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SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF ALAMEDA

CANDACE EVANS, individually, and on
behalf of other members of the general
public similarly situated and on behalf of
other aggrieved employees pursuant to the
California Private Attorneys General Act ;

Plaintiff,

vs.

BIG JOE HANDLING SYSTEMS INC., an
unknown business entity; BIG JOE
CALIFORNIA NORTH, INC., a California
corporation; and DOES 1 through 100,
inclusive,

Defendants.

Case No.: RG20055273

Honorable Brad Seligman
Department 23

CLASS ACTION

**DECLARATION OF EDWIN AIWAZIAN
IN SUPPORT OF PLAINTIFF'S MOTION
FOR FINAL APPROVAL OF CLASS
ACTION SETTLEMENT, CLASS
COUNSEL AWARD, AND
ENHANCEMENT PAYMENT**

[Notice of Motion and Motion for Final
Approval of Class Action Settlement, Class
Counsel Award, and Enhancement Payment;
Declaration of Class Representative (Candace
Evans); Declaration of Settlement
Administrator (Taylor Mitzner); and [Proposed]
Final Approval Order and Judgment filed
concurrently herein]

Reservation No.: A-20055273-001
Date: August 1, 2023
Time: 3:00 p.m.
Department: 23

Complaint Filed: February 20, 2020
FAC Filed: May 22, 2020
Trial Date: None Set

DECLARATION OF EDWIN AIWAZIAN

I, Edwin Aiwazian, 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 Candace Evans (“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 March 30, 2023, in Department 23 of the above-entitled Court, the Honorable Brad Seligman preliminarily approved the Joint Stipulation of Class and Representative Action Settlement and Amendment No. 1 to Joint Stipulation of Class and Representative Action Settlement (together, “Settlement,” “Agreement,” or “Settlement Agreement”) entered into between Plaintiff and Defendant Big Joe California North, Inc. d/b/a Big Joe Handling Systems (erroneously sued as Big Joe Handling Systems, Inc.) (“Defendant”), and conditionally certified the Class for settlement purposes. The Court preliminarily appointed Plaintiff Candace Evans 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 Settlement (“Notice Packet”), adopted the notice, opt-out, and objection procedures, and ordered their implementation. The Court appointed Phoenix Class Action Administration Solutions (“Phoenix” or “Settlement Administrator”) to serve as Settlement Administrator for handling the notice and settlement administration process.

3. As of the date of filing the accompanying Motion for Final Approval of Class Action Settlement, Class Counsel Award, and Enhancement Payment (“Motion for Final Approval”), no Class Members have objected to the Settlement or the request for Class Counsel Award, 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”).

WORK PERFORMED BY CLASS COUNSEL

4. I and several other attorneys at Lawyers *for* Justice, PC have been actively engaged in litigating the above-captioned putative class and PAGA action, which was commenced on February 20, 2020, since its inception.

5. Before initiating the action, 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 our firm 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, off-the-clock theory, meal and rest periods, wage-and-hour law and enforcement, PAGA representative claims, Plaintiff's claims and allegations, and potential defenses. After conducting initial investigation, our firm 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 hourly-paid or non-exempt employees who worked for Defendant within the State of California, who were not properly compensated for, *inter alia*, all hours worked, non-compliant meal and rest periods, and business expenses.

6. Class Counsel investigated the veracity, strength, and scope of the claims, and was preparing the matter for class certification, representative adjudication, and trial prior to reaching the Settlement. The parties conducted significant formal and informal discovery and investigation into the facts of the case, exchanging a large volume of documents, information, and data throughout the course of litigation and in connection with mediation and settlement negotiations. Class Counsel propounded multiple sets of written discovery requests in various forms; reviewed Defendant's responses thereto; worked with Plaintiff to provide responses to discovery requests that were propounded on her by Defendant; and prepared and served numerous deposition notices. Class Counsel also interviewed and obtained information from Plaintiff and other Class Members, including and not limited to the names of potential witnesses, and reviewed and analyzed thousands of pages of documents and data produced by Defendant and obtained through other sources. The documents and data reviewed and analyzed by Class Counsel included, and

were not limited to, Plaintiff's employment records, a detailed sampling of Class Members' time and pay data, multiple iterations of Defendant's Employee Handbook, company policy acknowledgements (including, but not limited to, Acknowledgment of Receipt of Basic Employment Policies, Meal and Rest Period Obligation Acknowledgement, Equipment Acknowledgment Letter, and General Handbook Acknowledgment), internal memoranda, job descriptions, Defendant's operations and employment practices, forms, procedures, and policies (including, but not limited to, Defendant's Rest Breaks policy, Meal Periods policy, General Requirements for Rest Periods and Meal Breaks, Timekeeping Procedures policy, Overtime policy, Employee Dress, Personal Appearance, and Protective Footwear policy, and Business Expense Reimbursement policy), among other information and documents. Class Counsel researched applicable law, developed liability, damages, and penalties valuation models in connection with mediation and settlement negotiations, and met and conferred with Defendant's counsel on numerous occasions, e.g., to discuss issues relating to the pleadings, case management, discovery, and the production of information, documents, and data in the course of litigation as well as mediation and settlement negotiations. Other work performed by Class Counsel included, and was not limited to, case strategy and analysis; drafting, reviewing, and revising pleadings and the mediation brief; drafting, reviewing, and responding to formal discovery; preparing and appearing for court proceedings; and preparing for and attending mediation and settlement negotiations.

7. The parties have conducted significant formal and informal discovery and investigation during the course of litigating the case and in connection with mediation and settlement negotiations, and Class Counsel analyzed thousands of pages of information, documents, and data obtained from Plaintiff, Defendant, and other sources. The information, documents, and data provided a critical understanding of the nature of the work performed by the Class Members, as well as Defendant's operations and employment policies, practices, and procedures, and were used in analyzing liability, damages, and penalties valuation issues in connection with all phases of the litigation, and ultimately in connection with the mediation and settlement negotiation process. Class Counsel also performed research regarding applicable law

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

4 8. After conducting significant investigation of the facts and law during the
5 prosecution of the case, counsel for the parties engaged in extensive settlement negotiations to
6 try to resolve the entire matter. These efforts included participating in a formal, full-day
7 mediation conducted by Jeffrey A. Ross, Esq. (the "Mediator"), a well-regarded mediator
8 experienced in mediating complex labor and employment matters. During all settlement
9 discussions, the parties conducted their negotiations at arm's length in an adversarial position. In
10 the course of mediation and settlement negotiations, the parties exchanged information and data,
11 and discussed all aspects of the case, including and not limited to, the risks and delays of further
12 litigation; the risks to the parties of proceeding with class certification and trial; the law relating
13 to class certification, off-the-clock theory, meal and rest periods, representative PAGA claims
14 and manageability, and wage-and-hour law and enforcement; the evidence produced and
15 analyzed; and the possibility of appeals, among other things. Arriving at a settlement that was
16 acceptable to the parties was not easy. Defendant contended that individualized questions of fact
17 predominate over any common issues and that these issues would pose challenges to certification
18 and representative adjudication. Defendant and its counsel felt very strongly about Defendant's
19 ability to prevail on the merits and to avoid class certification and representative adjudication,
20 while Plaintiff and Class Counsel believed that they would be able to obtain class certification
21 and prevail at trial. With the aid of the Mediator's evaluation, the parties agreed that the case was
22 well-suited for settlement given the legal issues relating to Plaintiff's principal claims, as well as
23 the costs and risks to the parties that would attend further litigation. These risks of further
24 litigation include, and are not limited to, a determination that the claims are unsuitable for class
25 treatment and/or representative adjudication, failure to obtain class certification, class de-
26 certification after certification of a class, allowing a jury to decide the claims asserted in the case,
27 and the real possibility of no monetary recovery after years of litigation.

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9. By way of the accompanying Motion for Final Approval, Class Counsel seeks attorneys' fees in the amount of \$182,232.82, which is thirty-five percent (35%) of the Maximum Settlement Amount of \$520,665.20, as set forth in the Settlement Agreement and the Notice Packet. Pursuant to the contingency-fee agreement entered into by and between Plaintiff and Class Counsel, Plaintiff has agreed to contingency fees 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 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 for the Class Members; and (6) the other cases that Class Counsel has turned down in order to devote its 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 are in the range 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 case 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 477.40 hours performing tasks and obtaining recovery in this matter. Attached hereto as "EXHIBIT A" is an Attorney Task and Time and 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 myself and several other attorneys at Lawyers *for* Justice, PC. Additionally, 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 case, 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 actions, and in particular, employment class and representative actions, support a reasonable blended hourly rate of compensation of at least \$650 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 \$650 per hour for legal services performed, by courts granting approval of settlement in other wage-and-hour cases: 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 a higher 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 a higher hourly rate of \$831.38; final approval of the class and representative action settlement in *Luis Carlos Deluna v. Amerit Fleet Solutions, Inc., et al.* (San Bernardino County Superior Court Case No. CIVDS1721564) was granted on October 19, 2018, and the award of attorneys' fees involved a higher hourly rate of \$671.72; 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 a higher 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 a higher hourly rate of \$845.64.

ADEQUACY OF LAWYERS for JUSTICE, PC

EDUCATION

13. In May of 2004, I graduated from *Pepperdine University School of Law* with a Juris Doctor degree. I have extensive formal training in dispute resolution and negotiation from the Straus Institute for Dispute Resolution as part of its Masters in Dispute Resolution degree

1 program. In addition, I have previously served as a *pro bono* mediator for the Los Angeles
2 County Superior Court. In October of 2000, I obtained a Litigation Paralegal Certificate from
3 the *UCLA Extension Program*. During the summer of 2000, I studied Legal Writing at *Harvard*
4 *University*. In April of 1999, I obtained a Bachelor of Arts degree in Communication with a
5 concentration in Natural Sciences from *Pepperdine University*.

6 ***JUDICIAL EXTERNSHIPS***

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

12 ***LITIGATION AND CLASS ACTION EXPERIENCE***

13 15. In December of 2004, I obtained a license to practice law from the California State
14 Bar. From approximately December 2004 to approximately August 2008, I was employed by a
15 prominent plaintiff-side law firm.

16 16. At the prominent plaintiff-side law firm, my practice focused on class actions and
17 other complex cases involving toxic torts and products liability. In addition, I gained substantial
18 experience on cases involving insurance bad faith, premises liability, and medical negligence.
19 While employed by the prominent plaintiff-side law firm, I argued approximately 100 motions,
20 took or defended approximately 150 depositions, and prepared dozens of expert witnesses for
21 deposition or trial.

22 17. Since its inception, in or around October of 2008, Lawyers *for* Justice, PC has
23 almost exclusively focused on the prosecution of consumer and employment class actions,
24 involving wage-and-hour claims, race discrimination, unfair business practices or consumer
25 fraud. Currently, Lawyers *for* Justice, PC is the attorney of record in well over a dozen
26 employment-related putative class actions in both state and federal courts in the State of
27 California. Lawyers *for* Justice, PC has successfully litigated cases involving the executive,
28 administrative, and other overtime exemptions to the State of California and federal overtime

1 compensation requirements. During this relatively short time, in association with other law firms,
2 Lawyers *for* Justice, PC has recovered millions of dollars on behalf of thousands of individuals
3 in California.

4 ***EXAMPLES OF RESULTS IN WAGE AND HOUR CLASS ACTION AND***
5 ***REPRESENTATIVE ACTION CASES***

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

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

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

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

23 d) LFJ, in association with co-counsel therein, represented the plaintiffs in a
24 wage-and-hour class action against a national retailer involving allegations of misclassification
25 of the “Store Manager” position. On June 10, 2011, the court granted plaintiffs’ motion for class
26 certification. On August 26, 2013, the court granted final approval of the class action settlement.
27 The Los Angeles County Superior Court Case Number is BC424012.

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

6 f) LFJ, in association with co-counsel therein, represented the plaintiff in a
7 wage-and-hour class and PAGA representative action against a national wholesale distributor of
8 plumbing and builder supplies, involving allegations of misclassification of multiple salaried
9 “manager” positions. On May 22, 2014, the court granted final approval of the class and PAGA
10 representative action settlement. The Sacramento County Superior Court Case Number is 34-
11 2012-00136285.

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

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

22 i) LFJ, in association with co-counsel therein, represented the plaintiff in a
23 wage-and-hour class and PAGA representative action involving allegations of misclassification
24 of the salaried residential “Property Manager” position. On September 17, 2015, the court granted
25 plaintiff’s motion for class certification. On October 20, 2017, the court granted final approval of
26 the class and PAGA representative action settlement. The Los Angeles County Superior Court
27 Case Number is BC474784.

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

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

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

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

n) LFJ, in association with co-counsel therein, represented the plaintiffs in a wage-and-hour class and PAGA representative action against a full-service bank, on behalf of nonexempt employees. On November 18, 2016, the court granted final approval of the class and PAGA representative action settlement. The San Francisco County Superior Court Case 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 settlement.
13 The Alameda County Superior Court Case Number is RG15764300.

14 w) LFJ represented the plaintiff in a PAGA representative action, against the
15 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 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 court
24 granted approval of the PAGA representative action settlement. The Kern County Superior Court
25 Case Number is S-1500-CV-280215-SDC.

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1 ee) LFJ, in association with co-counsel therein, represents the plaintiff in a
2 wage-and-hour class action against a parking company on behalf of non-exempt employees. On
3 September 3, 2019, the court granted the plaintiff's motion for class certification and certified a
4 class. The Santa Clara County Superior Court Case Number is 16CV292208 and the Judicial
5 Council Coordination Proceeding Number is 4886.

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

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

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

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

1 jj) LFJ, in association with co-counsel therein, represented the plaintiff in a
2 wage-and-hour class and PAGA representative action against a large national drug testing
3 laboratory on behalf of non-exempt employees. On February 21, 2020, the court granted the
4 plaintiff's motion for class certification and certified a class. On October 28, 2022, the court
5 granted final approval of the class and PAGA representative action settlement. The San Diego
6 County Superior Court Case Number is 37-2018-00019611-CU-OE-CTL.

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

13 ll) LFJ, in association with co-counsel therein, represented the plaintiffs in a
14 wage-and-hour class action against manufacturer and supplier of power products and services on
15 behalf of non-exempt employees. On July 31, 2020, the court granted in part the plaintiffs' motion
16 for class certification and certified a class. On August 27, 2021, the court granted final approval
17 of the class action settlement. The San Diego County Superior Court Case Number is 37-2015-
18 00025968-CU-OE-CTL.

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

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

24 19. To date, Class Counsel has borne all the risks and costs of litigation and will not
25 receive any compensation until recovery is obtained in this matter. Lawyers *for* Justice, PC seeks
26 reimbursement of \$10,754.05 in litigation costs and expenses incurred in the case, as reflected in
27 **"EXHIBIT B"** attached hereto. These expenses were reasonable and necessary in the
28 prosecution of this matter and to obtain the Settlement. It should be noted that Class Counsel has

borne all of the risks and costs of litigation and will not receive any compensation until recovery is obtained under the Settlement.

ENHANCEMENT PAYMENT TO PLAINTIFF

20. In recognition of her efforts and work in the case and her serving as the Class Representative, the Settlement provides for an Enhancement Payment in the amount of \$7,500.00 to Plaintiff Candace Evans. The requested Enhancement Payment is fair and appropriate. Plaintiff spent a substantial amount of time and effort in producing relevant documents and past employment records and provided the facts and evidence necessary to attempt to prove the allegations, including and not limited to, working with Class Counsel to provide responses to discovery requests that were propounded on her by Defendant. Plaintiff was available whenever Class Counsel needed her and actively tried to obtain and provide information that would facilitate the pursuit of the class and PAGA claims. Plaintiff spent numerous hours speaking with Class Counsel about her claims, describing her work experience with Defendant, and gathering and reviewing documents. Accordingly, it is appropriate for Plaintiff Candace Evans to receive \$7,500.00 as a reasonable Enhancement Payment, in addition to her Individual Settlement Payment, for her services on behalf of the Class and the State of California.

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

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

Executed this 10th day of July 2023, at Glendale, California.



Edwin Aiwanian

EXHIBIT A

EVANS V. BIG JOE CALIFORNIA NORTH, INC., ET AL.
(ALAMEDA COUNTY SUPERIOR COURT CASE NO. RG20055273)
ATTORNEY TASK AND TIME CHART

TASK	LAWYERS <i>FOR</i> 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	9.10
Pre-Lawsuit Investigation of the Merits of Plaintiff Candace Evans’s (“Plaintiff”) Claims and the Merits of the Claims of the Putative Class Members	9.70
Pre-Lawsuit Investigation of Potential Damages Exposure of Defendant Big Joe California North, Inc. and Defendant Big Joe Handling Systems, Inc. (collectively the “Defendants”) with Respect to the Damages Sustained by Plaintiff and the Putative Class Members	7.90
Pre-Lawsuit Legal Research and Analysis of Latest Off-the-Clock, Meal and Rest Break, Representative PAGA, and Class Certification Decisions in California, Including all New Relevant DLSE Materials	6.20
Investigation of Defendants, Defendants’ Business Relationships, and the Industry in which Defendants Operate	3.60
Investigation of Defendants’ Organizational and Corporate Structures, and Executive Reporting Structures as They Relate to the Employment and Management of the Putative Class Members	2.10
Investigation of Defendants’ Executives, Officers, and Leadership with a Focus on Involvement in Wage-and-Hour Issues and Establishing Willfulness and Uniformity	2.10

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	3.90
Research and Investigation Re: Locations Owned, Managed, or Operated by Defendants in California During the Class Period, Including Differences Between the Various Locations to Determine Whether Those Differences Will Cause Individual Issues to Predominate Over Common Issues	3.30
Comparative Analysis and Cross-Checking of All Available Job Postings by 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	4.50
Research and Investigation Re: Staffing Models and Staffing Levels at Defendants' Locations at which Putative Class Members Worked Throughout California	3.10
Research and Investigation Re: Defendants' Policies, Practices, and Procedures Relating to Bonuses/Incentive/Shift Differential Pay, Timekeeping, Meal/Rest Breaks, Overtime Compensation, and Reimbursement of Business-Related Expenses	12.40
Research and Investigation Re: Various Software Programs Defendants Use to Conduct Everyday Business, Including Timekeeping Software, with a Focus on What 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	3.80
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	6.90
Research and Investigation Re: Post- <i>Duran vs. U.S. Bank</i> Trial Manageability Issues, including Research Regarding Which Experts to Retain and For What Purpose	3.90
Research and Analysis of Defendants' Litigation History Involving Wage-and-Hour Issues and Other Related Employment Issues	0.30

Review and Analysis of Defendants' Written Policies, Practices, and Procedures and Related Documents Regarding Timekeeping, Compensation, Scheduling, and Wage-and-Hour Compliance	9.50
Prepare a Discovery Strategy Plan of Action, Including Topics of Inquiry Important to Certification, Liability, and Damages/Civil Penalties	2
Meet and Communicate with Plaintiff Candace Evans Throughout the Pendency of the Case	39.20
Investigate and Meet and Communicate with Putative Class Members and Percipient Witnesses	27.0
Pleadings and Court Filings	
Research and Draft Plaintiff's Class Action Complaint for Damages and Legal Research and Analysis of All Claims Involved (filed on February 20, 2020)	7.30
Review Court's Notice of Hearing Re: Complex Determination Hearing; Case Management Conference (filed on February 24, 2020)	0.10
Review Court's Notice of Hearing (Amended) Re: Complex Determination (filed on April 20, 2020)	0.10
Review Court's Order Re: Complaint- Other Employment (filed on May 5, 2020)	0.10
Research and Draft Plaintiff's First Amended Class Action Complaint for Damages & Enforcement Under the Private Attorneys General Act, California Labor Code Section 2698, Et Seq. and Legal Research and Analysis of All Claims Involved (filed on May 22, 2020)	5.20
Review Defendants' Case Management Statement (served on June 2, 2020)	0.50
Review Court's Notice of Assignment of Judge for All Purposes (filed on June 9, 2020)	0.10
Review Court's Order Re: Complaint- Other Employment (filed on June 9, 2020)	0.10

Review Court's Initial Case Management Order (filed on June 11, 2020)	0.10
Review Court's Case Management Order (filed on June 23, 2020)	0.10
Meet and Confer with Defendants' Counsel and Draft Joint Case Management Conference Statement (filed on July 14, 2020)	1.30
Review Court's Tentative Case Management Order (filed on July 21, 2020)	0.10
Meet and Confer with Defendants' Counsel and Draft Joint Stipulation to Extend Defendants' Deadline to Respond to First Amended Complaint (filed on July 28, 2020)	1.60
Review Court's Order Granting Stipulation to Extend Defendants' Deadline to Respond to First Amended Complaint (filed on August 5, 2020)	0.10
Meet and Confer with Defendants' Counsel and Draft Joint Case Management Conference Statement (filed on October 13, 2020)	0.80
Review Court's Tentative Case Management Order (issued on October 14, 2020)	0.10
Review Court's Case Management Order (filed on October 20, 2020)	0.10
Meet and Confer with Defendants' Counsel and Draft Joint Notice of Settlement and Case Management Statement (filed on March 15, 2021)	0.80
Review Court's Tentative Case Management Order (issued on March 26, 2021)	0.10
Review Court's Case Management Order (filed on March 30, 2021)	0.10
Meet and Confer with Defendants' Counsel and Draft Joint Case Management Conference Statement (submitted on June 14, 2021)	0.40

Review Court's Tentative Case Management Order (issued on June 25, 2021)	0.10
Review Court's Case Management Order (filed on June 29, 2021)	0.10
Meet and Confer with Defendants' Counsel and Draft Joint Case Management Conference Statement (submitted on September 27, 2021)	0.40
Review Court's Tentative Case Management Order (filed on September 27, 2021)	0.10
Review Court's Case Management Order (filed on September 28, 2021)	0.10
Meet and Confer with Defendants' Counsel and Draft Joint Case Management Conference Statement (submitted on December 27, 2021)	0.20
Review Court's Tentative Ruling Re: Case Management (issued on January 2, 2022)	0.10
Review Court's Minute Order Re: Case Management Conference and Case Management Conference Order (filed on January 4, 2022)	0.10
Meet and Confer with Defendants' Counsel and Draft Joint Case Management Conference Statement (submitted on March 1, 2022)	0.30
Review Tentative Ruling Re: Case Management (issued on March 4, 2022)	0.10
Review Court's Minute Order Re: Case Management Conference and Case Management Conference Order (filed on March 8, 2022)	0.10
Meet and Confer with Defendants' Counsel and Draft Joint Case Management Conference Statement (submitted on May 2, 2022)	0.30
Meet and Confer with Defendants' Counsel and Draft Joint Case Management Conference Statement (submitted on May 31, 2022)	0.20

Meet and Confer with Defendants' Counsel and Draft Joint Status Report in Advance of Non- Appearance Case Management Conference (submitted on June 23, 2022)	0.20
Review Court's Minutes Re: Case Management Conference (filed on June 24, 2022)	0.10
Review Court's Order Re: Case Management Conference (filed on June 24, 2022)	0.10
Meet and Confer with Defendants' Counsel and Draft Joint Status Report in Advance of Non- Appearance Case Management Conference (submitted on July 7, 2022)	0.20
Review Court's Minutes Re: Case Management Conference (filed on July 8, 2022)	0.10
Review Court's Order Re: Case Management Conference (filed on July 8, 2022)	0.10
Meet and Confer with Defendants' Counsel and Draft Joint Stipulation and Protective Order – Confidential Designation Only (submitted on August 1, 2022)	0.50
Review Court's Order Re: Proposed Protective Order (filed on August 8, 2022)	0.10
Meet and Confer with Defendants' Counsel and Draft Joint Case Management Conference Statement (submitted on August 9, 2022)	0.20
Review Court's Tentative Ruling Re: Case Management (issued on August 11, 2022)	0.10
Review Court's Minutes Re: Case Management Conference (filed on August 16, 2022)	0.10
Review Court's Case Management Order (filed on August 16, 2022)	0.10
Meet and Confer with Defendants' Counsel and Draft Joint Stipulation and Protective Order Re: Confidential Information (submitted on August 26, 2022)	0.20
Review Court's Order Granting Joint Stipulation and Protective Order Re: Confidential Information	0.10

Meet and Confer with Defendants' Counsel and Draft Joint Case Management Conference Statement (filed on September 28, 2022)	0.20
Review Court's Tentative Ruling Re: Case Management (issued on October 3, 2022)	0.10
Meet and Confer with Defendants' Counsel and Draft Joint Case Management Conference Statement (submitted on December 13, 2022)	0.20
Review Court's Tentative Ruling Re: Case Management (issued on December 19, 2022)	0.10
Meet and Confer with Defendants' Counsel and Draft Joint Case Management Conference Statement (submitted on February 21, 2023)	0.20
Review Court's Minutes Re: Case Management Conference (filed on February 28, 2023)	0.10
Review Court's Case Management Order (filed on February 28, 2023)	0.10
Meet and Confer with Defendants' Counsel and Draft Joint Case Management Conference Statement (submitted on March 28, 2023)	0.20
Appearances	
Prepare for and Telephonically Attend Hearing on Plaintiff's Motion for Preliminary Approval of Class Action Settlement (May 10, 2022)	6.5
Prepare for and Telephonically Attend Hearing on Plaintiff's Motion for Preliminary Approval of Class Action Settlement (June 7, 2022)	4.3
Prepare for, Travel to/from, and Attend Hearing on Plaintiff's Motion for Final Approval of Class Action Settlement, Attorneys' Fees, Costs, and Service Award (August 1, 2023) (Anticipated)	1.70
Discovery and Deposition	

Draft Letter to Defendants Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Candace Evans (served on October 28, 2019)	1.90
Draft Follow-Up Letter to Defendants Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Candace Evans (served on December 5, 2019)	2.10
Review and Analyze Documents Produced by Defendants in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Candace Evans (served on January 16, 2020)	4
Review and Analyze Defendants' Form Interrogatories- General (Set One), Form Interrogatories- Employment (Set One), and Request for Production of Documents (Set One) to Plaintiff (served on March 18, 2020)	7.90
Review Defendants' Notice of Taking Deposition of Plaintiff Candace Evans (served on March 18, 2020)	3.90
Draft Plaintiff's Responses to Defendant's Form Interrogatories – Employment Law (Set One), Responses to Defendant's Request for Production of Documents (Set One), and Responses to Defendant's Form Interrogatories – General (Set One) (served on April 21, 2020)	20.20
Draft Plaintiff's Objections to Defendants' Notice of Taking Deposition of Plaintiff Candace Evans (served on May 13, 2020)	1.10
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 Big Joe Handling Systems, Inc. (served on June 9, 2020)	7.10
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 Big Joe California North, Inc. (served on June 9, 2020)	7.10

Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant Big Joe Handling Systems, Inc. and Requests for Production of Documents (July 23, 2020; Organizational Structure) (served on June 9, 2020)	2.10
Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant Big Joe Handling Systems, Inc. and Requests for Production of Documents (July 24, 2020; Job Duties) (served on June 9, 2020)	2.30
Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant Big Joe California North, Inc. and Requests for Production of Documents (July 27, 2020; Organizational Structure) (served on June 9, 2020)	2.10
Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant Big Joe California North, Inc. and Requests for Production of Documents (July 28, 2020; Job Duties) (served on June 9, 2020)	2.30
Draft Plaintiff's Special Interrogatories (Set Three) and Requests for Production of Documents (Set Two) to Defendant Big Joe California North, Inc. (served on July 26, 2022)	4
Review and Analyze Defendant Big Joe California North, Inc.'s Responses to Plaintiff Candace Evans' Special Interrogatories (Set Three), and Requests for Production of Documents (Set Two) to Defendant Big Joe California North, Inc. (served on September 12, 2022)	7.70
Letters and Correspondence	
Draft PAGA Notice to California Labor and Workforce Development Agency Re: Claims of Plaintiff Candace Evans for Penalties Under California Labor Code section 2698, <i>et seq.</i> (served on February 20, 2020)	4.20
Meet with Defendants' Counsel, and Draft Correspondence to, and Respond to Correspondence from, Defendants' Counsel	22

Mediation/Settlement	
Review and Analyze Mediation Data and Documents Produced by Defendants • Employee Handbooks and Policies • Sampling of Employee Time Data • Sampling of Employee Pay Data (served on September 12, 2022) (served on September 26, 2022) (served on November 2, 2022) (served on November 14, 2022) (served on November 21, 2022)	27.50
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 Analysis/Calculations (submitted on March 4, 2021)	24
Attend Mediation Session (March 10, 2021; Zoom Video Conference)	8
Draft, Review, Revise, Negotiate, and Finalize Memorandum of Understanding Regarding Class Action Settlement (executed on March 21, 2021)	3.70
Draft, Review, Revise, Negotiate, and Finalize Joint Stipulation of Class and Representative Action Settlement Agreement (executed on January 26, 2022) and Draft Exhibits	22.10
Draft Amendment No. 1 to Joint Stipulation of Class and Representative Action Settlement Agreement (executed on March 28, 2023) and Draft Exhibits	5.10

Law and Motion	
Research and Draft Plaintiff's Notice of Motion and Motion for Preliminary Approval of Class Action Settlement, Declaration of Alexandra Rose in Support Thereof, Declaration of Candace Evans in Support Thereof, and [Proposed] Order Thereon (filed on April 18, 2022)	22.40
Review Court's Tentative Ruling Re: Hearing on Motion- other Motion for Preliminary Approval; Case Management Conference (issued on May 9, 2022)	0.10
Review Court's Minutes Re: Hearing on Motion- Other Motion for Preliminary Approval; Case Management Conference (filed on May 10, 2022)	0.10
Review Court's Order Re: Hearing on Motion - Other Motion for Preliminary Approval; Case Management Conference (filed on May 10, 2022)	0.10
Draft Plaintiff's Supplemental Brief in Support of Motion and Motion for Preliminary Approval of Class Action Settlement; Memorandum of Points and Authorities, Supplemental Declaration of Alexandra Rose in Support Thereof, Supplemental Declaration of Rod Kiefus in Support Thereof, and [Revised Proposed] Order Thereon (filed on May 31, 2022)	20.50
Review Court's Tentative Ruling Re: Hearing on Motion - Other Motion for Preliminary Approval; Case Management Conference and Minute Order (issued on June 6, 2022)	0.10
Review Court's Minutes Re: Hearing on Motion - Other Motion for Preliminary Approval; Case Management Conference (filed on June 7, 2022)	0.10
Review Court's Order Re: Hearing on Motion - Other Motion for Preliminary Approval; Case Management Conference (filed on June 7, 2022)	0.10
Review Court's Minutes Re: Hearing on Motion for Preliminary Approval (filed on June 24, 2022)	0.10
Review Court's Order Re: Hearing on Motion for Preliminary Approval (filed on June 24, 2022)	0.10

Review Court's Minutes Re: Hearing on Motion for Preliminary Approval (filed on July 8, 2022)	0.10
Review Court's Order Re: Hearing on Motion for Preliminary Approval (filed on July 8, 2022)	0.10
Review Court's Tentative Ruling Re: Hearing on Motion – Other Motion for Preliminary Approval (issued on August 11, 2022)	0.10
Review Court's Minutes Re: Hearing on Motion – Other Motion for Preliminary Approval (filed on August 16, 2022)	0.10
Review Court's Order Re: Hearing on Motion – Other Motion for Preliminary Approval (filed on August 16, 2022)	0.10
Review Court's Tentative Ruling Re: Hearing on Motion – Other Motion for Preliminary Approval (issued on October 3, 2022)	0.10
Review Court's Minutes Re: Hearing on Motion – Other Motion for Preliminary Approval (filed on October 4, 2022)	0.10
Review Court's Order Re: Hearing on Motion for Preliminary Approval (filed on October 4, 2022)	0.10
Review Court's Tentative Ruling Re: Hearing on Motion – Other Motion for Preliminary Approval (issued on December 19, 2022)	0.10
Review Court's Minutes Re: Hearing on Motion – Other Motion for Preliminary Approval (filed on December 20, 2022)	0.10
Review Court's Order Re: Hearing on Motion – Other Motion for Preliminary Approval (filed on December 20, 2022)	0.10
Draft Plaintiff's Further Supplemental Brief in Support of Motion and Motion for Preliminary Approval of Class Action Settlement, Further Supplemental Declaration of Alexandra Rose in Support Thereof, and [Further Revised Proposed] Order Thereon (filed March 28, 2023)	16

Review Court's Order Granting Preliminary Approval of Class Action Settlement (issued on March 29, 2023)	0.10
Review Court's Order Granting Preliminary Approval of Class Action Settlement (filed on March 30, 2023)	0.10
Review Court's Minutes Re: Hearing on Motion for Preliminary Approval and Order Re: Hearing on Motion for Preliminary Approval (filed on April 4, 2023)	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 Settlement, Attorneys' Fees, Costs, and Service Award, and Declaration of Edwin Aiwasian in Support Thereof, and Revise [Proposed] Final Approval Order and Judgment (filed on July 6, 2023) (Anticipated)	26.10
Total Hours:	477.40

EXHIBIT B

LAWYERS for JUSTICE PC CASE COST DETAIL
Evans v. Big Joe Handling Systems, Inc.

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
12/5/2019	U.S. Postmaster	Postage	7.00
2/20/2020	U.S. Postmaster	Postage	6.95
2/20/2020	Legal Document Server, Inc.	Attorney Service	180.22
2/20/2020	Alameda Superior Court	Complaint Filing Fee	435.00
2/20/2020	Alameda Superior Court	Complex Filing Fee	1,000.00
2/20/2020	Labor & Workforce Development Agency	PAGA Filing Fee	75.00
3/5/2020	Legal Document Server, Inc.	Attorney Service	460.00
4/20/2020	FedEx Express	Courier Service	31.89
5/22/2020	Legal Document Server, Inc.	Attorney Service	210.00
6/2/2020	Legal Document Server, Inc.	Attorney Service	80.00
7/2/2020	Legal Document Server, Inc.	Attorney Service	120.00
7/14/2020	Legal Document Server, Inc.	Attorney Service	195.00
7/29/2020	Jeffrey A. Ross	Mediation Fee	7,000.00
10/13/2020	Legal Document Server, Inc.	Attorney Service	65.00
10/19/2020	Legal Document Server, Inc.	Attorney Service	130.00
3/17/2021	Legal Document Server, Inc.	Attorney Service	130.00
6/14/2021	Legal Document Server, Inc.	Attorney Service	195.00
9/27/2021	One Legal	Attorney Service	69.49
12/27/2021	Legal Document Server, Inc.	Attorney Service	18.95
1/18/2022	Alameda Superior Court	Document Download Fee	1.00
3/1/2022	Legal Document Server, Inc.	Attorney Service	17.95
4/18/2022	Legal Document Server, Inc.	Attorney Service	22.00
4/18/2022	Alameda Superior Court	Motion Fee	60.00
5/2/2022	Legal Document Server, Inc.	Attorney Service	17.95
5/25/2022	Alameda Superior Court	Document Download Fee	4.00
6/1/2022	Legal Document Server, Inc.	Attorney Service	35.90
6/9/2022	Alameda Superior Court	Document Download Fee	2.00
6/24/2022	Legal Document Server, Inc.	Attorney Service	17.95
7/8/2022	Legal Document Server, Inc.	Attorney Service	18.70
7/14/2022	Alameda Superior Court	Document Download Fee	10.00
8/8/2022	Alameda Superior Court	Document Download Fee	1.00
8/9/2022	Legal Document Server, Inc.	Attorney Service	18.70
9/20/2022	Alameda Superior Court	Document Download Fee	5.00
9/30/2022	Legal Document Server, Inc.	Attorney Service	18.70
12/13/2022	Legal Document Server, Inc.	Attorney Service	18.70
2/21/2023	Legal Document Server, Inc.	Attorney Service	18.70
3/29/2023	Legal Document Server, Inc.	Attorney Service	37.40
4/10/2023	Legal Document Server, Inc.	Attorney Service	18.90
Total:			10,754.05