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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN BERNARDINO**

JASON BEINBRECH, individually, and on
behalf of other members of the general public
similarly situated and on behalf of other
aggrieved employees under the California
Private Attorney General Act,

Plaintiff,

vs.

MATTHEWS INTERNATIONAL
CORPORATION, an unknown business
entity; and DOES 1 through 100, inclusive,

Defendants.

Case No. CIVSB2226992

**CLASS ACTION UNDER CAL. CIV.
PROC. CODE § 382, ET SEQ. & PAGA
ACTION UNDER CALIFORNIA
PRIVATE ATTORNEYS GENERAL ACT,
CAL. LAB. CODE § 2698, ET SEQ.**

Honorable Joseph T. Ortiz
Department S17

**DECLARATION OF JOANNA GHOSH
IN SUPPORT OF PLAINTIFF'S MOTION
FOR FINAL APPROVAL OF CLASS
ACTION SETTLEMENT, ATTORNEYS'
FEES AND COSTS, AND
ENHANCEMENT AWARD**

[Notice of Motion and Motion for Final
Approval of Class Action Settlement,
Attorneys' Fees and Costs, and Enhancement
Award; Declaration of Class Representative
(Jason Beinbrech); Declaration of Settlement
Administrator (Lisa Pavlik); and [Proposed]
Final Approval Order and Judgment filed
concurrently herein]

Date: September 26, 2024
Time: 1:30 p.m.
Department: S17

Complaint Filed: November 30, 2022
Trial Date: None Set

DECLARATION OF JOANNA GHOSH

I, Joanna Ghosh, 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 Jason Beinbrech (“Plaintiff”) and the Class in the above-captioned matter. 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 or about November 17, 2023, Plaintiff filed the Motion for Preliminary Approval of Class Action Settlement and papers in support thereof (“Motion for Preliminary Approval”), seeking preliminary approval of the Class Action and PAGA Settlement Agreement (“Original Agreement”) executed by Plaintiff and Defendant Matthews International Corporation (together, the “Parties”) on or about May 31, 2023, attached as Exhibit A to the Declaration of Annabel Blanchard in Support of Plaintiff’s Motion for Preliminary Approval of Class Action Settlement filed on November 17, 2023 (“Declaration of Annabel Blanchard”). On November 17, 2023, a non-attorney staff member at Lawyers *for* Justice, PC transmitted a copy of the moving and supporting papers for the Motion for Preliminary Approval that were filed with this Court in this matter on November 17, 2023, including and not limited to the Declaration of Annabel Blanchard which contained the Original Agreement, both by e-mail and online submission on the DIR’s designated website for such submissions.

3. On or about February 9, 2024, the Parties executed Amendment No. 1 to Class Action and PAGA Settlement Agreement (“Amendment No. 1”) (together, the Original Agreement and Amendment No.1 are the “Settlement,” “Agreement,” or “Settlement Agreement”), attached as Exhibit K to the Declaration of Joanna Ghosh in Support of Plaintiff’s Motion for Preliminary Approval of Class Action Settlement filed on or about April 22, 2024.

4. As discussed in further detail in my declaration filed with the Court on April 22, 2024, from approximately November 2023 to March 2024, Plaintiff’s counsel, Lawyers *for* Justice, PC, on behalf of Plaintiff, engaged in extensive correspondence with a representative of

the Department of Industrial Relations (“DIR”) regarding this matter and the settlement of this matter. Through this elaborate exchange with the DIR, the DIR requested and was provided with, *inter alia*, information regarding the value of the claims in the above-captioned action to assess the sufficiency of the proposed settlement amount, information about Defendant and Covered Entities (and their organizational structure), an explanation about the sufficiency of Plaintiff’s notice provided to labor agency prior to commencing a lawsuit under PAGA, and clarification that the Settlement does not cover or include employees of Sannipoli Corporation or impact the separate legal actions pending against Sannipoli Corporation with respect to its employees (i.e., *Pedro Cedeno v. Sannipoli Corporation, et al.*, Riverside County Superior Court Case No. CVRI2304132 and *Santos Martinez Padilla v. Sannipoli Corporation, et al.*, Riverside County Superior Court Case No. CVRI230685). The last communication that I personally had with the DIR regarding this matter was on March 18, 2024, by which I informed the DIR that the hearing on Plaintiff’s Motion for Preliminary Approval had been continued to April 26, 2024 at 1:30 p.m. and provided the fully-executed Amendment No. 1 inclusive of Exhibit 1 which contained the Notice of Class Action and PAGA Settlement. On March 18, 2024, I also requested that the DIR let me know if there is any other information that they seek or any other issues that they would like for us to address with respect to this matter and the Settlement. On March 21, 2024, the DIR responded to thank me for providing the information. On April 19, 2024, a non-attorney staff member at Lawyers for Justice, PC transmitted a copy of my April 22, 2024 declaration and the [Revised Proposed] Order Granting Preliminary Approval of Class Action Settlement, that were filed with this Court in this matter on April 22, 2024, both by e-mail and online submission on the DIR’s designated website for such submissions. Additionally, on May 2, 2024, a non-attorney staff member at Lawyers for Justice, PC transmitted a copy of the Notice of Entry of Judgment or Order that was filed with this Court in this matter on May 2, 2024, attaching a copy of the Order Granting Preliminary Approval of Class Action Settlement and Minute Order Re Motion for Preliminary Approval of Class Action Settlement, both by e-mail and online submission on the DIR’s designated website for such submissions. To my knowledge, the DIR did not appear at, or attempt to appear at, the April 26, 2024 hearing on the Motion for Preliminary Approval,

1 and to date, neither I nor Lawyers *for* Justice, PC have received any other inquiries or
2 communications from the DIR regarding the above-captioned action and/or the Settlement.

3 5. On April 26, 2024, in Department S17 of the above-entitled Court,
4 the Honorable Joseph T. Ortiz preliminarily approved the Settlement and conditionally certified
5 the Class for settlement purposes. The Court provisionally appointed Plaintiff Jason Beinbrech
6 the representative of the Class (“Class Representative”). The Court also provisionally appointed
7 and designated Lawyers *for* Justice, PC as counsel for the Class (“Class Counsel”).

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

12 7. As of the date of filing the accompanying Motion for Final Approval of Class
13 Action Settlement, Attorneys’ Fees and Costs, and Enhancement Award (“Motion for Final
14 Approval”), no Settlement Class Members have objected to the Class Settlement, the
15 contemplated request for Attorneys’ Fees and Costs, Enhancement Award, and Settlement
16 Administration Costs, or the allocation for PAGA Payment.

17 **WORK PERFORMED BY CLASS COUNSEL**

18 8. Several attorneys at Lawyers *for* Justice, PC have been actively performing work
19 in this matter since prior to its commencement on November 30, 2022.

20 9. Before initiating the case, Lawyers *for* Justice, PC investigated and researched the
21 facts and circumstances underlying the pertinent factual and legal issues and applicable law. This
22 required thorough discussions and interviews between attorneys at Lawyers *for* Justice, PC and
23 Plaintiff and research into the various legal issues involved in the case, namely, the current state
24 of the law as it applied to class certification, off-the-clock theory, rounding, meal and rest periods,
25 representative Private Attorneys General Act (“PAGA”) claims, joint employer and alter ego
26 theories, wage-and-hour law and enforcement, Plaintiff’s claims and allegations, and potential
27 defenses. After conducting an initial investigation, Lawyers *for* Justice, PC determined that the
28 claims of Plaintiff were well-suited for class-wide and representative adjudication, owing to what

1 appeared to be a common course of conduct affecting a similarly situated group of current and
2 former hourly-paid or non-exempt employees of Defendant in California, who were not properly
3 compensated for, *inter alia*, all hours worked, non-compliant meal and rest periods, and business
4 expenses.

5 10. The Parties engaged in court proceedings in state court and federal court and two
6 (2) mediations, over the course of several years. The original action was commenced on May 29,
7 2020, asserting ten (10) putative class causes of action for violations of the California Labor Code
8 and California Business and Professions Code and one (1) representative PAGA cause of action
9 for civil penalties for violations of the California Labor Code. Defendant removed the case to
10 the United States District Court for the Central District of California pursuant to 28 U.S.C. §§
11 1332, 1441, and 1446, and after the Parties had reached a settlement and notified the Federal
12 Court about the settlement, on September 21, 2022, the Federal Court on its own motion
13 dismissed the matter without prejudice. On November 30, 2022, Plaintiff filed the Class Action
14 Complaint for Damages & Enforcement Under the Private Attorneys General Act, California
15 Labor Code § 2698, Et Seq. (“Operative Complaint”), thereby commencing the above-captioned
16 action against Defendant, asserting the same ten (10) putative class causes of action for violations
17 of the California Labor Code and California Business and Professions Code and one (1)
18 representative PAGA cause of action for civil penalties for violations of the California Labor
19 Code.

20 11. Plaintiff alleged a joint employer legal theory and pursued the parent company
21 Matthews International Corporation to hold it accountable as an employer of its own direct
22 employees and as an employer of its subsidiaries’ employees, and Plaintiff also pursued several
23 of Matthews International Corporation’s subsidiaries. The parent company asserted that it was
24 not the employer of its subsidiaries’ employees. However, in the end, without waiving any
25 arguments or defenses regarding, or making any admissions or concessions regarding, any
26 purported joint employment relationship or employer status, the Parties informally exchanged
27 extensive information, data, and documents pertaining to the current and former non-exempt
28 employees of Matthews International Corporation, Matthews International Corporation’s wholly-

owned subsidiary Matthews Gibraltar and Mausoleum & Construction Company, Matthews International Corporation's wholly-owned subsidiary The York Group, Inc., and The York Group, Inc.'s wholly-owned subdivision Matthews Granite Company (collectively, "Covered Entities").

12. The Parties conducted meaningful initial disclosures while this matter was pending in Federal Court as well as extensive and informal discovery and investigation into the facts of the case, to assess the veracity, strength, and scope of the claims, and were preparing this matter for class certification and trial prior to reaching the Settlement. The Parties exchanged a large volume of information, documents, and data throughout the course of the litigation and in connection with the mediation and settlement negotiations. The volume of data and documents that Class Counsel reviewed and analyzed by Class Counsel included, and were not limited to: employment records of Plaintiff, a detailed sampling of Class Members' time and pay records, job descriptions, the employer's internal memoranda and relevant policies (including, but not limited to policies regarding: timekeeping, clocking in and out, tardiness, California meal and rest periods, off-premises meals and rest breaks, company sponsored events, and overtime), and various agreements (including, *inter alia*, meal break waivers and arbitration agreements), among other information and documents. Class Counsel had the opportunity to interview and obtain information from Plaintiff and percipient witnesses, and reviewed and analyzed a volume of information, data, and documents obtained from Plaintiff, Defendant, and other sources. Class Counsel developed liability, damages, violation, and penalties valuation models in the course of litigation and in connection with the two mediations 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 and in connection with mediations and settlement negotiations, and settlement. After the DIR reached out to Class Counsel, Class Counsel also met and conferred with the DIR regarding this matter and the Settlement and provided extensive information and documents to the DIR. Other work performed by Class Counsel included, and was not limited to, case strategy and analysis; researching, drafting, reviewing, and/or revising the pleadings,

1 motion-related papers, the mediation briefing and supporting materials, and settlement
2 documents; and preparing for and attending court proceedings, mediation, and settlement
3 negotiations, among other tasks.

4 13. As outlined herein, the Parties have conducted significant investigation and
5 informal discovery during the course of litigating this matter, mediation, and extensive settlement
6 negotiations. Class Counsel analyzed a volume of information, documents, and data obtained
7 from Plaintiff, Defendant, and other sources that provided a critical understanding of the nature
8 of the work performed by the Class Members and PAGA Employees, as well as Covered Entities'
9 organizational structures and their operations and employment policies, practices, and
10 procedures. The information, documents, and data were used in analyzing liability, damages,
11 penalties, and other valuation issues in connection with all phases of the litigation, and ultimately,
12 in connection with the mediation and settlement negotiation process. Class Counsel also
13 performed significant research into the applicable law, which is evolving as it relates to class
14 certification, manageability, off-the-clock theory, rounding, meal and rest periods, representative
15 PAGA claims and penalties, joint employer and alter ego theories, wage-and-hour law and
16 enforcement, Plaintiff's claims and allegations, and Defendant's defenses thereto, as well as facts
17 discovered.

18 14. After conducting significant investigation of the facts and law during the
19 prosecution of this matter, counsel for the Parties engaged in extensive settlement negotiations to
20 try to resolve this matter. These efforts included participating in two formal mediations
21 conducted by the late Jeffrey Krivis, Esq., who was a well-regarded mediator experienced in
22 handling complex labor and employment matters. During all settlement discussions, the Parties
23 conducted their negotiations at arm's length in an adversarial position. In the course of the
24 mediations and settlement discussions, the Parties exchanged information, documents, and data,
25 and discussed various aspects of the case, including and not limited to, the risks and delays of
26 further litigation, the risks and expenses to the Parties of proceeding with class certification and
27 trial, the law relating to class certification, manageability, off-the-clock theory, rounding, meal
28 and rest periods, representative PAGA claims, joint employer and alter ego theories, and wage-

1 and-hour law and enforcement, as well as the evidence produced and analyzed, and the possibility
2 of appeals, among other things. Arriving at a settlement that was acceptable to the Parties was
3 not easy. Defendant contended that individualized questions of fact predominate over any
4 common issues, and these issues would pose challenges to class certification and representative
5 adjudication. Defendant and its counsel felt strongly about Defendant's ability to avoid class
6 certification and prevail on the merits, while Plaintiff and Class Counsel believed that they would
7 be able to obtain class certification and prevail at trial. With the aid of the mediator's evaluation,
8 the Parties ultimately agreed that this matter was well-suited for settlement given the legal issues
9 relating to Plaintiff's principal claims, as well as the costs and risks to the Parties that would
10 attend further litigation. These risks of further litigation include, and are not limited to, a
11 determination that the claims are unsuitable for class treatment and/or representative adjudication,
12 class de-certification after certification of a class, allowing a jury to decide the claims asserted in
13 this matter, and the real possibility of no monetary recovery after years of litigation.

14 15. By way of the accompanying Motion for Final Approval, Class Counsel seeks
15 attorneys' fees in the amount of \$366,666.67, which is one-third (1/3) of the Gross Settlement
16 Amount of \$1,100,000.00—this amount is less than the percentage fee provided for by the
17 Settlement (i.e., up to \$385,000.00 which is 35% of the Gross Settlement Amount). The
18 difference of \$18,333.33 will be part of the Net Settlement Amount, which will be distributed to
19 the Settlement Class Members in accordance with the Settlement. Pursuant to the contingency-
20 fee agreement entered into by and between Plaintiff and Class Counsel, Plaintiff has agreed to a
21 contingency fee of at least one-third (1/3) of the recovery.

22 16. The attorneys' fees sought are commensurate with: (1) the risk that Class Counsel
23 took in commencing this matter; (2) the time, effort, and expense that Class Counsel dedicated to
24 this matter; (3) the skill and determination that Class Counsel has shown; (4) the results that Class
25 Counsel has achieved throughout the litigation; (5) the value of the settlement that Class Counsel
26 has achieved in this matter; and (6) the other cases that Class Counsel has turned down in order
27 to devote their time and efforts to this matter. The nature of the work performed, skill exercised,
28 and the outcome in this matter—which involves an outstanding monetary recovery involving a

Gross Settlement Amount of \$1,100,000.00 (with a Net Settlement Amount of approximately at least \$649,862.25 to be paid to Settlement Class Members (with gross Individual Settlement Payments averaging approximately more than \$1,928.79), payment of \$10,000.00 to PAGA Employees, and payment of \$30,000.00 to the State of California)—support the percentage fee sought and the application of a lodestar multiplier.

17. While not necessarily required to be demonstrated because the percentage fee is proper for this settlement, Class Counsel has incurred many hours of work in connection with prosecuting this matter such that the award of attorneys' fees is also justified under a lodestar analysis. Attorneys at Lawyers for Justice, PC have spent a total of **364.60 hours** performing tasks and obtaining recovery in this matter. Attached hereto as "**EXHIBIT A**" is an Attorney Task and Time Chart that sets forth in detail the nature of the legal services provided by attorneys at Lawyers for Justice, PC and the time incurred by them in performing those services. These hours include work done by several attorneys at Lawyers for Justice, PC. Also, separate from the hours referenced herein and in the chart, Lawyers for Justice, PC had litigation support personnel actively engaged in assisting with the prosecution of this matter.

18. The work performed in this particular matter, the background of Lawyers for Justice, PC, 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 action and representative action cases, support a reasonable blended hourly rate of compensation of at least \$800 per hour 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 \$800 per hour for legal services performed, by courts granting approval of settlements in other wage-and-hour class action and representative action cases: final approval of the class and representative action settlement in *David Dugan v. TEC Equipment, Inc., et al.* (Los Angeles Superior Court Case No. 19STCV01591) was granted on July 8, 2021, and the award of attorneys' fees involved compensation at the rate of \$936.47 per hour; final approval of the class and representative action settlement in *Larry Greenwood, et al. v. Scan Health Plan* (Los Angeles Superior Court Case No. BC715157) was granted on April 20, 2021, and the award of attorneys'

1 fees involved compensation at the rate of \$919.57 per hour; and final approval of the class and
2 representative action settlement in *Seth Swan v. Pace Supply Corp.* (Sonoma County Superior
3 Court Case No. SCV258764) was granted on February 6, 2019, and the award of attorneys' fees
4 involved compensation at the rate of \$855.96 per hour.

5 **EXPERIENCE AND ADEQUACY OF**
6 **LAWYERS for JUSTICE, PC**

7 19. For over a decade, Lawyers for Justice, PC has almost exclusively focused on the
8 prosecution of consumer and employment class actions, involving wage-and-hour claims, race
9 discrimination, unfair business practices, or consumer fraud. Currently, Lawyers for Justice, PC
10 is the attorney of record in dozens of employment-related putative class actions in both state and
11 federal courts in the State of California. Lawyers for Justice, PC is comprised of attorneys who
12 focus on litigating complex wage-and-hour class and Private Attorneys General Act ("PAGA")
13 representative actions. The firm has successfully litigated cases involving nearly every aspect of
14 California wage and hour law, including payment of overtime and minimum wages, provision of
15 meal and rest breaks and/or premiums wages for same, timely payment of wages, provision of
16 compliant wage statements, reimbursement of business expenses, executive, administrative, and
17 other overtime exemptions to the State of California and federal overtime compensation
18 requirements, PAGA claims, and sister statutes under federal law. Lawyers for Justice, PC has
19 recovered (sometimes in association with other law firms) millions of dollars on behalf of
20 thousands of individuals in California.

21 20. Edwin Aiwarzian is a Managing Member and Shareholder of Lawyers for Justice,
22 PC. He received his Bachelor of Arts degree from Pepperdine University in April of 1999 and
23 earned a Juris Doctor degree from Pepperdine University School of Law in May of 2004. He has
24 extensive formal training in dispute resolution and negotiation from the Straus Institute for
25 Dispute Resolution as part of its Masters in Dispute Resolution degree program. In addition, he
26 has previously served as a pro bono mediator for the Los Angeles County Superior Court. In
27 October of 2000, he obtained a Litigation Paralegal Certificate from the UCLA Extension
28 Program. During the summer of 2000, he studied Legal Writing at Harvard University. From

1 approximately September 2002 to approximately December 2002, he served as a Judicial Extern
2 to the Honorable Kim McLane Wardlaw of the United States Court of Appeals for the Ninth
3 Circuit. From approximately June 2002 to approximately August 2002, he served as a Judicial
4 Extern to the Honorable Earl Johnson, Jr. of the California Court of Appeal for the Second
5 Appellate District. In December of 2004, he obtained a license to practice law from the California
6 State Bar. Since in or around October of 2008, through his work at Lawyers *for* Justice, PC, he
7 has almost exclusively focused on the prosecution of consumer and employment class actions.
8 While employed by Lawyers *for* Justice PC, he has argued over one hundred (100) motions, taken
9 or defended over one hundred fifty (150) depositions, prepared dozens of expert witnesses for
10 deposition or trial, and attended over one hundred seventy-five (175) mediations. Together with
11 other attorneys at the firm, and in some cases in conjunction with co-counsel, he has successfully
12 litigated cases involving the executive, administrative, and other overtime exemptions to the State
13 of California and federal overtime compensation requirements. Under his supervision, Lawyers
14 *for* Justice, PC has successfully obtained class certification by contested motion practice in
15 approximately sixteen (16) cases in the last decade and litigated over 1,000 class action or
16 representative action cases.

17 21. Arby Aiwazian is a Member and Shareholder of Lawyers *for* Justice, PC. He
18 received his Bachelor of Arts degree from University of California, Los Angeles and graduated
19 magna cum laude. He earned a Juris Doctor degree, cum laude, from Southwestern Law School.
20 From approximately May 2007 to approximately July 2007, he served as a Judicial Extern to the
21 Honorable Earl Johnson, Jr. of the California Court of Appeal for the Second Appellate District.
22 From approximately August 2008 to approximately December 2008, he served as a Judicial
23 Extern to the Honorable Kim McLane Wardlaw of the United States Court of Appeals for the
24 Ninth Circuit. He was admitted to practice law in California in 2010. He is admitted to practice
25 before all courts of the State of California and all United States District Courts in the State of
26 California. He has worked on many wage-and-hour class action and representative action cases,
27 taking the lead in taking and defending depositions, arguing motions, and attending mediations.
28 He has played an integral role in preparing matters for class certification, including and not

1 limited to, successful certification of a class in *Upson v. Sur La Table* (Los Angeles County
2 Superior Court Case No. BC424012), *Montazemi v. Regus Management* (Los Angeles County
3 Superior Court Case No. BC478769), and *Abdulhaqq v. Urban Outfitters* (Alameda County
4 Superior Court Case No. RG13680477). Under his supervision, dozens of class action or
5 representative cases have resulted in settlements that have been granted court approval, including
6 and not limited to, those listed in paragraph 23 herein. He has handled over one hundred and fifty
7 (150) mediations and worked on over two hundred and fifty (250) class action or representative
8 action cases which have resulted in settlement.

9 22. I am a Managing Member of Lawyers for Justice, PC. I received a Bachelor of Arts
10 degree from California State University, Los Angeles in 2006, a Master of Science degree from
11 the London School of Economics in 2007, and a Juris Doctor degree from Georgetown University
12 Law Center in 2010. I am admitted to practice in California (since 2010) and in New York (since
13 2013) and I am also admitted to practice in all U.S. District Courts in California, the U.S.
14 Bankruptcy Court for the Central District of California, and the U.S. Supreme Court. I have taken
15 and defended dozens of depositions and successfully handled motion practice in class action cases
16 regarding discovery (including and not limited to, regarding class contact information), class
17 certification (both contested class certification and stipulated class certification), arbitration
18 agreements, coordination, and intervention. I have successfully handled briefing and oral
19 arguments on appeal and obtained notable decisions regarding Private Attorneys General Act
20 claims and employer efforts to compel arbitration of such claims, e.g., *Betancourt v. Prudential*
21 *Overall Supply* (Cal. Ct. App., Mar. 7, 2017) 9 Cal.App.5th 439, cert. denied (Cal., May 24,
22 2017), cert. denied (U.S., Dec. 11, 2017) and *ZB, N.A. v. Superior Court* (2019) 8 Cal.5th175. I
23 have significant experience with class actions, including and not limited to working on cases to
24 obtain class certification through contested motion practice and working on cases in the post-
25 certification stage (e.g., post-certification discovery, appeal, statistical sampling and pilot study,
26 and trial preparation in conjunction with co-counsel in a case involving a certified class consisting
27 of approximately 2,600 individuals). I also have extensive experience with class action and/or
28 representative action settlements, and have handled this process in over three hundred (300) cases.

Under Edwin Aiwazian, Arby Aiwazian, and my supervision, Lawyers *for* Justice, PC has handled the class certification and court approval process for hundreds of class action and/or representative action matters that have successfully resolved. I am a member of the California Employment Lawyers Association and, on several occasions, have been a speaker regarding topics in wage and hour law at the organization's continuing legal education events.

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

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

a) LFJ, in association with co-counsel therein, represented the plaintiffs in a wage-and-hour class 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 action settlement. The Los Angeles County Superior Court Case Number is BC400414.

b) LFJ, in association with co-counsel therein, represented the plaintiffs in a wage-and-hour class action against a national retailer of household items 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) LFJ, in association with co-counsel therein, represented the plaintiffs in a wage-and-hour class 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 action settlement. The Los Angeles County Superior Court Case Number is BC430918.

d) LFJ, in association with co-counsel therein, 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 certification. On August 26, 2013, the court granted final approval of the class action settlement.

1 The Los Angeles County Superior Court Case Number is BC424012.

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

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

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

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

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

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 non-exempt 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.

o) LFJ represented the plaintiffs in a wage-and-hour class and PAGA representative action against a food service distributor, on behalf of non-exempt employees. On January 26, 2017, the court granted final approval of the class and PAGA representative action

1 settlement. The San Bernardino County Superior Court Case Number is CIVDS1507260.

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

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

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

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

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

1 BC586234.

2 u) LFJ represented the plaintiff in a wage-and-hour class and PAGA
3 representative action against a food company on behalf of non-exempt employees. On June 30,
4 2017, the court granted final approval of the class and PAGA representative action settlement.
5 The Sacramento County Superior Court Case Number is 34-2015-00175871.

6 v) LFJ represented the plaintiffs in a wage-and-hour class and PAGA
7 representative action against a chocolate company on behalf of non-exempt employees. On July
8 19, 2017, the court granted final approval of the class and PAGA representative action settlement.
9 The Alameda County Superior Court Case Number is RG15764300.

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

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

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

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

Number is 4819.

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

bb) LFJ, in association with co-counsel therein, represents 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.

cc) LFJ represented the plaintiffs in a wage-and-hour class and PAGA 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 PAGA representative action settlement. The Alameda County Superior Court Case Number is RG16811450.

dd) LFJ, in association with co-counsel therein, represented the plaintiff in a PAGA representative action 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 PAGA representative action settlement. The Kern County Superior Court Case Number is S-1500-CV-280215-SDC.

ee) LFJ, in association with co-counsel therein, represents 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 granted the plaintiff's motion for class certification and certified a class. The Santa Clara County Superior Court Case Number is 16CV292208 and the Judicial Council Coordination Proceeding Number is 4886.

ff) LFJ, in association with co-counsel therein, represents the plaintiffs in a wage-and-hour class and PAGA representative action against a bank on behalf of non-exempt employees. On September 27, 2019, the court granted the plaintiffs' motion for class certification

1 in part and certified a class. The Alameda County Superior Court Case Number is RG15757606
2 and the Judicial Council Coordination Proceeding Number is 4921.

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

9 hh) LFJ, in association with co-counsel therein, represented the plaintiff in a
10 wage-and-hour class and PAGA representative action against a medical equipment supplier on
11 behalf of non-exempt employees. On February 13, 2020, the court granted the plaintiff's motion
12 for class certification and certified a class. On November 2, 2023, the court granted final approval
13 of the class and PAGA representative action settlement. The San Bernardino County Superior
14 Court Case Number is CIVDS1505744.

15 ii) LFJ, in association with co-counsel therein, on behalf of the plaintiff and
16 respondent in a PAGA representative action, successfully opposed in the trial court, and briefed
17 and argued an appeal with respect to the employer's motion to compel arbitration, resulting in a
18 notable decision from the California Supreme Court clarifying the law regarding PAGA claims,
19 *ZB, N.A. v. Superior Court* (2019) 8 Cal.5th 175. On February 21, 2020, the court granted
20 approval of the PAGA representative action settlement. The San Diego County Superior Court
21 Case Number is 37-2016-00005578-CU-OE-CTL.

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

28 ///

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

7 ll) LFJ, in association with co-counsel therein, represented the plaintiffs in a
8 wage-and-hour class and PAGA representative action against a plastic packaging company on
9 behalf of non-exempt employees. On June 8, 2020, the court granted in part the plaintiffs' motion
10 for class certification and certified a class. On November 8, 2021, the court granted approval of
11 the partial settlement of the action. On April 22, 2024, the court granted approval of the PAGA
12 settlement and entered an order dismissing the action. The San Bernardino County Superior
13 Court Case Number is CIVDS1507361.

14 mm) LFJ, in association with co-counsel therein, represented the plaintiffs in a
15 wage-and-hour class action against manufacturer and supplier of power products and services on
16 behalf of non-exempt employees. On July 31, 2020, the court granted in part the plaintiffs'
17 motion for class certification and certified a class. On August 27, 2021, the court granted final
18 approval of the class action settlement. The San Diego County Superior Court Case Number is
19 37-2015-00025968-CU-OE-CTL.

20 nn) LFJ represented the plaintiff in a wage-and-hour class action against a
21 nutritional products manufacturer on behalf of non-exempt production line employees. On
22 December 13, 2021, the court granted the plaintiff's motion for class certification in part and
23 certified a class. On January 16, 2024, the court granted final approval of the class and PAGA
24 representative action settlement. The Solano County Superior Court Case Number is
25 FCS051001.

26 oo) LFJ represents the plaintiffs in a wage-and-hour class action against a
27 manufacturer and distributor of commercial dish and glass cleaning machines and supplies for
28 the restaurant and hospitality industries, on behalf of hourly-paid or non-exempt employees. On

July 13, 2023, the court granted the plaintiffs' motion for class certification and certified a class. The Los Angeles County Superior Court Case Number is BC707670.

pp) LFJ represents the plaintiffs in a wage-and-hour class action against a chain of restaurants on behalf of non-exempt employees. On July 22, 2024, the court granted in part the plaintiffs' motion for class certification and certified a class. The San Francisco Superior Court Case Number is CGC-20-582809.

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

24. To date, Class Counsel has borne all of the risks and costs of litigation and will not receive any compensation until recovery is obtained in this matter. The Settlement provides for reimbursement of litigation costs and expenses of up to \$32,000.00. Lawyers for Justice, PC seeks reimbursement of **\$23,471.08** in litigation costs and expenses incurred in the matter, as reflected in "**EXHIBIT B**" attached hereto. These expenses were reasonable and necessary in the prosecution of the matter and to obtain the Settlement. The cost savings of \$8,528.92 will be part of the Net Settlement amount, which will be distributed to the Settlement Class Members in accordance with the Settlement.

ENHANCEMENT AWARD TO PLAINTIFF

25. In recognition of his efforts and work spearheading the prosecution of this matter and serving as the Class Representative, as well as his broader individual waiver and release of claims with a California Civil Code Section 1542 waiver (set forth in Paragraph 101 of the Settlement Agreement), the Settlement provides for an enhancement award in the amount of up to \$10,000.00 to Plaintiff. Plaintiff spent a substantial amount of time and effort discussing his employment with his counsel, gathering and providing relevant documents and information, and providing facts and evidence to support the prosecution of the claims. Plaintiff was available whenever Class Counsel needed him and actively tried to obtain and provide information that would help obtain a recovery in this matter. Accordingly, it is appropriate for Plaintiff to receive \$10,000.00 as a reasonable enhancement award for his broader waiver and release of claims and services performed in this matter, in addition to his individual settlement payment(s).

1 26. I submit that the Settlement is fair, reasonable, and adequate, and is in the best
2 interests of Plaintiff, Class Members, PAGA Employees, and the State of California.

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

5 Executed this 12th day of September 2024, at Glendale, California.

6
7 

8 _____
Joanna Ghosh

EXHIBIT A

JASON BEINBRECH V. MATTHEWS INTERNATIONAL CORPORATION
San Bernardino County Superior Court Case No. CIVDS2016242 (“Original State Action”)

JASON BEINBRECH V. MATTHEWS INTERNATIONAL CORPORATION
San Bernardino County Superior Court Case No. CIVBS2226992 (“Current State Action”)

JASON BEINBRECH V. MATTHEWS INTERNATIONAL CORPORATION
United States District Court, Central District of California, Case No. 5:20-CV-1971 (“Federal Action”)

ATTORNEY TASK AND TIME CHART

TASK	LAWYERS FOR JUSTICE, PC
Investigation and Research / Due Diligence	
Meet and Communicate with Plaintiff Jason Beinbrech During the Case	45.50
Investigate, Communicate with, and/or Interview Class Members, Aggrieved Employees, and/or Percipient Witnesses	8.50
Review and Analyze Court Papers Filed in <i>Pedro Cedeno v. Sannipoli Corporation, et al.</i> , Riverside County Superior Court Case No. CVRI2304132	1.50
Review and Analyze Court Papers Filed in <i>Santos Martinez Padilla v. Sannipoli Corporation, et al.</i> , Riverside County Superior Court Case No. CVRI230685	1.50
Pleadings and Court Filings	
Research and Draft Plaintiff Jason Beinbrech’s (“Plaintiff”) 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 29, 2020) (Original State Action)	7.50
Review Court’s Initial Case Management Conference Order (filed on August 11, 2020) (Original State Action)	0.20

Review and Analyze Defendant Matthews International Corporation's ("Defendant") Answer to Class Action Complaint for Damages and Research Affirmative Defenses in Defendant's Answer (served on September 22, 2020) (Original State Action)	1.10
Review Defendant's Notice to Plaintiff and Clerk of the Superior Court of Removal of Civil Action to the United States District Court (served on September 23, 2020) (Original State Action)	0.20
Review Defendant's Notice of Interested Parties (served September 23, 2020) (Federal Action)	0.10
Review Court's Notice of Assignment of Eastern Division Removal Case and Notice to Parties of Court – Directed ADR Program (filed on September 24, 2020) (Federal Action)	0.10
Review Court's Notice Re: Status Conference (filed on September 24, 2020) (Original State Action)	0.10
Review Court's Order Setting Scheduling Conference (filed on October 1, 2020) (Federal Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation to Stay Action Pending Mediation; and [Proposed] Order Thereon (filed on November 4, 2020) (Federal Action)	1.10
Review Court's Order Re: Joint Stipulation to Stay Action Pending Mediation (filed on November 5, 2020) (Federal Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Status Report (filed on February 2, 2021) (Federal Action)	0.50
Review Court's (In Chambers) Order Continuing Stay and Setting Date for Updated Status Report (filed on February 18, 2021) (Federal Action)	0.10
Review Court's Initial Standing Order (filed on February 24, 2021) (Federal Action)	0.20
Meet and Confer with Defendant's Counsel, and Draft Joint Status Report (filed on March 17, 2021) (Original State Action)	1.10
Draft Plaintiff's Notice of Ruling Re: March 23, 2021 Hearing on Status of Removal (filed on March 24, 2021) (Original State Action)	0.20
Meet and Confer with Defendant's Counsel, and Draft Joint Report and Stipulation to Continue Stay of Action Pending Post-Mediation Settlement Efforts (filed on May 13, 2021) (Federal Action)	0.80

Review Court's Order Denying Stipulation to Continue Stay of Action Pending Post-Mediation Settlement Efforts and Order Setting Scheduling Conference (filed on May 20, 2021) (Federal Action)	0.20
Meet and Confer with Defendant's Counsel, and Draft Joint Rule 26(f) Report (filed on June 25, 2021) (Federal Action)	1.50
Review Court's Order Taking Scheduling Conference Under Submission (filed on July 6, 2021) (Federal Action)	0.10
Review Court's Order/Referral to ADR and Order Re: Schedule of Pretrial and Trial Dates, Trial Requirements, and Conduct of Attorneys and Parties (filed on July 21, 2021) (Federal Action)	0.20
Meet and Confer with Defendant's Counsel, and Draft Joint Notice of Settlement and Stipulation Vacating Motion for Class Certification and Trial Deadlines; and [Proposed] Order Thereon (submitted on February 4, 2022) (Federal Action)	1.20
Review Court's Order Granting Joint Stipulation Vacating Motion for Class Certification and Trial Deadlines (filed on February 14, 2022) (Federal Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Status Report Regarding Settlement (filed on April 19, 2022) (Federal Action)	0.50
Meet and Confer with Defendant's Counsel, and Draft Joint Response to Order to Show Cause (filed on April 20, 2022) (Federal Action)	0.70
Review Court's Order Re: Order to Show Cause (filed on April 21, 2022) (Federal Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Status Report Regarding Settlement (filed on June 17, 2022) (Federal Action)	0.60
Review Court's Order Re: Joint Status Report Regarding Settlement (filed on June 21, 2022) (Federal Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Status Report Regarding Settlement (filed on August 19, 2022) (Federal Action)	0.60

Review Court's (In Chambers) Order Re: Joint Status Report Regarding Settlement (filed on August 23, 2022) (Federal Action)	0.20
Draft Plaintiff's Notice of Appearance or Withdrawal of Counsel: Annabel Blanchard (filed on August 24, 2022) (Federal Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Status Report Regarding Settlement (filed on September 19, 2022) (Federal Action)	0.60
Review Court's (In Chambers) Order Dismissing the Action (filed on September 21, 2022) (Federal Action)	0.20
Research and Draft Plaintiff's 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 November 30, 2022) (Current State Action)	1.50
Review Court's Initial Case Management Conference Order (filed on March 27, 2023) (Current State Action)	0.30
Review Court's Notice Re: Case Management Conference (filed on May 9, 2023) (Current State Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Initial Status Conference Statement (filed on May 19, 2023) (Current State Action)	1.10
Meet and Confer with Defendant's Counsel, and Draft Stipulation and [Proposed] Order to Extend Time for Defendant to File Responsive Pleading (submitted on June 20, 2023) (Current State Action)	0.50
Draft Plaintiff's Notice of Posting Jury Fees (filed on June 21, 2023) (Current State Action)	0.10
Review Court's Order to Extend Time for Defendant to File Responsive Pleading (filed on June 26, 2023) (Current State Action)	0.10
Review and Analyze Defendant's Answer to Class Action Complaint for Damages and Research Affirmative Defenses in Defendant's Answer (served on August 4, 2023) (Current State Action)	1.10
Meet and Confer with Defendant's Counsel, and Draft Joint Further Case Management Statement (filed on September 5, 2023) (Current State Action)	0.60

Draft Plaintiff's Notice of Continuance of Case Management Conference (filed on September 21, 2023) (Current State Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation to Continue Hearing on Plaintiff's Motion for Preliminary Approval of Class Action Settlement; [Proposed] Order Thereon (submitted on December 5, 2023) (Current State Action)	1.10
Review Court's Order Granting Stipulation to Continue Hearing on Plaintiff's Motion for Preliminary Approval of Class Action Settlement (filed on December 19, 2023) (Current State Action)	0.20
Draft Plaintiff's Notice of Entry of Judgment or Order Re: Order Granting Stipulation to Continue Hearing on Plaintiff's Motion for Preliminary Approval of Class Action Settlement (filed on December 21, 2023) (Current State Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation to Continue Hearing on Plaintiff's Motion for Preliminary Approval of Class Action Settlement; [Proposed] Order Thereon (submitted on January 16, 2024) (Current State Action)	1.10
Review Court's Order Granting Stipulation to Continue Hearing on Plaintiff's Motion for Preliminary Approval of Class Action Settlement (filed on January 29, 2024) (Current State Action)	0.10
Appearances	
Prepare for and Remotely Attend Hearing on the Status of Removal (March 23, 2021) (Original State Action)	0.20
Prepare for and Remotely Attend Initial Case Management Conference (June 21, 2021) (Original State Action)	1.30
Prepare for and Remotely Attend Hearing on Plaintiff's Motion for Preliminary Approval of Class Action Settlement (March 15, 2024) (Current State Action)	0.50
Prepare for, Travel to/from, and Attend Hearing on Plaintiff's Motion for Preliminary Approval of Class Action Settlement (April 26, 2024) (Current State Action)	4.50

Discovery and Deposition	
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Jason Beinbrech (served on February 27, 2020)	1.90
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Jason Beinbrech (served March 17, 2020)	3.50
Review and Analyze Documents Produced by Defendant (served on March 19, 2020)	0.20
Draft Follow-Up Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Jason Beinbrech (served on July 6, 2020)	1.50
Draft Plaintiff's Initial Disclosures and Gather and Produce Documents (served on July 19, 2021)	6.50
Review Defendant's Initial Disclosures (served on July 19, 2021)	10.50
Letters and Correspondence	
Draft Notice to California Labor and Workforce Development Agency Re: Claims of Plaintiff Jason Beinbrech for Penalties Under the Private Attorneys General Act, California Labor Code section 2698, <i>et seq.</i> ("PAGA") (served on March 20, 2020)	4.50
Meet with, Draft Correspondence to, and Respond to Correspondence from, Defendant's Counsel	14.50
Meet with, Draft Correspondence to, and Respond to Correspondence from, Department of Industrial Relations	9.50
Mediation/Settlement	
Review and Analyze Information, Data, and Documents Obtained from Plaintiff, Defendant (served on April 5, 2021 and April 15, 2021), and Other Sources Prior to First Mediation	68.50
Prepare for First Mediation, Including Researching Settlement-Related Issues and Merits of Claims, Drafting the Mediation Brief, Compiling the Mediation Exhibits in Support of Mediation Brief, and Performing Damages and Penalties Analysis/Calculations (submitted on April 28, 2021)	32.50
Attend First Mediation Session (May 5, 2021; Zoom Video Conference)	10.50

Review and Analyze Information, Data, and Documents Obtained from Plaintiff, Defendant (served on November 22, 2021 and December 8, 2021), and Other Sources Prior to Second Mediation	43.50
Prepare for Second Mediation, Including Researching Settlement-Related Issues and Merits of Claims, Drafting the Mediation Brief, Compiling the Mediation Exhibits in Support of Mediation Brief, and Performing Damages and Penalties Analysis/Calculations (submitted on December 13, 2021)	30.50
Attend Second Mediation Session (December 20, 2021; Zoom Video Conference)	12.50
Draft, Review, Revise, Negotiate, and Finalize Memorandum of Understanding Following Mediation (fully executed on February 24, 2022)	4.50
Draft, Review, Revise, Negotiate, and Finalize Class Action and PAGA Settlement Agreement (executed on May 31, 2023) and Notice of Class Action and PAGA Settlement	16.50
Review Declaration of Grant Holloway (Regarding Covered Entities and Excluded Entities) (dated January 22, 2024)	0.90
Draft, Review, Revise, Negotiate, and Finalize Amendment No. 1 to Class Action and PAGA Settlement Agreement (fully executed on February 9, 2024) and revised Notice of Class Action and PAGA Settlement	2.50
Law and Motion	
Review Defendant's Notice of Removal of Civil Action to Federal Court Pursuant to 28 U.S.C. §§ 1332, 1441, and 1446 and Exhibits, Declaration of Frank Del Campo in Support Thereof, and Declaration of Jennifer C. Terry in Support Thereof (served on September 23, 2020) (Federal Action)	1.50
Research and Draft Plaintiff's Notice of Motion and Motion for Preliminary Approval of Class Action Settlement; Memorandum of Points and Authorities, Declaration of Annabel Blanchard in Support Thereof, Declaration of Jason Beinbrech in Support Thereof, and [Proposed] Order Granting Preliminary Approval of Class Action Settlement (filed on November 17, 2023) (Current State Action)	19.50
Review Court's Tentative Ruling Re: Motion for Preliminary Approval of Class Action Settlement (issued on March 14, 2024) (Current State Action)	0.20
Review Court's Minute Order Re: Motion for Preliminary Approval of Class Action Settlement (filed on March 15, 2024) (Current State Action)	0.10

Draft Declaration of Joanna Ghosh in Support of Plaintiff's Motion for Preliminary Approval of Class Action Settlement and [Revised Proposed] Order Granting Preliminary Approval of Class Action Settlement (filed on April 22, 2024) (Current State Action)	7.50
Review Court's Order Granting Preliminary Approval of Class Action Settlement and Minute Order Re: Motion for Preliminary Approval of Class Action Settlement (filed on April 26, 2024) (Current State Action)	0.10
Draft Plaintiff's Notice of Entry of Judgment or Order: Re: Order Granting Preliminary Approval of Class Action Settlement (filed on May 2, 2024) (Current State Action)	0.10
Review and Analyze Settlement Administrator's Declaration Regarding Settlement Notice Administration; and Research and Draft Plaintiff's Motion for Final Approval of Class Action Settlement, Attorneys' Fees and Costs, and Enhancement Award, Declaration of Joanna Ghosh in Support Thereof, and [Proposed] Final Approval Order and Judgment (filed on September 12, 2024) (Current State Action)	21.50
Total Hours:	364.60

EXHIBIT B

LAWYERS *for* JUSTICE PC CASE COST DETAIL
Beinbrech v. Matthews International Corporation

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
3/20/2020	Labor & Workforce Development Agency	PAGA Filing Fee	75.00
3/23/2020	U.S. Postmaster	Postage	14.60
6/1/2020	Legal Document Server, Inc.	Attorney Service	180.23
6/1/2020	San Bernardino Superior Court	Complaint Filing Fee	450.00
6/1/2020	San Bernardino Superior Court	Complex Filing Fee	1,000.00
8/21/2020	San Bernardino Superior Court	Document Download Fee	20.50
8/24/2020	Legal Document Server, Inc.	Attorney Service	110.00
8/31/2020	Legal Document Server, Inc.	Attorney Service	120.00
10/5/2020	Legal Document Server, Inc.	Attorney Service	130.00
3/16/2021	First Mediation Corporation	Mediation Fee	8,000.00
3/17/2021	Legal Document Server, Inc.	Attorney Service	245.00
3/24/2021	Legal Document Server, Inc.	Attorney Service	95.00
3/24/2021	CourtCall, LLC	Attorney Service	94.00
4/1/2021	CourtCall, LLC	Attorney Service	94.00
4/9/2021	CourtCall, LLC	Attorney Service	94.00
4/21/2021	CourtCall, LLC	Attorney Service	94.00
4/22/2021	CourtCall, LLC	Attorney Service	94.00
7/20/2021	General Logistics Systems US, Inc.	Courier Service	19.28
8/25/2021	First Mediation Corporation	Mediation Fee	9,000.00
11/30/2022	Legal Document Server, Inc.	Attorney Service	266.86
11/30/2022	San Bernardino Superior Court	Complaint Filing Fee - Refiling of Complaint	435.00
11/30/2022	San Bernardino Superior Court	Complex Filing Fee -Refiling of Complaint	1,000.00
5/5/2023	Legal Document Server, Inc.	Attorney Service	150.00
5/19/2023	Legal Document Server, Inc.	Attorney Service	150.00
6/15/2023	CourtCall, LLC	Attorney Service	72.00
6/21/2023	Legal Document Server, Inc.	Attorney Service	160.43
6/21/2023	San Bernardino Superior Court	Jury Fee	150.00
9/5/2023	Legal Document Server, Inc.	Attorney Service	130.00
9/21/2023	Legal Document Server, Inc.	Attorney Service	130.00
11/20/2023	Legal Document Server, Inc.	Attorney Service	21.37
11/20/2023	San Bernardino Superior Court	Motion Fee	60.00
12/21/2023	San Bernardino Superior Court	Document Download Fee	2.50
12/21/2023	Legal Document Server, Inc.	Attorney Service	17.09
1/8/2024	Legal Document Server, Inc.	Attorney Service	11.95
1/12/2024	Riverside Superior Court	Document Download Fee	15.00
1/25/2024	Legal Document Server, Inc.	Attorney Service	196.39
1/25/2024	San Bernardino Superior Court	Stipulation & Order Fee	20.00
1/29/2024	Legal Document Server, Inc.	Attorney Service	18.59
1/29/2024	San Bernardino Superior Court	Stipulation & Order Fee	20.00
2/1/2024	Legal Document Server, Inc.	Attorney Service	17.09

LAWYERS *for* JUSTICE PC CASE COST DETAIL
Beinbrech v. Matthews International Corporation

3/13/2024	CourtCall, LLC	Attorney Service	72.00
4/12/2024	CourtCall, LLC	Attorney Service	72.00
4/22/2024	Legal Document Server, Inc.	Attorney Service	336.00
5/30/2024	Legal Document Server, Inc.	Attorney Service	17.20
Total:			23,471.08