	ANR	Revision to remainder of brief.	.80	476.00
7/13/20	LAF	Revise mediation statement.	3.00	1,785.00
7/13/20	LAF	Further research re fraud claims.	1.50	892.50
7/13/20	ANR	Revision to mediation statement.	.50	297.50
7/13/20	ANR	Review email with T. Knets re mediation.	.10	59.50
7/14/20	LAF	Review and analyze Hospital mediation brief.	1.20	714.00
7/14/20	LAF	Revise mediation brief.	4.00	2,380.00
7/14/20	LAF	Numerous telephone call re same.	.80	476.00
7/14/20	ANR	Telephone call with Dentons re mediation brief.	.30	178.50
7/14/20	ANR	Revisions to brief.	1.40	833.00
7/14/20	ANR	Fact check of mediation brief.	.30	178.50
7/16/20	ANR	Conference call with T. Knets and T. Moyron re mediation.	.30	178.50
7/20/20	LAF	Review documents, prepare for mediation.	1.50	892.50
7/20/20	LAF	Conference call with Dentons team re mediation coordination.	.30	178.50
7/20/20	LAF	Emails to Denton's team re: mediation preparation.	.10	59.50
7/20/20	ANR	Preparation for mediation.	1.80	1,071.00

Client #: 2786
Matter #: 000

August 5, 2020
Invoice #: 126316

Date	Tkpr	Description	Hours	Amount
7/20/20	ANR	Conference call with Dentons team re mediation coordination.	.30	178.50
7/21/20	LAF	Represent clients at mediation.	8.00	4,760.00
7/21/20	LAF	Review documents re other settlements.	.30	178.50
7/21/20	LAF	Work on term sheet.	.50	297.50
7/21/20	ANR	Attend mediation.	8.50	5,057.50
7/22/20	LAF	Work on and review revisions to term sheet.	.70	416.50
7/22/20	LAF	Conference call with client re term sheet.	.50	297.50
7/22/20	ANR	Revisions to term sheet .	1.20	714.00
7/22/20	ANR	Conference call with client re term sheet.	.50	297.50
7/24/20	LAF	Represent client and finalize termsheet during mediation.	5.00	2,975.00
7/24/20	ANR	Mediation session with J. Coar re term sheet.	3.00	1,785.00
7/30/20	ANR	Review of email from Dentons re settlement agreement.	.10	59.50
7/30/20	ANR	Review of long form settlement agreement.	.50	297.50

TOTAL PROFESSIONAL SERVICES RENDERED

\$ 33,022.50

TIMEKEEPER SUMMARY

Name	Rate	Hours	Amount	N/C Hr	N/C \$
Fernandez, Louise Ann	595.00	33.80	20,111.00	.00	.00
Ruda, An Nguyen	595.00	21.70	12,911.50	.00	.00
TOTALS		55.50	\$ 33,022.50	.00	\$.00

TOTAL THIS INVOICE

\$ 33,022.50

Balance is due within 30 days from the date of this invoice.

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September 8, 2020

Richard Adcock and Steven Sharrer
Verity Health Systems of California
601 S. Figueroa Street, Suite 4050
Los Angeles, CA 90017

Invoice #: 126693
Client #: 2786
Matter #: 000
Billing Attorney: ANR

For professional services rendered and disbursements advanced through September 4, 2020:

RE: California Nurses Association v. Verity Health Systems of California, et al.

DETAIL OF PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
8/03/20	ANR	Review email from T. Knets re settlement.	.10	59.50
8/03/20	ANR	Reply to email from T. Knets re settlement.	.10	59.50
8/04/20	ANR	Review of settlement agreement redline.	.50	297.50
8/05/20	ANR	Review of email from T. Knets re settlement agreement.	.10	59.50
8/05/20	ANR	Reply to email from T. Knets re settlement agreement.	.10	59.50
8/06/20	ANR	Conference call with T. Knets re mediation.	.30	178.50
8/10/20	ANR	Review notice of settlement.	.20	119.00
8/10/20	ANR	Email to Dentons approving notice of settlement.	.10	59.50
8/14/20	ANR	Telephone call with A. Yousefi re 9019 motion.	.10	59.50
8/14/20	ANR	Telephone call with A. Yousefi and S. McCandless re 9019 motion.	.10	59.50
8/14/20	ANR	Telephone call with T. Moyron and M. Zeefe re 9019 motion.	.10	59.50
8/14/20	ANR	Review of 9019 motion.	.90	535.50
8/14/20	ANR	Redline of release.	.90	535.50
8/14/20	ANR	Email of release to Dentons team.	.10	59.50
9/01/20	LAF	Prepare emails to follow up re data from OCH.	.60	357.00
9/04/20	ANR	Telephone call to T. Knets re release.	.10	59.50
9/04/20	ANR	Telephone call with T. Moyron re release.	.10	59.50

TOTAL PROFESSIONAL SERVICES RENDERED

\$ 2,677.50

Client #: 2786
Matter #: 000

September 8, 2020
Invoice #: 126693

TIMEKEEPER SUMMARY

Name	Rate	Hours	Amount	N/C Hr	N/C \$
Fernandez, Louise Ann	595.00	.60	357.00	.00	.00
Ruda, An Nguyen	595.00	3.90	2,320.50	.00	.00
TOTALS		4.50	\$ 2,677.50	.00	\$.00

TOTAL THIS INVOICE

\$ 2,677.50

*Balance is due within 30 days from the date of this invoice.
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EXHIBIT AQ

BARTKO ZANKEL BUNZEL

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June 3, 2020

Verity Medical Foundation
601 S. Figueroa Street
Suite 4050
Los Angeles, CA 90017

Invoice #: 125866
Client #: 2801
Matter #: 000
Billing Attorney: ANR

For professional services rendered and disbursements advanced through May 31, 2020:

RE: General Labor

DETAIL OF PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
5/06/20	ET	Calls with Compex regarding service issues for Rodriguez subpoena.	.20	79.00
5/06/20	ET	Email County regarding incomplete Rodriguez subpoena.	.10	39.50
5/06/20	ET	Email correspondence with C. Mullin regarding Rodriguez subpoena status.	.10	39.50
TOTAL PROFESSIONAL SERVICES RENDERED				\$ 158.00

TIMEKEEPER SUMMARY

Name	Rate	Hours	Amount	N/C Hr	N/C \$
Tilman, Elina	395.00	.40	158.00	.00	.00
TOTALS		.40	\$ 158.00	.00	\$.00

TOTAL THIS INVOICE

\$ 158.00

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July 6, 2020

Verity Medical Foundation
601 S. Figueroa Street
Suite 4050
Los Angeles, CA 90017

Invoice #: 126074
Client #: 2801
Matter #: 000
Billing Attorney: ANR

For professional services rendered and disbursements advanced through June 30, 2020:

RE: General Labor

DETAIL OF PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
6/20/20	ET	Preliminary review of new wage and hour claims.	.20	79.00
6/22/20	ET	Review and analysis of Santiago and Angulo claims and documents.	.50	197.50
6/22/20	ET	Send update regarding Santiago and Angulo claims to J. Moe and K. Chapman, and Hope Biehl.	.20	79.00
6/22/20	ET	Email E. Paul and R. Adcock regarding DLSE claims.	.10	39.50
6/22/20	ET	Email correspondence with L. Ho, A. Estrada, K. Chapman, K. Vitale regarding Santiago and Angulo claims.	.60	237.00
6/22/20	ET	Email correspondence with P. Opp regarding Santiago and Angulo claims.	.10	39.50
6/22/20	ET	Email correspondence with K. Vitale regarding workers compensation carrier information.	.30	118.50
6/24/20	ET	Make additions to DLSE letter regarding Santiago and Angulo claims.	.30	118.50
6/24/20	ET	Finalize exhibits to DLSE letter.	.10	39.50
6/24/20	ET	Email L. Ho and A. Brown regarding fact-gathering for Santiago and Angulo claims.	.10	39.50
6/24/20	ET	Review bankruptcy pleadings regarding VMF sale.	.10	39.50
6/24/20	ET	Email correspondence with N. Koffron regarding VMF status.	.10	39.50
6/24/20	ET	Call with J. Moe regarding pending claims.	.10	39.50
6/24/20	ET	Call NLRB agent regarding SIEU charge.	.10	39.50
6/24/20	ET	Email Deputy commissioner regarding Santiago and Angulo claims.	.10	39.50
6/25/20	ET	Review and analysis of Santiago documents.	.20	79.00
6/25/20	ET	Review and analysis of information regarding Angulo claim.	.10	39.50
6/25/20	ET	Analysis of next steps regarding Santiago and Angulo cases.	.40	158.00
6/25/20	ET	Email L. Ho, J. Si, and A. Brown regarding DLSE cases and further needed facts.	.40	158.00

Client #: 2801
Matter #: 000

July 6, 2020
Invoice #: 126074

Date	Tkpr	Description	Hours	Amount
6/25/20	ET	Call with Y. Devi regarding Santiago case.	.30	118.50
6/25/20	ET	Review carrier letters from Santiago and Angualo.	.10	39.50
6/25/20	ET	Email K. Chapman regarding carrier letters for Santiago and Angualo.	.10	39.50
6/26/20	ET	Call with Y. Devi regarding Santiago case.	.10	39.50
6/26/20	ET	Multiple email correspondence with D. Devi, B. Paulsen, M. Day, and I. Golomeic, J. Si regarding Santiago case.	.60	237.00
6/26/20	ET	Email E. Paul regarding pending issues with data.	.20	79.00
6/26/20	ET	Review client documents.	.10	39.50
6/30/20	ET	Email A. Brown re Angulo claim information.	.10	39.50
6/30/20	ET	Review Santiago client documents.	.10	39.50

TOTAL PROFESSIONAL SERVICES RENDERED **\$ 2,291.00**

TIMEKEEPER SUMMARY

Name	Rate	Hours	Amount	N/C Hr	N/C \$
Tilman, Elina	395.00	5.80	2,291.00	.00	.00
TOTALS		5.80	\$ 2,291.00	.00	\$.00

TOTAL THIS INVOICE **\$ 2,291.00**

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August 5, 2020

Verity Medical Foundation
601 S. Figueroa Street
Suite 4050
Los Angeles, CA 90017

Invoice #: 126317
Client #: 2801
Matter #: 000
Billing Attorney: ANR

For professional services rendered and disbursements advanced through July 31, 2020:

RE: General Labor

DETAIL OF PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
7/01/20	ET	Email correspondence with A. Brown regarding Angulo.	.10	39.50
7/03/20	ET	Email DLSE hearing officer regarding Santiago and Angulo claims.	.40	158.00
7/06/20	ET	Review and analysis of Santiago client documents.	.30	118.50
7/06/20	ET	Email correspondence with M. Day and HR regarding fact-gathering.	.20	79.00
7/15/20	ET	Review and analysis of Best subpoena.	.20	79.00
7/15/20	ET	Email G. Plascencia regarding Best subpoena invalidity.	.20	79.00
7/17/20	ET	Email correspondence with county and process server regarding Best subpoena.	.20	79.00
7/17/20	ET	Review emails and documents from N. Nguyen and T. Conner regarding Angelo claim.	.10	39.50
7/17/20	ET	Respond to N. Nguyen and T. Conner regarding Angelo claim.	.20	79.00
7/22/20	ET	Review carrier responses for Santiago claim and correspondence with K. Chapman regarding same.	.10	39.50
7/22/20	ET	Review and analysis of motion to compel and exhibits regarding Zikoor subpoena.	.40	158.00
7/22/20	ET	Email counsel regarding Zikoor motion to compel and VMF's response.	.40	158.00
7/22/20	ET	Email correspondence with Hope, K. Champan, and L. Seargeant regarding Zikoor subpoena and next steps.	.50	197.50
7/22/20	ET	Review secretary of state website regarding service issues.	.10	39.50
7/23/20	ET	Email correspondence with counsel regarding Zikoor subpoena.	.20	79.00
7/23/20	ET	Review Zikoor subpoena.	.10	39.50
7/23/20	ET	Email correspondence with C. Mullen regarding Zikoor subpoena follow-up information.	.10	39.50
7/23/20	ET	Call with J. Moe regarding medical record issue.	.10	39.50
7/23/20	ET	Email P. Chadwick regarding VMF subpoena issues.	.30	118.50

Client #: 2801
Matter #: 000

August 5, 2020
Invoice #: 126317

Date	Tkpr	Description	Hours	Amount
7/23/20	ET	Review and analysis of Siddiqui and Picchi subpoenas.	.20	79.00
7/23/20	ET	Respond to N. Nguyen regarding VMF subpoenas.	.10	39.50
7/24/20	ET	Email correspondence with P. Chadwick and C. Mullen regarding medical record subpoenas and protocol.	.20	79.00
7/24/20	ET	Email correspondence with counsel and C. Mullen regarding Zikoor subpoena.	.10	39.50
7/27/20	ET	Review carrier correspondence regarding Arullo and email regarding same with K. Chapman.	.10	39.50
7/27/20	ET	Review and analysis of Rodriguez subpoena and assess next steps.	.20	79.00
7/27/20	ET	Email SCC and process server regarding invalid Rodriguez subpoena.	.20	79.00
7/27/20	ET	Email K. Chapman and K. Murphy regarding Rodriguez subpoena.	.10	39.50
7/27/20	ET	Call with K. Murphy regarding Rodriguez subpoena.	.10	39.50
7/28/20	ET	Email correspondence with C. Mullen regarding Zikoor subpoena.	.20	79.00
7/28/20	ET	Review Zikoor subpoena and treatment information.	.10	39.50
7/28/20	ET	Call with C. Mullen regarding Zikoor subpoena.	.10	39.50
7/28/20	ET	Email counsel regarding Zikoor subpoena.	.30	118.50
7/28/20	ET	Review demand for Quinonez's records.	.10	39.50
7/28/20	ET	Email correspondence with K. Chapman, Compex, and counsel regarding Quinonez subpoena.	.20	79.00
7/28/20	ET	Email correspondence with C. Mullen regarding Siddiqui and Ryan subpoenas.	.20	79.00
7/29/20	ET	Review Ervand Sanosyan subpoena.	.10	39.50
7/29/20	ET	Correspondence with process server and C. Mullen regarding subpoenas.	.20	79.00

TOTAL PROFESSIONAL SERVICES RENDERED **\$ 2,765.00**

TIMEKEEPER SUMMARY

Name	Rate	Hours	Amount	N/C Hr	N/C \$
Tilman, Elina	395.00	7.00	2,765.00	.00	.00
TOTALS		7.00	\$ 2,765.00	.00	\$.00

TOTAL THIS INVOICE **\$ 2,765.00**

*Balance is due within 30 days from the date of this invoice.
We reserve the right to charge interest at 10% per annum on amounts not paid within 30 days.*

BARTKO ZANKEL BUNZEL & MILLER

Client #: 2801
Matter #: 000

August 5, 2020
Invoice #: 126317

BARTKO ZANKEL BUNZEL

BARTKO ZANKEL BUNZEL & MILLER
A Professional Law Corporation

One Embarcadero Center, Ste. 800
San Francisco, CA 94111
p: 415.956.1900
f: 415.956.1152
www.bzbm.com

September 8, 2020

Verity Medical Foundation
601 S. Figueroa Street
Suite 4050
Los Angeles, CA 90017

Invoice #: 126694
Client #: 2801
Matter #: 000
Billing Attorney: ANR

For professional services rendered and disbursements advanced through September 4, 2020:

RE: General Labor

DETAIL OF PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
8/31/20	ET	Review Walkers subpoena and respond to K. Chapman re same.	.10	39.50

TOTAL PROFESSIONAL SERVICES RENDERED \$ 39.50

TIMEKEEPER SUMMARY

Name	Rate	Hours	Amount	N/C Hr	N/C \$
Tilman, Elina	395.00	.10	39.50	.00	.00
TOTALS		.10	\$ 39.50	.00	\$.00

TOTAL THIS INVOICE \$ 39.50

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EXHIBIT AR

In Account With

BARTKO ZANKEL BUNZEL

BARTKO ZANKEL BUNZEL & MILLER

A Professional Law Corporation

One Embarcadero Center, Ste. 800

San Francisco, CA 94111

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July 6, 2020

Verity Medical Foundation
601 S. Figueroa Street
Suite 4050
Los Angeles, CA 90017

Invoice #: 126075
Client #: 2801
Matter #: 001
Billing Attorney: ANR

For professional services rendered and disbursements advanced through June 30, 2020:

RE: Sofia Santiago

DETAIL OF PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
6/23/20	ET	Email correspondence with J. Moe, J. Davis, and E. Paul regarding Santiago and Angulo matters.	.40	158.00
6/23/20	ET	Draft letter to DLSE regarding Santiago and Angulo claims.	.70	276.50
6/23/20	ET	Review client documents for DLSE claims.	.20	79.00
6/23/20	ET	Complete workers' compensation documents for Santiago and Angulo claims.	.40	158.00

TOTAL PROFESSIONAL SERVICES RENDERED **\$ 671.50**

TIMEKEEPER SUMMARY

Name	Rate	Hours	Amount	N/C Hr	N/C \$
Tilman, Elina	395.00	1.70	671.50	.00	.00
TOTALS		1.70	\$ 671.50	.00	\$.00

TOTAL THIS INVOICE **\$ 671.50**

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BARTKO ZANKEL BUNZEL

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September 8, 2020

Verity Medical Foundation
601 S. Figueroa Street
Suite 4050
Los Angeles, CA 90017

Invoice #: 126695
Client #: 2801
Matter #: 001
Billing Attorney: ANR

For professional services rendered and disbursements advanced through September 4, 2020:

RE: Sofia Santiago

DETAIL OF PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
8/04/20	ET	Research and analysis regarding waiting time penalties.	.60	237.00
8/04/20	ET	Review employment records and Outlook searches for Santiago claim.	1.10	434.50
8/04/20	ET	Draft summary of facts for Santiago claim.	.30	118.50
8/04/20	ET	Strategize regarding response to DLSE regarding Santiago claim.	.20	79.00
8/04/20	ET	Email correspondence with J. Si and I. Golomeic regarding Santiago claim.	.30	118.50
8/04/20	ET	Draft response letter to DLSE regarding Santiago claim.	1.30	513.50
8/04/20	ET	Email J. Moe regarding Santiago claim.	.20	79.00
8/04/20	ET	Review client documents and determine exhibits for Santiago claim.	.40	158.00
8/05/20	ET	Call with J. Moe regarding Santiago claim.	.10	39.50
8/05/20	ET	Email correspondence with R. Adcock and H. Biehl regarding Santiago claim.	.40	158.00
8/05/20	ET	Finalize DLSE letter and exhibits regarding Santiago claim.	.50	197.50
8/05/20	ET	Strategize regarding Santiago claim.	.10	39.50
8/05/20	ET	Email DLSE commissioner regarding Santiago claim.	.10	39.50
8/10/20	ET	Review correspondence from DLSE regarding Santiago.	.10	39.50
8/10/20	ET	Respond to DLSE officer regarding Santiago.	.10	39.50
8/10/20	ET	Email R. Adcock and J. Moe update regarding Santiago claim.	.10	39.50

TOTAL PROFESSIONAL SERVICES RENDERED

\$ 2,330.50

Client #: 2801
Matter #: 001

September 8, 2020
Invoice #: 126695

TIMEKEEPER SUMMARY

Name	Rate	Hours	Amount	N/C Hr	N/C \$
Tilman, Elina	395.00	5.90	2,330.50	.00	.00
TOTALS		5.90	\$ 2,330.50	.00	\$.00

TOTAL THIS INVOICE

\$ 2,330.50

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EXHIBIT AS

In Account With

BARTKO ZANKEL BUNZEL

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September 8, 2020

Verity Medical Foundation
601 S. Figueroa Street
Suite 4050
Los Angeles, CA 90017

Invoice #: 126696
Client #: 2801
Matter #: 002
Billing Attorney: ANR

For professional services rendered and disbursements advanced through September 4, 2020:

RE: Valeria Revollo Angulo

DETAIL OF PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
8/03/20	ET	Review carrier response regarding Angulo case.	.10	39.50
8/03/20	ET	Email J. Moe and K. Chapman regarding Angulo case.	.10	39.50
TOTAL PROFESSIONAL SERVICES RENDERED				\$ 79.00

TIMEKEEPER SUMMARY

Name	Rate	Hours	Amount	N/C Hr	N/C \$
Tilman, Elina	395.00	.20	79.00	.00	.00
TOTALS		.20	\$ 79.00	.00	\$.00

TOTAL THIS INVOICE \$ 79.00

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