

## Document Production / Keppel

---

From: Matthew Thurmer (mthurmer@mcdougallawfirm.com)

To: artbotham@gmail.com

Cc: sboehmer@mcdougallawfirm.com; ablake@mcdougallawfirm.com; ztaylor Tyson@yahoo.com

Date: Thursday, December 5, 2024 at 11:55 AM PST

---

Arthur:

To accommodate your request, we will be reproducing the below documents with the confidential designation moved off the text. You should be able to search all documents, so let us know if you are unable to do so. The documents are password protected for editing only because they are confidential and should not be edited, changed, or altered in any way.

Please let us know if there are documents we have not addressed and if you have legal authority that requires production without a password, as we are not aware of any such requirement. Thanks.

154-1025 Deals;  
1027-1036 Finance Gross;  
1037 2024 Pay Plan;  
1041-1042 Kidd Commissions Report;  
1043-1125 Compensation Plans Vol. I;  
1126-1193 Compensation Plans Vol. II;  
1194-1514 PAGA Pay Records Vol. I;  
1516-1522 Espinoza Time Records;  
1523-1663 PAGA Pay Records Vol. II;  
1664-2327 PAGA Pay Records Vol. III;  
2328-2439 Compensation Plans Vol. III; and  
2440-2443 Employee List.

**MCDUGAL BOEHMER FOLEY  
LYON MITCHELL & ERICKSON**

**Matthew A. Thurmer**  
**Attorney**

T: 619.440.4444  
F: 619.440.4907  
La Mesa Village Plaza  
8100 La Mesa Boulevard, Suite 200  
La Mesa, CA 91942

[site](#) | [get directions](#)

The information contained in this e-mail message is intended only for the CONFIDENTIAL use of the designated addressee named above. The information transmitted is subject to the attorney-client privilege and/or represents confidential attorney work product. If YOU are not the designated addressee named above or the authorized agent responsible for delivering it to the designated addressee, you received this document through inadvertent error and any further review, dissemination, distribution or copying of this communication by you or anyone else is strictly prohibited. IF YOU RECEIVED THIS COMMUNICATION IN ERROR, PLEASE NOTIFY US IMMEDIATELY BY TELEPHONING THE SENDER NAMED ABOVE AT (619) 440-4444. Thank you.