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*Attorneys for Plaintiff and the Class*

**SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF ORANGE**

KEVIN FLORES, individually, and on behalf  
of other members of the general public  
similarly situated and on behalf of all other  
aggrieved employees pursuant to the  
California Private Attorney General Act,

Plaintiff,

vs.

PACIFIC PLASTICS, INC., a California  
corporation; and DOES 1 through 100,  
inclusive,

Defendants.

Case No.: 30-2021-01214613-CU-OE-CXC

Honorable Lori A. Kim  
Department C16

**CLASS ACTION**

**DECLARATION OF HELENE MAYER IN  
SUPPORT OF PLAINTIFF'S MOTION  
FOR FINAL APPROVAL OF CLASS  
ACTION SETTLEMENT, ATTORNEYS'  
FEES AND COSTS, AND ENHANCEMENT  
AWARD AND GENERAL RELEASE FEE**

Date: October 3, 2025  
Time: 10:00 a.m.  
Department: C16

Complaint Filed: August 4, 2021  
FAC Filed: July 15, 2024  
Trial Date: None Set

**DECLARATION OF HELENE MAYER**

I, Helene Mayer, hereby declare as follows:

1. I am an attorney licensed to practice law in the State of California. I am a member of Lawyers *for* Justice, PC, attorneys of record for Plaintiff Kevin Flores (“Plaintiff”) and the Class in the above-captioned matters. The facts set forth in this declaration are within my personal knowledge or based on information and belief, and, if called as a witness, I could and would competently testify as follows.

**PRELIMINARY APPROVAL OF SETTLEMENT**

2. On April 11, 2025, in Department CX-105 of the above-entitled Court, the Honorable Randall J. Sherman preliminarily approved the Joint Stipulation for Class Action and PAGA Settlement (“Settlement,” “Agreement,” or “Settlement Agreement,”) entered into between Plaintiff and Defendant Pacific Plastics, Inc., (“Defendant,”) (together with Plaintiff referred to as the “Parties”) and conditionally certified the Class for settlement purposes. The Court provisionally appointed Plaintiff Kevin Flores as the representative of the Class (“Class Representative”). The Court also provisionally appointed and designated Lawyers *for* Justice, PC as counsel for the Class (“Class Counsel”).

3. The Court approved and ordered the mailing of the Notice of Class Action Settlement (“Notice”), adopted the notice, opt-out, and objection procedures and ordered their implementation. The Court appointed Simpluris, Inc. (“Simpluris”) to serve as the third-party settlement administrator and handle the notice and settlement administration process.

4. As of the date of filing the accompanying Motion for Final Approval of Class Action Settlement, Attorneys’ Fees and Costs, and Enhancement Award and General Release Fee (“Motion for Final Approval”), no Participating Class Member has objected to the Class Settlement, the contemplated request for Attorneys’ Fees and Costs, Enhancement Award and General Release Fee, and Settlement Administration Costs, or the allocation for the PAGA Amount.

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**WORK PERFORMED BY CLASS COUNSEL**

5. Several attorneys at Lawyers for Justice, PC have been actively performing work in the above captioned action entitled *Flores v. Pacific Plastics, Inc.*, Orange County Superior Court, Case No. 30,2021-01214613-CU-OE-CXC (“Litigation”), which was filed on August 4, 2021.

6. Before initiating the case, Lawyers for Justice, PC investigated and researched the facts and circumstances underlying the pertinent factual and legal issues and applicable law. This required thorough discussions and interviews between attorneys at Lawyers for Justice, PC and Plaintiff and research into the various legal issues involved in the case, namely, the current state of the law as it applied to class certification, representative adjudication, and trial; the law relating to class certification, manageability, off-the-clock theory, meal and rest periods, expense reimbursements, recordkeeping and wage statement requirements, representative Private Attorneys General Act ("PAGA") claims and penalties, and wage-and-hour law and enforcement, Plaintiff's claims and allegations, and potential defenses. After conducting an initial investigation, Lawyers for Justice, PC determined that the claims of Plaintiff were well-suited for class-wide and representative adjudication, owing to what appeared to be a common course of conduct affecting a similarly situated group of current and former non-exempt employees of Defendant in California, who were not properly compensated for, *inter alia*, all hours worked, non-compliant meal and rest periods, and business expenses.

7. Collectively, Class Counsel conducted significant formal and informal discovery and investigation into the facts of the case, to assess the veracity, strength, and scope of the claims, and were preparing the case for class certification and trial, prior to reaching the Settlement. The Parties exchanged a large volume of information, documents, and data throughout the course of the litigation and in connection with the mediation and settlement negotiations. The volume of records and documents that Class Counsel reviewed and analyzed included, and were not limited to: Plaintiff's employment records, a detailed sampling of Plaintiff's and other Settlement Class Member's time data and pay records, Defendant's Employee Handbook, new employee checklists, Defendant's organizational chart, company

1 policy acknowledgments (including but not limited to Handbook Acknowledgement Form),  
2 forms, procedures, and policies (including but not limited to Harassment Free Workplace Policy,  
3 Whistleblower Policy, Open Door Policy, Sick Leave Policy, Leaves of Absence Policies, Time  
4 Keeping Policy, Overtime Policy, Milage Reimbursement and Travel Expenses Policy,  
5 Employee Conduct Policies), among other information and documents. Class Counsel had the  
6 opportunity to interview and obtain information from Plaintiff and percipient witnesses, and  
7 reviewed and analyzed a volume of information, data, and documents obtained from Plaintiff,  
8 Defendant, and other sources. Class Counsel developed liability, damages, violation, and  
9 penalties valuation models in the course of litigation and in connection with the mediation and  
10 settlement negotiations, and met and conferred with Defendant's counsel on numerous  
11 occasions, e.g., to discuss issues relating to the pleadings, formal and informal discovery, and the  
12 production of information, documents, and data in the course of litigation and in connection with  
13 mediation and settlement negotiations, and settlement. Other work performed by Class Counsel  
14 included, and was not limited to, case strategy and analysis; researching, drafting, reviewing,  
15 and/or revising the pleadings, the mediation briefing and supporting materials, and settlement  
16 documents; drafting and propounding multiple sets of formal written discovery requests on  
17 Defendant; and preparing for and attending court proceedings, mediation, and settlement  
18 negotiations, among other tasks.

19 8. As outlined herein, the Parties have conducted significant investigation and  
20 formal and informal discovery during the course of litigating this matter, mediation, and  
21 extensive settlement negotiations. Class Counsel analyzed a large volume of information,  
22 documents, and data obtained from Plaintiff, Defendant, and other sources that provided a  
23 critical understanding of the nature of the work performed by the Settlement Class Members and  
24 Aggrieved Employees, as well as Defendant's organizational structure and their operations and  
25 employment policies, practices, and procedures. The information, documents, and data were  
26 used in analyzing liability, damages, penalties, and other valuation issues in connection with all  
27 phases of the litigation, and ultimately, in connection with the mediation and settlement  
28 negotiations process. Class Counsel also performed significant research into the applicable law,

1 which is evolving as it relates to class certification, manageability, off-the-clock theory, meal and  
2 rest periods, representative PAGA claims and penalties, wage-and-hour enforcement, Plaintiff's  
3 claims and allegations, and Defendant's defenses thereto, as well as facts discovered.

4 9. After conducting significant investigation of the facts and law during the  
5 prosecution of this matter, counsel for the Parties engaged in extensive settlement negotiations to  
6 try to resolve the cases. These efforts included participating in a mediation session conducted by  
7 the Hon. Jeffrey K. Winikow (Ret.), a well-regarded mediator experienced in handling complex  
8 labor and employment matters. During all settlement discussions, the Parties conducted their  
9 negotiations at arm's length in an adversarial position. In the course of the mediation and  
10 settlement negotiations, the Parties exchanged documents and data, and discussed various  
11 aspects of the cases, including and not limited to, the risks and delays of further litigation, the  
12 risks and expenses to the Parties of proceeding with class certification, representative  
13 adjudication, and trial; the law relating to class certification, manageability, off-the-clock theory,  
14 meal and rest periods (including *inter alia*, on premises breaks), expense reimbursements,  
15 recordkeeping and wage statement requirements, representative PAGA claims and penalties, and  
16 wage-and-hour law and enforcement; Plaintiff's claims and allegations, and Defendant's  
17 defenses thereto, as well as the evidence produced and analyzed; and the possibility of appeals,  
18 among other things. Arriving at a settlement that was acceptable to the Parties was not easy.  
19 Defendant contended that individualized questions of fact predominate over any common issues,  
20 and these issues would pose challenges to class certification and representative adjudication.  
21 Defendant and its counsel felt strongly about Defendant's ability to avoid class certification and  
22 prevail on the merits and, while Plaintiff and Class Counsel believed that they would be able to  
23 obtain class certification and prevail at trial. With the aid of the mediator's evaluation, the  
24 Parties ultimately agreed that this matter was well-suited for settlement given the legal issues  
25 relating to Plaintiff's principal claims, as well as the costs and risks to the Parties that would  
26 attend further litigation. These risks of further litigation include, and are not limited to, a  
27 determination that the claims are unsuitable for class treatment and/or representative  
28 adjudication, class de-certification after certification of a class, allowing a jury to decide the

claims asserted in this matter, and the real possibility of no monetary recovery after years of litigation.

10. By way of the accompanying Motion for Final Approval, Class Counsel seeks attorneys' fees in the amount of \$612,500.00, which is thirty-five percent (35%) of the Gross Settlement Amount of \$1,750,000.00. Pursuant to the contingency-fee agreement entered into by and between Plaintiff and Class Counsel, Plaintiff has agreed to a contingency fee of at least forty-five percent (45%) of the recovery.

11. The attorneys' fees sought are commensurate with: (1) the risk that Class Counsel took in commencing the case; (2) the time, effort, and expense that Class Counsel dedicated to the case; (3) the skill and determination that Class Counsel has shown; (4) the results that Class Counsel has achieved throughout the litigation; (5) the value of the settlement that Class Counsel has achieved in this matter; and (6) the other cases that Class Counsel has turned down in order to devote their time and efforts to these case. The nature of the work performed, skill exercised, and the outcome in this matter which involves an outstanding monetary recovery involving an Gross Settlement Amount of \$1,750,000.00 (with a Net Settlement Amount of approximately at least \$856,320.74 to be paid to Participating Class Members (with gross Individual Settlement Shares averaging approximately \$1,933.00), payment of \$62,500.00 to Aggrieved Employees (with Individual PAGA Shares averaging approximately \$419.46) and payment of \$187,500.00 to the State of California)—support the percentage fee sought.

12. While not necessarily required to be demonstrated because a percentage fee is proper for this settlement, it should be noted that Class Counsel has incurred many hours of work in connection with prosecuting this matter such that the award of attorneys' fees is also justified under a lodestar analysis. Attorneys at Lawyers *for* Justice, PC have spent a total of **410.10 hours** performing tasks and obtaining recovery in this matter. Attached hereto as "**EXHIBIT 1**" is an Attorney Task and Time Chart that sets forth in detail the nature of the legal services provided by attorneys at Lawyers *for* Justice, PC and the time incurred by them in performing those services. These hours include work done by several attorneys at Lawyers *for* Justice, PC. Also, separate from the hours referenced herein and, in the chart, Lawyers *for* Justice, PC had

1 litigation support personnel actively engaged in assisting with the prosecution of this matter.

2       13. The work performed in this particular matter, the background of Lawyers *for*  
3 Justice, PC, as well as the individual backgrounds, training, and experience of the attorneys who  
4 worked on this matter, in litigating complex wage-and-hour actions, and in particular,  
5 employment class action and representative action cases, support a reasonable blended hourly  
6 rate of compensation of at least \$850 per hour for work performed by Lawyers *for* Justice, PC.  
7 Lawyers *for* Justice, PC has been awarded attorneys' fees, compensating the firm at the rate of at  
8 least \$850 per hour for legal services performed, by courts granting approval of settlements in  
9 other wage-and-hour class action and representative action cases: final approval of the class and  
10 representative action settlement in *David Dugan v. TEC Equipment, Inc., et al.* (Los Angeles  
11 Superior Court Case No. 19STCV01591) was granted on July 8, 2021, and the award of  
12 attorneys' fees involved compensation at the rate of \$936.47 per hour; final approval of the class  
13 and representative action settlement in *Larry Greenwood, et al. v. Scan Health Plan* (Los  
14 Angeles Superior Court Case No. BC715157) was granted on April 20, 2021, and the award of  
15 attorneys' fees involved compensation at the rate of \$919.57 per hour; final approval of the class  
16 and representative action settlement in *Seth Swan v. Pace Supply Corp.* (Sonoma County  
17 Superior Court Case No. SCV258764) was granted on February 6, 2019, and the award of  
18 attorneys' fees involved compensation at the rate of \$855.96 per hour.

19                                   **EXPERIENCE AND ADEQUACY OF**

20                                   **LAWYERS *for* JUSTICE, PC**

21       14. For over a decade, Lawyers *for* Justice, PC has almost exclusively focused on the  
22 prosecution of consumer and employment class actions, involving wage-and-hour claims, race  
23 discrimination, unfair business practices, or consumer fraud. Currently, Lawyers *for* Justice, PC  
24 is the attorney of record in well over a dozen employment-related putative class actions in both  
25 state and federal courts in the State of California. Lawyers *for* Justice, PC is comprised of  
26 attorneys who focus on litigating complex wage-and-hour class and Private Attorneys General  
27 Act ("PAGA") representative actions. The firm has successfully litigated cases involving nearly  
28 every aspect of California wage and hour law, including payment of overtime and minimum

1 wages, provision of meal and rest breaks and/or premiums wages for same, timely payment of  
2 wages, provision of compliant wage statements, reimbursement of business expenses, executive,  
3 administrative, and other overtime exemptions to the State of California and federal overtime  
4 compensation requirements, PAGA claims, and sister statutes under federal law. During a  
5 relatively short time, in association with other law firms, Lawyers *for* Justice, PC has recovered  
6 millions of dollars on behalf of thousands of individuals in California.

7 15. Edwin Aiwarzian is a Managing Member and Shareholder of Lawyers for Justice,  
8 PC. He received his Bachelor of Arts degree from Pepperdine University in April of 1999 and  
9 earned a Juris Doctor degree from Pepperdine University School of Law in May of 2004. He has  
10 extensive formal training in dispute resolution and negotiation from the Straus Institute for  
11 Dispute Resolution as part of its Masters in Dispute Resolution degree program. In addition, he  
12 has previously served as a pro bono mediator for the Los Angeles County Superior Court. In  
13 October of 2000, he obtained a Litigation Paralegal Certificate from the UCLA Extension  
14 Program. During the summer of 2000, he studied Legal Writing at Harvard University. From  
15 approximately September 2002 to approximately December 2002, he served as a Judicial Extern  
16 to the Honorable Kim McLane Wardlaw of the United States Court of Appeals for the Ninth  
17 Circuit. From approximately June 2002 to approximately August 2002, he served as a Judicial  
18 Extern to the Honorable Earl Johnson, Jr. of the California Court of Appeal for the Second  
19 Appellate District. In December of 2004, he obtained a license to practice law from the  
20 California State Bar. Since in or around October of 2008, through his work at Lawyers *for*  
21 Justice, PC, he has almost exclusively focused on the prosecution of consumer and employment  
22 class actions. While employed by Lawyers *for* Justice PC, he has argued over one hundred (100)  
23 motions, taken or defended over one hundred fifty (150) depositions, prepared dozens of expert  
24 witnesses for deposition or trial, and attended over one hundred seventy-five (175) mediations.  
25 Together with other attorneys at the firm, and in some cases in conjunction with co-counsel, he  
26 has successfully litigated cases involving the executive, administrative, and other overtime  
27 exemptions to the State of California and federal overtime compensation requirements. Under  
28 his supervision, Lawyers *for* Justice, PC has successfully obtained class certification by

1 contested motion practice in approximately sixteen (16) cases in the last decade, and litigated  
2 over 1,000 class action or representative action cases.

3 16. Arby Aiwarzian is a Member and Shareholder of Lawyers *for* Justice, PC. He  
4 received his Bachelor of Arts degree from University of California, Los Angeles and graduated  
5 magna cum laude. He earned a Juris Doctor degree, cum laude, from Southwestern Law School.  
6 From approximately May 2007 to approximately July 2007, he served as a Judicial Extern to the  
7 Honorable Earl Johnson, Jr. of the California Court of Appeal for the Second Appellate District.  
8 From approximately August 2008 to approximately December 2008, he served as a Judicial  
9 Extern to the Honorable Kim McLane Wardlaw of the United State Court of Appeals for the  
10 Ninth Circuit. He was admitted to practice law in California in 2010. He is admitted to practice  
11 before all courts of the State of California and all United States District Courts in the State of  
12 California. He has worked on many wage-and-hour class action and representative action cases,  
13 taking the lead in taking and defending depositions, arguing motions, and attending mediations.  
14 He has played an integral role in preparing matters for class certification, including and not  
15 limited to, successful certification of a class in *Upson v. Sur La Table* (Los Angeles County  
16 Superior Court Case No. BC424012), *Montazemi v. Regus Management* (Los Angeles County  
17 Superior Court Case No. BC478769), and *Abdulhaqq v. Urban Outfitters* (Alameda County  
18 Superior Court Case No. RG13680477). Under his supervision, dozens of class action or  
19 representative action cases have resulted in settlements that have been granted court approval.  
20 He has handled over one hundred and fifty (150) mediations and worked on over two hundred  
21 and fifty (250) class action or representative action cases which have resulted in settlement.

22 17. Joanna Ghosh is a Managing Member of Lawyers *for* Justice, PC. She received a  
23 Bachelor of Arts degree from California State University, Los Angeles in 2006, a Master of  
24 Science degree from the London School of Economics in 2007, and a Juris Doctor degree from  
25 Georgetown University Law Center in 2010. She is admitted to practice in California (since  
26 2010) and in New York (since 2013) and She is also admitted to practice in all U.S. District  
27 Courts in California, the U.S. Bankruptcy Court for the Central District of California, and the  
28 U.S. Supreme Court. She has taken and defended dozens of depositions and successfully

1 handled motion practice in class action cases regarding discovery (including and not limited to,  
2 regarding class contact information), class certification (both contested class certification and  
3 stipulated class certification), arbitration agreements, coordination, and intervention. She has  
4 successfully handled briefing and oral arguments on appeal and obtained notable decisions  
5 regarding Private Attorneys General Act claims and employer efforts to compel arbitration of  
6 such claims, e.g., *Roberto Betancourt v. Prudential Overall Supply* (Cal. Ct. App., Mar. 7, 2017)  
7 9 Cal.App.5th 439, cert. denied (Cal., May 24, 2017), cert. denied (U.S., Dec. 11, 2017) and *ZB,*  
8 *N.A. v. Superior Court* (2019) 8 Cal.5th175. She has significant experience with class actions,  
9 including and not limited to working on cases to obtain class certification through contested  
10 motion practice and working on cases in the post-certification stage (e.g., post-certification  
11 discovery, appeal, statistical sampling and pilot study, and trial preparation in conjunction with  
12 co-counsel in a case involving a certified class consisting of approximately 2,600 individuals).  
13 She has extensive experience with class action and/or representative action settlements, and has  
14 handled this process in over five hundred (500) cases. Under her, Edwin Aiwazian, and Arby  
15 Aiwazian's supervision, Lawyers *for* Justice, PC has handled the class certification and court  
16 approval process for hundreds of class action and/or representative action matters that have  
17 successfully resolved. Joanna Ghosh is a member of the California Employment Lawyers  
18 Association and, on several occasions, has been a speaker regarding topics in wage and hour law  
19 at the organization's continuing legal education events.

20 18. I, Helene Mayer, am a Member of Lawyers *for* Justice, PC. I received my  
21 Bachelor of Arts degree from University of San Diego in 2017, and I earned my Juris Doctor  
22 degree from University of San Diego School of Law in 2020. I was admitted to practice law in  
23 California in 2021. I am admitted to practice before all courts of the State of California and all  
24 U.S. Federal District Courts in the State of California. I have worked on wage-and-hour class  
25 action and PAGA representative cases, and my work has included, *inter alia*, researching and  
26 drafting pleadings, administrative notice exhaustion, drafting, negotiating, and finalizing  
27 stipulations and settlement agreements, and making court appearances. Prior to working at  
28 Lawyers *for* Justice, PC, I worked at law firms focused primarily on family law matters,

1 including, *inter alia*, representing clients in divorce, parentage, child custody, and domestic  
2 violence restraining order proceedings, researching, and drafting pleadings, negotiating and  
3 finalizing marital settlement agreements, engaging in motion practice, and making court  
4 appearances.

5 **LITIGATION COSTS AND EXPENSES INCURRED BY**  
6 **LAWYERS *FOR* JUSTICE, PC**

7 19. To date, Class Counsel has borne all of the risks and costs of litigation and will  
8 not receive any compensation until recovery is obtained in this matter. The Settlement provides  
9 for reimbursement of litigation costs and expenses of up to \$25,000.00. Lawyers *for* Justice, PC  
10 seeks reimbursement of **\$12,179.26** in litigation costs and expenses incurred in the matter, as  
11 reflected in “**EXHIBIT 2**” attached hereto. These expenses were reasonable and necessary in  
12 the prosecution of the matter and to obtain the Settlement. The cost savings of \$12,820.74 will  
13 be part of the Net Settlement Amount, which will be distributed to the Settlement Class Members  
14 in accordance with the Settlement.

15 **ENHANCEMENT AWARD AND GENERAL RELEASE FEE TO PLAINTIFF**

16 20. In recognition of his efforts and work spearheading the prosecution of this matter  
17 and serving as the Class Representative, as well as his broader individual waiver and release of  
18 claims with a California Civil Code Section 1542 waiver (set forth in Paragraph 8.2 of the  
19 Settlement Agreement), the Settlement provides for an Enhancement Award and General Release  
20 Fee, in the amount of up to \$7,500.00 to Plaintiff. Plaintiff spent a substantial amount of time  
21 and effort discussing his employment with Class Counsel, gathering and providing relevant  
22 documents and information, and providing facts and evidence to support the prosecution of the  
23 claims. Plaintiff was available whenever Class Counsel needed him and actively tried to obtain  
24 and provide information that would help obtain a recovery in this matter. Accordingly, it is  
25 appropriate for Plaintiff to receive \$7,500.00 as a reasonable Enhancement Award and General  
26 Release Fee for his broader waiver and release of claims and services performed in this matter, in  
27 addition to his individual settlement payment(s).

28 ///

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

  
\_\_\_\_\_  
Helene Mayer

# **EXHIBIT 1**

**KEVIN FLORES V. PACIFIC PLASTICS, INC.**  
**Orange County Superior Court, Case No. 30-2021-01214613-CU-OE-CXC**

**ATTORNEY TASK AND TIME CHART**

| <b>TASK</b>                                                                                                                                                                                                                      | <b>LAWYERS <i>for</i> JUSTICE, PC</b> |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------|
| <b>Investigation and Research / Due Diligence</b>                                                                                                                                                                                |                                       |
| Meet and Communicate with Plaintiff Kevin Flores (“Plaintiff”) During the Case                                                                                                                                                   | 34.50                                 |
| Investigate, Communicate with, and/or Interview Putative Class Members, Aggrieved Employees, and/or Percipient Witnesses                                                                                                         | 14.50                                 |
| <b>Pleadings and Court Filings</b>                                                                                                                                                                                               |                                       |
| Investigate the Merits of Plaintiff’s Class Action Claims, Conduct Legal Research and Analysis of Class Action Claims, and Draft, Review, and/or Revise Plaintiff’s Class Action Complaint for Damages (filed on August 4, 2021) | 8.50                                  |
| Review Court’s Minute Order Re: Complex Designation (filed on September 29, 2021)                                                                                                                                                | 0.10                                  |
| Review and Analyze Defendant Pacific Plastics, Inc.’s (“Defendant”) Answer to Plaintiff’s Complaint (served on October 5, 2021) and Research Affirmative Defenses in Defendant’s Answer                                          | 1.10                                  |
| Review Court’s Minute Order Re: Case Management Conference (filed on January 7, 2022)                                                                                                                                            | 0.10                                  |
| Draft Notice of Ruling (filed on January 7, 2022)                                                                                                                                                                                | 0.10                                  |
| Meet and Confer with Defendant’s Counsel, and Draft, Review, and/or Revise Joint Status Conference Statement (filed on May 6, 2022)                                                                                              | 1.70                                  |
| Review Court’s Minute Order Re: Case Management Conference (filed on May 11, 2022)                                                                                                                                               | 0.10                                  |
| Review Court’s Minute Order Re: Status Conference (filed on September 22, 2022)                                                                                                                                                  | 0.10                                  |

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |      |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------|
| Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Status Conference Statement (filed on January 26, 2023)                                                                                                                                                                                                                                                                                                                                                                                      | 1.50 |
| Draft Plaintiff's Response to Order to Show Cause (filed on January 26, 2023)                                                                                                                                                                                                                                                                                                                                                                                                                                                 | 0.80 |
| Review Court's Minute Order Re: Status Conference (filed on January 31, 2023)                                                                                                                                                                                                                                                                                                                                                                                                                                                 | 0.10 |
| Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Status Conference Statement (filed on July 11, 2023)                                                                                                                                                                                                                                                                                                                                                                                         | 1.40 |
| Review Court's Minute Order Re: Status Conference (filed on July 17, 2023)                                                                                                                                                                                                                                                                                                                                                                                                                                                    | 0.10 |
| Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Notice of Settlement (filed on October 4, 2023)                                                                                                                                                                                                                                                                                                                                                                                              | 0.80 |
| Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation to Vacate Status Conference and [Proposed] Order Thereon (submitted on October 9, 2023)                                                                                                                                                                                                                                                                                                                                                                 | 0.90 |
| Review Court's Order Granting Joint Stipulation to Vacate Status Conference (filed on October 9, 2023)                                                                                                                                                                                                                                                                                                                                                                                                                        | 0.10 |
| Draft Notice of Entry of Judgment or Order (filed on October 10, 2023)                                                                                                                                                                                                                                                                                                                                                                                                                                                        | 0.10 |
| Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Status Conference Statement (filed on April 18, 2024)                                                                                                                                                                                                                                                                                                                                                                                        | 0.60 |
| Review Court's Minute Order Re: Status Conference (filed on April 23, 2024)                                                                                                                                                                                                                                                                                                                                                                                                                                                   | 0.10 |
| Investigate the Merits of Plaintiff's PAGA Claim, Conduct Legal Research and Analysis of PAGA Claim, and Draft, Review, and/or Revise Plaintiff's First Amended Class Action Complaint for Damages & Enforcement Under the Private Attorneys General Act, California Labor Code § 2698, Et Seq. (filed on July 15, 2024), and Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Stipulation Re: Leave to File First Amended Complaint and [Proposed] Order Thereon (submitted on July 3, 2024) | 4.50 |
| Review Court's Order Granting Joint Stipulation Re: Leave to File First Amended Complaint (filed on July 5, 2024)                                                                                                                                                                                                                                                                                                                                                                                                             | 0.10 |
| Draft Notice of Entry of Judgment or Order (filed on July 8, 2024)                                                                                                                                                                                                                                                                                                                                                                                                                                                            | 0.10 |

|                                                                                                                                                                                                                                                                                         |       |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------|
| Review and Analyze Defendant's Answer to Plaintiff's First Amended Complaint (served on July 16, 2024) and Research Affirmative Defenses in Defendant's Answer                                                                                                                          | 0.50  |
| Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Status Conference Statement (filed on August 22, 2024)                                                                                                                                                 | 0.90  |
| Review Court's Minute Order Re: Status Conference (filed on August 28, 2024)                                                                                                                                                                                                            | 0.10  |
| Draft Notice of Change of Address (filed on March 26, 2025)                                                                                                                                                                                                                             | 0.10  |
| Draft Notice of Entry of Judgment or Order (filed on April 18, 2025)                                                                                                                                                                                                                    | 0.10  |
| Review Court's Notice of Case Reassignment (filed on April 28, 2025)                                                                                                                                                                                                                    | 0.10  |
| <b>Appearances</b>                                                                                                                                                                                                                                                                      |       |
| Prepare for and Remotely Attend Case Management Conference (January 7, 2022)                                                                                                                                                                                                            | 1.10  |
| Prepare for and Remotely Attend Status Conference (September 22, 2022)                                                                                                                                                                                                                  | 0.60  |
| <b>Discovery and Deposition</b>                                                                                                                                                                                                                                                         |       |
| Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Kevin Flores (served on April 20, 2021)                                                                                                                                             | 1.90  |
| Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Kevin Flores (served April 27, 2021)                                                                                                        | 2.10  |
| Draft, Review, and/or Revise Plaintiff's Form Interrogatories – General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), Special Interrogatories (Set Three), and Requests for Production of Documents (Set One) to Defendant (served on March 1, 2022) | 5.40  |
| <b>Letters and Correspondence</b>                                                                                                                                                                                                                                                       |       |
| Draft Notice to California Labor and Workforce Development Agency Re: Claim of Plaintiff Under the Private Attorneys General Act, California Labor Code section 2698, <i>et seq.</i> (served on September 6, 2023)                                                                      | 4.50  |
| Draft Correspondence to, Meet and Confer with, and/or Respond to Correspondence from Defendant's Counsel                                                                                                                                                                                | 21.50 |

| <b>Mediation/Settlement</b>                                                                                                                                                                                                                                                                                                                                                                         |       |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------|
| Review and Analyze Information, Data, and Documents Obtained from Plaintiff, Defendant (approximately 21,559 pages), and Other Sources Prior to Mediation (produced April 19, 2023)                                                                                                                                                                                                                 | 61.50 |
| Review and Analyze Additional Information, Data, and Documents Obtained from Defendant (approximately 25,339 pages) Prior to Mediation (produced on April 28, 2023)                                                                                                                                                                                                                                 | 68.50 |
| Review and Analyze Additional Information, Data, and Documents Obtained from Defendant (approximately 190 pages) Prior to Mediation (produced on August 3, 2023)                                                                                                                                                                                                                                    | 3.10  |
| Review and Analyze Additional Information, Data, and Documents Obtained from Defendant (approximately 14,993 pages) Prior to Mediation (produced on August 28, 2023)                                                                                                                                                                                                                                | 39.50 |
| Prepare for Mediation, Including Researching Settlement-Related and Merits-Related Issues, Drafting the Mediation Brief and Compiling the Mediation Exhibits in Support of Mediation Brief, and Performing Damages and Penalties Analysis and Calculations (submitted on September 12, 2023)                                                                                                        | 28.50 |
| Attend Mediation Session (September 18, 2023; via Video Conference)                                                                                                                                                                                                                                                                                                                                 | 16.50 |
| Draft, Review, Revise, Negotiate, and Finalize Class Action/Representative Action Memorandum of Understanding (executed on September 28, 2023)                                                                                                                                                                                                                                                      | 4.50  |
| Draft, Review, Revise, Negotiate, and Finalize Joint Stipulation for Class Action and PAGA Settlement (executed on April 12, 2024), and Draft, Review, and/or Revise Notice of Class Action Settlement                                                                                                                                                                                              | 16.50 |
| Coordinate Settlement Administration with Settlement Administrator, Ongoing Monitoring of Settlement Administration, and Review Calculations, Documents, and Weekly Reports                                                                                                                                                                                                                         | 8.50  |
| <b>Law and Motion</b>                                                                                                                                                                                                                                                                                                                                                                               |       |
| Research, Draft, Review, and/or Revise Plaintiff's Notice of Motion and Motion for Preliminary Approval of Class Action Settlement; Memorandum of Points and Authorities in Support Thereof, Declaration of Helene Mayer in Support Thereof, Declaration of Kevin Flores in Support Thereof, and [Proposed] Order Granting Preliminary Approval of Class Action Settlement (filed on July 25, 2024) | 20.10 |

|                                                                                                                                                                                                                                                                                                                                                                               |        |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------|
| Review and Analyze Court's Tentative Ruling Re: Motion for Preliminary Approval of Class Action Settlement (published on December 5, 2024)                                                                                                                                                                                                                                    | 0.50   |
| Review Court's Minute Order Re: Motion for Preliminary Approval of Class Action Settlement (filed on December 6, 2024)                                                                                                                                                                                                                                                        | 0.20   |
| Review Declaration of Benjamin J. Treger Regarding Lack of Interest in Cy Pres, and Research, Draft, Review, and/or Revise Supplemental Declaration of Helene Mayer in Support of Plaintiff's Motion for Preliminary Approval of Class Action Settlement and [Proposed] Order Granting Preliminary Approval of Class Action Settlement (filed on March 26, 2025)              | 8.40   |
| Review and Analyze Court's Tentative Ruling Re: Motion for Preliminary Approval of Class Action Settlement (published on April 10, 2025)                                                                                                                                                                                                                                      | 0.20   |
| Review Court's Order Granting Preliminary Approval of Class Action Settlement and Minute Order Re: Motion for Preliminary Approval of Class Action Settlement (filed on April 11, 2025)                                                                                                                                                                                       | 0.20   |
| Review Declaration of Settlement Administrator, and Research, Draft, Review, and/or Revise Plaintiff's Motion for Final Approval of Class Action Settlement, Attorneys' Fees and Costs, and Enhancement Award and General Release Fee; Memorandum of Points and Authorities, Declaration of Helene Mayer in Support Thereof, and [Proposed] Final Approval Order and Judgment | 22.50  |
| <b>Total Hours:</b>                                                                                                                                                                                                                                                                                                                                                           | 410.10 |

# **EXHIBIT 2**

**LAWYERS *for* JUSTICE, PC CASE COST DETAIL**  
**Flores vs. Pacific Plastics Inc.**

| <u>Date</u>   | <u>Payee</u>                         | <u>Expense Description</u> | <u>Amount</u>             |
|---------------|--------------------------------------|----------------------------|---------------------------|
| 4/20/2021     | U.S. Postmaster                      | Postage                    | \$7.00                    |
| 8/9/2021      | One Legal                            | Attorney Service           | \$57.00                   |
| 8/9/2021      | Orange County Superior Court         | Complex Filing Fee         | \$1,000.00                |
| 8/9/2021      | Orange County Superior Court         | Complaint Filing Fee       | \$435.00                  |
| 9/3/2021      | ProLegal                             | Attorney Service           | \$82.30                   |
| 11/19/2021    | Legal Document Server, Inc.          | Attorney Service           | \$13.25                   |
| 12/2/2021     | Legal Document Server, Inc.          | Attorney Service           | \$13.25                   |
| 1/7/2022      | Orange County Superior Court         | Document Download Fee      | \$7.50                    |
| 1/10/2022     | CourtCall, LLC                       | Attorney Service           | \$94.00                   |
| 1/10/2022     | Legal Document Server, Inc.          | Attorney Service           | \$13.25                   |
| 2/1/2022      | Legal Document Server, Inc.          | Attorney Service           | \$13.25                   |
| 5/6/2022      | Legal Document Server, Inc.          | Attorney Service           | \$13.25                   |
| 5/12/2022     | Orange County Superior Court         | Document Download Fee      | \$15.00                   |
| 1/26/2023     | Orange County Superior Court         | Attorney Service           | \$14.00                   |
| 1/31/2023     | Jeffrey K. Winikow                   | Mediation Fee              | \$10,000.00               |
| 2/1/2023      | Orange County Superior Court         | Document Download Fee      | \$7.50                    |
| 7/11/2023     | Legal Document Server, Inc.          | Attorney Service           | \$14.20                   |
| 7/11/2023     | Orange County Superior Court         | Document Download Fee      | \$7.50                    |
| 7/26/2023     | Orange County Superior Court         | Document Download Fee      | \$7.50                    |
| 9/6/2023      | U.S. Postmaster                      | Postage                    | \$8.56                    |
| 9/6/2023      | Labor & Workforce Development Agency | PAGA Filing Fee            | \$75.00                   |
| 10/4/2023     | Legal Document Server, Inc.          | Attorney Service           | \$14.20                   |
| 10/10/2023    | Legal Document Server, Inc.          | Attorney Service           | \$1.39                    |
| 10/10/2023    | Orange County Superior Court         | Stipulation & Order Fee    | \$20.00                   |
| 10/11/2023    | Legal Document Server, Inc.          | Attorney Service           | \$14.20                   |
| 4/18/2024     | Legal Document Server, Inc.          | Attorney Service           | \$14.20                   |
| 4/24/2024     | Orange County Superior Court         | Document Download Fee      | \$7.50                    |
| 7/3/2024      | Legal Document Server, Inc.          | Attorney Service           | \$14.20                   |
| 7/5/2024      | Legal Document Server, Inc.          | Attorney Service           | \$1.39                    |
| 7/5/2024      | Orange County Superior Court         | Stipulation & Order Fee    | \$20.00                   |
| 7/15/2024     | Legal Document Server, Inc.          | Attorney Service           | \$28.40                   |
| 7/25/2024     | Legal Document Server, Inc.          | Attorney Service           | \$18.37                   |
| 7/25/2024     | Orange County Superior Court         | Motion Fee                 | \$60.00                   |
| 8/22/2024     | Legal Document Server, Inc.          | Attorney Service           | \$14.20                   |
| 12/19/2024    | Orange County Superior Court         | Document Download Fee      | \$7.50                    |
| 3/26/2025     | Legal Document Server, Inc.          | Attorney Service           | \$15.20                   |
| 4/16/2025     | Orange County Superior Court         | Document Download Fee      | \$7.50                    |
| 4/21/2025     | Legal Document Server, Inc.          | Attorney Service           | \$15.20                   |
| 7/17/2025     | Orange County Superior Court         | Document Download Fee      | \$7.50                    |
| <b>Total:</b> |                                      |                            | <b><u>\$12,179.26</u></b> |