

SNELL & WILMER L.L.P.
Tiffany Brosnan, Bar No. 184810
tbrosnan@swlaw.com
Erin D. Leach, Bar No. 247785
eleach@swlaw.com
Andrew B. Still, Bar No. 312444
astill@swlaw.com
600 Anton Blvd, Suite 1400
Costa Mesa, California 92626-7689
Telephone: 714.427.7000
Facsimile: 714.427.7799

Special Counsel to Karen Sue Naylor,
Chapter 7 Trustee

UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA – SANTA ANA DIVISION

In re:
ANNA’S LINENS, INC.,
Debtor

Case No. 8:15-bk-13008-TA
Chapter 7

Third Interim Fee Application of Snell & Wilmer L.L.P. for Approval of Compensation and Reimbursement of Expenses as Special Litigation Counsel for Karen Sue Naylor, Chapter 7 Trustee; Declaration of Tiffany Brosnan

Hearing Information:

Date: December 15, 2020
Time: 11:00 a.m.
Cttrm.: 5B
Address: 411 West Fourth Street
Santa Ana, CA 92701

**TO THE HONORABLE THEODOR C. ALBERT, UNITED STATES
BANKRUPTCY JUDGE, THE OFFICE OF THE UNITED STATES TRUSTEE, AND
ALL INTERESTED PARTIES:**

Snell & Wilmer, L.L.P. (“S&W” or the “Firm”), special counsel to Karen Sue Naylor, Chapter 7 Trustee (“Trustee”) for the bankruptcy estate (“Estate”) of Anna’s Linens, Inc. (“Debtor”), pursuant to section 331 of title 11 of the United States Code (the “Bankruptcy Code”) hereby applies to the Court for an order approving this Third Interim Fee Application for

1 Approval of Compensation and Reimbursement of Expenses (the “Application”) for the period
2 beginning June 1, 2020 through November 13, 2020 (the “Application Period”).

3 This Application is brought pursuant to Bankruptcy Code section 331, Rule 2016 of the
4 Federal Rules of Bankruptcy Procedure (“FRBP”), Rule 2016-1 of the Local Bankruptcy Rules
5 for the Central District of California (“LBR”), and is supported by the Declaration of Tiffany
6 Brosnan attached hereto (“Brosnan Declaration”).

7 During the Application Period, the Firm has spent 51.3 hours representing the Trustee and
8 the Estate in accordance with its scope of employment, as described in the Application of Chapter
9 7 Trustee to Employ Snell & Wilmer L.L.P. as Special Litigation Counsel for the Estate in
10 Pending Adversary Proceeding, filed on June 4, 2019, as Docket No. 2479 (the “Employment
11 Application”). In particular, S&W has assisted, advised and represented the Trustee and the
12 interests of the Estate in connection with the adversary proceeding filed on July 1, 2015, styled
13 *Linda Martz-Gomez v. Anna’s Linens, Inc., et al.*, Adv. Proc. No. 8:15-ap-01293-TA (the
14 “WARN Adversary”).

15 Based upon its ordinary hourly rates in effect at the time S&W rendered the services, the
16 total fees incurred during the Application Period are \$30,278.00. In addition, S&W incurred
17 expenses for which it is seeking reimbursement in the total amount of \$643.45. By this
18 Application, S&W seeks entry of an order granting allowance of compensation and
19 reimbursement of expenses in the total amount of \$30,921.45 for services rendered and costs
20 incurred during the Application Period on an interim basis.

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I.

SUMMARY

A. Basic Information

Name of applicant	Snell & Wilmer L.L.P.
Name of client	Karen Sue Naylor, Chapter 7 Trustee
Time period covered by this application	6/1/2020 through 11/13/2020
Total compensation sought this period	\$30,278.00
Total expenses sought this period	\$643.45
Petition date	6/14/2015
Date of entry of order approving employment	7/1/2019
Date of filing of last fee and/or expense application	6/4/2020
Total amount requested in all prior applications	\$50,409.29 (fees: \$50,083.00; expenses: \$326.29)
Date of order approving last fee application	7/1/2020
Total fees/expenses approved by interim order to date	\$50,409.29 (fees: \$50,083.00; expenses: \$326.29)
Total amount actually paid pursuant to prior approved applications	\$50,409.29
Total amount currently due but unpaid pursuant to prior approved applications	\$0.00
Retainer received	N/A
Retainer remaining	N/A

B. Summary of Requested Fees by Individual

Name	Title	Year Admitted	Hourly Rate	Effective Rate	Total Hours	Total Fees
Tiffany Brosnan	Partner	1996	\$625.00	\$625.00	36.3	\$22,687.50
Erin Leach	Counsel	2006	\$545.00	\$545.00	11.5	\$6,267.50
Andrew Still	Associate	2016	\$435.00	\$435.00	2.8	\$1,218.00
Kyle Stowell	Paralegal Assistant	N/A	\$150.00	\$150.00	.7	\$105.00
TOTAL			Blended Rates: All: \$438.75 Attorneys: \$535		51.3	\$30,278.00

C. Summary of Requested Fees by Project Category

Category	Hours	Total
Fee Applications	3.3	\$1,435.50
Litigation	48	\$28,842.50
TOTAL		\$30,278.00

D. Summary of Requested Expenses

Type of Expense	Reimbursement Requested
FedEx/UPS	\$28.15
Pacer Service Fees	\$4.50
Westlaw Research	\$600.00
Scanning Expense	\$9.40
Printing Expense	\$1.40
TOTAL	\$643.45

II.

JURISDICTION

This Court has jurisdiction to consider this Application pursuant to 28 U.S.C. sections 157 and 1334. This matter is a core proceeding pursuant to 28 U.S.C. section 157(b). Venue is proper before this Court pursuant to 28 U.S.C. sections 1408 and 1409.

III.

RELEVANT BACKGROUND

On June 14, 2015, the Debtor commenced the above-captioned case by the filing of a voluntary petition for relief under chapter 11 of the Bankruptcy Code. On March 2, 2016, as Docket No. 1379, the Debtor filed a motion to convert the case to one under chapter 7 of the Bankruptcy Code. On March 30, 2016, as Docket No. 1455, the Court entered its order converting this case to

one under chapter 7. The Trustee was appointed on March 31, 2016, as reflected in Docket No. 1458.

On June 4, 2019, the Trustee caused to be filed the Employment Application wherein the Trustee sought authority to employ the Firm to represent her and the Estate in connection with the WARN Adversary, with such employment effective as of March 30, 2019. On July 1, 2019, as Docket No. 2521, the Court entered its order authorizing the employment of S&W as special litigation counsel for the Trustee. This Application represents S&W's third interim fee application. On November 14, 2019, as Docket No. 2645, S&W filed its First Interim Fee Application for Approval of Compensation and Reimbursement of Expenses (the "First Fee Application"), wherein S&W sought approval of \$31,033.50 in fees and \$13.37 in expenses. On December 17, 2019, as Docket No. 2724, the Court entered its order approving the First Fee Application, approving S&W's fees in the amount of \$31,033.50 and expenses in the amount of \$13.37. On June 4, 2020, as Docket No. 2775, S&W filed its Second Interim Fee Application for Approval of Compensation and Reimbursement of Expenses (the "Second Fee Application"), wherein S&W sought approval of \$19,049.50 in fees and \$312.92 in expenses. On July 1, 2020, as Docket No. 2799, the Court entered its order approving the Second Fee Application, approving S&W's fees in the amount of \$19,049.50 and expenses in the amount of \$312.92.

The parties have reached a settlement of the WARN Adversary. On September 20, 2020, the Trustee filed her *Motion to Approve Compromise of Controversy By and Between the Chapter 7 Trustee, on the One Hand, and Linda Martz-Gomez, on her Own Behalf and on Behalf of Others Similarly Situated, on the Other, as to the Claims Asserted Against the Estate in Class Action Adversary Proceeding No. 8:15-ap-01293-TA, Pursuant to F.R.B.P. 9019 and 7023* [Docket No. 2809] ("Motion for Approval of Compromise"). On October 21, 2020, the Court entered an Order preliminarily granting the Motion for Approval of Compromise, approving the form and manner of notice to the class members of the proposed settlement, and scheduling a final hearing for approval of the settlement [Docket No. 2861]. The Court scheduled the final hearing for approval of the settlement for December 9, 2020 at 11:00 a.m.

1 The pre-trial conference in the WARN Adversary is presently scheduled for December 3,
2 2020. However, in light of the settlement and the Motion for Approval of Compromise, on
3 November 13, 2020, the parties filed their *Stipulation to Modify Scheduling Order*, requesting a
4 continuance of the pre-trial conference to March 3, 2021, and continuing the stay of discovery
5 pursuant to the parties prior stipulations [Adv. Docket No. 111].

6 Since her appointment, the Trustee has liquidated most of the Estate's assets, and has
7 administered the Estate. A more detailed narrative history and report concerning the status of the
8 case, the Trustee's administration of the Estate, and funds on hand in the Estate is set forth in the
9 Eighth Interim Fee Application of Ringstad & Sanders LLP for the Allowance and Payment of Fees
10 and Reimbursement of Expenses, and is incorporated herein by this reference pursuant to LBR
11 2016-1(a)(1)(A)(iv).

12 IV.

13 **SUMMARY OF S&W PROFESSIONALS**

14 S&W is an international law partnership with locations in, among other places, Costa Mesa,
15 California. All attorneys who appear in this case and work on this matter are duly licensed to
16 practice in the State of California and various United States District Courts, including the Central
17 District of California. S&W is well-qualified and experienced to have performed services in this
18 case.

19 S&W has staffed this case with attorneys and paraprofessionals with experience and
20 expertise in separate and distinct areas, including employment and labor-related counseling and
21 litigation, and bankruptcy proceedings. The Firm's professional resume, along with the
22 backgrounds of attorneys at the Firm who are responsible for providing services to the Trustee and
23 the Estate are attached to the Brosnan Declaration as Exhibit 2 and incorporated herein by this
24 reference. Pursuant to LBR 2016-1(a)(1)(H), the biographies include a description of the
25 professional education and experience of each S&W attorney rendering services, including
26 identification of the professional school attended, year of graduation, relevant publications or other
27 achievements, and identification of specialized backgrounds and concentrations. The current title
28 and year of licensure to practice law of each individual at S&W who rendered services to the

Trustee are set forth in the chart titled “Summary of Requested Fees by Individual” in section I.B, *supra*. In addition to these professionals, Kyle Stowell, a paralegal assistant with the Firm performed certain document preparation and assembly in connection with the Second Fee Application and assisted in the review of employee wage documents in connection with the WARN Adversary. Mr. Stowell is a member of the litigation department of the Firm and regularly assists the Firm’s professionals with matters related to litigation and court filings.

In addition, detailed information concerning the identity of each professional and paraprofessional who provided services to the Trustee, the task description, number of hours spent on each task, and the amount of compensation requested for each professional per task is set forth in the narrative time entries attached as Exhibit 1 to the Brosnan Declaration and are incorporated herein by this reference. The compensation is based on the customary compensation charged to S&W’s non-bankruptcy clients. S&W has drafted summaries of the services rendered within each category of service, and those summaries appear in Section V below. However, the statements of account that appear within Exhibit 1 provide the most detailed and accurate description of S&W’s specific services and were drafted at the time the services were rendered.

V.

SUMMARY OF LEGAL SERVICES RENDERED BY S&W

A. Project Summary

In accordance with the Guidelines of the United States Trustee (the “UST Guidelines”), S&W has separated its fees incurred for services rendered into project categories. The chart titled “Summary of Requested Fees by Project Category” in section I.C., *supra*, is a summary of the services performed by S&W during the Application Period, sorted by specific project category, the total number of hours billed per category, and the total amount of fees sought by S&W for the combined categories. Exhibit 1 contains the detailed statements of account supporting the information set forth in the chart.

B. Narrative Summary

The UST Guidelines provide that professionals' time entries should be placed into one of the following categories: (1) Asset Analysis and Recover; (2) Asset Disposition; (3) Business Operations; (4) Case Administration; (5) Claims Administration and Objections; (6) Employee Benefits/Pensions; (7) Fee/Employment Applications; (8) Fee/Employment Objections; (9) Financing; (10) Litigation; (11) Meetings of Creditors; (12) Plan and Disclosure Statement; and (13) Relief from Stay Proceedings. Because S&W has been retained as special litigation counsel in connection with the WARN Adversary, nearly all of these categories are inapplicable to S&W's services. Nevertheless, S&W has performed the below services during the Application Period, all of which were reasonable, necessary and beneficial to the Estate.

1. Litigation

Name	Title	Rate	Effective Rate	Hours	Total
Tiffany Brosnan	Partner	\$625.00	\$625.00	36	\$22,500
Erin Leach	Counsel	\$545.00	\$545.00	11.5	\$6,267.50
Kyle Stowell	Paralegal Assistant	\$150.00	\$150.00	.5	\$75.00
TOTAL					\$28,842.50

In this category, S&W professionals have represented the Trustee and the interests of the Estate in the WARN Adversary. This work includes conducting research and analysis into the claims presented in the WARN Adversary, planning and strategizing regarding defenses to the same, preparing pleadings, participating in discovery, communicating with various parties and negotiating settlement and obtaining preliminary approval thereof. This work was reasonable and necessary for the Trustee to have adequate representation in the WARN Adversary.

2. Fee Applications

Name	Title	Rate	Effective Rate	Hours	Total
Tiffany Brosnan	Partner	\$625.00	\$625.00	.3	\$187.50
Andrew Still	Associate	\$435.00	\$435.00	2.8	\$1,218.00
Kyle Stowell	Paralegal Assistant	\$150.00	\$150.00	.2	\$30.00
TOTAL					\$1,435.50

In this category, S&W has undertaken certain tasks to prepare this Application and the Second Fee Application. These tasks were reasonable and necessary for the Trustee to have effective legal representation in the WARN Adversary.

VI.

SUMMARY OF EXPENSES INCURRED BY S&W

The costs for which S&W seeks reimbursement, as set forth in the expense statement attached as Exhibit 1, and summarized in the chart titled "Summary of Requested Expenses" in section I.D, above, total \$643.45. As relevant here, in the ordinary course of its practice, S&W maintains the following records or expenses incurred on behalf of its clients.

a. Online Research/Pacer: Charges for use of the PACER Service Center are passed directly to the client. S&W is charged \$.10 per page.

b. Overnight Delivery and Federal Express Services: Costs for these services are charged to the client only upon receipt of billing form the respective service.

c. Westlaw Research: Charges for use of Westlaw are passed directly to the client. S&W is charged by the minute for use of Westlaw and passed that cost to the client.

d. Scanning Expenses: Charges for scanning expenses are charged to the client. S&W charges \$.10 per page.

e. Printing Expenses: Charges for printing expenses are charged to the client. S&W charges \$.10 per page.

VII.

THE COURT SHOULD APPROVE THIS APPLICATION

Section 330 of the Bankruptcy Code allows courts to award a professional person employed under section 327 of the Bankruptcy Code reasonable compensation for actual, necessary services rendered, based on the time, the nature, the extent, and the value of such services, and the cost of comparable services to a non-debtor. 11 U.S.C. § 330; *see In re Mednet*, 251 B.R. 103, 106 (B.A.P. 9th Cir. 2000). Section 330 also allows for reimbursement of the actual, necessary expenses expended by a professional employed under Section 327 of the Bankruptcy Code. *See In re Garcia*, 335 B.R. 717, 723 (B.A.P. 9th Cir. 2005). Bankruptcy Code section 331 provides that professionals employed under section 327 of the Bankruptcy Code may apply to the court for compensation and reimbursement of expenses before such time as allowed under Bankruptcy Code section 330. 11 U.S.C. § 331.

“A compensation award based on a reasonable hourly rate multiplied by the number of hours actually and reasonably expended is presumptively a reasonable fee.” *In re Manoa Finance Co., Inc*, 853 F.2d 687, 691 (9th Cir. 1988). Factors ordinarily accounted for in either the hourly rate or the number of hours expended include the novelty and complexity of the issues, the special skill and experience of counsel, the quality of representation, and the results obtained. *Id.*

Accordingly, here, S&W respectfully requests that this Court approve this Application for compensation and reimbursement of expenses. All of the services specified in Exhibit 1 were reasonably necessary for the benefit of the Trustee and the Estate. S&W’s involvement in this case is limited to the WARN Adversary, requiring attention to discrete, employment- and labor-related issues, and greatly benefitting the Estate. Likewise, all of the costs S&W incurred were reasonably necessary for the benefit of the Trustee and the Estate. S&W has endeavored to deploy the appropriate experience and expertise of its attorneys to perform the services described in this Application in a cost-efficient manner.

Moreover, S&W’s standard hourly rates are based on the customary compensation charged by comparably skilled practitioners in similar cases under both the Bankruptcy Code and applicable

1 non-Bankruptcy law. Therefore, S&W respectfully requests that this Court grant this Application
2 for interim compensation and reimbursement of expenses.

3 **VIII.**

4 **CONCLUSION**

5 For the foregoing reasons, S&W respectfully requests that this Court enter an order
6 (1) allowing on an interim basis \$30,278.00 as compensation for professional services rendered as
7 Trustee's special litigation counsel; (2) allowing on an interim basis reimbursement of \$643.45
8 for the actual and necessary expenses S&W incurred and paid in rendering services as Trustee's
9 special litigation counsel; (3) authorizing the Estate to pay the aforementioned fees and costs as
10 an allowed administrative expense if and when the funds become available; and (4) such other
11 and additional relief as the Court deems just and proper.

12 Dated: November 18, 2020

SNELL & WILMER L.L.P.

13 By: /s/ Andrew B. Still

14 Tiffanny Brosnan
15 Erin D. Leach
16 Andrew B. Still

17 Attorneys for Trustee
18 Karen Sue Naylor, Chapter 7 Trustee
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DECLARATION OF TIFFANNY BROSNAN

I, Tiffany Brosnan, declare as follows:

1. I am a partner with the law firm of Snell & Wilmer, L.L.P. ("S&W" and/or the "Firm"), special litigation counsel for Karen Sue Naylor, the duly appointed and acting Chapter 7 Trustee ("Trustee") of the estate ("Estate") of Anna's Linens, Inc. ("Debtor"). The matters set forth herein are of my own personal knowledge and, if called upon to do so, I could and would competently testify as to the truth of the matters set forth herein, except those matters set forth on information and belief, as to which I am informed and believe they are true.

2. S&W is a law partnership with offices in, among other places, Costa Mesa, California. All attorneys who appear in this case are duly licensed to practice in the State of California and various United States District Courts, including the Central District of California. S&W specializes in, among other areas of law, all phases of employment and labor-related counseling and litigation, and bankruptcy.

3. In the ordinary course of its business, the Firm keeps a record of all time expended by its professionals in the rendering of professional services on a computerized billing system. At or near the time the professional services are rendered, the professional records his or her time in the computerized billing system by logging the date of service, client number, matter number, duration of time expended, and a description of the services performed. Through its computer billing system, the Firm maintains a record of all such time inputted for any given client and matter. These records are maintained in the ordinary course of the Firm's business and are relied upon by the Firm for accuracy in the conduct of its business.

4. I have reviewed the Firm's bills for services rendered in connection with S&W's employment in this matter. Attached hereto as **Exhibit 1** is a true and correct copy of the Firm's billing records in this matter.

5. At any time a reimbursable charge is incurred on behalf of a client, employees of the Firm keep a written record of the client and matter number for which the charges were expended. These records are transcribed into a computerized system. These records are maintained

1 in the ordinary course of the Firm's business and are relied upon by the Firm for accuracy in the
2 conduct of its business.

3 6. It is the Firm's practice to allocate work and assignments in an efficient manner to
4 achieve an effective result for the client. The attorneys primarily responsible for working on this
5 matter specialize in employment and labor-related issues, and bankruptcy proceedings. Attached
6 hereto as **Exhibit 2** is a true and correct copy of the Firm's professional resume along with the
7 backgrounds of attorneys at the Firm who are responsible for providing services to the Trustee and
8 the Estate.

9 7. No understanding exists for sharing of compensation received or to be received by
10 S&W for services rendered in this case, except that the compensation received herein shall be
11 shared among the members and associates of S&W.

12 8. I have reviewed the requirements of Rule 2016-1 of the Local Bankruptcy Rules for
13 the Central District of California ("LBR"). This Application complies with LBR 2016-1.

14 9. I have read and reviewed the Application. To the best of my knowledge, information
15 and belief, the facts in the Application are true and correct.

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17 I declare under penalty of perjury under the laws of the United States that the foregoing is
18 true and correct. Executed this 18th day of November 2020 at Newport Beach, California.

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Tiffany Brosnan

Exhibit 1

Snell & Wilmer L.L.P.
One Arizona Center
Phoenix, AZ 85004
602-382-6000

Karen Sue Naylor, Trustee
ELECTRONIC BILL - DO NOT MAIL
Send via Email to: karen@ringstadlaw.com
nanette@ringstadlaw.com

Report Date: 11/16/2020

Matter: 78637.00001 Martz-Gomez

Services Rendered between 6/1/2020 and 11/13/2020:

Timekeeper			Date	Hours	Rate	Amount
1	Attorney Services					
6144	Still, Andrew	Finalize second interim fee application.	6/2/2020	0.90	435.00	391.50
6144	Still, Andrew	Email correspondence with B. Metzner re inclusion of Snell & Wilmer in notice of fee applications.	6/4/2020	0.10	435.00	43.50
6144	Still, Andrew	Finalize second interim fee application and coordinate filing of same.	6/4/2020	0.20	435.00	87.00
6144	Still, Andrew	Review and analyze declaration of K. Naylor in support of fee applications.	6/10/2020	0.10	435.00	43.50
1295	Brosnan, Tiffany	Prepare email to opposing counsel re settlement negotiations	6/16/2020	0.10	625.00	62.50
1295	Brosnan, Tiffany	Exchange emails with N. Sanders re case update	6/22/2020	0.10	625.00	62.50
1295	Brosnan, Tiffany	Exchange emails with opposing counsel and N. Sanders re pretrial dates and settlement negotiations	6/23/2020	0.20	625.00	125.00
2190	Leach, Erin	Research re pretrial stipulation requirements	6/23/2020	0.20	545.00	109.00
1295	Brosnan, Tiffany	Exchange emails with opposing counsel and N. Sanders re settlement negotiations and continuing dates	6/25/2020	0.20	625.00	125.00
2190	Leach, Erin	Work on stipulation to continue pre-trial conference date and proposed order re same	6/25/2020	0.30	545.00	163.50
1295	Brosnan, Tiffany	Exchange emails with N. Sanders re continuance of pre-trial dates and settlement negotiations	6/29/2020	0.20	625.00	125.00
6144	Still, Andrew	Review and analyze tentative ruling re second fee application.	6/29/2020	0.10	435.00	43.50
1295	Brosnan, Tiffany	Review order re fee application	6/30/2020	0.10	625.00	62.50
6144	Still, Andrew	Draft order granting second interim fee application.	6/30/2020	0.30	435.00	130.50
1295	Brosnan, Tiffany	Exchange emails with N. Sanders re settlement negotiations	7/2/2020	0.10	625.00	62.50
1295	Brosnan, Tiffany	Review settlement demand from opposing counsel and exchange emails with opposing counsel re same	7/2/2020	0.30	625.00	187.50
1295	Brosnan, Tiffany	Exchange emails with N. Sanders re settlement demand	7/3/2020	0.20	625.00	125.00
1295	Brosnan, Tiffany	Analyze plaintiff's settlement demand and exposure; prepare email to N. Sanders re same	7/6/2020	0.70	625.00	437.50
2190	Leach, Erin	Review and analyze plaintiff's settlement offer and strategize re next steps	7/6/2020	0.20	545.00	109.00
1295	Brosnan, Tiffany	Review email from N. Sanders re settlement negotiations	7/23/2020	0.10	625.00	62.50

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Timekeeper			Date	Hours	Rate	Amount
1295	Brosnan, Tiffany	Work on exposure analysis; exchange emails with N. Sanders re same	7/24/2020	0.80	625.00	500.00
2190	Leach, Erin	Strategize re settlement discussions	7/24/2020	0.10	545.00	54.50
1295	Brosnan, Tiffany	Phone call with N. Sanders re settlement negotiations	7/29/2020	0.30	625.00	187.50
1295	Brosnan, Tiffany	Work on exposure analysis and settlement strategy	7/29/2020	0.40	625.00	250.00
2190	Leach, Erin	Strategize re settlement discussions	7/29/2020	0.40	545.00	218.00
1295	Brosnan, Tiffany	Exchange emails with opposing counsel re settlement negotiations	7/30/2020	0.10	625.00	62.50
1295	Brosnan, Tiffany	Exchange emails with N. Sanders and with opposing counsel re settlement negotiations	7/31/2020	0.10	625.00	62.50
1295	Brosnan, Tiffany	Prepare for and conduct call with opposing counsel; exchange emails with N. Sanders re same	8/3/2020	0.50	625.00	312.50
1295	Brosnan, Tiffany	Exchange emails with opposing counsel and N. Sanders re settlement negotiations	8/6/2020	0.20	625.00	125.00
1295	Brosnan, Tiffany	Exchange emails with opposing counsel re settlement negotiations	8/7/2020	0.10	625.00	62.50
1295	Brosnan, Tiffany	Exchange emails with client and opposing counsel re settlement negotiations; strategize with E. Leach re same	8/10/2020	0.30	625.00	187.50
2190	Leach, Erin	Revise settlement agreement	8/11/2020	2.10	545.00	1,144.50
1295	Brosnan, Tiffany	Review and revise plaintiff's draft settlement agreement; strategize with E. Leach re same; exchange emails with opposing counsel	8/13/2020	1.50	625.00	937.50
2190	Leach, Erin	Work on class action settlement agreement and research re objection provisions	8/13/2020	1.40	545.00	763.00
1295	Brosnan, Tiffany	Prepare email to N. Sanders re draft settlement agreement	8/14/2020	0.10	625.00	62.50
1295	Brosnan, Tiffany	Review email from N. Sanders re settlement negotiations; email to E. Leach re same	8/17/2020	0.20	625.00	125.00
1295	Brosnan, Tiffany	Exchange emails with opposing counsel and N. Sanders re finalizing settlement agreement	8/19/2020	0.20	625.00	125.00
1295	Brosnan, Tiffany	Review proposed revisions to settlement agreement; strategize with E. Leach re same	8/24/2020	0.70	625.00	437.50
2190	Leach, Erin	Review client's proposed changes to settlement agreement and strategize re same	8/24/2020	0.50	545.00	272.50
1295	Brosnan, Tiffany	Review settlement agreement; phone call with N. Sanders re finalizing settlement agreement; exchange emails re same and with opposing counsel	8/25/2020	1.10	625.00	687.50
2190	Leach, Erin	Revise settlement agreement following call with client re same	8/25/2020	0.30	545.00	163.50
2190	Leach, Erin	Call with N. Sanders to discuss revisions to settlement agreement	8/25/2020	0.70	545.00	381.50
1295	Brosnan, Tiffany	Exchange emails with opposing counsel re settlement agreement	8/26/2020	0.10	625.00	62.50
1295	Brosnan, Tiffany	Prepare email to opposing counsel re settlement agreement	9/1/2020	0.10	625.00	62.50

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One Arizona Center
Phoenix, AZ 85004
602-382-6000

Timekeeper			Date	Hours	Rate	Amount
1295	Brosnan, Tiffany	Exchange emails with opposing counsel and N. Sanders re status of settlement	9/2/2020	0.10	625.00	62.50
1295	Brosnan, Tiffany	Review revised settlement agreement from opposing counsel; exchange emails with opposing counsel and N. Sanders regarding same	9/3/2020	0.50	625.00	312.50
2190	Leach, Erin	Review plaintiff's changes to settlement agreement	9/3/2020	0.10	545.00	54.50
1295	Brosnan, Tiffany	Exchange emails with N. Sanders and opposing counsel regarding finalizing settlement agreement	9/4/2020	0.20	625.00	125.00
1295	Brosnan, Tiffany	Review exhibits to settlement agreement from opposing counsel	9/8/2020	0.20	625.00	125.00
2190	Leach, Erin	Compare Exhibit A to settlement agreement with class lists we have	9/8/2020	0.20	545.00	109.00
1295	Brosnan, Tiffany	Review and revise motion for approval of settlement and supporting declarations; exchange emails with N. Sanders re same	9/9/2020	0.80	625.00	500.00
1295	Brosnan, Tiffany	Exchange emails with opposing counsel and N. Sanders re notice to class members	9/9/2020	0.20	625.00	125.00
1295	Brosnan, Tiffany	Review and revise stipulation to continue trial and pre-trial dates	9/9/2020	0.20	625.00	125.00
2190	Leach, Erin	Prepare stipulation and proposed order to continue pre-trial conference	9/9/2020	0.30	545.00	163.50
2190	Leach, Erin	Review and revise notice of proposed WARN Act settlement and fairness hearing and request to exclusion	9/10/2020	0.60	545.00	327.00
1295	Brosnan, Tiffany	Review and revise notice to class members and opt out form; exchange emails with N. Sanders and opposing counsel re same	9/10/2020	1.20	625.00	750.00
1295	Brosnan, Tiffany	Exchange emails with N. Sanders re finalizing motion and class notice	9/11/2020	0.20	625.00	125.00
2190	Leach, Erin	Compare class notice attached to client's motion with last class notice from opposing counsel to confirm they are consistent	9/14/2020	0.10	545.00	54.50
1295	Brosnan, Tiffany	Finalize declaration and motion and exchange emails with Trustee's counsel and opposing counsel re same	9/14/2020	0.50	625.00	312.50
1295	Brosnan, Tiffany	Exchange emails re possible objections to settlement	9/18/2020	0.20	625.00	125.00
1295	Brosnan, Tiffany	Phone call with N. Sanders re production information to S. Gladstone	9/21/2020	0.30	625.00	187.50
1295	Brosnan, Tiffany	Gather documents to produce to counsel for S. Gladstone and exchange emails with same	9/21/2020	1.70	625.00	1,062.50
1295	Brosnan, Tiffany	Prepare for and attend conference call with N. Sanders and K. Naylor re objections to settlement	9/21/2020	1.30	625.00	812.50
2190	Leach, Erin	Strategize and gather documents in response to S. Gladstone's counsel's request for records in support of settlement	9/21/2020	0.80	545.00	436.00
1295	Brosnan, Tiffany	Exchange emails with R. Roupinian re producing information to S. Gladstone	9/21/2020	0.40	625.00	250.00
1295	Brosnan, Tiffany	Exchange emails with N. Sanders and opposing counsel and counsel for S. Gladstone	9/22/2020	0.40	625.00	250.00
1295	Brosnan, Tiffany	Prepare documents for counsel for S. Gladstone	9/22/2020	0.90	625.00	562.50

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Timekeeper			Date	Hours	Rate	Amount
1295	Brosnan, Tiffany	Review email from attorney for S. Gladstone; work on response to same with N. Sanders	9/23/2020	0.50	625.00	312.50
1295	Brosnan, Tiffany	Legal re for and prepare email and documents for attorney for S. Gladstone	9/24/2020	0.80	625.00	500.00
1295	Brosnan, Tiffany	Phone call and exchange emails with N. Sanders regarding providing information to S. Gladstone	9/24/2020	0.90	625.00	562.50
1295	Brosnan, Tiffany	Exchange emails and phone conference with opposing counsel regarding providing information to S. Gladstone	9/24/2020	0.70	625.00	437.50
2190	Leach, Erin	Gather documents requested by Gladstone's counsel re good faith settlement motion	9/24/2020	0.80	545.00	436.00
1295	Brosnan, Tiffany	Review email from attorney for S. Gladstone; exchange emails with N. Sanders	9/28/2020	0.20	625.00	125.00
1295	Brosnan, Tiffany	Work on response to email from S. Gladstone's lawyer; phone call with N. Sanders re same	9/29/2020	0.60	625.00	375.00
1295	Brosnan, Tiffany	Legal research for reply in support of motion to approve settlement	9/29/2020	0.30	625.00	187.50
1295	Brosnan, Tiffany	Exchange emails with N. Sanders re reply for motion to approve re settlement	9/30/2020	0.20	625.00	125.00
1295	Brosnan, Tiffany	Research potential defenses for reply in support of motion to approve settlement; draft reply	9/30/2020	3.20	625.00	2,000.00
1295	Brosnan, Tiffany	Review opposition to motion to approve settlement	9/30/2020	0.50	625.00	312.50
1295	Brosnan, Tiffany	Phone call with opposing counsel re reply for motion to approve settlement	9/30/2020	0.10	625.00	62.50
2190	Leach, Erin	Review and analyze S. Gladstone's Opposition to Motion to Approve Compromise	9/30/2020	0.80	545.00	436.00
2190	Leach, Erin	Research re arguments in response to S. Gladstone's opposition to motion for approval of settlement	9/30/2020	0.60	545.00	327.00
1295	Brosnan, Tiffany	Exchange emails with opposing counsel and N. Sanders re reply re motion to approve settlement	10/1/2020	0.10	625.00	62.50
1295	Brosnan, Tiffany	Phone call with opposing counsel re reply for motion to approve settlement and exchange emails with N. Sanders re same	10/2/2020	0.60	625.00	375.00
1295	Brosnan, Tiffany	Work on arguments for reply brief and exchange emails with N. Sanders regarding same; revise brief	10/5/2020	1.30	625.00	812.50
2190	Leach, Erin	Research re S. Gladstone's termination date	10/5/2020	0.20	545.00	109.00
1295	Brosnan, Tiffany	Review reply from opposing counsel re motion to approve settlement and exchange emails with opposing counsel re same	10/6/2020	0.80	625.00	500.00
1295	Brosnan, Tiffany	Exchange emails with opposing counsel and N. Sanders re reply in support of motion to approve settlement; work on reply	10/6/2020	0.70	625.00	437.50
1295	Brosnan, Tiffany	Work on issues re individual class member claims and responding to argument re class notice	10/8/2020	0.50	625.00	312.50
1295	Brosnan, Tiffany	Exchange emails with N. Sanders re objection to class notice and identifying class members	10/9/2020	0.10	625.00	62.50
1295	Brosnan, Tiffany	Review tentative ruling re motion to approve settlement; exchange emails with opposing counsel and N. Sanders re same	10/12/2020	0.80	625.00	500.00

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Timekeeper			Date	Hours	Rate	Amount
1295	Brosnan, Tiffany	Exchange emails with N. Sanders re additional class members and revising order	10/12/2020	0.20	625.00	125.00
2190	Leach, Erin	Research re addresses and social security numbers of 17 class members added after original class notice	10/12/2020	0.40	545.00	218.00
1295	Brosnan, Tiffany	Prepare for and attend hearing on motion to approve settlement	10/13/2020	0.90	625.00	562.50
1295	Brosnan, Tiffany	Work with N. Sanders and opposing counsel on proposed order and issues re notice to class members	10/13/2020	0.50	625.00	312.50
1295	Brosnan, Tiffany	Exchange emails with N. Sanders and opposing counsel re proposed order and notice to class members	10/14/2020	0.30	625.00	187.50
1295	Brosnan, Tiffany	Research client documents re non-class member requesting to participate; exchange emails with opposing counsel re same	10/16/2020	1.10	625.00	687.50
1295	Brosnan, Tiffany	Review final notices to class members; exchange emails with N. Sanders and opposing counsel re same	10/22/2020	0.70	625.00	437.50
1295	Brosnan, Tiffany	Review email from N. Sanders re class members with proof of claim	10/26/2020	0.10	625.00	62.50
1295	Brosnan, Tiffany	Exchange emails with N. Sanders and A. Still re fee application	10/27/2020	0.20	625.00	125.00
6144	Still, Andrew	Review and analyze notice to professionals re intended hearing on fee applications.	10/29/2020	0.10	435.00	43.50
1295	Brosnan, Tiffany	Exchange emails with N. Sanders and opposing counsel regarding service of notices on class members and declaration regarding same	11/6/2020	0.20	625.00	125.00
1295	Brosnan, Tiffany	Work on calendaring issues; exchange emails with opposing counsel and client re notices to class members and declaration re same	11/9/2020	0.30	625.00	187.50
1295	Brosnan, Tiffany	Review emails from N. Sanders and opposing counsel re claims by class members	11/11/2020	0.30	625.00	187.50
1295	Brosnan, Tiffany	Review emails re individual class members' claims	11/12/2020	0.10	625.00	62.50
1295	Brosnan, Tiffany	Exchange emails with N. Sanders re further trial continuance	11/12/2020	0.10	625.00	62.50
6144	Still, Andrew	Draft declaration of T. Brosnan in support of third application for interim compensation.	11/13/2020	0.20	435.00	87.00
6144	Still, Andrew	Draft third application for interim compensation.	11/13/2020	0.80	435.00	348.00
2190	Leach, Erin	Work on stipulation to continue pre-trial conference and proposed order re same	11/13/2020	0.40	545.00	218.00
Attorney Services				50.60		30,173.00
2	Para-Professional Services					
6363	Stowell, Kyle	Prepare document for filing for A. Still.	6/3/2020	0.20	150.00	30.00
6363	Stowell, Kyle	Assist in review of employee wage documents for T. Brosnan.	10/16/2020	0.50	150.00	75.00
Para-Professional Services				0.70		105.00

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Timekeeper	Date	Hours	Rate	Amount
Fee Totals		51.30		30,278.00
Discount				

Cost Code	Date	Qty	Amount
9125 FedEx/UPS			
	6/26/2020		14.27
	9/10/2020		13.88
	FedEx/UPS		28.15
9354 Pacer Service			
VENDOR: Pacer Service Center Calif - OC #4455336; INVOICE#:	7/14/2020		4.50
4455336-Q22020; DATE: 7/14/2020 - Usage 04/01/20 to 06/30/20			
	Pacer Service		4.50
9400 WestLaw Research			
Brosnan, Tiffannyl Westlaw Research	9/29/2020	14	70.00
Brosnan, Tiffanny Westlaw Research	9/30/2020	62	310.00
LEACH,ERIN Westlaw Legal Research	9/30/2020	44	220.00
	WestLaw Research	120	600.00
9600 Scanning Expenses			
Brosnan Tiffanny Scanning Expenses	9/22/2020	7	0.70
Brosnan Tiffanny Scanning Expenses	9/22/2020	85	8.50
Brosnan Tiffanny Scanning Expenses	9/22/2020	2	0.20
	Scanning Expenses	94	9.40
9700 Printing Expense			
Martin Toni Printing Expense	6/26/2020	8	0.80
Martin Toni Printing Expense	9/10/2020	6	0.60
	Printing Expense	14	1.40
	Disbursement Totals	228	643.45

Timekeeper	Hours	Eff Rate	Amount
1295 Brosnan, Tiffanny	36.30	625.00	22,687.50
2190 Leach, Erin	11.50	545.00	6,267.50
6144 Still, Andrew	2.80	435.00	1,218.00
6363 Stowell, Kyle	0.70	150.00	105.00

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Report Range Fees \$	30,278.00
Report Range Costs \$	643.45
	<hr/>
Total Report Range \$	30,921.45
	<hr/>
Previous Fees \$	50,083.00
Previous Costs \$	326.29
	<hr/>
Grand Total \$	81,330.74

Exhibit 2

Snell & Wilmer



Tiffany Brosnan

Partner | Orange County | San Diego

Tel. 714.427.7068

tbrosnan@swlaw.com

Main Bio

Tiffany Brosnan's practice is concentrated in employment litigation and counseling. Her employment-related counseling includes advising employers regarding wage and hour problems, leaves of absence, layoff planning, termination and disciplinary matters. Tiffany provides training to employers, including mandatory sexual harassment training. She also conducts independent workplace investigations. In litigation, Tiffany represents employers in individual matters and class actions including allegations of wrongful termination, whistle blower claims, discrimination, harassment, unfair competition, misappropriation of trade secrets and wage and hour violations.

Representative Matters

- Defense of "whistleblower" actions on behalf of technology-based, health care and retail clients
- Defense of wrongful termination, discrimination, and sexual harassment actions on behalf of service and retail clients, and management employees
- Defense of wage and hour class actions and Private Attorneys General Act (PAGA) claims involving claims for meal period, rest break, overtime and other labor code violations on behalf of automotive, manufacturing, service and retail clients
- Defense of unfair competition and trade secrets litigation involving technology-based, manufacturing and healthcare clients
- Trial and binding arbitration experience in retaliation, harassment, discrimination, wage loss, and fraud cases
- Training employers in best practices for supervisors, avoiding "bad apple" employees and mandatory sexual harassment training
- Internal investigations regarding harassment, discrimination, fraud and misappropriation of company resources

Education

- University of California at Los Angeles, School of Law (J.D., 1996)
- University of California at Los Angeles (B.A., summa cum laude, 1993)
 - Phi Beta Kappa

Professional Memberships & Activities

- Orange County Bar Association
 - Employment Litigation Section
- ProVisors, Orange County

Representative Presentations & Publications

- "[Voting Rights – Key Questions for Employers](#)," Co-Author, Snell & Wilmer Legal Alert (November 2, 2020)
- "Trends in Pandemic-Related Employment Law Claims," Co-Presenter and "Regional Roundup: A State-Focused Look at Covered Topics," Panelist, 2020 Employment Law Tool Kit Three-Part Webinar Series: Session 1: Issues for All Employers (October 20, 2020)
- "[California Mandates COVID-19 Supplemental Paid Sick Leave for Employers Not Covered by the FFCRA](#)," Co-Author, Snell & Wilmer Legal Alert (September 15, 2020)
- "[Eligibility for Families First Coronavirus Response Act Leave Under Different School Reopening Models](#)," Co-Author, Snell & Wilmer Legal Alert (August 31, 2020)
- "Labor and Employment," Co-Presenter, Snell & Wilmer 2020 Year-End CLE Series (August 18, 2020)
- "Top Employment Law Concerns as We Return to the Office," Presenter, Orange County Bar Association Solo Practitioner/Small Firm Section Webinar (July 17, 2020)
- "Tools to Safely Re-open your Workplace," Co-Presenter, Woodruff Sawyer Employee Benefits Webinar (July 10, 2020)
- "Returning to the Workplace: Employment Law Pitfalls," Co-Presenter, Woodruff Sawyer Employee Benefits Webinar (July 10, 2020)
- "[School's Out for Summer - Can I Get Paid Leave Under the Families First Coronavirus Response Act](#)," Author, Snell & Wilmer Labor and Employment Law Blog (May 15, 2020)
- "[Employees' Refusal to Work Over Coronavirus Concerns](#)," Co-Author, Snell & Wilmer Legal Alert (May 14, 2020)
- "[HR Strategies and Legal Advice for Reopening Your Workplace](#)," Co-Presenter, Woodruff Sawyer Employee Benefits Webinar (May 14, 2020)
- "Top Employment Law Concerns Surrounding a Return to Work," Co-Presenter, Financial Executives International (FEI) Orange County Webinar (May 13, 2020)
- "The Good, the Bad, and the Ugly," Presenter, Association for Corporate Growth - Orange County Live Webinar (May 13, 2020)
- "[Updated EEOC Guidance for Employers Permits Testing for COVID-19](#)," Co-Author, Snell & Wilmer Legal Alert (April 30, 2020)
- "[Managing Business Needs During a Pandemic: COVID-19 Traps and Tricks for Employers](#)," Presenter, Snell & Wilmer Live Webinar to ACC SoCal (April 8, 2020)
- "Today's Frequently Asked Employment Law Questions in the COVID-19 Crisis," Presenter, Fieldstone Network Orange County Webinar (March 31, 2020)
- "[Does the Federal WARN Act Apply to Me?](#)" Author, Snell & Wilmer Legal Alert (March 30, 2020)
- "[Coronavirus: Supporting Your Employees, Their Benefits, and a Legal Perspective](#)," Co-Presenter, Woodruff Sawyer Employee Benefits Webinar (March 19, 2020)
- "[Uber, Wary of AB5, Is Giving California Drivers More Freedom. Its Tactics May Not Work](#)," Quoted,

San Francisco Chronicle (February 10, 2020)

- "[Uber Makes Major Changes to California Rides as Gig-Work Law Takes Effect](#)," Quoted, San Francisco Chronicle (January 8, 2020)
- "Tips from the Trenches," Co-Presenter, Employment Law Tool Kit Seminar, Snell & Wilmer, Costa Mesa, CA (November 6, 2019)
- "Bad Apples: How to Spot Them, Swiftly Fire Them, and Reduce Your Exposure," Co-Presenter, Employment Law Tool Kit Seminar, Snell & Wilmer, Costa Mesa, CA (November 6, 2019)
- "[New California Legislation Makes it More Difficult to Classify Workers as Independent Contractors](#)," Author, Labor and Employment Law Blog (September 19, 2019)
- "[Almost Two Years of the #MeToo Era: The Unexpected Impact on Your Business](#)," Co-Author, Orange County Journal (July 29, 2019)
- "[Deliv Switching California Couriers to Employees — 'Start of a Wave'](#)," Quoted, San Francisco Chronicle (June 22, 2019)
- "[State of the States: Wage, Leave Laws Gaining Steam](#)," Quoted, Law360 (May 31, 2019)
- "Spotting Hot Button Issues For Nonprofit Employers," (Training Program for Pro Bono Nonprofit Organizations Legal Assessment Clinic), Co-Presenter, ACC-SoCal, Public Law Center, Snell & Wilmer Orange County Offices, Costa Mesa, CA (April 4, 2019)
- "[2019 Legislative Changes for California Severance and Settlement Agreements](#)," Author, Labor and Employment Law Blog (January 21, 2019)
- "2018 Employment Law Update and What You Need to Know for 2019," Presenter, Human Resources and Legal Department Seminar, Irvine, CA (January 18, 2019)
- "[California Responds to the #MeToo Movement With Sweeping Legislation](#)," Author, The Recorder (January 3, 2019)
- "Avoiding Pay Equity Claims," Co-Presenter, Employment Law Tool Kit Seminar, Snell & Wilmer, Costa Mesa, CA (November 7, 2018)
- "Sexual Harassment Law in the #MeToo Era," Co-Presenter, Employment Law Tool Kit Seminar, Snell & Wilmer, Costa Mesa, CA (November 7, 2018)
- "[California Enacts Sweeping Legislation Designed to Address the #Metoo Movement](#)," Author, Labor and Employment Law Blog (October 2, 2018)
- "[NLRB Update: 2015 Joint Employer Standard Revised](#)," Co-Author, Labor and Employment Law Blog (January 2, 2018)
- "[#MeToo – Don't Let it Be You How to Prevent Sexual Harassment in the Workplace](#)," Author, Orange County Business Journal (December 4, 2017)
- "Ethics on the Inside: What Every In-House Attorney Needs to Know," Presenter, Snell & Wilmer Harbor Cruise, Newport Beach, CA (November 16, 2017)
- "What's New With the Federal Government," Co-Presenter, Employment Law Tool Kit Seminar, Snell & Wilmer, Costa Mesa, CA (November 7, 2017)
- "[Immigration Alert: California Passes Bill Restricting ICE Entering Businesses](#)," Co-Author, Labor and Employment Law Blog (September 18, 2017)
- "He, She or Ze: Addressing Transgender Issues in the Workplace," Co-Presenter, Employment Law Tool Kit Seminar, Snell & Wilmer, Costa Mesa, CA (November 16, 2016)
- "Bills, Bills and More Bills: New California Laws Employers Should Know," Co-Presenter, Employment

Law Tool Kit Seminar, Snell & Wilmer, Costa Mesa, CA (November 16, 2016)

- "Threat Management: Workplace Violence Restraining Orders," Co-Presenter, Snell & Wilmer Workplace Violence Seminar, Costa Mesa, CA (June 23, 2016)
- "[Cover Story: Six Degrees of Todd Friedland](#)," Co-Author, Orange County Lawyer magazine (January 5, 2016)
- "Non-Union Employers Beware: NLRB Decisions Affect You Too," Presenter, Employment Tool Kit Seminar, Snell & Wilmer, Costa Mesa, CA (November 12, 2015)
- "[Paid Sick Leave - It's an Epidemic](#)," Author, Workplace Word (October 12, 2015)
- "Avoiding Employment Law Hazards: Keys to Running a Tight Ship for In-House Counsel," Co-Presenter, Association of Corporate Counsel (Southern California Chapter), Long Beach, CA (June 3, 2015)
- "Understanding, Recognizing and Preventing Bullying in the Workplace," Co-Presenter, PIHRA Gateway Cities, Cerritos, CA (March 4, 2015)
- "Employment Case Law and Legislation for 2015," Panelist, ProVisors Human Capital Group, Irvine, CA (March 3, 2015)
- "[An Employment Lawyer's Top Ten Tips to Avoid Holiday Party Headaches](#)," Co-Author, Orange County Business Journal (December 1, 2014)
- "Wage and Hour Issues - The Recurring Nightmare" and "Severance Agreement Pitfalls," Co-Presenter, Employment Tool Kit Seminar, Snell & Wilmer, Costa Mesa, CA (November 13, 2014)
- "[Judge Douglas F. McCormick: Sitting on the Bench After a Career on His Feet](#)," Author, Orange County Lawyer (October 2014)
- "Ever-Expanding Accommodations," Presenter, Employment Tool Kit Seminar, Snell & Wilmer, Costa Mesa, CA (November 7, 2013)
- "Do My Employees Ever Have to Work?," Speaker, Employment Tool Kit Seminar, Snell & Wilmer, Costa Mesa, CA (November 8, 2012)
- "Best Practices for In-house Attorneys When Navigating The Choppy Waters of Investigation," Speaker, Snell & Wilmer and Thomson West Harbor Cruise, Newport Beach, CA (October 18, 2012)
- "[California's Wage Orders: Landmines and Goldmines](#)," Author, Orange County Lawyer (June 2012)
- "Dealing with Disabilities and the New Wave of Leave-Related Lawsuits," Speaker, Employment Tool Kit Seminar, Snell & Wilmer, Costa Mesa, CA (October 2011)
- "[Failure to pay wages? Now There's an App for That](#)," Co-Author, Daily Journal (September 15, 2011)
- "Enforcing Your Social Media Policy Around the World," Speaker, 44th Annual Legal Symposium, International Franchise Association, Washington, DC (May 2011)
- "My Employee is Injured — So Why Am I in Pain?," Speaker, Employment Toolkit Seminar, Snell & Wilmer, Costa Mesa, CA (October 2010)
- "[My Employee is Injured — So Why Am I in Pain?](#)," Co-Author, Orange County Business Journal, Vol. 33, No. 38 (September 20, 2010)

Professional Recognition & Awards

- 2019 Distinguished Community Champion, Southland Integrated Services
- The Best Lawyers in America[®], Labor & Employment Litigation (2013-2021)

- Southern California Super Lawyers®, Rising Stars Edition, Employment & Labor (2006-2011)
- Nominated for Women in Business Award, Orange County Business Journal

Community Involvement

- Constitutional Rights Foundation of Orange County, Past President
- Career Forum Committee, Past Co-Chair
- Ensign Intermediate School Foundation, Board Member

Bar Admissions

- California

Court Admissions

- Supreme Court of California

Snell & Wilmer



Erin Denniston Leach

Counsel | Orange County

Tel. 714.427.7008

eleach@swlaw.com

Main Bio

Erin Leach's practice is concentrated in employment litigation and counseling. She provides clients with ongoing counseling on a wide range of personnel matters including hiring and termination decisions, employment agreements, policy drafting, wage and hour issues, and employee medical leave. Erin represents employers in state and federal courts and arbitration, as well as before administrative agencies, in disputes regarding wrongful termination, discrimination, sexual harassment, unfair competition, trade secrets, reasonable accommodation of disabilities, retaliation, wage and hour (individual and class actions), and other types of employment matters.

Representative Litigation

- Defense of "whistleblower" actions on behalf of service and retail clients
- Defense of wrongful termination, discrimination and harassment actions on behalf of service and retail clients and management employees
- Defense of wage and hour class action litigation on behalf of service and retail clients
- Binding arbitration experience in retaliation, wrongful termination, harassment, discrimination, fraud and wage claim cases

Education

- University of California, Hastings College of Law (J.D., cum laude, 2006)
 - Order of the Coif
- Harvard University (B.A., Psychology, cum laude, 2002)
 - Academic All-Ivy (2001)
 - Academic All-District Second Team (2001)
 - All-Ivy Second Team (1999-2001)
 - Volleyball - Co-Captain (2001)

Professional Memberships & Activities

- Orange County Bar Association, Labor and Employment Law Section
- Athletes Touch

Representative Presentations & Publications

- "New California Laws for 2021 Affecting California Employers," Presenter, 2020 Employment Law Tool Kit Three-Part Webinar Series: Session 2: California-Specific Issues (November 12, 2020)
- ["There May Be Some Good News Coming to Companies Using Independent Contractors – At Least Under Federal Law,"](#) Author, Snell & Wilmer Labor and Employment Law Blog (September 30, 2020)
- ["Can Independent Contractors Still Exist in California?"](#) Author, Orange County Business Journal (December 2, 2019)
- ["The California Supreme Court Is To Decide the Retroactive Application of the Dynamex Independent Contractor Decision,"](#) Author, Snell & Wilmer Labor and Employment Law Blog (November 26, 2019)
- "Did AB 5 Do Away with Independent Contractors?" Co-Presenter, Employment Law Tool Kit Seminar, Snell & Wilmer, Costa Mesa, CA (November 6, 2019)
- ["A New Law Passed Raising the Standard for Classifying Workers as Independent Contractors in California,"](#) Co-Author, Snell & Wilmer Legal Alert (September 30, 2019)
- ["California's Deadline for Giving Newly Required Sexual Harassment Prevention Training Was Extended,"](#) Author, Snell & Wilmer Labor and Employment Law Blog (September 6, 2019)
- ["Employee Non-Solicitation Agreements Are Shot Down Once Again in California,"](#) Author, Snell & Wilmer Labor and Employment Law Blog (February 7, 2019)
- ["Employers Face Open Questions After Landmark 'Dynamex' Labor Ruling,"](#) Quoted, The Recorder (December 5, 2018)
- ["Might There Be an End in Sight to the Private Attorney General Act?"](#) Author, Snell & Wilmer Labor and Employment Law Blog (November 29, 2018)
- "Restrictive Covenants Dos and Don'ts," Co-Presenter, Employment Law Tool Kit Seminar, Snell & Wilmer, Costa Mesa, CA (November 7, 2018)
- "Dynamex: The Destruction of the Independent Contractor Model and Where We Are Now," Co-Presenter, Employment Law Tool Kit Seminar, Snell & Wilmer, Costa Mesa, CA (November 7, 2018)
- "Dynamex: The Destruction of the Independent Contractor Model," Presenter, SMB TechFest Q4, Anaheim, CA (October 18, 2018)
- "Did *Dynamex* Destroy the Independent Contractor Model?" Co-Presenter, Snell & Wilmer Seminar, Los Angeles, CA (October 17, 2018)
- "Did *Dynamex* Destroy the Independent Contractor Model?" Co-Presenter, Snell & Wilmer Seminar, Costa Mesa, CA (September 27, 2018)
- "Did *Dynamex* Destroy the Independent Contractor Model?" Co-Presenter, Snell & Wilmer and Association of Corporate Counsel (Southern California Chapter) Harbor Cruise CLE, Newport Beach, CA (June 20, 2018)
- ["Tolling of Statute of Limitations in Class Action Realm Narrowed,"](#) Author, Snell & Wilmer Labor and Employment Law Blog (June 11, 2018)
- ["What Can and Can't You Do To Get Ready for Flu Season?"](#) Author, Snell & Wilmer Labor and Employment Law Blog (October 5, 2017)
- ["California Employers Must Pay California Employees Separate Rest Break Pay,"](#) Author, Snell & Wilmer Labor and Employment Law Blog (July 11, 2017)
- ["Paid Sick Leave Won't Go Away,"](#) Author, Snell & Wilmer Labor and Employment Law Blog (July 9, 2017)
- ["Just Like the Flu, Paid Sick Leave Laws Don't Seem to Want to Go Away,"](#) Author, Snell & Wilmer

Workplace Word (May 1, 2017)

- ["California Appellate Court Rules that - Like Piece Rate Workers - Employees Paid Commissions Are Entitled to Separate Rest Break Pay,"](#) Co-Author, Snell & Wilmer Legal Alert (March 6, 2017)
- "He, She or Ze: Addressing Transgender Issues in the Workplace," Co-Presenter, Employment Law Tool Kit Seminar, Snell & Wilmer, Costa Mesa, CA (November 16, 2016)
- "Bills, Bills and More Bills: New California Laws Employers Should Know," Co-Presenter, Employment Law Tool Kit Seminar, Snell & Wilmer, Costa Mesa, CA (November 16, 2016)
- ["First Paid Sick Leave and Now You're Telling Me Some Employees May No Longer Be Exempt from Overtime,"](#) Co-Author, Orange County Business Journal (June 27, 2016)
- "Threat Management: Workplace Violence Restraining Orders," Co-Presenter, Snell & Wilmer Workplace Violence Seminar, Costa Mesa, CA (June 23, 2016)
- ["Additional Paid Sick Leave Requirements in Los Angeles,"](#) Author, Snell & Wilmer Legal Alert (April 27, 2016)
- "Down the Rabbit Hole: What to Expect in Appellate Arbitration," Presenter, Orange County Bar Association - Appellate Law Section Meeting, Santa Ana, CA (April 7, 2016)
- ["The Difficult Dilemma Facing Employers When it Comes to Threats of Workplace Violence,"](#) Author, Snell & Wilmer Workplace Word (April 6, 2016)
- "Paid Sick Leave - It's an Epidemic," Presenter, Employment Tool Kit Seminar, Snell & Wilmer, Costa Mesa, CA (November 12, 2015)
- ["The Clock is Ticking for California Employers to Comply with New Paid Sick Leave Requirements that Take Effect July 1, 2015,"](#) Co-Author, Snell & Wilmer Legal Alert (May 14, 2015)
- ["Ever-Expanding Attacks on Non-Traditional 'Employers',"](#) Author, Corporate Counsel, American Bar Association Section of Litigation (March 31, 2015)
- ["Since When Am I the Boss? Ever Expanding Attacks on Non-Traditional 'Employers',"](#) Author, Snell & Wilmer Workplace Word (February 12, 2015)
- ["An Employment Lawyer's Top Ten Tips to Avoid Holiday Party Headaches,"](#) Co-Author, Orange County Business Journal (December 1, 2014)
- "Wage and Hour Issues - The Recurring Nightmare" and "Severance Agreement Pitfalls," Co-Presenter, Employment Tool Kit Seminar, Snell & Wilmer, Costa Mesa, CA (November 13, 2014)
- ["Employer To Do List for the New Year,"](#) Author, Snell & Wilmer Workplace Word (February 2014)
- ["The California Supreme Court Kicks Up Dust Storm on the Road to Enforcing Employment Arbitration Agreements,"](#) Co-Author, Orange County Business Journal (December 9, 2013)
- "Avoiding Bad Apple Employees and Wage and Hour Nightmares," Presenter, Employment Tool Kit Seminar, Snell & Wilmer, Costa Mesa, CA (November 7, 2013)
- ["Protecting the Workforce from Violence,"](#) Author, Snell & Wilmer Workplace Word (February 27, 2013)
- "Independent Contractors - What's in a Name? and New Hire Notices - More Paper for Employers to Complete," Speaker, Employment Tool Kit Seminar, Snell & Wilmer, Costa Mesa, CA (November 8, 2012)
- ["How to Handle Whistleblower Claims and Try to Avoid a Retaliation Lawsuit,"](#) Author, Snell & Wilmer Workplace Word (February 29, 2012)
- "The Ten Commandments of Religious Discrimination," Speaker, Employment Tool Kit Seminar, Snell

& Wilmer, Costa Mesa, CA (October 2011)

- "Where Are My Employees Headed With My Trade Secrets?," Speaker, Employment Tool Kit Seminar, Snell & Wilmer, Costa Mesa, CA (October 2011)
- "[The Ten Commandments of Religious Discrimination](#)," Co-Author, Orange County Business Journal (August 22, 2011)
- "Take Control of Your Computers: Top 5 Considerations in the New Media Era," Speaker, Employment Toolkit Seminar, Snell & Wilmer, Costa Mesa, CA (October 2010)

Professional Recognition & Awards

- Southern California Super Lawyers[®], Rising Stars Edition, Employment Litigation: Defense (2013-2016)
 - "The Top Women Attorneys in Southern California," Los Angeles Magazine (2016)

Community Involvement

- Women Helping Women/Men to Work (WHW), Board of Directors

Other Professional Experience

- Legal Services for Children, Intern (Fall 2004)
- Adams, Esq., Law Clerk, Oakland, CA (Summer 2004)
- Public Defender's Office, Juvenile Division, Intern, San Francisco, CA (Summer 2004)
- The Help Group, High School Special Education Teacher (2002-2003)

Bar Admissions

- California

Court Admissions

- Supreme Court of California
- United States District Court, All Districts of California

Snell & Wilmer



Andrew Still

Associate | Orange County | Los Angeles

Tel. 714.427.7055

astill@swlaw.com

Main Bio

Andrew Still focuses his practice in bankruptcy and commercial litigation. His practice is concentrated in bankruptcy, reorganization, creditor's rights and remedies, receiverships, foreclosure and workout law. Prior to joining Snell & Wilmer, Andrew served as a judicial law clerk to the Honorable Catherine E. Bauer, U.S. Bankruptcy Court judge for the Central District of California.

Education

- Chapman University, Dale E. Fowler School of Law (J.D., cum laude, 2016)
 - Senior Articles Editor, Chapman Law Review
 - CALI Award for Excellence in Contracts I, Property I, Torts I, Federal Income Tax, Bankruptcy II & Fundamentals of In-House Corporate Counsel
 - Property Law Academic Fellow
- University of California, San Diego (B.A., History, 2010)
 - Minor in Law and Society
 - Provost's Honors

Professional Memberships & Activities

- Orange County Bar Association
 - Commercial Law & Bankruptcy Section, Secretary/Treasurer
- State Bar of California
- American Bar Association
- Orange County Bankruptcy Forum
- American Bankruptcy Institute
- California Receiver's Forum

Representative Presentations & Publications

- "Defaulted Loan Enforcement Webinar Series – Session 3: General Bankruptcy Concepts," Co-Presenter, Special Assets Team and Legal Department for a Large International Financial Institution (October 21, 2020)
- "Defaulted Loan Enforcement Webinar Series – Session 1: Basics of Foreclosures," Co-Presenter,

Special Assets Team and Legal Department for a Large International Financial Institution (July 16, 2020)

- "California and Texas Non-Judicial Foreclosures Webinar," Co-Presenter, Special Assets Team and Legal Department for a Large Private Lender (July 16, 2020)
- "Bankruptcy Overview Presentation," Co-Presenter, Special Assets Group for a Major Banking Institution, Glendale, CA (March 10, 2020)

Professional Recognition & Awards

- Best Lawyers in America®: Ones to Watch, Bankruptcy & Creditor Debtor Rights/Insolvency & Reorganization Law (2021)

Other Professional Experience

- United States Bankruptcy Court, Judicial Law Clerk for The Honorable Catherine E. Bauer (2016-2018)
- Bremer, Whyte, Brown & O'Meara, Summer Associate (2015)

Bar Admissions

- California

Court Admissions

- Supreme Court of California
- United States District Court, All Districts of California

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:
600 Anton Boulevard, Suite 1400, Costa Mesa, CA 92626-7689.

A true and correct copy of the foregoing document entitled (*specify*): **Third Interim Fee Application of Snell & Wilmer L.L.P. for Approval of Compensation and Reimbursement of Expenses as Special Litigation Counsel for Karen Sue Naylor, Chapter 7 Trustee; Declaration of Tiffany Brosnan**

will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) November 18, 2020, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

- Todd M Arnold tma@lnbyb.com
- Wesley H Avery wes@averytrustee.com, lucy@averytrustee.com;alexandria@averytrustee.com
- James C Bastian jbastian@shulmanbastian.com
- Cristina E Bautista , ecf.lax.docket@kattenlaw.com
- Alan Betten abetten@sagallaw.com
- Karen C Bifferato kbifferato@connollygallagher.com, kbifferato@connollygallagher.com
- Mikel R Bistrow mikel.bistrow@dinsmore.com, caron.burke@dinsmore.com
- Wanda Borges ecfcases@borgeslawllc.com
- Dustin P Branch branchd@ballardspahr.com, carolod@ballardspahr.com;hubenb@ballardspahr.com
- Peter M Bransten pbransten@glaserweil.com, dsanchez@glaserweil.com
- Jerrold L Bregman ecf@bg.law, jbregman@bg.law
- Jess R Bressi jess.bressi@dentons.com, kimberly.sigismondo@dentons.com
- Robert Brier bbrier@bihlaw.com, smann@bihlaw.com
- Mark Bringardner Mark@stollaw.com
- Heather D Brown heather@hdbrownlaw.com
- David L Bruck bankruptcy@greenbaumlaw.com, cdeluca@greenbaumlaw.com
- Larry Butler notices@becket-lee.com
- Frank Cadigan frank.cadigan@usdoj.gov
- Gary O Caris gcaris@btlaw.com, slmoore@btlaw.com;rsutton@btlaw.com
- Stephanie Chau schau@carltonfields.com, kathompson@carltonfields.com
- Shirley Cho scho@pszjlaw.com
- Shawn M Christianson cmcintire@buchalter.com, schristianson@buchalter.com
- Ronald Clifford rclifford@blakeleyllp.com, ecf@blakeleyllp.com;info@ecf.inforuptcy.com
- Cynthia M Cohen ccohen@brownwhitelaw.com
- Leslie A Cohen leslie@lesliecohenlaw.com, jaime@lesliecohenlaw.com;olivia@lesliecohenlaw.com
- Lee A Collins LCOLLINS@BOYARMILLER.COM
- Sean B Cooney scooney@shb.com, scooney@shb.com
- Joseph Corrigan Bankruptcy2@ironmountain.com
- Randy J Creswell rcreswell@perkinsthompson.com, lmccler@perkinsthompson.com
- Jeffry A Davis jdavis@mintz.com, docketing@mintz.com
- Joseph P Davis davisjo@gtlaw.com, wangm@gtlaw.com;laik@gtlaw.com
- Michael W Davis mdavis@dtolaw.com, jmartinez@dtolaw.com
- Walter J DeLorrell walter.delorrell@sdcounty.ca.gov, nancy.beltran@sdcounty.ca.gov
- Richard F DeLossa rdelossa@kelleydrye.com, wtaylor@kelleydrye.com
- Denise Diaz Denise.Diaz@rmsna.com

This form is mandatory. It has been approved for use by the United States Bankruptcy Court for the Central District of California.

- Eldia M Diaz-Olmo diazolmo@villamil.net, eldia.diazolmo@gmail.com
- John P Dillman houston_bankruptcy@publicans.com
- Caroline Djang caroline.djang@bbklaw.com, laurie.verstegen@bbklaw.com;wilma.escalante@bbklaw.com
- Keith S Dobbins keith@kdobbinslaw.com
- Richard C Donahoo becky@ringstadlaw.com, arlene@ringstadlaw.com
- Jonathan R Doolittle jdoolittle@reedsmith.com
- Glen Dresser gombd@aol.com
- Reid E Dyer reiddy@mvallaw.com, davidwheeler@mvallaw.com
- Lei Lei Wang Ekvall lekvall@swelawfirm.com, lgarrett@swelawfirm.com;gcruz@swelawfirm.com;jchung@swelawfirm.com
- Gary B Elmer gelmer@ciardilaw.com
- Amanda N Ferns afern@fernslaw.com, mmakalintal@fernslaw.com
- M Douglas Flahaut flahaut.douglas@arentfox.com
- Margaret G Foley mgfoley05@gmail.com
- Joseph D Frank jfrank@fgllp.com, mmatlock@fgllp.com;csmith@fgllp.com;jkleinman@fgllp.com;csucic@fgllp.com
- Roger F Friedman rfriedman@rutan.com
- John-Patrick M Fritz jpf@lnbyb.com, JPF.LNBYB@ecf.inforuptcy.com
- Eric J Fromme efromme@tocounsel.com, stena@tocounsel.com
- Thomas M Gaa tgaa@bbslaw.com
- Lauren N Gans lgans@shensonlawgroup.com
- Sidney Garabato sgarabato@epiqsystems.com, rjacobs@ecf.epiqsystems.com
- Jeffrey K Garfinkle jgarfinkle@buchalter.com, docket@buchalter.com;dcyrankowski@buchalter.com
- John S Garner , semerson@frfirm.com
- Richard Girgado rgirgado@counsel.lacounty.gov
- Bernard R Given bgiven@loeb.com, mortiz@loeb.com;ladoCKET@loeb.com;bgiven@ecf.courtdrive.com
- Barry S Glaser bglaser@lkfirm.com, jlee@lkfirm.com
- Ronald E Gold rgold@fbtlaw.com, joguinn@fbtlaw.com
- Stanley E Goldich sgoldich@pszjlaw.com
- David B Golubchik dbg@lnbyb.com, stephanie@lnbyb.com
- David M Goodrich dgoodrich@wgllp.com, vrosales@wgllp.com;kadele@wgllp.com;lbracken@wgllp.com
- Leon B Gordon bankruptcy@mvbalaw.com;jwilliams@mvbalaw.com;alocklin@mvbalaw.com;tleday@ecf.courtdrive.com;kmorris@mvbalaw.com
- William A Gray bgray@sandsanderson.com, rarrington@sandsanderson.com
- Irving M Gross img@lnbyb.com, john@lnbyb.com
- Steven T Gubner sgubner@bg.law, ecf@bg.law
- Ralph P Guenther rguenther@montereylaw.com
- Mirco J Haag mhaag@buchalter.com, dcyrankowski@buchalter.com;docket@buchalter.com
- Mina Hakakian mhakakian@lwmpartners.com
- Christopher J Harney charney@tocounsel.com, stena@tocounsel.com
- Michael J Hauser michael.hauser@usdoj.gov
- James H Henderson henderson@title11.com, ginny@title11.com
- William H Heslup william.heslup@illinois.gov
- Matthew C. Heyn Matthew.Heyn@doj.ca.gov, mcheyn@outlook.com
- Mark S Horoupian mhoroupian@sulmeyerlaw.com, mhoroupian@ecf.inforuptcy.com;ccaldwell@sulmeyerlaw.com
- Brian D Huben hubenb@ballardspahr.com, carolod@ballardspahr.com
- Joan Huh joan.huh@cdtfa.ca.gov
- James KT Hunter jhunter@pszjlaw.com
- William E Ireland wireland@hbblaw.com, edocs@hbblaw.com
- Ronald N Ito Ronald.Ito@doj.ca.gov, Valerie.Thompson@doj.ca.gov
- Nina Z Javan nina.javan@swmlp.com
- Kenneth E Johnson kjohnson@tocounsel.com, jortiz@tocounsel.com

This form is mandatory. It has been approved for use by the United States Bankruptcy Court for the Central District of California.

- Jeanne M Jorgensen jjorgensen@pj-law.com, cpage@pj-law.com
- Eve H Karasik ehk@lnbyb.com
- Ori Katz okatz@sheppardmullin.com, lsegura@sheppardmullin.com
- Doah Kim doah.kim@whitecase.com
- Simon Kimmelman skimmelman@sillscummis.com
- Stuart I Koenig Skoenig@leechtishman.com, sfrey@leechtishman.com;jabrams@leechtishman.com
- Michael S Kogan mkogan@koganlawfirm.com
- Jason B Komorsky ecf@bg.law, jkomorsky@bg.law
- Matthew Kramer mkramer@wwhgd.com, iperez@wwhgd.com
- Jeffrey C Krause jkrause@gibsondunn.com, dtrujillo@gibsondunn.com;jstern@gibsondunn.com
- Mette H Kurth mkurth@foxrothschild.com, mette-kurth-7580@ecf.pacerpro.com
- Jeffrey S Kwong jsk@lnbyb.com, jsk@ecf.inforuptcy.com
- Paul B La Scala plascala@shb.com, hkeresztes@shb.com
- David Brian Lally davidlallylaw@gmail.com
- Ian Landsberg ilandsberg@sklarkirsh.com,
lskaist@sklarkirsh.com;yalarcon@sklarkirsh.com;mmadden@sklarkirsh.com;ilandsberg@ecf.inforuptcy.com;kfraz
ier@sklarkirsh.com
- Erin D Leach eleach@swlaw.com, tmartin@swlaw.com
- William J Levant wlevant@kaplaw.com, wlevant@gmail.com
- Lori A Lewis lewisl004@mail.maricopa.gov
- Gail C Lin GCL@raisnerroupinian.com, warnlawyers@raisnerroupinian.com;jenny--hoxha--
5459@ecf.pacerpro.com;rllp@ecf.courtdrive.com
- James V Lombardi jlombardi@rossbanks.com, kjohnson@rossbanks.com;cnivens@rossbanks.com
- Melissa Davis Lowe mlowe@shulmanbastian.com, salarcon@shulmanbastian.com
- David J Mahoney efilings@spallp.com
- Kathleen P March kmarch@bkylawfirm.com, kmarch3@sbcglobal.net
- Robert S Marticello Rmarticello@swelawfirm.com,
gcruz@swelawfirm.com;lgarrett@swelawfirm.com;jchung@swelawfirm.com
- David A Mawhinney david.mawhinney@klgates.com
- Gordon G May hpc@ggb-law.com
- Thor D McLaughlin tmclaughlin@allenmatkins.com, igold@allenmatkins.com
- David W. Meadows david@davidwmeadowslaw.com
- Joel S. Miliband jmiliband@brownrudnick.com
- Christopher Minier becky@ringstadlaw.com, arlene@ringstadlaw.com
- Eric A Mitnick MitnickLaw@aol.com, mitnicklaw@gmail.com
- Dennette A Mulvaney dmulvaney@leechtishman.com, lmoya@leechtishman.com
- Klaus P Muthig muthigk@mcao.maricopa.gov, geiserr@mcao.maricopa.gov
- Sean N Nagel , ldc@dr-slo.com
- Karen S. Naylor knaylor@burd-naylor.com, Karen@ringstadlaw.com;Arlene@ringstadlaw.com
- Karen S. Naylor Becky@ringstadlaw.com, Karen@ringstadlaw.com;Arlene@ringstadlaw.com
- Karen S Naylor (TR) alane@ringstadlaw.com, knaylor@IQ7technology.com;ecf.alert+Naylor@titlexi.com
- Brian R Nelson becky@ringstadlaw.com, brian@ringstadlaw.com;arlene@ringstadlaw.com
- Mark A Neubauer mneubauer@carltonfields.com,
mlrodriguez@carltonfields.com;smcloughlin@carltonfields.com;ecfla@carltonfields.com
- Mike D Neue mikeneue@gmail.com
- Kevin M Newman knewman@barclaydamon.com, kmnbk@barclaydamon.com;kevin-newman-
8809@ecf.pacerpro.com
- Victor W Newmark bankruptcy@evict.net
- William Novotny william.novotny@mwmf.com
- Abigail V O'Brient avobrient@mintz.com,
docketing@mintz.com;DEHashimoto@mintz.com;nleali@mintz.com;ABLevin@mintz.com
- Juliet Y Oh jyo@lnbrb.com, jyo@lnbrb.com
- Keith C Owens kowens@foxrothschild.com, khoang@foxrothschild.com
- Ernie Zachary Park ernie.park@bewleylaw.com

This form is mandatory. It has been approved for use by the United States Bankruptcy Court for the Central District of California.

- Paul J Pascuzzi ppascuzzi@ffwplaw.com, docket@ffwplaw.com
- Kristen N Pate ggpbk@ggp.com
- Christopher J Petersen cjpetersen@blankrome.com, gsolis@blankrome.com
- David M Poitras dpoitras@wedgewood-inc.com, dpoitras@jmbm.com;dmarcus@wedgewood-inc.com;aguisinger@wedgewood-inc.com;jchoi@wedgewood-inc.com
- David L Pollack pollack@ballardspahr.com, petlaka@ballardspahr.com
- Jeffrey N Pomerantz jpomerantz@pszjlaw.com
- Kelly L Pope kpope@downeybrand.com, mfrazier@downeybrand.com;courtfilings@downeybrand.com
- David L Prince dlp@redchamber.com
- Jennifer Pruski jpruski@trainorfairbrook.com
- Brett Ramsaur brett@ramsaurlaw.com, martha.araki@gmail.com, stacey@ramsaurlaw.com
- Todd C. Ringstad becky@ringstadlaw.com, arlene@ringstadlaw.com
- Steven B Sacks , ksieckman@srclaw.com
- Steven B Sacks ssacks@sheppardmullin.com, ksieckman@srclaw.com
- Diane W Sanders austin.bankruptcy@publicans.com
- Nanette D Sanders becky@ringstadlaw.com, arlene@ringstadlaw.com
- Allan D Sarver ADS@asarverlaw.com
- Scott A Schiff sas@soukup-schiff.com
- Steven R Schlesinger sschlesinger@jaspanllp.com, smionis@jaspanllp.com;rcoles@jaspanllp.com;tnavruzov@jaspanllp.com
- Lance A Selfridge lances@lbbslaw.com, Susan.Awe@lewisbrisbois.com
- James R Selth , jselth@yahoo.com;eduardo@wsrlaw.net;gabby@wsrlaw.net;vinnet@ecf.inforuptcy.com
- Michael J Shane mshane@eplawyers.com, bsilva@eplawyers.com
- Jonathan Seligmann Shenson jshenson@shensonlawgroup.com
- Jeffrey S Shinbrot jeffrey@shinbrotfirm.com, sandra@shinbrotfirm.com
- William H Short bill.short@arlaw.com, candice.carter@arlaw.com
- Evan D Smiley esmiley@swelawfirm.com, gcruz@swelawfirm.com;csheets@swelawfirm.com;hdavis@swelawfirm.com
- Lindsey L Smith lls@lnbyb.com, lls@ecf.inforuptcy.com
- Robyn B Sokol ecf@bg.law, rsokol@bg.law
- Louis F Solimine Louis.Solimine@thompsonhine.com
- Owen M Sonik osonik@pbfc.com, tpope@pbfc.com
- Howard Steinberg steinbergh@gtlaw.com, pearsallt@gtlaw.com;laik@gtlaw.com
- Rick A Steinberg rsteinberg@nakblaw.com
- Andrew Still astill@swlaw.com, kcollins@swlaw.com
- Norman C Sullivan jgarner@frfirm.com, semerson@frfirm.com
- Salina R Thomas bankruptcy@co.kern.ca.us
- United States Trustee (SA) ustpreion16.sa.ecf@usdoj.gov
- Daniel R Utain dutain@kaplaw.com, kcoughlin@kaplaw.com
- Kimberly Walsh bk-kwalsh@texasattorneygeneral.gov, sherri.simpson@oag.texas.gov
- Howard J Weg hweg@robinskaplan.com
- Jeffrey T Wegner jeffrey.wegner@kutakrock.com, lisa.peters@kutakrock.com
- David R. Weinstein dweinstein@weinsteinlawfirm.net
- Daniel J Weintraub dan@wsrlaw.net, vinnet@ecf.inforuptcy.com;gabby@wsrlaw.net;eduardo@wsrlaw.net
- Gilbert B Weisman notices@becket-lee.com
- Elizabeth Weller dallas.bankruptcy@publicans.com
- Lee G Werner leegwerner@gmail.com
- Steven Werth swerth@sulmeyerlaw.com, cblair@sulmeyerlaw.com;mviramontes@sulmeyerlaw.com;dperez@sulmeyerlaw.com;swerth@ecf.inforuptcy.com
- Brian D Wesley brian.wesley@doj.ca.gov
- Eric R Wilson kdwbankruptcydepartment@kelleydrye.com, MVicinanza@ecf.inforuptcy.com
- Brian Barour Yeretian byeretian@jhindsllaw.com, yeretian@gmail.com
- Royce Zur rzur@elkinskalt.com, aaburto@elkinskalt.com;myuen@elkinskalt.com

☐ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On (*date*) November 18, 2020, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

Debtor

Anna's Linens, Inc.
P.O. Box 10075
Costa Mesa, CA 92711-0075

☐ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) November 18, 2020, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

Via Federal Express

The Honorable Theodor Albert
United States Bankruptcy Court
Central District of California
411 West Fourth Street, Suite 5085
Santa Ana, CA 92701-4593

☐ Service information continued on attached page

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

November 18, 2020
Date

Kimberly A. Collins
Printed Name

/s/ Kimberly A. Collins
Signature