

Gregory N. Karasik (SBN 115834)
Karasik Law Firm
16021 Aiglon St.
Pacific Palisades, CA 90272
Tel (310) 463-9761
Fax (310) 943-2582
greg@karasiklawfirm.com

Santos Gomez (SBN 172741)
Law Offices of Santos Gomez
1003 Freedom Boulevard
Watsonville, CA 95076
Tel (831) 228-1560
Fax (831) 228-1542
santos@lawofficesofsantosgomez.com

Attorneys for Plaintiff
JOSE MARIO MENDOZA

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

JOSE MARIO MENDOZA,

Plaintiff,
vs.

TRANS VALLEY TRANSPORT et al,
Defendants.

And Related Cross-Action

Case No. 22-cv-07164 TLT

**DECLARATION OF GREGORY N.
KARASIK IN SUPPORT OF PLAINTIFF'S
MOTION FOR AN AWARD OF ATTORNEY'S
FEES, COSTS AND ENHANCEMENT
PAYMENT IN CONNECTION WITH FINAL
APPROVAL OF CLASS ACTION
SETTLEMENT**

Date: October 8, 2024
Time: 2:00 p.m.
Ctm: 9

I, Gregory N. Karasik, declare:

1. I am an attorney duly licensed to practice before all courts of the State of California. I am one of the attorneys of record for Jose Mario Mendoza ("Plaintiff") in this action against Defendants Trans Valley Transport ("TVT") and FTU Labor Contractors, Inc. ("FTU"). I have

1 personal knowledge of the matters stated herein and if called and sworn as a witness, I could and
2 would competently testify under oath thereto.

3 Qualifications as Class Counsel

4 2. I graduated from Stanford Law School in 1984. Prior to April 2006, I spent more than
5 20 years as a labor and employment law litigator, primarily at large and well-known law firms in Los
6 Angeles, where I typically represented the interests of management. I have substantial experience in
7 all facets of litigation in state and federal court, including discovery, law and motion, trial, appeals,
8 arbitration and mediation. I also have many years experiencing representing clients in connection with
9 investigations or adversarial proceedings conducted by state and federal government agencies. In the
10 course of my practice as a defense lawyer, I worked on many class actions against large companies and
11 gained significant experience with a wide variety of class action issues.

12 3. I worked at the Spiro Moss law firm from April 2006 to August 2011. At Spiro Moss,
13 my practice was devoted exclusively to class actions lawsuits on behalf of employees and consumers
14 and I litigated numerous class actions on behalf of plaintiffs. At Spiro Moss I was lead counsel or
15 otherwise exercised significant case handling responsibilities in cases resulting in class action
16 judgments or settlements with a cumulative value in excess of \$70 million.

17 4. In August 2011, I left Spiro Moss to open my own law practice under the name Karasik
18 Law Firm. As before, my practice is now devoted exclusively to class actions lawsuits on behalf of
19 employees and consumers. Currently, I am lead counsel for plaintiffs in numerous class actions that
20 are pending in state or federal court, including several in which a settlement was reached and
21 preliminary or final approval of the settlement is pending. Since becoming a plaintiff's lawyer at Spiro
22 Moss, I have negotiated more than 70 class action settlements.

23 5. Over the course of my legal career, I have been involved in filing appeals, writs and/or
24 *amicus curiae* briefs on issues directly related to wage and hour or consumer class actions, resulting in
25 several published and unpublished opinions, and have been an author or speaker at various legal
26 seminars. Among other achievements, I personally briefed and argued the plaintiff's successful appeal
27

1 before the California Supreme Court in the wage and hour class action case *Pineda v. Bank of America*,
2 *N.A.* (2010) 50 Cal.4th 1389 and briefed and argued the plaintiff's successful appeal before the Ninth
3 Circuit Court of Appeals in the consumer class action case *Bateman v. American Multi-Cinema, Inc.*
4 (9th Cir. 2010) 623 F.3d 708. Most recently, I briefed and argued Plaintiff's successful opposition to
5 Defendants' appeal from the denial of their motion to compel arbitration in this case, which was upheld
6 by the California Court of Appeal in the published decision *Mendoza v. Trans Valley Transport* (2022)
7 75 Cal.App.5th 748.

8 The Settlement

9 6. The Court granted preliminary approval of the Settlement on April 17, 2024. Pursuant
10 to the Settlement, Defendants are required to pay the Gross Settlement Amount of \$700,000 in addition
11 to the employer's share of payroll taxes on the portion of settlement payments allocated to wages.
12 Plaintiff calculated that Defendants faced a maximum potential liability of approximately \$2,556,209
13 for unpaid minimum wages, so the Gross Settlement Amount reflects a recovery of approximately
14 27.4% of Defendants' potential liability for unpaid minimum wages. Although the parties initially
15 believed there were 206 class members, upon finalization of the class list it was determined that there
16 are 200 class members so the average gross recovery per class member is approximately \$3,500. The
17 expected Net Settlement Amount – assuming the Court awards Plaintiff the full amounts of attorney's
18 fees, costs and enhancement payment requested – is approximately \$436,967 so the average gross
19 settlement payment per class member is approximately \$2,185.

20 Attorney's Fees

21 7. Attached as Exhibit 1 is a true and correct copy of my time records for this case
22 reflecting that, to date, I have spent at least 291.1 hours on this case. I estimate that I will spend at
23 least an additional 15 hours on this case in connection with preparing Plaintiff's motion for final
24 approval of the Settlement, appearing at the final approval hearing, and settlement administration after
25 final approval. My hourly rate for lodestar purposes in this case (I do not charge any clients by the
26 hour but work exclusively on a contingency basis) is \$850 an hour (which is less than the current rate
27

1 of \$875 an hour for my cases in Los Angeles). I am familiar with the market rate for attorneys of my
2 level of skill and experience in the San Francisco Bay Area, and I believe that an \$850 hourly rate is
3 equivalent to, or lower than, the market rate for attorneys with comparable level of experience. Most
4 recently, I was awarded fees based on a lodestar rate of \$850 an hour by the San Francisco Superior
5 Court in the case of *Jimenez v. Environmental Service Partners, Inc.*, Case No. CGC-19-576544 (final
6 approval granted on March 15, 2024). Based on the hourly rate of \$850 the total lodestar value of my
7 time in this case will be at least \$260,185.

8 8. As set forth in the declaration of Santos Gomez he will have spent at 102.25 hours on
9 this case by the time it has been fully administered so the lodestar value of his time on this case, based
10 on his hourly rate of \$850 an hour, is at least \$86,912.50. The total lodestar value for all the time of
11 Plaintiff's counsel for this case is thus at least \$347,097.50

12 9. Based on the lodestar value of \$347,097.50 the amount of attorney's fees requested by
13 Plaintiff (\$233,333.33) reflects a "negative" multiplier (i.e. less than 1) of approximately 0.67. From
14 my experience, a negative multiplier of 0.67 falls well below the range of lodestar multipliers typically
15 applicable to attorney's fees awards in wage and hour class actions, which are usually between 1 and 3
16 and sometimes greater than 4. The negative multiplier resulting from a lodestar cross check confirms
17 that Plaintiff's request for fees equal to 33.3% of the Gross Settlement Amount is reasonable, as that
18 amount, while commensurate with the result obtained by Plaintiff's counsel on behalf of the class,
19 compensates Plaintiff's counsel far less than the lodestar value of their time on this case.

20 Litigation Costs

21 10. Attached as Exhibit 2 is a true and correct copy of expenses recorded by my Quicken
22 software program reflecting \$12,776.56 in litigation expenses in connection with this case to date. In
23 addition to these expenses, I incurred \$60 for parking expenses at LAX airport on April 16, 2024
24 (which was not tracked in Quicken because I used a personal credit card to pay that expense) and the
25 expense of \$130.07 for a roundtrip flight between Los Angeles and Oakland on October 8, 2024 to
26 appear at the final approval hearing (which is not yet recorded in Quicken because the credit card
27

1 Case No. 5:17-CV-01863, Judge Edward Davila awarded each of the two plaintiffs an enhancement
2 payment of \$10,000 where the average amount of settlement benefits payable to class members was
3 \$1,163 (final approval granted May 24, 2018).

4 I declare under penalty of perjury that the foregoing is true and correct and that this declaration
5 was executed in Pacific Palisades, California on June 18, 2024.

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7 Gregory N. Karasik
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EXHIBIT 1

5/22/15	4.4 review client documents; research defendant; draft complaint
6/25/15	0.2 emails defense counsel
7/31/15	0.4 tel call defense counsel
9/1/15	0.2 email defense counsel
9/2/15	1.3 prepare for and attend meeting with defense counsel; prepare joint CMC statement
9/8/15	0.2 finalize joint status report
9/9/15	0.2 emails defense counsel
9/25/15	1.8 draft first amended complaint; prepare for and attend cmc
10/20/15	0.4 tel call defense counsel
10/29/15	1.8 emails re informal conference; prepare letter brief re informal conference
10/30/15	0.8 revise letter brief; tel call Alex
11/4/15	0.6 appear at informal conference
11/5/15	2.6 draft interrogatories and document requests; emails Santos
12/2/15	0.7 review and respond to meet and confer letter; emails defense counsel
12/7/15	0.6 emails defense counsel

12/8/15	4.3 emails defense counsel; prepare ex parte application papers
12/14/15	1.0 prepare ex parte application papers
12/15/15	0.6 finalize, serve and file ex parte papers
12/16/15	15.0 appear at ex parte hearing (travel between Spokane and San Jose)
1/4/16	0.6 legal research; emails defense counsel
1/13/16	0.2 emails defense counsel
1/25/16	6.8 prepare opposition to motion for stay and protective order
2/10/16	0.4 review tentative ruling; email defense counsel
2/11/16	0.6 appear at motion hearing
2/18/16	0.2 tel call and email Santos re discovery
2/22/16	0.7 prepare cmc statement
2/23/16	0.4 revise cmc statement; emails defense counsel
3/11/16	0.7 appear at CMC
3/18/16	2.2 review defendant's discovery responses; prepare plaintiff's discovery responses
3/21/16	3.2 prepare discovery responses; tel conf Hector and plaintiff; tel call Santos

3/22/16	0.2 email defense counsel
3/28/16	0.8 finalize discovery responses
6/7/16	0.8 prepare cmc statement; emails opposing counsel
6/28/16	2.3 research arbitration issues; email Santos
6/28/16	0.6 tel call Santos re litigation strategy
7/20/16	0.6 email defense counsel re deposition issues
9/13/16	0.4 emails Santos and Hector re scheduling of meeting with client
9/15/16	0.8 emails Hector re meeting with client; review court orders; revise travel arrangements for hearing
9/20/16	review motion to compel arbitration documents; meeting with client (travel to/from Fresno); prepare opposition to motion to compel arbitration
9/21/16	3.6 prepare opposition to motion to compel arbitration and evidentiary objections
9/22/16	prepare memorandum in opposition to motion to compel arbitration; prepare 6.2 declarations in opposition to motion to compel arbitration
9/23/16	0.4 finalize opposition to motion to compel arbitration papers
10/31/16	0.4 prepare CMC statement
11/1/16	0.6 revise cmc statement; emails defense counsel
11/17/16	review tentative ruling; prepare order denying motion to compel; prepare for motion 1.2 hearing

11/18/16	2.3 appear at motion hearing and CMC
11/21/16	0.4 tel call defense counsel re motion scheduling issues
11/29/16	prepare opposition to motion to compel arbitration, evidentiary objections, and 5.6 declarations
12/22/16	0.8 review tentative ruling; prepare order;
12/23/16	0.5 appear at CMC
1/18/17	0.4 review designation of record and appeal procedures
2/17/17	0.2 prepare appellate mediation statement
5/23/17	0.2 email defense counsel re cmc statement
6/9/17	0.7 appear at CMC
11/8/17	0.3 review joint status conference statement; emails defense counsel
5/9/18	0.5 review joint statement; emails office
5/25/18	0.2 emails defense counsel
8/13/18	7.4 prepare respondents' brief
8/15/18	1.2 prepare respondents' brief; prepare certificate of interested parties
8/16/18	0.7 prepare respondents' brief

8/27/18	1.8 finalize and file respondent's brief
11/7/18	0.2 review stipulation; email defense counsel
11/13/18	0.3 emails clerk and defense counsel
5/7/19	emails Santos; review court decision re preemption of meal and rest period claims; 0.6 legal research; review motion to dismiss; tel call Alex
6/20/19	0.5 tel call Santos; email Peter Hart
7/19/19	0.6 prepare, serve and file request for oral argument
11/8/19	0.2 email defense counsel
4/29/21	0.2 emails defense counsel and Santos
9/10/21	0.6 telephone call defense counsel; emails Santos; email defense counsel
10/6/21	0.5 prepare, serve and file notice of change of address
10/25/21	0.8 review new case authority; prepare, serve and file letter to court re new case authority
11/3/21	0.3 review and revise CMC statement; email defense counsel
11/9/21	0.2 arrange court call appearance
11/10/21	0.5 appear at CMC
11/30/21	0.3 emails and tel call court clerk

12/30/21	0.5 prepare and submit letter re new case authority
1/20/22	0.1 email court clerk re oral argument
1/31/22	1.6 prepare for oral argument; attend video orientation
2/1/22	1.5 prepare for and appear at court of appeal oral argument
2/5/22	0.8 review court of appeal opinion; emails Santos
2/7/22	2.2 legal research; prepare letter requesting publication
2/8/22	1.8 prepare, serve and file letter requesting publication
2/10/22	0.2 email defense counsel
2/18/22	0.2 email defense counsel
3/7/22	0.4 emails defense counsel and Santos
3/8/22	0.6 email defense counsel re data for mediation
3/10/22	0.8 emails defense counsel and Santos
3/14/22	2.3 emails Horace and Santos; tel call Santos; legal research
3/15/22	0.2 emails defense counsel
3/22/22	2.2 tel call Santos; prepare interrogatories and document requests

3/23/22	0.8 finalize and serve discovery; email defense counsel
3/31/22	0.4 emails defense counsel; tel call Santos
4/28/22	0.2 email Santos
5/11/22	0.3 review request for admissions; email Santos
5/31/22	1.2 review discovery responses; emails defense counsel and Santos
6/3/22	0.8 tel calls defense counsel and Santos
6/16/22	0.6 review supplemental discovery responses; emails Santos
6/17/22	0.7 prepare deposition notice; email Santos
6/21/22	tel call and emails Santos; review new appellate decision; emails defense counsel; 1.6 research mediators
6/23/22	0.4 emails defense counsel, Santos and mediator
6/28/22	0.2 emails defense counsel
7/6/22	0.2 email defense counsel and counsel for cross-defendant
8/19/22	0.2 email defense counsel
8/26/22	0.3 emails defense counsel, Santos and mediator
9/5/22	4.2 prepare mediation brief

9/6/22	2.2 prepare mediation brief
9/19/22	4.7 prepare mediation brief, emails and tel call Santos
9/23/22	5.2 mediation
10/14/22	0.4 emails Horace and Santos
10/17/22	0.4 prepare amended complaint; email Santos
10/26/22	review and revise CMC statement; emails Santos and defense counsel; prepare 2.8 interrogatories, document requests and requests for admissions
10/27/22	1.2 finalize and serve discovery
11/16/22	2.6 review removal papers; research removal issues; emails Santos
11/23/22	1.2 review federal court orders; emails Santos and defense counsel
11/30/22	1.4 legal research; email Santos
1/13/23	0.2 email counsel for defendants and counsel for cross defendant
1/18/23	prepare for and participate in meet and confer; emails and tel call Santos; email court 1.2 clerkre MSC scheduling; prepare and file certification re interested entities
1/30/23	0.2 finalize, serve and file ADR certification
1/31/23	0.5 emails defense counsel and counsel for cross-defendant; email Magistrate Judge clerk draft stipulation and proposed order; email counsel for defendants and counsel for
2/1/23	0.9 cross-defendant; file stipulation and proposed order

2/3/23	0.6 emails defense counsel and Santos; prepare ADR certification
2/10/23	3.4 emails defense counsel; draft joint case management statement
2/13/23	review discovery responses; prepare joint case management statement; email and tel 2.7 call Santos
2/16/23	revise case management statement; review Rule 26(f) report; emails counsel for 0.9 defendants and counsel for cross defendant
2/22/23	0.4 emails counsel for defendant and counsel for cross defendant
2/23/23	0.4 finalize, serve and file CMC statement
3/2/23	0.7 appear at CMC; email defense counsel
3/28/23	2.2 legal research
3/29/23	2.4 legal research; emails defense counsel and Santos
4/4/23	review records provided by defense counsel; tel call Santos; legal research; emails 4.6 Santos and defense counsel
4/6/23	0.3 emails defense counsel and Santos
4/7/23	1.2 legal research
4/24/23	3.2 prepare settlement conference statement; emails defense counsel
4/26/23	4.5 legal research; prepare confidential settlement letter
4/27/23	3.2 legal research; prepare confidential settlement letter; email Santos

4/28/23	0.3 emails Santos and defense counsel
5/1/23	prepare settlement conference statement and confidential settlement letter; emails Santos
5/1/23	2.2 legal research; revise confidential settlement letter; emails Santos
5/2/23	0.6 finalize confidential settlement letter; email defense counsel
5/4/23	0.4 emails court and defense counsel; arrange for delivery of chambers copies
5/10/23	3.2 prepare settlement conference statement; emails Santos
5/11/23	0.5 tel conference with court; email Santos
5/12/23	8.1 settlement conference
5/15/23	0.1 email defense counsel re CMC statement
5/17/23	settlement conference; legal research; prepare class settlement agreement; email Santos
5/19/23	0.3 tel call defense counsel; email Atticus
5/22/23	0.6 emails Atticus; prepare settlement agreement and class notice
5/24/23	1.6 revise settlement agreement; prepare class notice; email Santos
6/6/23	emails Horace and Santos; research tax issue; prepare motion for preliminary approval
6/7/23	2.2 of settlement
	6.5 prepare motion for preliminary approval

6/8/23	2.4 prepare motion for preliminary approval
6/9/23	finalize settlement agreement; emails Santos and defense counsel; prepare motion for 1.5 preliminary approval
6/12/23	1.8 prepare motion for preliminary approval
6/20/23	review Gomez declaration; revise brief in support of preliminary approval motion; 1.8 prepare declaration in support of preliminary approval
6/28/23	check hearing date availability; email defense counsel; revise motion for preliminary 0.2 approval
6/30/23	revise motion for preliminary approval; prepare proposed order; email defense counsel; 1.2 email Santos; finalize and submit preliminary approval motion papers
7/3/23	prepare notice of settlement and request to continue status conference; email counsel 0.4 for defendants and counsel for cross-defendant
7/5/23	0.2 email defense counsel
7/6/23	revise notice of settlement; email counsel for defendants and cross-defendants; file 0.3 notice of settlement
10/2/23	0.3 emails defense counsel and court clerk
10/3/23	0.2 tel call defense counsel
10/9/23	0.5 prepare CMC statement; email defense counsel and counsel for cross-defendant
10/10/23	0.4 emails counsel for Peoplelease; finalize, serve and file CMC statement
11/27/23	1.2 prepare for motion hearing
11/28/23	10.2 prepare for and appear at motion hearing; travel to and from San Francisco

11/29/23	emails Atticus; prepare supplemental declaration; review and revise CAFA notice; 2.2 emails defense counsel and Santos
11/30/23	file declarations in support of preliminary approval; prepare and file statement of non- 0.5 opposition to proposed CAFA notice
12/20/23	0.7 emails Santos, defense counsel, Atticus; get bids for settlement administration
12/22/23	0.6 emails re bids from settlement administrators
1/2/24	0.4 emails defense counsel and Atticus
1/3/24	0.2 emails Atticus
1/15/24	defense counsel, Atticus, Santos; prepare declaration in support of motion for 4.2 preliminary approval of revised class action settlement; legal research; tel calls Christopher Longley and Santos; revise declaration in support of motion for
1/16/24	1.2 preliminary approval of revised class action settlement
1/17/24	0.6 prepare declarations for plaintiff and Christopher Longley; email Santos
1/18/24	0.2 emails Santos
1/19/24	email Atticus; prepare motion for preliminary approval of revised class action 2.2 settlement; review and revise Longley declaration; emails Santos; tel call Longley revise declaration and prepare motion for preliminary approval of revised class action
1/22/24	3.2 settlement; emails Santos and defense counsel
1/24/24	0.2 tel call and email Santos
1/25/24	email defense counsel; revise motion for preliminary approval of revised settlement; 0.9 finalize and file preliminary approval motion papers
4/15/24	0.5 prepare for preliminary approval motion hearing

4/16/24	prepare for motion hearing; travel to/from San Francisco; attend motion hearing; 10.2 emails Santos and defense counsel
4/17/24	0.6 review court order; email Atticus
4/30/24	0.3 review settlement administration timeline; emails settlement administrator
5/1/24	0.3 review class notice; email Atticus
5/7/24	prepare CMC statement; emails counsel for defendant and cross defendants; serve 0.6 and file CMC statement
5/13/24	0.2 email Atticus
5/30/24	prepare stipulation and proposed order; email defense counsel; serve and file 0.8 stipulation and proposed order
6/6/24	0.4 emails Horace, Santos and Atticus
6/7/24	0.4 emails defense counsel and Atticus
6/11/24	prepare fees motion; review and revise supporting declarations; emails and tel call 4.2 Santos
6/12/24	3.2 prepare fees motion and supporting declaration
6/14/24	0.6 emails Atticus and defense counsel; prepare stipulation
6/18/24	1.6 finalize, serve and file fees motion
subtotal	291.1
expected	prepare final approval papers; travel to/from San Francisco for final approval hearing; 15.0 appear at final approval hearing; settlement administration

total

306.1

EXHIBIT 2

Date Range: All Dates (8/1/2011 - 6/12/2024)

Accounts: All Accounts

Categories: All Categories

Tags: TVT Trucking

Type: Custom

✓ Show Memo/Notes

▼ Money In

\$0.00

▼ Money Out

-\$12,776.56

Airfare

-\$1,068.88

TVT Trucking

-\$1,068.88

1/7/2016

KLF

chase

-\$675.96

12/8/2023

KLF

Chase Credit Crd

-\$182.96

5/8/2024

KLF

Chase Credit Crd

-\$229.96

Attorney Service

-\$1,324.44

TVT Trucking

-\$1,324.44

6/24/2015

KLF

First Legal Network

-\$192.20

7/27/2015

KLF

First Legal Network

-\$411.25

7/27/2015

KLF

First Legal Network

-\$46.75

8/7/2015

KLF

chase

-\$21.00

11/7/2015

KLF

chase

-\$21.00

11/7/2015

KLF

chase

-\$21.00

12/7/2015

KLF

chase

-\$21.00

12/7/2015	KLF	chase	-\$34.00
2/7/2016	KLF	chase	-\$123.00
2/7/2016	KLF	chase	-\$21.00
3/7/2016	KLF	chase	-\$48.00
4/7/2016	KLF	chase	-\$24.00
5/7/2016	KLF	chase	-\$120.00
7/7/2016	KLF	chase	-\$24.00
11/7/2016	KLF	chase	-\$5.16
12/7/2016	KLF	chase	-\$5.16
1/7/2017	KLF	chase	-\$3.60
10/7/2018	KLF	chase	-\$10.50
10/7/2018	KLF	chase	-\$10.50
10/7/2018	KLF	chase	-\$10.50
3/7/2020	KLF	Chase Credit Crd	-\$10.50
8/7/2020	KLF	Chase Credit Crd	-\$5.72
10/6/2021	KLF	CAEFILE	-\$2.05
10/6/2021	KLF	CAEFILE	-\$3.75
11/7/2021	KLF	Chase Credit Crd	-\$10.50
12/8/2021	KLF	Chase Credit Crd	-\$10.50
3/8/2022	KLF	Chase Credit Crd	-\$10.50
6/5/2023	KLF	First Legal Network	-\$41.50
5/7/2024	KLF	CAEFILE	-\$3.75
5/7/2024	KLF	CAEFILE	-\$2.05

BART**TVT Trucking**

2/8/2024	KLF	Chase Credit Crd	-\$23.00
6/7/2024	KLF	Chase Credit Crd	-\$24.00

Car Rental

			-\$53.04
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Page 3

TVT Trucking				- \$7,500.00
8/29/2022	KLF	Lisa Kiernan		- \$7,500.00
Messenger				- \$36.93
TVT Trucking				- \$36.93
10/7/2018	KLF	chase		- \$36.93
Parking				- \$55.00
TVT Trucking				- \$55.00
12/21/2015	KLF	235 North 2nd		- \$5.00
2/8/2024	KLF	Chase Credit Crd		- \$50.00

Money In:	\$0.00
Money Out:	-\$12,776.56
Net Total:	-\$12,776.56