

# Exhibit C

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

**CHRISTINE RODRIGUEZ, SANDRA  
BURGA, KAREN MALAK, JAMES  
TORTORA, LISA BRUNO, JANEEN  
CAMERON, KAREN McBRIDE,  
ANDREW WOOLF, and BRAD  
BERKOWITZ, individually, and for all  
others similarly situated,**

Plaintiffs,

-against-

**IT'S JUST LUNCH INTERNATIONAL,  
IT'S JUST LUNCH, INC., HARRY and  
SALLY, INC, RIVERSIDE COMPANY,  
LOREN SCHLACHET, IJL NEW YORK  
CITY FRANCHISE, IJL ORANGE  
COUNTY FRANCHISE, IJL CHICAGO  
FRANCHISE, IJL PALM BEACH  
FRANCHISE, IJL DENVER FRANCHISE,  
IJL AUSTIN FRANCHISE, IJL LOS  
ANGELES-CENTURY CITY FRANCHISE,  
and DOES 1-136,**

Defendants.

Case No.: 07-CV-9227 (SHS)(SN)

**AFFIDAVIT OF MARC J.  
NATALE IN SUPPORT OF  
PLAINTIFFS' MOTION FOR FEES**

I, Marc J. Natale, under penalty of perjury, declare the following:

1. I am the Chief of Staff at the law firm Balestriere Fariello ("the Firm"), and I make this affidavit based on my personal knowledge and/or review of my files. I submit this affidavit in support of Plaintiffs' Motion for Award of Attorney's Fees.
2. As the Chief of Staff, I am responsible for establishing billing and time- entry procedures, as well as generating and submitting invoices for services

rendered. I am responsible for the maintenance of records related to the billing of the Firm's clients.

3. The Firm's time records are made and kept in the regular course of the Firm's business.

4. The Firm's time records are made at or about the time of the event being recorded.

5. The Firm's time records are made by individuals acting within the course of regular business conduct.

*Firm Billing Practices*

6. Staff must record all time spent working on matters handled by the Firm ("Hours Entries") and must, on a daily basis, input their time into the Firm's electronic case management software.

7. Attorneys may designate an individual with knowledge of the matters to record Hours Entries on his or her behalf, but all attorneys must personally review such Hours Entries on a daily basis to ensure accuracy.

8. All hours recorded and accrued working on the Firm's matters during a day must be entered into the Firm's electronic case management software by 10:30 a.m. of the following workday.

9. I review the Hours Entries of all staff every workday.

10. All recorded hours must be accompanied by a description of the tasks worked on during such time and attributed to the specific matter for which those tasks were undertaken.

11. When entering recorded hours into the Firm's electronic case management system, staff must review their Hours Entries to ensure they are accurate and complete.

12. On a monthly basis, the Firm's staff again reviews Hours Entries for accuracy.

13. All staff must follow this procedure regardless of whether the Firm shall bill on an hourly or some other (including contingency fee) basis. In other words, from the perspective of staff entering their hours, how the Firm shall be paid is irrelevant to the procedure the staff person must follow to enter hours.

14. I generate monthly invoices from the Hours Entries recorded by staff in the Firm's electronic case management software.

15. Monthly invoices generated from staff Hours Entries are reviewed by a partner at the Firm to ensure accuracy and fair billing practices. As with staff persons entering hours, partners follow this procedure regardless of how the Firm shall be paid.

16. In matters where discounted billing rates have not been negotiated and where compensation is remunerated on an hourly basis, standardized staff billing rates apply.

17. In matters where compensation is not remunerated on an hourly basis, invoices reflect the cost of services that would have accrued on an hourly basis at standard staff rates even though such charges may not be debited or billed

in such a manner. This practice reflects the value of services rendered in matters where compensation due is not billed on an hourly basis.

Dated: New York, New York  
November 11, 2019

  
\_\_\_\_\_  
Marc J. Natale

Sworn to before me on this  
11th day of November 2019

  
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**ANDREW CHAIM BERSHTEIN**  
NOTARY PUBLIC, STATE OF NEW YORK  
Registration No. 02BE6393462  
Qualified in New York County  
Commission Expires 06/17/2023