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SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES—SPRING STREET COURTHOUSE

NATHAN POOL, individually, and on behalf
of other members of the general public
similarly situated;

Plaintiff,

vs.

UTC RESTAURANT VENTURE, LLC, a
California limited liability company; PASEO
RESTAURANT VENTURE, LLC, a
California limited liability company; and
DOES 1 through 100, inclusive,

Defendants.

Case No.: 20STCV07785 (Lead Case)
Consolidated Case No.: 20GDCV00377

Honorable Lawrence P. Riff
Department SSC7

CLASS ACTION

**DECLARATION OF EDWIN AIWAZIAN
IN SUPPORT OF MOTION FOR FINAL
APPROVAL OF CLASS ACTION
SETTLEMENT**

[Notice of Motion and Motion for Final
Approval of Class Action Settlement,
Attorneys' Fees, Costs, and Enhancement
Payment; Declaration of Class Counsel
(Edwin Aiwarzian); Declaration of Class
Representative (Nathan Pool); Declaration of
Settlement Administrator (Evelin Reyes);
and [Proposed] Final Approval Order and
Judgment filed concurrently herein]

Date: November 30, 2022
Time: 11:00 a.m.
Department: SSC7

Complaint Filed: February 27, 2020
Trial Date: None Set

DECLARATION OF EDWIN AIWAZIAN

I, Edwin Aiwarzian, 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 Nathan Pool (“Plaintiff”) and the Class. 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 July 6, 2022, in Department 7 of the above-entitled Court, the Honorable Kenneth R. Freeman preliminarily approved the Second Amended Joint Stipulation of Class Action and PAGA Settlement (“Settlement,” “Agreement,” or “Settlement Agreement”) entered into between Plaintiff Nathan Pool and Defendants UTC Restaurant Venture, LLC and Paseo Restaurant Venture, LLC (together, “Defendants”), and conditionally certified the Class for settlement purposes. The Court preliminarily appointed Plaintiff Nathan Pool as the representative of the Class (“Class Representative”). The Court also preliminarily appointed and designated Lawyers *for* Justice, PC as counsel for the Class (“Class Counsel”). The Court approved and ordered the mailing of the Notice of Class Action and PAGA Settlement (“Notice”), adopted the notice, opt-out, and objection procedures, and ordered their implementation. The Court appointed Simpluris, Inc. (“Simpluris” or “Settlement Administrator”) to serve as the third-party settlement administrator and to handle the notice and settlement administration process.

3. As of the date of filing the accompanying Motion for Final Approval of Class Action Settlement, Attorneys’ Fees, Costs, and Enhancement Payment (“Motion for Final Approval”), no Class Members have objected to the Settlement or the contemplated request for Attorneys’ Fees and Costs, Enhancement Payment, Settlement Administration Costs, or allocation for the penalties under the Private Attorneys General Act of 2004, California Labor Code section 2698, et seq. (“PAGA”).

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1 **WORK PERFORMED BY CLASS COUNSEL**

2 4. This matter has involved litigation in two (2) cases: the above-captioned putative
3 class action entitled *Nathan Pool v. UTC Restaurant Venture, LLC., et al.*, Los Angeles County
4 Superior Court Case No. 20STCV07785, commenced February 27, 2020, and the PAGA
5 representative action entitled *Nathan Pool v. UTC Restaurant Venture, LLC., et al.*, Los Angeles
6 County Superior Court Case No. 20GDCV00377, commenced April 3, 2020. I have been
7 actively engaged in litigating this matter since prior to the commencement of the above-
8 captioned action on February 27, 2020, as have several other attorneys and members in our firm.

9 5. Lawyers *for* Justice, PC has actively participated in all phases of the litigation
10 process. Before initiating the cases, Lawyers *for* Justice, PC investigated and researched the
11 facts and circumstances underlying the pertinent factual and legal issues and applicable law.
12 This required thorough discussions and interviews between attorneys at our firm and Plaintiff,
13 and research into the various legal issues involved in the cases, namely, the current state of the
14 law as it applied to certification, off-the-clock theory, meal and rest periods, wage-and-hour law
15 and enforcement, PAGA representative claims, the claims and allegations of Plaintiff, and
16 potential defenses. After conducting initial investigation, our firm determined that the claims of
17 Plaintiff were well-suited for class-wide and representative adjudication owing to what appeared
18 to be a common course of conduct affecting a similarly situated group of current and former
19 hourly-paid, non-exempt employees who worked for Defendants, who were not properly
20 compensated for, *inter alia*, all hours worked, non-compliant meal and rest periods, and business
21 expenses.

22 6. Prior to reaching the Settlement, the parties investigated the veracity, strength, and
23 scope of the claims, and were preparing the matter for class certification and trial. The parties
24 conducted significant formal and informal discovery and investigation into the facts of the cases,
25 and also informally exchanged a large volume of information, documents, and data in
26 preparation for mediation. Class Counsel served multiple sets of written discovery requests in
27 various forms on multiple defendants in both cases, prepared and served numerous notices of
28 deposition of person(s) most knowledgeable along with requests for production of documents

1 on multiple defendants in both cases, and prepared for and took the deposition of Defendants’
2 Person Most Knowledgeable designee, Amanda Ho, over the course of two (2) days. Class
3 Counsel also interviewed and obtained information from Plaintiff and other Class Members,
4 including and not limited to the names of potential witnesses, and reviewed and analyzed a large
5 volume of information, documents, and data obtained from Plaintiff, Defendants, and other
6 sources. The documents and data reviewed and analyzed by Class Counsel included, and were
7 not limited to, Plaintiff’s employment records, a sampling of class time and pay data, various
8 agreements (including, but not limited to, Employee Arbitration Agreement and Waiver of Jury
9 Trial, Slip-Resistant Shoe Agreement, and Cutting Glove Agreement), acknowledgements
10 (including, but not limited to, Employee Handbook Acknowledgement Forms, Final Paycheck
11 Acknowledgement, Policy Acknowledgement, and Receipt of Employee Handbook and
12 Employment-At-Will Statement), waivers (including, but not limited to, signed Meal Period
13 Waivers), internal memoranda, job descriptions, New Hire Packets, trainings (including, but not
14 limited to, Defendants’ Manager Training – Meal and Rest Periods), reports (including, but not
15 limited to Hours Compliance Reports and Employee Schedule Report), and Defendants’
16 operations and employment policies, practices, and procedures (including, but not limited to
17 Defendants’ Employee Handbook, Employee Home Book, Time Theft and Eating Policy,
18 Recording Your Time policy, Paycheck Deductions policy, Meal Periods policy, and Rest and
19 Recovery Periods policy), among other information and documents prior to mediation. Other
20 work performed by Class Counsel included, and was not limited to, case strategy and analysis;
21 drafting, reviewing, and revising pleadings, papers related to the petition for coordination and
22 stay, the mediation brief, and settlement approval motion papers; preparing and appearing for
23 court proceedings; and preparing for and engaging in mediation and settlement negotiations,
24 among other tasks.

25 7. As outlined herein, the parties have conducted significant formal and informal
26 discovery and investigation during the course of litigating the cases. Class Counsel analyzed a
27 large volume of information, documents, and data obtained from Plaintiff, Defendants, and other
28 sources. These documents and data provided a critical understanding of the nature of the work

1 performed by the Class Members, as well as Defendants' operations and employment policies,
2 practices, and procedures, and were used in analyzing liability, damages, penalties, and
3 valuation issues in connection with all phases of the litigation, and ultimately, in connection
4 with the settlement negotiation process. Class Counsel also invested time researching and
5 investigating the applicable law, which is constantly evolving as it relates to certification, off-
6 the-clock theory, meal and rest periods, arbitration agreements, PAGA claims and penalties,
7 wage-and-hour enforcement, Plaintiff's claims and damages, and Defendant's defenses thereto,
8 as well as facts discovered.

9 8. After conducting significant investigation of the facts and law during the
10 prosecution of the case, counsel for the parties engaged in extensive settlement negotiations to
11 try to resolve the entire matter. During all settlement discussions, the parties conducted their
12 negotiations at arm's length in an adversarial position. In the course of litigation and settlement
13 discussions, the parties exchanged information and data, and discussed all aspects of the cases,
14 including the risks and delays of further litigation, the risks to the parties of proceeding with
15 class certification and trial, the law relating to off-the-clock theory, meal and rest periods,
16 arbitration agreements, representative PAGA claims, and wage-and-hour enforcement, the
17 evidence produced and analyzed, and the possibility of appeals, among other things. Arriving at
18 a settlement that was acceptable to the parties was not easy. Defendants also contended that
19 individualized questions of fact predominate over any common issues, and these issues would
20 pose challenges to class certification and representative adjudication. Defendants and their
21 counsel felt very strongly about Defendants' ability to prevail on the merits and to obtain a
22 denial of class certification, while Plaintiff and Class Counsel believed that class certification
23 would be obtained and that they would prevail at trial. The parties ultimately agreed that the
24 matter was well-suited for settlement given the legal issues relating to Plaintiff's principal
25 claims, as well as the costs and risks to the parties that would attend further litigation. These
26 risks of further litigation include, and are not limited to, a determination that the claims are
27 unsuitable for class treatment and/or representative adjudication, class de-certification after
28 certification of a class, allowing a jury to decide the claims asserted in the cases, and the real

possibility of no monetary recovery after years of litigation.

9. As set forth more fully in the accompanying Motion for Final Approval, Class Counsel seeks attorneys' fees in the amount of \$96,250.00, which is thirty-five percent (35%) of the Total Settlement Amount of \$275,000.00, as set forth in the Settlement Agreement and the Notice. 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 thirty-five percent (35%) of the recovery. The attorneys' fees sought are commensurate with: (1) the risk that Class Counsel took in commencing the cases; (2) the time, effort, and expense that Class Counsel dedicated to the cases; (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 the cases; and (6) the other cases that Class Counsel has turned down in order to devote their time and efforts to this matter.

10. I am aware that the common and acceptable rate for contingency representation in wage and hour class action litigation is normally 40% before trial, with the range being from 33.3% up to 50%.

11. While not necessarily required to be demonstrated because the contingent fee is proper for this settlement, Class Counsel has incurred many hours of work in connection with prosecuting the cases such that the award of attorneys' fees is also justified under a simple lodestar analysis. Attorneys at Lawyers *for* Justice, PC have spent a total of **536.60 hours** performing tasks and obtaining recovery in the matter. Attached hereto as "**EXHIBIT A**" 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 in performing those services. These hours include work done by me and several other attorneys at the firm. Also, separate from the hours referenced herein, Lawyers *for* Justice, PC had litigation support personnel actively engaged in assisting with the prosecution of this matter.

12. The work performed in this particular matter, the background of our firm, as well as the individual backgrounds, training, and experience of the attorneys who worked on this matter, in litigating complex wage-and-hour cases, and in particular, employment class actions,

support a reasonable blended hourly rate of compensation at the rate of \$675 for work performed by Lawyers for Justice, PC. Lawyers for Justice, PC has been awarded attorneys' fees, compensating the firm at the rate of at least \$675 per hour for legal services performed, by courts granting approval of wage and hour settlements in other cases: final approval of the class and representative action settlement in *David Dugan v. TEC Equipment, Inc., et al.* (Los Angeles Superior Court Case No. 19STCV01591) was granted on July 8, 2021, and the award of attorneys' fees involved an hourly rate of \$936.47; final approval of the class and representative action settlement in *Larry Greenwood, et al. v. Scan Health Plan* (Los Angeles Superior Court Case No. BC715157) was granted on April 20, 2021, and the award of attorneys' fees involved an hourly rate of \$919.57; final approval of the class action settlement in *Thereasa Carrozzella v. Basalite Concrete Products, LLC* (Sacramento County Superior Court Case No. 34-2017-00220214-CU-OE-GDS) was granted on February 21, 2020, and the award of attorneys' fees involved an hourly rate of \$766.05; final approval of the class and representative action settlement in *Alice Rutledge, et al. v. Healthport Technologies, LLC* (Alameda County Superior Court Case No. RG16835813) was granted on June 11, 2019, and the award of attorneys' fees involved an hourly rate of \$764.82; final approval of the class and representative action settlement in *Seth Swan v. Pace Supply Corp.* (Sonoma County Superior Court Case No. SCV258764) was granted on February 6, 2019, and the award of attorneys' fees involved an hourly rate of \$855.96; final approval of the class and representative action settlement in *Stanley Bland, et al. v. Telecare Corporation* (Alameda County Superior Court Case No. RG16811450) was granted on November 21, 2018, and the award of attorneys' fees involved an hourly rate of \$831.38; final approval of the class and representative action settlement in *Maryjo Ungerbuhler Anderson v. Boyett Petroleum* (Stanislaus County Superior Court Case No. 2020582) was granted on May 15, 2018, and the award of attorney's fees involved an hourly rate of \$780.77; and final approval of the class and representative action settlement in *Demetrius Camarillo v. Blue Diamond Growers* (Sacramento County Superior Court Case No. 34-2015-00175871) was granted on June 30, 2017, and the award of attorneys' fees involved an hourly rate of \$845.64.

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1 **ADEQUACY OF LAWYERS *for* JUSTICE, PC**

2 **EDUCATION**

3 13. In May of 2004, I graduated from *Pepperdine University School of Law* with a
4 Juris Doctor degree. I have extensive formal training in dispute resolution and negotiation from
5 the Straus Institute for Dispute Resolution as part of its Masters in Dispute Resolution degree
6 program. In addition, I have previously served as a *pro bono* mediator for the Los Angeles
7 County Superior Court. In October of 2000, I obtained a Litigation Paralegal Certificate from
8 the *UCLA Extension Program*. During the summer of 2000, I studied Legal Writing at *Harvard*
9 *University*. In April of 1999, I obtained a Bachelor of Arts degree in Communication with a
10 concentration in Natural Sciences from *Pepperdine University*.

11 **JUDICIAL EXTERNSHIPS**

12 14. From approximately September 2002 to approximately December 2002, I served
13 as a Judicial Extern to the Honorable Kim McLane Wardlaw of the *United States Court of*
14 *Appeals for the Ninth Circuit*. From approximately June 2002 to approximately August 2002, I
15 served as a Judicial Extern to the Honorable Earl Johnson, Jr. of the *California Court of Appeal*
16 *for the Second Appellate District*.

17 **LITIGATION AND CLASS ACTION EXPERIENCE**

18 15. In December of 2004, I obtained a license to practice law from the California State
19 Bar. From approximately December 2004 to approximately August 2008, I was employed by
20 *Girardi & Keese*.

21 16. At *Girardi & Keese*, my practice focused on class actions and other complex cases
22 involving toxic torts and products liability. In addition, I gained substantial experience on cases
23 involving insurance bad faith, premises liability, and medical negligence. While employed by
24 *Girardi & Keese*, I argued approximately 100 motions, took or defended approximately 150
25 depositions, and prepared dozens of expert witnesses for deposition or trial.

26 17. Since its inception, in or around October of 2008, *Lawyers for Justice, PC* has
27 almost exclusively focused on the prosecution of consumer and employment class actions,
28 involving wage-and-hour claims, race discrimination, unfair business practices or consumer

1 fraud. Currently, Lawyers *for* Justice, PC is the attorney of record in over a dozen employment-
2 related putative class actions in both state and federal courts in the State of California. Lawyers
3 *for* Justice, PC has successfully litigated cases involving the executive, administrative, and other
4 overtime exemptions to the State of California and federal overtime compensation requirements.
5 During this relatively short time, in association with other law firms, Lawyers *for* Justice, PC
6 has recovered millions of dollars on behalf of thousands of individuals in California.

7 ***EXAMPLES OF RESULTS IN WAGE AND HOUR CLASS ACTION AND***
8 ***REPRESENTATIVE ACTION CASES***

9 18. What follows are just a few examples of the type of results Lawyers *for* Justice,
10 PC (“LFJ”) has achieved on behalf of its clients:

11 a) LFJ, in association with co-counsel therein, represented the plaintiffs in a
12 wage-and-hour class action against a major property management company involving
13 allegations of misclassification of various “manager” positions. On September 20, 2010, the
14 court granted final approval of the class action settlement. The Los Angeles County Superior
15 Court Case Number is BC400414.

16 b) LFJ, in association with co-counsel therein, represented the plaintiffs in a
17 wage-and-hour class action against a national retailer of household items involving allegations
18 of misclassification of the “Assistant Store Manager” position. On October 28, 2010, the court
19 granted final approval of the class action settlement. The Los Angeles County Superior Court
20 Case Number is BC413498.

21 c) LFJ, in association with co-counsel therein, represented the plaintiffs in a
22 wage-and-hour class action against a national property management company involving
23 allegations of misclassification of the “Property Manager” position. On May 23, 2012, the court
24 granted final approval of the class action settlement. The Los Angeles County Superior Court
25 Case Number is BC430918.

26 d) LFJ, in association with co-counsel therein, represented the plaintiffs in a
27 wage-and-hour class action against a national retailer involving allegations of misclassification
28 of the “Store Manager” position. On June 10, 2011, the court granted plaintiffs’ motion for class

certification. On August 26, 2013, the court granted final approval of the class action settlement. The Los Angeles County Superior Court Case Number is BC424012.

e) LFJ, in association with co-counsel therein, represented the plaintiff in a wage-and-hour class and PAGA representative action against a bank, involving allegations of misclassification of the “Assistant Branch Manager” position. On August 27, 2013, the court granted final approval of the class and PAGA representative action settlement. The Kern County Superior Court Case Number is S-1500-CV-273194-LHB.

f) LFJ, in association with co-counsel therein, represented the plaintiff in a wage-and-hour class and PAGA representative action against a national wholesale distributor of plumbing and builder supplies, involving allegations of misclassification of multiple salaried “manager” positions. On May 22, 2014, the court granted final approval of the class and PAGA representative action settlement. The Sacramento County Superior Court Case Number is 34-2012-00136285.

g) LFJ, in association with co-counsel therein, represented the plaintiff in a wage-and-hour class action against a multinational corporation that provides global workplace solutions, involving allegations of misclassification of the “Operations Manager” position. On September 16, 2014, the court granted plaintiff’s motion for class certification. The Los Angeles County Superior Court Case Number is BC478769.

h) LFJ, in association with co-counsel therein, represented the plaintiff in a wage-and-hour class and PAGA representative action against a national retailer of household items, on behalf of hourly-paid or non-exempt employees. On May 27, 2015, the court granted final approval of the class and PAGA representative action settlement. The San Francisco County Superior Court Case Number is CGC-13-532344.

i) LFJ, in association with co-counsel therein, represented the plaintiff in a wage-and-hour class and PAGA action involving allegations of misclassification of the salaried residential “Property Manager” position. On September 17, 2015, the court granted plaintiff’s motion for class certification. On October 20, 2017, the court granted final approval of the class and PAGA representative action settlement. The Los Angeles County Superior Court Case

1 Number is BC474784.

2 j) LFJ, in association with co-counsel therein, represented the plaintiffs in a
3 wage-and-hour class and PAGA representative action against a national retailer of upscale
4 hardware and home furnishings, on behalf of non-exempt employees. On April 28, 2016, the
5 court granted final approval of the class and PAGA representative action settlement. The Los
6 Angeles County Superior Court Case Numbers are BC516795 and JCCP4794, and the Judicial
7 Council Coordination Proceeding Number is 4794.

8 k) LFJ, in association with co-counsel therein, represented the plaintiffs in a
9 wage-and-hour class action against a national retailer of apparel and fashion accessories, on
10 behalf of non-exempt employees. On August 5, 2016, the court granted final approval of the
11 class action settlement. The Los Angeles County Superior Court Case Number is BC488069.

12 l) LFJ, in association with co-counsel therein, represented the plaintiffs in a
13 wage-and-hour class action against a national retailer of apparel, accessories, and home
14 products, involving allegations of misclassification of the "Department Manager" position. On
15 August 12, 2016, the court granted the plaintiffs' motion for class certification in part and
16 certified a class. On August 6, 2019, the court granted final approval of the class action
17 settlement. The Alameda County Superior Court Case Number is RG13680477.

18 m) LFJ represented the plaintiff in a PAGA representative action against a
19 real estate and property management company, on behalf of non-exempt employees. On
20 November 4, 2016, the court granted approval of the PAGA representative action settlement.
21 The Orange County Superior Court Case Number is 30-2015-00775439-CU-OE-CXC.

22 n) LFJ, in association with co-counsel therein, represented the plaintiffs in a
23 wage-and-hour class and PAGA representative action against a full-service bank, on behalf of
24 non-exempt employees. On November 18, 2016, the court granted final approval of the class
25 and PAGA representative action settlement. The San Francisco County Superior Court Case
26 Number is CJC-13-004839 and the Judicial Council Coordination Proceeding Number is 4839.

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1 o) LFJ represented the plaintiffs in a wage-and-hour class and PAGA
2 representative action against a foodservice distributor, on behalf of non-exempt employees. On
3 January 26, 2017, the court granted final approval of the class and PAGA representative action
4 settlement. The San Bernardino County Superior Court Case Number is CIVDS1507260.

5 p) LFJ, on behalf of the plaintiff and respondent in a PAGA representative
6 action, successfully opposed in the trial court, and briefed and argued an appeal with respect to
7 the employer's motion to compel arbitration, which resulted in a published opinion by the
8 California Court of Appeal in favor of employees. *Roberto Betancourt v. Prudential Overall*
9 *Supply* (Cal. App. 4th Dist., Mar. 7, 2017) 9 Cal.App.5th 439, review denied, cert. denied (U.S.
10 Supreme Court Docket No. 17-254). The Riverside County Superior Court Case Numbers are
11 RIC1503952 and RICJCCP5046, and the Judicial Council Coordination Proceeding Number is
12 5046.

13 q) LFJ, in association with co-counsel therein, represented the plaintiffs in a
14 wage-and-hour class and PAGA representative action against a consumer packaging company,
15 on behalf of non-exempt employees. On March 10, 2017, the court granted final approval of the
16 class and PAGA representative action settlement. The Los Angeles County Superior Court Case
17 Number is BC590429.

18 r) LFJ, in association with co-counsel therein, represented the plaintiffs in a
19 wage-and-hour class and PAGA representative action against a manufacturer of food service
20 industry supplies on behalf of non-exempt employees. On April 14, 2017, the court granted final
21 approval of the class and PAGA representative action settlement. The Orange County Superior
22 Court Case Number is 30-2015-00810013-CU-OE-CXC.

23 s) LFJ, in association with co-counsel therein, represented the plaintiffs in a
24 wage-and-hour class and PAGA representative action against a lumber and hardware company
25 on behalf of non-exempt employees. On April 26, 2017, the court granted final approval of the
26 class and PAGA representative action settlement. The Orange County Superior Court Case
27 Number is 30-2014-00747750-CU-OE-CXC.

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1 t) LFJ represented the plaintiff in a wage-and-hour class and PAGA
2 representative action against a property management company, on behalf of non-exempt
3 employees. On June 14, 2017, the court granted final approval of the class and PAGA
4 representative action settlement. The Los Angeles County Superior Court Case Number is
5 BC586234.

6 u) LFJ represented the plaintiff in a wage-and-hour class and PAGA
7 representative action against a food company on behalf of non-exempt employees. On June 30,
8 2017, the court granted final approval of the class and PAGA representative action settlement.
9 The Sacramento County Superior Court Case Number is 34-2015-00175871.

10 v) LFJ represented the plaintiffs in a wage-and-hour class and PAGA
11 representative action against a chocolate company on behalf of non-exempt employees. On July
12 19, 2017, the court granted final approval of the class and PAGA representative action
13 settlement. The Alameda County Superior Court Case Number is RG15764300.

14 w) LFJ firm represented the plaintiff in a PAGA representative action, against
15 the parent company of several restaurants, on behalf of hourly-paid, non-exempt employees. On
16 October 18, 2017, the court granted approval of the PAGA representative action settlement. The
17 Los Angeles County Superior Court Case Number is BC569664.

18 x) LFJ represented the plaintiffs in a wage-and-hour class and PAGA
19 representative action against a manufacturer of plastic containers on behalf of non-exempt
20 employees. On October 31, 2017, the court granted final approval of the class and PAGA
21 representative action settlement. The Los Angeles County Superior Court Case Number is
22 BC577233.

23 y) LFJ, in association with co-counsel therein, represented the plaintiffs in a
24 wage-and-hour class and PAGA representative action against a bank on behalf of non-exempt
25 employees. On December 11, 2017, the court granted final approval of the class and PAGA
26 representative action settlement. The Los Angeles County Superior Court Case Number is
27 BC569646.

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1 z) LFJ, in association with co-counsel therein, represented the plaintiffs in a
2 wage-and-hour class and PAGA representative action against a property management company
3 on behalf of hourly-paid and non-exempt employees. On January 4, 2018, the court granted final
4 approval of the class and PAGA representative action settlement. The Los Angeles County
5 Superior Court Case Number is JCCP4819 and the Judicial Council Coordination Proceeding
6 Number is 4819.

7 aa) LFJ, in association with co-counsel therein, represented the plaintiffs in a
8 wage-and-hour class and PAGA representative action against a global provider of flexible office
9 space solutions. On February 15, 2018, the court granted final approval of the class and PAGA
10 representative action settlement. The Los Angeles County Superior Court Case Number is
11 BC498401.

12 bb) LFJ, in association with co-counsel therein, represents the plaintiff in a
13 wage-and-hour class action against a container manufacturer, on behalf of non-exempt
14 employees. On October 15, 2018, the court granted the plaintiff's motion for class certification.
15 The Tulare County Superior Court Case Number is VCU264528.

16 cc) LFJ represented the plaintiffs in a wage-and-hour class and PAGA
17 representative action against a behavioral health service provider on behalf of non-exempt
18 employees. On November 13, 2018, the court granted final approval of the class and PAGA
19 representative action settlement. The Alameda County Superior Court Case Number is
20 RG16811450.

21 dd) LFJ, in association with co-counsel therein, represented the plaintiff in a
22 PAGA representative action against a global provider of products and services to the energy
23 industry, on behalf of hourly-paid and non-exempt employees. On November 19, 2018, the
24 court granted approval of the PAGA representative action settlement. The Kern County
25 Superior Court Case Number is S-1500-CV-280215-SDC.

26 ee) LFJ, in association with co-counsel therein, represents the plaintiff in a
27 wage-and-hour class action against a parking company on behalf of non-exempt employees. On
28 September 3, 2019, the court granted the plaintiff's motion for class certification and certified a

1 class. The Santa Clara County Superior Court Case Number is 16CV292208 and the Judicial
2 Council Coordination Proceeding Number is 4886.

3 ff) LFJ, in association with co-counsel therein, represents the plaintiffs in a
4 wage-and-hour class and representative action against a bank on behalf of non-exempt
5 employees. On September 27, 2019, the court granted the plaintiffs' motion for class
6 certification in part and certified a class. The Alameda County Superior Court Case Number is
7 RG15757606 and the Judicial Council Coordination Proceeding Number is 4921.

8 gg) LFJ, in association with co-counsel therein, represented the plaintiffs in a
9 wage-and-hour class and PAGA representative action against a national retailer of apparel and
10 fashion accessories, on behalf of non-exempt employees. On October 9, 2019, the court granted
11 the plaintiffs' motion for class certification in part and certified a class. On May 14, 2021, the
12 court granted final approval of the class and PAGA representative action settlement. The
13 Sacramento County Superior Court Case Number is 34-2015-00175330-CU-OE-GDS.

14 hh) LFJ, in association with co-counsel therein, on behalf of the plaintiff and
15 respondent in a PAGA representative action, successfully opposed in the trial court, and briefed
16 and argued an appeal with respect to the employer's motion to compel arbitration, resulting in a
17 notable decision from the California Supreme Court clarifying the law regarding PAGA claims,
18 *ZB, N.A. v. Superior Court* (2019) 8 Cal.5th 175. On February 21, 2020, the court granted
19 approval of the PAGA representative action settlement. The San Diego County Superior Court
20 Case Number is 34-2015-00175330.

21 ii) LFJ, in association with co-counsel therein, represents the plaintiff in a
22 wage-and-hour class and PAGA representative action against a medical equipment supplier on
23 behalf of non-exempt employees. On February 13, 2020, the court granted the plaintiff's motion
24 for class certification and certified a class. The San Bernardino County Superior Court Case
25 Number is CIVDS1505744.

26 jj) LFJ, in association with co-counsel therein, represents the plaintiff in a
27 wage-and-hour class and PAGA representative action against a large national drug testing
28 laboratory on behalf of non-exempt employees. On February 21, 2020, the court granted the

1 plaintiff's motion for class certification and certified a class. The San Diego County Superior
2 Court Case Number is 37-2018-00019611-CU-OE-CTL.

3 kk) LFJ, in association with co-counsel therein, represents the plaintiffs in a
4 wage-and-hour class and PAGA representative action against a national retailer of sportswear,
5 footwear, and camping equipment on behalf of non-exempt employees. On March 16, 2020,
6 the court granted in part the plaintiff's motion for class certification and certified a class. The
7 Riverside County Superior Court Case Numbers are RIC1507504 and RICJCCP4930, and the
8 Judicial Council Coordination Proceeding Number is 4930.

9 ll) LFJ, in association with co-counsel therein, represents the plaintiffs in a
10 wage-and-hour class action against manufacturer and supplier of power products and services
11 on behalf of non-exempt employees. On July 31, 2020, the court granted in part the plaintiffs'
12 motion for class certification and certified a class. The San Diego County Superior Court Case
13 Number is 37-2015-00025968-CU-OE-CTL.

14 mm) LFJ represents the plaintiff in a wage-and-hour class action against a
15 nutritional products manufacturer on behalf of non-exempt production line employees. On
16 December 13, 2021, the court granted the plaintiff's motion for class certification in part and
17 certified a class. The Solano County Superior Court Case Number is FCS051001.

18 **LITIGATION COSTS AND EXPENSES INCURRED BY CLASS COUNSEL**

19 19. To date, Class Counsel has borne all of the risks and costs of litigation and will
20 not receive any compensation until recovery is obtained in this matter. Lawyers *for* Justice, PC
21 seeks reimbursement of \$34,700.47 in litigation costs and expenses incurred in this matter, as
22 reflected in "**EXHIBIT B**" attached hereto. These expenses were reasonable and necessary in
23 the prosecution of the cases and to obtain the Settlement.

24 **ENHANCEMENT PAYMENT TO PLAINTIFF**

25 20. In recognition of his efforts and work serving as the Class Representative, the
26 Settlement provides for an Enhancement Payment in the amount of \$7,500.00 to Plaintiff. The
27 requested Enhancement Payment is fair and appropriate. Plaintiff spent a substantial amount of
28 time and effort in producing relevant documents and information and provided the facts and

1 evidence necessary to attempt to prove the allegations. Plaintiff was available whenever Class
2 Counsel needed him and actively tried to obtain information that would facilitate the pursuit of
3 the class and PAGA claims. Plaintiff spent numerous hours speaking with Class Counsel about
4 his claims, describing his work experience with Defendants, and gathering and reviewing
5 documents. Accordingly, it is appropriate for Plaintiff to receive \$7,500.00 as a reasonable
6 Enhancement Payment for his services in the case, in addition to his Individual Settlement
7 Payment and Individual PAGA Payment under the Settlement.

8 21. I submit that the Settlement is fair, reasonable, and adequate. In addition, the
9 Settlement is in the best interests of Plaintiff, Class Members, the State of California, and PAGA
10 Members.

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

13 Executed this 3rd day of November 2022, at Glendale, California.

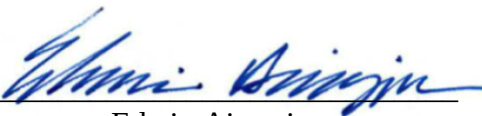
14
15 
16 Edwin Aiwasian

EXHIBIT A

POOL V. UTC RESTAURANT VENTURE, LLC, ET AL.
(LOS ANGELES COUNTY SUPERIOR COURT CASE NO. 20STCV07785) (“CLASS ACTION”)
POOL V. UTC RESTAURANT VENTURE, LLC, ET AL.
(LOS ANGELES COUNTY SUPERIOR COURT CASE NO. 20GDCV00377) (“PAGA ACTION”)

ATTORNEY TASK AND TIME CHART

TASK	LAWYERS FOR JUSTICE, PC
Investigation and Research / Due Diligence	
Pre-Lawsuit Investigation of the Key Facts with a Focus on Class Certification Elements, Including Adequacy, Typicality, Superiority, and Commonality	8.30
Pre-Lawsuit Investigation of the Merits of Plaintiff Nathan Pool’s (“Plaintiff”) Claims and the Merits of the Claims of the Putative Class Members and Merits of the Private Attorneys General Act (“PAGA”) Claim on Behalf of the State of California With Respect to Plaintiff and the Aggrieved Employees	11.40
Pre-Lawsuit Investigation of Potential Damages and Penalties Exposure of Defendants UTC Restaurant Venture, LLC and Paseo Restaurant Venture, LLC (collectively, “Defendants”) with Respect to Plaintiff, Putative Class Members, and Aggrieved Employees	10.70
Legal Research and Analysis of Latest Off-the-Clock, Meal and Rest Break, Representative PAGA, Arbitration Agreement, and Certification Decisions in California, Including all New and Relevant DLSE Materials	7.10
Investigation of Defendants, Defendants’ Business Relationships and Affiliates, and the Industry in which Defendants Operate	4.60

Investigation of Defendants' Organizational and Corporate Structures, and Executive Reporting Structures as They Relate to the Employment and Management of the Putative Class Members	4.30
Investigation of Defendants' Executives, Officers, and Leadership with a Focus on Involvement in Wage-and-Hour Issues and Establishing Willfulness and Uniformity	3.50
Analysis of Competitors in Various Relevant Geographic Areas within which Defendants Operate, and Comparing and Contrasting Defendants' Policies, Practices, and Procedures with the Policies, Practices, and Procedures of Defendants' Competitors	5.20
Research and Investigation Re: Location(s), Division(s), and/or Department(s) Owned, Managed, and/or Serviced Operated by Defendants in California During the Class Period, Including Differences Between Them to Determine Whether Those Differences Will Cause Individual Issues to Predominate Over Common Issues	5.80
Comparative Analysis and Cross-Checking of All Available Job Postings, Job Reviews, and Consumer Reviews Regarding Defendants in Order to Determine Any Variation and Identify Job Duties and Responsibilities That Would be Susceptible to Being Performed Off-the-Clock or During Meal or Rest Breaks	6.20
Research and Investigation Re: Workforce, Staffing Models, and Staffing Levels at Locations at which Putative Class Members Worked Throughout California	5.40
Research and Investigation Re: Defendants' Written and Unwritten Policies, Practices, and Procedures Relating to Customer Service and Hospitality, Tips, Bonuses/Incentive/Shift Differential Pay, Timekeeping, Scheduling, Reporting Time Pay, Meal/Rest Breaks, Meal Premiums, On-Premises Breaks, Meal Period Waivers, Overtime Compensation, Health and Safety, Dress Code, Uniform and Footwear Requirements, Use of Personal Cell Phone, and Reimbursement of Business-Related Expenses	17.50
Research and Investigation Re: Various Software Programs, Systems, and Other Technology Defendants Use to Conduct Everyday Business, Including Time and Attendance, Scheduling, Point of Sale, Customer Management, Workforce Management, and Resource Management Systems, with a Focus on What	5.40

Documents (Both Paper and Electronic) Are Created in the Normal Course of Business Relating to Overtime Worked, Off-the-Clock Time Worked Pre/Post-Shift, and Time Worked During Meal Breaks	
Research and Analysis of Potential Defenses Defendants May Raise, Including <i>De Minimis</i> Work, Non-Compensable Off-the-Clock Work, Waiver, and Compliant Policies	7.30
Research and Investigation Re: Post- <i>Duran</i> vs. <i>U.S. Bank</i> Trial Manageability Issues, including Research Regarding Which Experts to Retain and For What Purpose	5.20
Research and Analysis of Defendants' Litigation History Involving Wage-and-Hour Issues and Other Related Employment Issues	3.10
Prepare a Discovery Strategy and Outline Plan of Action, Including Topics of Inquiry Important to Certification, Liability, and Damages/Civil Penalties	3.90
Research and Investigation of Impact of COVID-19 Pandemic on Defendants, Their Operations, Furloughs, and Putative Class Members' Work	6.80
Meet and Communicate with Plaintiff Nathan Pool Throughout the Pendency of the Case	41.50
Investigate, Communicate with, and/or Interview Putative Class Members and Percipient Witnesses	21.50
Pleadings and Court Filings	
Draft Plaintiff's Class Action Complaint for Damages and Legal Research and Analysis of All Claims Involved (filed on February 27, 2020) (Class Action)	7.50
Review Court's Notice of Case Assignment (filed on February 27, 2020) (Class Action)	0.10
Draft Plaintiff's Peremptory Challenge to Judicial Officer (filed on March 2, 2020) (Class Action)	0.30
Review Court's Minute Order Re: Peremptory Challenge to Judicial Officer (filed on March 3, 2020) (Class Action)	0.10

Review Court's Initial Status Conference Order (filed on March 11, 2020) (Class Action)	0.10
Review Court's Minute Order Re: Newly Assigned Case (filed on March 11, 2020) (Class Action)	0.10
Draft Plaintiff's Complaint for Enforcement Under the Private Attorneys General Act, California Labor Code Section 2698, Et Seq. and Legal Research and Analysis of All Allegations Involved (filed on April 3, 2020) (PAGA Action)	7.10
Review Court's Notice of Case Assignment (filed on April 3, 2020) (PAGA Action)	0.10
Review Court's Notice of Case Management Conference (filed on April 3, 2020) (PAGA Action)	0.10
Review Court's Order to Show Cause Hearing (filed on April 3, 2020) (PAGA Action)	0.10
Review Court's Minute Order Continuing Initial Status Conference (filed on April 29, 2020) (Class Action)	0.10
Review Court's Minute Order Re: E-Service (filed on June 15, 2020) (Class Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Initial Status Conference Statement (submitted on June 19, 2020) (Class Action)	1.50
Review Court's Order Authorizing Electronic Service: Case Anywhere (filed on June 26, 2020) (Class Action)	0.10
Review Court's Minute Order Re: Initial Status Conference (filed on June 26, 2020) (Class Action)	0.10
Review Court's Minute Order Re: Order to Show Cause (filed on July 16, 2020) (PAGA Action)	0.10
Review Defendants' Substitution of Attorney (served on July 20, 2020) (Class Action)	0.10

Review and Analyze Defendants' Answer to Class Action Complaint for Damages and Research Affirmative Defenses in Defendant's Answer (served on July 27, 2020) (Class Action)	2.90
Draft Plaintiff's Amendment to Complaint (filed on August 10, 2020) (Class Action)	0.30
Review and Analyze Defendants' Amended Answer to Class Action Complaint for Damages and Research Affirmative Defenses in Defendant's Answer (served on August 17, 2020) (Class Action)	1.80
Review and Analyze Defendants' Answer to Class Action Complaint for Enforcement Under the Private Attorneys General Act, California Labor Code Section 2698, Et Seq. and Research Affirmative Defenses in Defendant's Answer (served on August 17, 2020) (PAGA Action)	2.20
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation to Consolidate Class Action and PAGA Action for all Purposes; [Proposed] Order (submitted on August 19, 2020) (Class Action)	1.50
Review Court's Order to Consolidate Class Action and PAGA Action for all Purposes (filed on August 25, 2020) (Class Action)	0.20
Review Court's Minute Order Re: Order to Consolidate (filed on August 25, 2020) (Class Action)	0.10
Draft Plaintiff's Notice of Related Case (filed on October 7, 2020) (Class Action)	0.30
Draft Plaintiff's Notice of Acknowledgment of Receipt (filed on October 13, 2020) (Class Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Further Status Conference Statement (submitted on October 15, 2020) (Class Action)	1.30
Review Court's Minute Order Continuing Further Status Conference (filed on October 16, 2020) (Class Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Notice of Class Action Settlement (submitted on January 6, 2021) (Class Action)	0.80

Review Court's Minute Order Re: Further Status Conference (filed on January 7, 2021) (Class Action)	0.10
Review Court's Minute Order Re: Non-Appearance Case Review Re: Filing of Motion for Preliminary Approval of Settlement (filed on April 14, 2021) (Class Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Status Report (submitted on April 15, 2021) (Class Action)	1.10
Review Court's Minute Order Re: Non-Appearance Case Review Re: Filing of Motion for Preliminary Approval of Settlement (filed on April 28, 2021) (Class Action)	0.10
Review Court's Minute Order Re: Non-Appearance Case Review Re: Filing of Motion for Preliminary Approval of Settlement (filed on June 24, 2021) (Class Action)	0.10
Review Court's Order Taking Hearing Date Off Calendar (filed on July 7, 2021) (Class Action)	0.10
Review Court's Minute Order Re: Non-Appearance Case Review Re: Filing of Motion for Preliminary Approval of Settlement (filed on August 12, 2021) (Class Action)	0.10
Review Court's Minute Order Re: Continuing Hearing on Non-Appearance Case Review Re: Filing of Motion for Preliminary Approval of Settlement (filed on September 14, 2021) (Class Action)	0.10
Review Court's Minute Order Re: Non-Appearance Case Review Re: Filing of Renewed Motion for Preliminary Approval of Settlement (filed on October 26, 2021) (Class Action)	0.10
Review Court's Minute Order Re: Non-Appearance Case Review Re: Filing of Renewed Motion for Preliminary Approval of Settlement (filed on November 18, 2021) (Class Action)	0.10
Review Court's Minute Order Re: Non-Appearance Case Review Re: Filing of Renewed Motion for Preliminary Approval of Settlement (filed on December 21, 2021) (Class Action)	0.10

Review Court's Minute Order Re: Non-Appearance Case Review Re: Filing of Renewed Motion for Preliminary Approval of Settlement (filed on January 14, 2022) (Class Action)	0.10
Review Court's Notice of Case Reassignment and Order for Plaintiff to Give Notice (filed on June 29, 2022) (Class Action)	0.10
Appearances	
Prepare for and Telephonically Attend Initial Status Conference (June 26, 2020) (Class Action)	0.40
Prepare for Hearing on Plaintiff's Motion for Preliminary Approval of Class Action Settlement and Review and Submit on Tentative Ruling (June 28, 2022) (Class Action)	0.50
Prepare for, Travel to/from, and Attend Hearing on Plaintiff's Motion for Final Approval of Class Action Settlement, Attorneys' Fees, Costs, and Enhancement Payment (November 30, 2022) (Class Action) (Anticipated)	1.50
Discovery and Deposition	
Draft Letter to Defendants Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Nathan Pool (served on September 9, 2019)	1.90
Review and Analyze Documents Produced by Defendants in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Nathan Pool (served on October 1, 2019)	2.10
Draft 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 UTC Restaurant Venture, LLC (served on July 31, 2020) (Class Action)	6.80
Draft 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 Paseo Restaurant Venture, LLC (served on July 31, 2020) (Class Action)	5.60

Draft Plaintiff's Form Interrogatories – General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), and Requests for Production of Documents (Set One) to Defendant UTC Restaurant Venture, LLC (served on July 31, 2020) (PAGA Action)	4.90
Draft Plaintiff's Form Interrogatories – General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), and Requests for Production of Documents (Set One) to Defendant Paseo Restaurant Venture, LLC (served on July 31, 2020) (PAGA Action)	3.80
Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant UTC Restaurant Venture, LLC and Requests for Production of Documents (September 10, 2020; Organizational Structure) (served on July 31, 2020) (PAGA Action)	3.70
Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant UTC Restaurant Venture, LLC and Requests for Production of Documents (September 11, 2020; Wage and Hour Practices) (served on July 31, 2020) (PAGA Action)	4.50
Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant Paseo Restaurant Venture, LLC and Requests for Production of Documents (September 14, 2020; Organizational Structure) (served on July 31, 2020) (PAGA Action)	3.50
Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant Paseo Restaurant Venture, LLC And Requests for Production of Documents (September 15, 2020; Wage and Hour Practices) (served on July 31, 2020) (PAGA Action)	4.20
Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant UTC Restaurant Venture, LLC and Requests for Production of Documents (September 2, 2020; Organizational Structure) (served on August 3, 2020) (Class Action)	3.20
Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant UTC Restaurant Venture, LLC and Requests for Production of Documents (September 3, 2020; Wage and Hour Practices) (served on August 3, 2020) (Class Action)	3.90

Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant Paseo Restaurant Venture, LLC and Requests for Production of Documents (September 4, 2020; Organizational Structure) (served on August 3, 2020) (Class Action)	3.30
Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant Paseo Restaurant Venture, LLC and Requests for Production of Documents (September 7, 2020; Wage and Hour Practices) (served on August 3, 2020) (Class Action)	4.10
Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant UTC Restaurant Venture, LLC and Requests for Production of Documents (September 8, 2020; Affirmative Defenses) (served on August 3, 2020) (Class Action)	3.40
Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant Paseo Restaurant Venture, LLC and Requests for Production of Documents (September 9, 2020; Affirmative Defenses) (served on August 3, 2020) (Class Action)	3.20
Review and Analyze Defendant Paseo Restaurant Venture, LLC.'s Objections to Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant Paseo Restaurant Venture, LLC and Requests for Production of Documents (September 4, 2020; Organizational Structure) (served on August 27, 2020) (Class Action)	2.60
Review and Analyze Defendant Paseo Restaurant Venture, LLC's Objections to Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant Paseo Restaurant Venture, LLC and Requests for Production of Documents (September 7, 2020; Wage and Hour Practices) (served on August 31, 2020) (Class Action)	3.90
Review and Analyze Defendant UTC Restaurant Venture, LLC's Responses to Plaintiff Nathan Pool's Form Interrogatories - General (Set One) (served on September 1, 2020) (Class Action)	2.50

Review and Analyze Defendant Paseo Restaurant Venture, LLC's Responses to Plaintiff Nathan Pool's Form Interrogatories - General (Set One), Special Interrogatories (Set One), and Request for Production of Documents (Set One) (served on September 1, 2020) (Class Action)	3.90
Review and Analyze Defendants' Production of Documents (served on September 1, 2020) [PRV 00001-00269]	5.80
Draft Plaintiff's Amended Notice of Deposition of Person Most Knowledgeable at Defendant Great Maple, LLC and Requests for Production of Documents (October 8, 2020; Organizational Structure) (served on October 1, 2020) (Class Action)	1.90
Draft Plaintiff's Amended Notice of Deposition of Person Most Knowledgeable at Defendant Paseo Restaurant Venture, LLC and Requests for Production of Documents (October 8, 2020; Organizational Structure) (served on October 1, 2020) (Class Action)	1.60
Draft Plaintiff's Amended Notice of Deposition of Person Most Knowledgeable at Defendant UTC Restaurant Venture, LLC and Requests for Production of Documents (October 8, 2020; Organizational Structure) (served on October 1, 2020) (Class Action)	1.40
Prepare for, Travel to/from, and Take the Deposition of Person Most Knowledgeable Amanda Ho (October 8, 2020; Zoom Video Conference) and Review Deposition Transcript	10.50
Prepare for, Travel to/from, and Take the Deposition of Person Most Knowledgeable Amanda Ho (October 9, 2020; Zoom Video Conference) and Review Deposition Transcript	11.80
Draft Plaintiff's Amended Notice of Deposition of Person Most Knowledgeable at Defendant Great Maple, LLC and Requests for Production of Documents (October 9, 2020; Wage and Hour Practices) (served on October 1, 2020) (Class Action)	2.10

Draft Plaintiff's Amended Notice of Deposition of Person Most Knowledgeable at Defendant Paseo Restaurant Venture, LLC and Requests for Production of Documents (October 9, 2020; Wage and Hour Practices) (served on October 1, 2020) (Class Action)	1.70
Draft Plaintiff's Amended Notice of Deposition of Person Most Knowledgeable at Defendant UTC Restaurant Venture, LLC and Requests for Production of Documents (October 9, 2020; Wage and Hour Practices) (served on October 1, 2020) (Class Action)	1.50
Letters and Correspondence	
Research and Draft Notice to California Labor and Workforce Development Agency Re: Claims of Plaintiff Nathan Pool for Penalties Under California Labor Code section 2698, <i>et seq.</i> (served on January 29, 2020)	4.20
Meet with, Draft Correspondence to, and Respond to Correspondence from, Defendant's Counsel	20.10
Mediation/Settlement	
Review and Analyze Mediation Data and Documents Obtained from Defendant and Other Sources Prior to and In Connection with Mediation (served on September 1, 2020, October 5, 2020, and October 13, 2020) • Employee Handbooks, Arbitration and Other Agreements, and Employment Policies, Practices, and Procedures Documents (Including, <i>Inter Alia</i>, Meal Period Waivers and Store Logs) • Settlement Agreement in <i>Jonathan Smith, et al. v. UTC Restaurant, LLC</i> • Sampling of Employee Time Data • Sampling of Employee Pay Data	27.80
Prepare for Mediation, Including Researching Settlement-Related Issues and Merits of Claims, Drafting the Mediation Brief, Compiling the Mediation Exhibits in Support of Mediation Brief, and Performing Damages and Penalties Analysis and Calculations (submitted on October 15, 2020)	20.40
Attend Mediation Session (October 20, 2020; Zoom Video Conference)	8.50

Draft, Review, Revise, Negotiate, and Finalize Joint Stipulation of Class Action and PAGA Settlement Agreement (executed on April 13, 2021) and Exhibits	18.20
Draft, Review, Revise, Negotiate, and Finalize First Amended Joint Stipulation of Class Action and PAGA Settlement Agreement (executed on November 2, 2021) and Exhibits	8.90
Draft, Review, Revise, Negotiate, and Finalize Second Amended Joint Stipulation of Class Action and PAGA Settlement Agreement (executed on June 13, 2022) and Exhibits	5.80
Law and Motion	
Draft Plaintiff's Petition for Coordination of Action and Application for Immediate Stay; Memorandum of Points and Authorities in Support Thereof and Declaration of Tara Zabehi in Support Thereof (filed on October 9, 2020) (Class Action)	10.50
Draft Plaintiff's Notice of Submission of Petition for Coordination of Actions and Application for Immediate Stay (filed on October 13, 2020) (Class Action)	0.20
Review Respondent Jonathan Smith's Memorandum of Points and Authorities in Opposition to Application for Immediate Stay Pending Petition for Coordination and Declaration of Hallie Von Rock in Support Thereof (served on October 13, 2020) (Class Action)	2.90
Review Defendant UTC Restaurant Venture, LLC's Declaration of Stephen Jennings in Support of Defendant UTC Restaurant Venture, LLC's Opposition to Petitioner Nathan Pool's Application for Immediate Stay in Related Actions Pending Determination of Coordination Petition (served on October 14, 2020) (Class Action)	0.20
Review Defendant UTC Restaurant Venture, LLC's Memorandum of Points and Authorities in Support of Defendant UTC Restaurant Venture, LLC's Opposition to Petitioner Nathan Pool's Application for Immediate Stay in Related Actions Pending Determination of Coordination Petition and Declaration of Nicole R. Roydson in Support Thereof (served on October 16, 2020) (Class Action)	2.80

Review and Analyze Defendant UTC Restaurant Venture, LLC.'s Notice of Opposition to Petitioner Nathan Pool's Application for Immediate Stay in Related Actions Pending Determination of Coordination Petition (served on October 19, 2020) (Class Action)	0.10
Review and Analyze Defendants' Notice and Opposition to Application for Immediate Stay, and Joinder to Oppositions to Petitioner Nathan Pool's Application for Immediate Stay in Related Actions Pending Determination of Coordination Petition; and Memorandum of Points and Authorities and Declaration of Heather B. Dillion in Support Thereof (served on October 22, 2020) (Class Action)	0.90
Draft Plaintiff's Notice of Withdrawal of Plaintiff's Petition for Coordination of Actions and Application for Immediate Stay (filed on November 5, 2020) (Class Action)	0.20
Research and Draft Plaintiff's Notice of Motion and Motion for Preliminary Approval of Class Action Settlement; Memorandum of Points and Authorities, Declaration of Edwin Aiwarzian in Support Thereof, Declaration of Nathan Pool in Support Thereof, and [Proposed] Order Thereon (filed on June 22, 2021) (Class Action)	22.10
Review Court's Minute Order Re: Motion for Preliminary Approval of Class Action Settlement (filed on July 7, 2021) (Class Action)	0.20
Research and Draft Plaintiff's Notice of Motion and Renewed Motion for Preliminary Approval of Class Action Settlement; Memorandum of Points and Authorities, Declaration of Edwin Aiwarzian in Support Thereof, Declaration of Nathan Pool in Support Thereof, Declaration of Norman Alcantara in Support Thereof, and [Proposed] Order Thereon (filed on January 14, 2022) (Class Action)	18.70
Review Court's Minute Order Re: Motion for Preliminary Approval Checklist (filed on April 28, 2022) (Class Action)	0.20
Review Court's Minute Order Re: Hearing on Motion for Preliminary Approval (filed on June 1, 2022) (Class Action)	0.10
Draft Plaintiff's Supplemental Brief in Support of Renewed Motion for Preliminary Approval of Class Action Settlement, Declaration of Brian St. John in Support Thereof, Declaration of Evelyn Reyes	10.20

Regarding Proposed Administrator and Estimates, and [Revised Proposed] Order Thereon (filed on June 13, 2022) (Class Action)	
Draft Plaintiff's Supplemental Declaration of Brian St. John in Support of Plaintiff's Renewed Motion for Preliminary Approval of Class Action Settlement and [Revised Proposed] Order Thereon (filed on June 29, 2022) (Class Action)	1.80
Review Court's Revised Order Granting Preliminary Approval of Class Action Settlement (filed on July 6, 2022) (Class Action)	0.10
Review and Analyze Settlement Administrator's Declaration Regarding Settlement Notice Administration; and Research and Draft Plaintiff's Motion for Final Approval of Class Action Settlement, Attorneys' Fees, Costs, and Enhancement Payment, Declaration of Edwin Aiwasian in Support Thereof, and [Proposed] Final Approval Order and Judgment (filed on November 3, 2022) (Class Action) (Anticipated)	19.50
Total Hours:	536.60

EXHIBIT B

LAWYERS for JUSTICE PC CASE COST DETAIL
Pool v. UTC Restaurant Venture, LLC

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
2/27/2020	Los Angeles Superior Court	Court Filing Fee	435.00
2/27/2020	Los Angeles Superior Court	Complex Filing Fee	1,000.00
3/9/2020	Legal Document Server, Inc.	Attorney Service	220.00
5/8/2020	Legal Document Server, Inc.	Attorney Service	75.00
6/19/2020	Legal Document Server, Inc.	Attorney Service	175.00
6/19/2020	General Logistics Systems US, LLC	Courier Service	11.82
6/22/2020	CourtCall, LLC	Attorney Service	94.00
6/22/2020	Legal Document Server, Inc.	Attorney Service	175.00
6/23/2020	General Logistics Systems US, LLC	Courier Service	11.82
8/10/2020	General Logistics Systems US, LLC	Courier Service	13.98
8/10/2020	Legal Document Server, Inc.	Attorney Service	205.00
9/4/2020	Case Anywhere LLC	Attorney Service	271.20
10/7/2020	Legal Document Server, Inc.	Attorney Service	205.00
10/13/2020	Legal Document Server, Inc.	Attorney Service	279.50
10/14/2020	Legal Document Server, Inc.	Attorney Service	306.05
10/16/2020	Legal Document Server, Inc.	Attorney Service	205.00
10/20/2020	Arby Aiwarzian	Travel Reimbursement	98.13
12/3/2020	Case Anywhere LLC	Attorney Service	180.00
1/6/2021	Legal Document Server, Inc.	Attorney Service	145.00
3/4/2021	Case Anywhere LLC	Attorney Service	126.00
4/15/2021	Legal Document Server, Inc.	Attorney Service	205.00
6/3/2021	Case Anywhere LLC	Attorney Service	126.00
6/23/2021	Legal Document Server, Inc.	Attorney Service	229.35
6/23/2021	Los Angeles Superior Court	Filing Fee	60.00
7/26/2021	General Logistics Systems US, LLC	Courier Service	13.14
9/3/2021	Case Anywhere LLC	Attorney Service	150.00
12/7/2021	Case Anywhere LLC	Attorney Service	120.00
1/14/2022	Legal Document Server, Inc.	Attorney Service	214.55
1/14/2022	Los Angeles Superior Court	Filing Fee	60.00
3/3/2022	Case Anywhere LLC	Attorney Service	156.00
6/7/2022	Case Anywhere LLC	Attorney Service	120.00
6/14/2022	Legal Document Server, Inc.	Attorney Service	189.95
6/30/2022	Legal Document Server, Inc.	Attorney Service	15.20
7/7/2022	Legal Document Server, Inc.	Attorney Service	15.95
Total:			5,907.64

LAWYERS for JUSTICE PC CASE COST DETAIL
Pool v. UTC Restaurant Venture, LLC (PAGA)

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
10/9/2002	Legal Document Server, Inc.	Attorney Service	14.00
1/29/2020	U.S. Postmaster	Postage	6.95
4/3/2020	Los Angeles Superior Court	Court Filing Fee	435.00
4/3/2020	Legal Document Server, Inc.	Attorney Service	28.93
4/26/2020	Legal Document Server, Inc.	Attorney Service	220.00
5/7/2020	Legal Document Server, Inc.	Attorney Service	13.70
5/8/2020	FedEx Express	Courier Service	32.34
7/1/2020	tollfreeconference.com	Attorney Service	25.16
8/27/2020	Paul Hastings LLP	Mediation Fee	12,000.00
9/23/2020	General Logistics Systems US, Inc.	Courier Service	32.08
10/7/2020	General Logistics Systems US, Inc.	Courier Service	201.67
10/8/2020	Esquire Deposition Solutions, LLC	Videography Service	860.00
10/8/2020	Esquire Deposition Solutions, LLC	Courier Service	2,577.75
10/9/2020	Esquire Deposition Solutions, LLC	Court Reporter	363.91
10/9/2020	Esquire Deposition Solutions, LLC	Court Reporter	3,615.79
10/9/2020	Esquire Deposition Solutions, LLC	Videography Service	826.25
10/13/2020	Legal Document Server, Inc.	Attorney Service	14.00
10/13/2020	General Logistics Systems US, Inc.	Courier Service	111.67
10/14/2020	General Logistics Systems US, Inc.	Courier Service	18.57
10/20/2020	Robert A. Parris	Damges Consulting Expert	7,200.00
11/5/2020	General Logistics Systems US, Inc.	Courier Service	75.06
6/7/2022	Case Anywhere, LLC	Attorney Service	120.00
Total:			<u>28,792.83</u>