

Edwin Aiwazian (SBN 232943)
Arby Aiwazian (SBN 269827)
Joanna Ghosh (SBN 272479)
LAWYERS for JUSTICE, PC
410 West Arden Avenue, Suite 203
Glendale, California 91203
Tel: (818) 265-1020 / Fax: (818) 265-1021

Attorneys for Plaintiffs and the Class

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

KEVIN BIHAN-POUDEC, TAYLOR
EDWARDS, 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;

Plaintiffs,

vs.

FARFETCH.COM US LLC, a California
limited liability company; and DOES 1
through 100, inclusive,

Defendants.

Case No.: 19STCV00800

Honorable Daniel J. Buckley
Department SSC1

CLASS ACTION

**DECLARATION OF EDWIN AIWAZIAN
IN SUPPORT OF PLAINTIFFS' MOTION
FOR FINAL APPROVAL OF CLASS
ACTION SETTLEMENT, ATTORNEYS'
FEES, COSTS, AND SERVICE AWARDS**

[Notice of Motion and Motion for Final
Approval of Class Action Settlement,
Attorneys' Fees, Costs, and Service Awards;
Declarations of Class Representatives (Kevin
Bihan-Poudec and Taylor Edwards);
Declaration of Settlement Administrator
(Zachary Cooley); and [Proposed] Final
Approval Order and Judgment filed
concurrently herein]

Date: April 6, 2022
Time: 10:30 a.m.
Department: SSC1

Complaint Filed: January 7, 2019
FAC Filed: February 14, 2019
SAC Filed: December 7, 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 Plaintiffs Kevin Bihan-Poudec and Taylor Edwards (together, “Plaintiffs”) 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 October 13, 2021, in Department SSC1 of the above-entitled Court, the Honorable Daniel J. Buckley preliminarily approved the Class Action and PAGA Settlement Agreement and Release and (together, “Settlement,” “Agreement,” or “Settlement Agreement”) entered into between Plaintiffs and Defendant Farfetch.com US LLC (“Defendant”), and conditionally certified the Class for settlement purposes. The Court preliminarily appointed Plaintiffs Kevin Bihan-Poudec and Taylor Edwards as Class Representatives. The Court also preliminarily appointed and designated Lawyers *for* Justice, PC as Class Counsel. The Court approved and ordered the mailing of the Notice of Class Action Settlement (“Class Notice”), adopted the notice, opt-out, and objection procedures, and ordered their implementation. The Court appointed Simpluris, Inc. (“Simpluris”) 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, no Class Members have objected to the Settlement or the request for Class Counsel Award, Service Awards, Settlement Administration Expenses, 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 have been actively engaged in litigating this matter since prior to the commencement of the action on January 7, 2019, as have several other attorneys and members in our firm.

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1 5. Lawyers *for* Justice, PC has actively participated in all phases of the litigation
2 process. Before initiating the action, Class Counsel investigated and researched the facts and
3 circumstances underlying the pertinent factual and legal issues and applicable law. This required
4 thorough discussions and interviews between attorneys at our firm and Plaintiff Kevin Bihan-
5 Poudec, and research into the various legal issues involved in the case, namely, the current state
6 of the law as it applied to certification, off-the-clock theory, meal and rest periods, wage-and-
7 hour enforcement, the claims of Plaintiffs, and potential defenses. After conducting initial
8 investigation, our firm determined that the claims of Plaintiffs were well-suited for class-wide
9 adjudication owing to what appeared to be a common course of conduct affecting a similarly
10 situated group of current and former hourly-paid and/or non-exempt employees who worked for
11 Defendant, who were not properly compensated for, *inter alia*, all hours worked, and non-
12 compliant meal and rest periods.

13 6. Prior to reaching the Settlement, the parties used the pre-mediation time period to
14 investigate the veracity, strength, and scope of the claims, and also to prepare the matter for class
15 certification, representative adjudication, and trial. The parties conducted significant informal
16 discovery and investigation into the facts of the case, and also informally exchanged information
17 and data in preparation for mediation. Class Counsel reviewed and analyzed thousands of pages
18 of documents and data produced by Defendant and obtained through other sources. The
19 documents and data reviewed and analyzed by Class Counsel included, and were not limited to,
20 Plaintiffs and other Class Members' employment records, a detailed sampling of Class
21 Members' time and pay data (such as Pay Statements, Earning Statements, and Timecard
22 Reports), company policy acknowledgments, internal memoranda, New Hire Checklists,
23 Defendant's operations and employment practices, forms (such as Employment Change in Status,
24 Employee Separation, and Employee Warning Notice), procedures, and policies (such as
25 Attendance Policy, Non-Exempt Employee Meal and Break Policy, Non-Exempt Employee Paid
26 Time Off (PTO) Policy, Travel and Expenses Policy, Open Door Policy, and Non-Exempt
27 Employee Paid Time Off Policy), among other documents and data. Class Counsel researched
28 applicable law, developed damages/valuation models in preparation for mediation, and met and

1 conferred with Defendant's counsel on numerous occasions, e.g., to discuss issues relating to the
2 pleadings and production of various documents and data prior to mediation. Other work
3 performed by Class Counsel included, and was not limited to, case strategy and analysis;
4 drafting, reviewing, and revising pleadings and mediation brief; preparing and appearing for
5 court proceedings; and preparing for and attending mediation and settlement negotiations.

6 7. As outlined herein, the parties have conducted significant informal discovery and
7 investigation during the course of litigating the case. Class Counsel analyzed thousands of pages
8 of documents and data either produced by Plaintiffs and Defendant or obtained by Class Counsel
9 through other sources. These documents and data provided a critical understanding of the nature
10 of the work performed by the Class Members, as well as Defendant's operations and employment
11 policies, practices, and procedures, and were used in analyzing liability, damages, and valuation
12 issues in connection with all phases of the litigation, and ultimately with the mediation and
13 settlement negotiation process. Class Counsel also performed significant research into the law
14 concerning Defendant's defenses.

15 8. After conducting significant investigation of the facts and law during the
16 prosecution of the case, counsel for the parties engaged in extensive settlement negotiations to
17 try to resolve the entire matter. These efforts included participating in a formal, full-day
18 mediation conducted by Deborah Crandall Saxe, Esq., a well-regarded mediator experienced in
19 mediating complex labor and employment matters. During all settlement discussions, the parties
20 conducted their negotiations at arm's length in an adversarial position. Prior to and during
21 mediation, the parties exchanged information and data, and discussed all aspects of the case,
22 including the risks and delays of further litigation, the risks to the parties of proceeding with
23 class certification and trial, the law relating to off-the-clock theory, meal and rest periods,
24 representative PAGA claims, and wage-and-hour enforcement, the evidence produced and
25 analyzed, and the possibility of appeals, among other things. Arriving at a settlement that was
26 acceptable to the parties was not easy. Defendant also contended that individualized questions of
27 fact predominate over any common issues, and these issues would pose challenges to
28 certification and representative adjudication. Defendant and its counsel felt very strongly about

1 Defendant's ability to prevail on the merits and to obtain a denial of class certification, while
2 Plaintiffs and Class Counsel believed that class certification would be obtained and that they
3 would prevail at trial. With the aid of the mediator's evaluation, the parties agreed that the case
4 was well-suited for settlement given the legal issues relating to Plaintiffs' principal claims, as
5 well as the costs and risks to the parties that would attend further litigation. These risks of
6 further litigation include, and are not limited to, a determination that the claims are unsuitable for
7 class treatment and/or representative adjudication, failure to obtain certification, class de-
8 certification after certification of a class, allowing a jury to decide the claims asserted in the case,
9 and the real possibility of no recovery after years of litigation.

10 9. As set forth more fully in the accompanying Motion for Final Approval, Class
11 Counsel seeks attorneys' fees in the amount of \$297,500.00, which is thirty-five percent (35%)
12 of the Total Settlement Amount of \$850,000.00, as set forth in the Settlement Agreement and the
13 Class Notice. Pursuant to the contingency-fee agreement entered into by and between Plaintiffs
14 and Class Counsel, Plaintiffs have each agreed to contingency fees of at least thirty-five percent
15 (35%) of the recovery. The attorneys' fees sought are commensurate with: (1) the risk that Class
16 Counsel took in commencing the case; (2) the time, effort, and expense that Class Counsel
17 dedicated to the case; (3) the skill and determination that Class Counsel has shown; (4) the
18 results that Class Counsel has achieved throughout the litigation; (5) the value of the settlement
19 that Class Counsel has achieved for the Class Members; and (6) the other cases that Class
20 Counsel has turned down in order to devote its time and efforts to this matter.

21 10. I am aware that the common and acceptable rate for contingency representation in
22 wage and hour class action litigation is normally 40% before trial, with the range being from
23 33.3% up to 50%.

24 11. While not necessarily required to be demonstrated because the contingent fee is
25 proper for this settlement, Class Counsel has incurred many hours of work in connection with
26 prosecuting the case such that the award of attorneys' fees is also justified under a simple
27 lodestar analysis. Class Counsel has spent a total of **539.30 hours** performing tasks and
28 obtaining recovery on behalf of Plaintiffs and the Class Members. Attached hereto as

1 “EXHIBIT A” is an Attorney Task and Time and Chart that sets forth in detail the nature of the
2 legal services provided by Class Counsel and the time incurred in performing those services.
3 These hours include work done by myself and several of the firm’s other members. We also had
4 litigation support personnel actively engaged in assisting with the prosecution of this matter.

5 12. The work performed in this particular matter, the background of our firm, as well
6 as the individual backgrounds, training, and experience of the attorneys who worked on this
7 matter, in litigating complex wage-and-hour matters, and in particular, employment class actions,
8 support a reasonable hourly rate of compensation at the rate of \$650 for work performed by
9 Class Counsel. Lawyers for Justice, PC has been awarded attorneys’ fees, compensating the firm
10 at the rate of at least \$650 per hour for legal services performed, by courts granting final
11 approval in other cases: final approval of the class and representative action settlement in
12 *Thereasa Carrozzella v. Basalite Concrete Products, LLC* (Sacramento County Superior Court
13 Case No. 34-2017-00220214-CU-OE-GDS) was granted on February 21, 2020, and the award of
14 attorneys’ fees involved an hourly rate of \$766.05; final approval of the class and representative
15 action settlement in *Alice Rutledge, et al. v. Healthport Technologies, LLC* (Alameda County
16 Superior Court Case No. RG16835813) was granted on June 11, 2019, and the award of
17 attorneys’ fees involved an hourly rate of \$764.8; final approval of the class and representative
18 action settlement in *Seth Swan v. Pace Supply Corp.* (Sonoma County Superior Court Case No.
19 SCV258764) was granted on February 6, 2019, and the award of attorneys’ fees involved a
20 higher hourly rate of \$855.96; final approval of the class and representative action settlement in
21 *Stanley Bland, et al. v. Telecare Corporation* (Alameda County Superior Court Case No.
22 RG16811450) was granted on November 21, 2018, and the award of attorneys’ fees involved a
23 higher hourly rate of \$831.38; final approval of the class and representative action settlement in
24 *Maryjo Ungerbuhler Anderson v. Boyett Petroleum* (Stanislaus County Superior Court Case No.
25 2020582) was granted on May 15, 2018, and the award of attorney’s fees involved a higher
26 hourly rate of \$780.77; final approval of the class and representative action settlement in
27 *Demetrius Camarillo v. Blue Diamond Growers* (Sacramento County Superior Court Case No.
28 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 program. In addition, I have previously served as a *pro bono* mediator for the Los Angeles County Superior Court. In October of 2000, I obtained a Litigation Paralegal Certificate from the *UCLA Extension Program*. During the summer of 2000, I studied Legal Writing at *Harvard University*. In April of 1999, I obtained a Bachelor of Arts degree in Communication with a concentration in Natural Sciences from *Pepperdine University*.

JUDICIAL EXTERNSHIPS

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

LITIGATION AND CLASS ACTION EXPERIENCE

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

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

17. Since its inception, in or around October of 2008, our firm has almost exclusively focused on the prosecution of consumer and employment class actions, involving wage-and-hour

claims, race discrimination, unfair business practices or consumer fraud. Currently, we are the attorneys of record in over a dozen employment-related putative class actions in both state and federal courts in the State of California. Our firm has successfully litigated cases involving the executive, administrative, and other overtime exemptions to the State of California and federal overtime compensation requirements. During this relatively short time, in association with other law firms, we have obtained millions of dollars on behalf of thousands of individuals in California.

EXAMPLES OF CLASS ACTION RESULTS

18. What follows are just a few examples of the type of results we have achieved on behalf of our clients:

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

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

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

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

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

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

8 f) Our firm, in association with co-counsel, represented the plaintiffs in a
9 wage-and-hour class and representative action against a national wholesale distributor of
10 plumbing and builder supplies, involving allegations of misclassification of multiple salaried
11 “manager” positions. On May 22, 2014, the court granted final approval of the class and
12 representative action settlement. The Sacramento County Superior Court Case Number is 34-
13 2012-00136285.

14 g) Our firm, in association with co-counsel, represented the plaintiffs in a
15 wage-and-hour class action involving allegations of misclassification of the “Operations
16 Manager” position. On September 16, 2014, the court granted plaintiffs’ motion for class
17 certification. The Los Angeles County Superior Court Case Number is BC478769.

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

23 i) Our firm, in association with co-counsel, represented the plaintiffs in a
24 wage-and-hour class action involving allegations of misclassification of the salaried residential
25 “Property Manager” position. On September 17, 2015, the court granted plaintiffs’ motion for
26 class certification. The Los Angeles County Superior Court Case Number is BC474784.

27 j) Our firm, in association with co-counsel, represented the plaintiffs in a
28 wage-and-hour class and representative action against a national retailer of upscale hardware and

1 home furnishings, on behalf of non-exempt employees. On April 28, 2016, the court granted
2 final approval of the class and representative action settlement. The Los Angeles County
3 Superior Court Case Number is JCCP4794.

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

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

14 m) Our firm represented the plaintiff in a representative action under the
15 Private Attorneys General Act, against a real estate and property management company, on
16 behalf of non-exempt employees. On November 4, 2016, the Court granted approval of the
17 settlement. The Orange County Superior Court Case Number is 30-2015-00775439-CU-OE-
18 CXC.

19 n) Our firm, in association with co-counsel, represented the plaintiffs in a
20 wage-and-hour class action against a full-service bank, on behalf of non-exempt employees. On
21 November 18, 2016, the court granted final approval of the class action settlement. The San
22 Francisco County Superior Court Case Number is CJC-13-004839.

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

27 p) Our firm, on behalf of the plaintiff and respondent in a PAGA
28 representative action, successfully opposed in the trial court, and briefed and argued an appeal

1 with respect to the employer's motion to compel arbitration, which resulted in a published
2 opinion by the California Court of Appeal in favor of employees. *Roberto Betancourt v.*
3 *Prudential Overall Supply*, 9 Cal.App.5th 439 (Cal. App. 4th Dist., Mar. 7, 2017), review denied,
4 cert. denied (U.S. Supreme Court Docket No. 17-254).

5 q) Our firm, in association with co-counsel, represented the plaintiffs in a
6 wage-and-hour class and representative action against a consumer packaging company, on behalf
7 of non-exempt employees. On March 10, 2017, the court granted final approval of the class and
8 representative action settlement. The Los Angeles County Superior Court Case Number is
9 BC590429.

10 r) Our firm, in association with co-counsel, represented the plaintiffs in a
11 wage-and-hour class action and representative action against a manufacturer of food service
12 industry supplies on behalf of non-exempt employees. On April 14, 2017, the court granted final
13 approval of the class and representative action settlement. The Orange County Superior Court
14 Case Number is 30-2015-00810013-CU-OE-CXC.

15 s) Our firm represented the plaintiff in a wage-and-hour class and
16 representative action against a property management company, on behalf of non-exempt
17 employees. On June 14, 2017, the court granted final approval of the class and representative
18 action settlement. The Los Angeles County Superior Court Case Number is BC586234.

19 t) Our firm represented the plaintiffs in a wage-and-hour class action and
20 representative action against a food company on behalf of non-exempt employees. On June 30,
21 2017, the court granted final approval of the class and representative action settlement. The
22 Sacramento County Superior Court Case Number is 34-2015-00175871.

23 u) Our firm represented the plaintiffs in a wage-and-hour class action and
24 representative action against a chocolate company on behalf of non-exempt employees. On July
25 19, 2017, the court granted final approval of the class and representative action settlement. The
26 Alameda County Superior Court Case Number is RG15764300.

27 v) Our firm represented the plaintiffs in a wage-and-hour class action and
28 representative action against a manufacturer of plastic containers on behalf of non-exempt

employees. On October 31, 2017, the court granted final approval of the class and representative action settlement. The Los Angeles County Superior Court Case Number is BC577233.

w) Our firm, in association with other co-counsel, represented the plaintiffs in a wage-and-hour class action and representative action against a property management company on behalf of hourly-paid and non-exempt employees. On January 4, 2018, the court entered an order granting final approval of the class and representative action settlement. The Los Angeles County Superior Court Case Number is JCCP 4819.

x) Our firm, in association with other co-counsel, represented the plaintiffs in a wage-and-hour class action and representative action against a global provider of flexible office space solutions. On February 15, 2018, the court entered an order granting final approval of the class and representative action settlement. The Los Angeles County Superior Court Case Number is BC498401.

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

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

aa) Our firm, in association with other co-counsel, represented the plaintiff in a representative action under the Private Attorneys General Act, against a global provider of products and services to the energy industry, on behalf of hourly-paid and non-exempt employees. On November 19, 2018, the Court granted approval of the settlement. The Kern County Superior Court Case Number is S-1500-CV-280215-SDC.

bb) Our firm represented the plaintiff in a wage-and-hour class action against a parking company on behalf of non-exempt employees. On September 3, 2019, the court

1 granted the plaintiff's motion for class certification and certified a class. The Santa Clara County
2 Superior Court Case Number is 16CV292208 and the Judicial Council Coordination Proceeding
3 Number is JCCP 4886.

4 cc) Our firm, in association with other counsel, on behalf of the plaintiff and
5 respondent in a PAGA representative action, successfully opposed in the trial court, and briefed
6 and argued an appeal with respect to the employer's motion to compel arbitration, resulting in a
7 notable decision from the California Supreme Court clarifying the law and finding, in part, that
8 employer arbitration agreements are unenforceable where they block a PAGA claim from
9 proceeding, *ZB, N.A. v. Superior Court*, 8 Cal.5th175 (2019).

10 dd) Our firm represented the plaintiffs in a wage-and-hour class and
11 representative action against a bank on behalf of non-exempt employees. On September 27,
12 2019, the court granted the plaintiffs' motion for class certification in part and certified a class.
13 The Alameda County Superior Court Case Number is RG15757606 and the Judicial Council
14 Coordination Proceeding Number is JCCP 4921.

15 ee) Our firm represented the plaintiffs in a wage-and-hour class and
16 representative action against a national retailer of apparel and fashion accessories, on behalf of
17 non-exempt employees. On October 9, 2019, the court granted the plaintiffs' motion for class
18 certification in part and certified a class. The Sacramento County Superior Court Case Number
19 is 34-2015-00175330-CU-OE-GDS.

20 ff) Our firm represented the plaintiff in a wage-and-hour class and
21 representative action against a medical equipment supplier on behalf of non-exempt employees.
22 On February 13, 2020, the court granted the plaintiff's motion for class certification and certified
23 a class. The San Bernardino County Superior Court Case Number is CIVDS1505744.

24 gg) Our firm, in association with other counsel, represented the plaintiff in a
25 wage-and-hour class and PAGA representative action against a large national drug testing
26 laboratory on behalf of non-exempt employees. On February 21, 2020, the court granted the
27 plaintiff's motion for class certification and certified a class. The San Diego County Superior
28 Court Case Number is 37-2018-00019611-CU-OE-CTL.

1 hh) Our firm represented the plaintiffs in a wage-and-hour class and
2 representative action against a national retailer of sportswear, footwear, and camping equipment
3 on behalf of non-exempt employees. On March 16, 2020, the court granted in part the plaintiff's
4 motion for class certification and certified a class. The Riverside County Superior Court Case
5 Number is RICJCCP4930.

6 ii) Our firm represented the plaintiffs in a wage-and-hour class and PAGA
7 representative action against a plastic packaging company on behalf of non-exempt employees.
8 On June 8, 2020, the court granted in part the plaintiffs' motion for class certification and
9 certified a class. The San Bernardino County Superior Court Case Number is CIVDS1507361.

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

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

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

20 19. To date, Class Counsel has borne all the risks and costs of litigation and will not
21 receive any compensation until recovery is obtained by Plaintiffs and the Class Members.
22 Lawyers for Justice, PC has incurred \$16,473.51 in litigation costs and expenses as reflected in
23 **"EXHIBIT B"** attached hereto. These expenses were reasonable and necessary in the
24 prosecution of this matter and to obtain the Settlement. It should be noted that Class Counsel has
25 borne all of the risks and costs of litigation and will not receive any compensation until recovery
26 is obtained under the Settlement.

27 ///

28 ///

SERVICE AWARDS TO PLAINTIFFS

20. In recognition of their efforts and work serving as the Class Representatives, the Settlement provides for Service Awards in the amount of \$7,500.00 each to Plaintiffs Kevin Bihan-Poudec and Taylor Edwards to compensate Plaintiffs for the time and effort that they expended on behalf of the Class. The requested Service Awards are fair and appropriate. Plaintiffs 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. Plaintiffs were available whenever Class Counsel needed them and actively tried to obtain information that would benefit the Class. Plaintiffs spent numerous hours speaking with Class Counsel about their claims, describing their work experience with Defendant, and gathering and reviewing documents. Accordingly, it is appropriate for Plaintiffs Kevin Bihan-Poudec and Taylor Edwards to each receive \$7,500.00 as reasonable Service Awards, in addition to their Individual Settlement Payments and Individual PAGA Payments, for their services on behalf of the Class.

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

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

Executed this 14th day of March 2022, at Glendale, California.

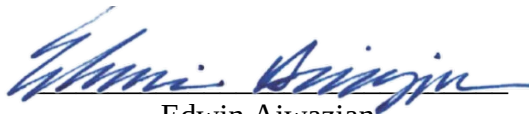

Edwin Aiwasian

EXHIBIT A

BIHAN-POUDEC, ET AL. V. FARFETCH.COM US, LLC.
(LOS ANGELES COUNTY SUPERIOR COURT CASE NO. 19STCV00800)

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	12.30
Pre-Lawsuit Investigation of the Merits of Plaintiff Kevin Bihan-Poudec's Claims and the Merits of the Claims of the Putative Class Members	10.20
Pre-Lawsuit Investigation of Potential Damages Exposure of Defendant Farfetch.com US, LLC. ("Defendant") with Respect to the Damages Sustained by Plaintiff Kevin Bihan-Poudec and the Putative Class Members	8.50
Pre-Lawsuit Legal Research and Analysis of Latest Off-the-Clock, Meal and Rest Break, Representative PAGA, and Certification Decisions in California, Including all Relevant and New Enforcement Guidance and DLSE Materials	10.50
Investigation of Defendant, Defendant's Business Relationships, and the Industry in which Defendant Operates	5.70
Investigation of Defendant's Organizational and Corporate Structure, and Executive Reporting Structure as It Relates to the Employment and Management of the Putative Class Members	4.30

Investigation of Defendant's Executives, Officers, and Leadership with a Focus on Involvement in Wage-and-Hour Issues and Establishing Willfulness and Uniformity	4.50
Analysis of Competitors in Various Relevant Geographic Areas within which Defendant Operates, and Comparing and Contrasting Defendant's Policies, Practices, and Procedures with the Policies, Practices, and Procedures of Defendant's Competitors	4.70
Research and Investigation Re: Location(s), Department(s), and/or Division(s) Owned, Managed, Serviced, or Operated by Defendant in California During the Class Period, Including Differences Between Location(s), Department(s), and/or Division(s) to Determine Whether Those Differences Will Cause Individual Issues to Predominate Over Common Issues	6.10
Comparative Analysis and Cross-Checking of All Available Job Postings and Job Review Regarding Employment at Defendant 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	5.80
Research and Investigation Re: Workforce, Staffing Models, and Staffing Levels at Defendant's Location(s) at which Putative Class Members Work Throughout California	5.40
Research and Investigation Re: Defendant's Written and Unwritten Policies, Practices, and Procedures Relating to Overseas Operations, Deliveries and Pickups, Reporting Time, Non-Discretionary Bonuses/Incentive/Shift Differential Pay, Regular Rate Calculations, Timekeeping, Customer Service, Customer Service Calls, Conference Calls, Scheduling, Meal/Rest Breaks, Meal/Rest Premiums, On-Premises Breaks, Overtime Compensation, Personal Cell Phone Use, Personal Vehicle Use, Reimbursement of Business-Related Expenses, and Wage and Hour Compliance	29.50
Research and Investigation Re: Various Software Programs, Systems, and Other Technologies Defendant Uses to Conduct Its Everyday Business, Including Marketing, Call, Customer Service, Timekeeping, and Sales Systems, with a Focus on What Documents (Both Paper and Electronic) Are Created in the Normal	4.60

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 Defendant May Raise, Including <i>De Minimis</i> Work, Non-Compensable Off-the-Clock Work, Waiver, and Compliant Policies	8.50
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	7.80
Research and Analysis of Defendant's Litigation History Involving Wage-and-Hour Issues and Other Related Employment Issues	4.30
Prepare a Discovery Strategy Plan of Action, Including Topics of Inquiry Important to Certification, Liability, and Damages/Civil Penalties	12.50
Meet and Communicate with Plaintiff Kevin Bihan- Poudec Throughout the Pendency of the Case	42.20
Meet and Communicate with Plaintiff Taylor Edwards Throughout the Pendency of the Case	44.10
Meet and Communicate with Putative Class Members	32.50
Pleadings and Court Filings	
Research and Draft Plaintiff Kevin Bihan-Poudec's Class Action Complaint for Damages and Legal Research and Analysis of All Claims Involved (filed on January 7, 2019)	9.10
Review Court's Notice of Case Assignment (filed on January 7, 2019)	0.10
Research and Draft Plaintiffs Kevin Bihan-Poudec and Taylor Edward's (together, "Plaintiffs") First Amended Class Action Complaint for Damages and Legal Research and Analysis of All Claims Involved (filed on February 14, 2019)	1.50

Review Court's Order Continuing Initial Status Conference from April 12, 2019 to June 7, 2019 (filed on April 8, 2019) (Case no. 19STCV00817)	0.10
Review Court's Initial Status Conference Order (filed on April 12, 2019)	0.30
Review Court's Minute Order Re: Newly Filed Class Action (filed on April 12, 2019)	0.10
Draft Notice of Acknowledgement of Summons and First Amended Complaint (filed on April 19, 2019)	0.20
Review Court's Minute Order Re: Initial Status Conference (filed on May 13, 2019)	0.10
Review Defendant's Notice of Continuance of Initial Statement Conference (served on May 14, 2019)	0.20
Meet and Confer with Defendant's Counsel, and Draft Joint Initial and Post-Mediation Status Conference Statement (submitted on September 11, 2019)	1.30
Draft Plaintiffs' Response to Order to Show Cause Regarding Sanctions for Plaintiffs' Failure to Appear and Declaration of Edwin Aiwarzian in Support Thereof (filed on September 12, 2019)	0.50
Meet and Confer with Defendant's Counsel, and Draft Joint Statement in Advance of Non-Appearence Case Review (submitted on December 3, 2019)	0.90
Review Court's Minute Order Re: Scheduling the Motion for Preliminary Approval Hearing (filed on December 16, 2019)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Statement in Advance of Non-Appearence Case Review (submitted on March 4, 2020)	0.80
Review Court's Minute Order Re: Scheduling the Motion for Preliminary Approval Hearing (filed on March 16, 2020)	0.10

Review Court's Minute Order Re: Non-Appeal Case Review Re: E-Service Provider (filed on June 2, 2020)	0.10
Review Court's Minute Order Continuing the Motion for Preliminary Approval Hearing from September 3, 2020 to October 1, 2020 (filed on June 24, 2020)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Statement in Advance of Non-Appeal Case Review (submitted on September 30, 2020)	0.50
Review Court's Minute Order Re: Non-Appeal Case Review Re: Motion for Preliminary Approval (filed on October 1, 2020)	0.10
Research and Draft Plaintiffs' Second 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; and Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation to File a Second Amended Complaint; [Proposed] Order (submitted on October 5, 2020) (filed on December 7, 2020)	6.20
Review Court's Order Granting Plaintiffs Leave to File Second Amended Complaint (filed on October 15, 2020)	0.10
Review Court's Minute Order Re: Extension of the Time to File Second Amended Consolidated Complaint (filed on December 4, 2020)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Response to Non-Appeal Case Review (submitted on December 10, 2020)	0.50
Review Court's Minute Order Re: Non-Appeal Case Review Re: Motion for Preliminary Approval (filed on December 10, 2020)	0.10

Review Court's Minute Order Re: Non-Appearance Case Review Re: Motion for Preliminary Approval (filed on February 9, 2021)	0.10
Review Court's Minute Order Re: Nunc Pro Tunc Order (filed on August 3, 2021)	0.10
Review Court's Minute Order Re: Vacating Status Conference; Setting Hearing on Motion for Preliminary Approval (filed on August 3, 2021)	0.10
Appearances	
Prepare for, Travel to/from, and Attend Hearing on Plaintiffs' Motion for Final Approval of Class Action Settlement, Attorneys' Fees, Costs, and Service Awards (April 6, 2022) (Anticipated)	1.50
Discovery and Deposition	
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Kevin Bihan-Poudec (served on November 26, 2018)	1.90
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Putative Class Member (served on December 6, 2018)	1.90
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Taylor Edwards (served on December 7, 2018)	1.90
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Kevin Bihan-Poudec (served on December 18, 2018)	4.70
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Putative Class Member (served on December 18, 2018)	2.40
Draft Follow-Up Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Taylor Edwards (served on January 22, 2019)	1.30

Draft Follow-Up Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Putative Class Member (served on January 22, 2019)	1.10
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Taylor Edwards (served on January 29, 2019)	1.90
Letters and Correspondence	
Draft Notice to California Labor and Workforce Development Agency Re: Claims of Plaintiff Taylor Edwards for Penalties Under California Labor Code section 2698, <i>et seq.</i> (served on March 30, 2020)	4.20
Meet with, and Draft Correspondence to, and Respond to Correspondence from, Defendant's Counsel	28.70
Mediation/Settlement	
Review and Analyze Mediation Data and Documents Produced by Defendant [FF 000001-FF 014156] (served on June 27, 2019, July 19, 2019, July 26, 2019, July 31, 2019, and August 2, 2019) • Employee Handbooks and Policies • Employee Time Card Reports • Employee Earnings Statements	51.50
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, Performing Meal Violation, Damages, and Penalties Analysis and Calculations, and Consulting with Expert(s) and/or Consultant(s) (submitted on August 16, 2019)	36.50
Travel to/from and Attend Mediation Session (August 20, 2019; Los Angeles, California)	10.50
Draft, Review, Revise, Negotiate, and Finalize Class Action and PAGA Settlement Agreement (executed on September 20, 2021) and Draft Exhibits	21.30

Draft, Review, Revise, Negotiate, and Finalize First Amended Class Action and PAGA Settlement Agreement (executed on September 30, 2021) and Draft Exhibits	13.60
Coordinate Settlement Administration with Settlement Administrator, Ongoing Monitoring of Settlement Administration, and Responding to Class Inquiries	4.10
Law and Motion	
Research and Draft Plaintiffs' 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 Kevin Bihan-Poudec in Support Thereof, Declaration of Taylor Edwards in Support Thereof, and [Proposed] Order Thereon (filed on April 7, 2021)	23.20
Review Court's Case Anywhere Message Board Posting and Tentative Ruling on Motion for Preliminary Approval of Class Action Settlement and Meet and Confer with Defendant's Counsel and Respond to Court (posting issued June 24, 2021; response sent June 27, 2021)	0.80
Review Court's Minute Order Re: Hearing on Motion for Preliminary Approval of Settlement (filed on June 28, 2021)	0.10
Review Court's Case Anywhere Message Board Posting Re: Hearing on Motion for Preliminary Approval of Settlement and Court's Minute Order Re: Hearing on Motion for Preliminary Approval of Settlement, and Meet and Confer with Defendant's Counsel and Respond to Court (posting issued July 28, 2021; order issued July 30, 2021; response sent August 3, 2021)	0.70
Meet and Confer with Defendant's Counsel and Post Case Anywhere Message Board Posting to Court Re: Update and Status of Settlement and Motion for Preliminary Approval of Class Action Settlement and Request for Extension of Deadline and New Hearing Date (posting sent September 1, 2021)	0.50
Review Court's Case Anywhere Message Board Posting Re: Hearing on Motion for Preliminary Approval of Settlement and Meet and Confer with Defendant's Counsel and Respond to Court (posting issued September 14, 2021; response sent September 15, 2021)	0.40

Review Court's Minute Order Re: Continuance of Hearing on Motion for Preliminary Approval (filed on September 15, 2021)	0.10
Draft Plaintiffs' Notice of Errata and Correction of Declaration of Edwin Aiwazian in Support of Plaintiffs' Motion for Preliminary Approval of Class Action Settlement (filed on September 22, 2021)	1.20
Draft Plaintiffs' Supplemental Brief in Support of Motion for Preliminary Approval of Class Action Settlement and Supplemental Declaration of Edwin Aiwazian with Exhibits in Support Thereof (filed on September 30, 2021)	12.40
Review Court's Case Anywhere Message Board Posting Re: Hearing on Motion for Preliminary Approval of Settlement and Meet and Confer with Defendant's Counsel and Respond to Court (posting issued October 8, 2021; response sent October 12, 2021)	0.50
Review Court's Minute Order Re: Hearing on Motion for Preliminary Approval of Settlement (filed on October 13, 2021)	0.10
Review Court's Order Granting Preliminary Approval of Class Action Settlement (filed on October 13, 2021)	0.20
Review and Analyze Settlement Administrator's Declaration Regarding Settlement Notice Administration; and Research and Draft Plaintiffs' Motion for Final Approval of Class Action Settlement, Attorneys' Fees, Costs, and Service Awards, Declaration of Edwin Aiwazian in Support Thereof, and [Proposed] Final Approval Order and Judgment (filed on March 11, 2022) (Anticipated)	22.60
Total Hours:	539.30

EXHIBIT B

LAWYERS for JUSTICE PC CASE COST DETAIL
Bihan-Poudec v. Farfetch.com US LLC

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
11/26/2018	U.S. Postmaster	Postage	6.70
12/6/2018	U.S. Postmaster	Postage	6.70
1/11/2019	ProLegal, Inc.	Attorney Service	287.76
1/11/2019	Los Angeles Superior Court	Filing Fee	435.00
1/11/2019	Los Angeles Superior Court	Complex Fee	1,000.00
1/11/2019	Los Angeles Superior Court	Jury Fee	150.00
1/20/2019	One Legal	Attorney Service	61.00
1/22/2019	U.S. Postmaster	Postage	6.91
2/11/2019	Golden State Overnight	Courier Service	13.17
3/13/2019	FedEx Express	Courier Service	21.47
3/15/2019	Golden State Overnight	Courier Service	17.14
4/19/2019	Pure Legal, Inc.	Attorney Service	197.40
4/23/2019	Jams, Inc.	Mediation Fee	5,450.00
7/28/2019	Legal Document Server, Inc.	Attorney Service	110.00
8/20/2019	Robert A. Parris	Damages Consulting Expert	5,866.52
8/20/2019	Arby Aiwazian	Travel Reimbursement	29.78
9/11/2019	Pure Legal, Inc.	Attorney Service	196.50
10/15/2019	Jams, Inc.	Mediation Fee	500.00
12/3/2019	Pure Legal, Inc.	Attorney Service	195.90
3/30/2020	Labor & Workforce Development Agency	Filing Fee	150.00
9/2/2020	Case Anywhere LLC	Attorney Service	106.80
9/30/2020	Legal Document Server, Inc.	Attorney Service	15.00
10/5/2020	Legal Document Server, Inc.	Attorney Service	145.70
10/5/2020	Los Angeles Superior Court	Filing Fee	20.00
12/1/2020	Case Anywhere LLC	Attorney Service	132.00
12/2/2020	Los Angeles Superior Court	Filing Fee	19.40
12/7/2020	Legal Document Server, Inc.	Attorney Service	165.00
12/10/2020	Legal Document Server, Inc.	Attorney Service	145.00
3/2/2021	Case Anywhere LLC	Attorney Service	132.00
4/8/2021	Legal Document Server, Inc.	Attorney Service	347.10
4/8/2021	Los Angeles Superior Court	Filing Fee	60.00
6/3/2021	Case Anywhere LLC	Attorney Service	156.00
9/1/2021	Case Anywhere LLC	Attorney Service	120.00
9/22/2021	One Legal	Attorney Service	16.68
10/1/2021	One Legal	Attorney Service	16.68
10/14/2021	Los Angeles Superior Court	Document Download Fee	9.00
12/2/2021	Legal Document Server, Inc.	Attorney Service	15.20
12/6/2021	Case Anywhere LLC	Attorney Service	150.00
Total:			16,473.51