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SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF ORANGE

RUBEN ALVARADO, individually, and on behalf of other members of the general public similarly situated; WHITEY DAVIS, 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.

CITADEL SERVICING CORPORATIONS, a California corporation; and DOES 1 through 100, inclusive,

Defendants.

Case No.: 30-2019-01057617-CU-OE-CXC

Honorable Lon F. Hurwitz
Department CX103

CLASS ACTION

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

[Notice of Motion and Motion for Final Approval of Class Action Settlement, Class Counsel Award, and Service Awards; Declaration of Class Counsel (Heather Davis) Declaration of Class Representatives (Ruben Alvarado and Whitey Davis); Declaration of Settlement Administrator (Stephen Gomez); and [Proposed] Final Approval Order and Judgment filed concurrently herein]

Date: June 2, 2023
Time: 1:30 p.m.
Department: CX103

Complaint Filed: March 18, 2019
FAC Filed: March 3, 2021
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 Ruben Alvarado and Whitey Davis (together, “Plaintiffs”) and the Non-Exempt Class and the Salaried 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 January 9, 2023, in Department CX103 of the above-entitled Court, the Honorable Lon F. Hurwitz preliminarily approved the Stipulation of Settlement and Amendment No. 1 to Stipulation of Settlement (together, “Settlement,” “Agreement,” or “Settlement Agreement”) entered into between Plaintiffs and Defendant Citadel Servicing Corporation (“Defendant”), and conditionally certified the Non-Exempt Class and the Salaried Class for settlement purposes. The Court preliminarily appointed Plaintiffs Ruben Alvarado and Whitey Davis as the representatives of the Non-Exempt Class and the Salaried Class (together, “Class Representatives”). The Court also preliminarily appointed and designated Lawyers *for* Justice, PC and Protection Law Group, LLP as counsel for the Non-Exempt Class and the Salaried Class (together, “Class Counsel”). The Court approved and ordered the mailing of the Notice of Class Action Settlement (“Class Notice”), Exclusion Form, Objection Form, and Dispute Form (together, “Notice Packet”), adopted the notice, opt-out, and objection procedures, and ordered their implementation. The Court appointed Simpluris, Inc. (“Simpluris” or “Settlement Administrator”) to serve as the third-party settlement administrator and handle the notice and settlement administration process.

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

WORK PERFORMED BY CLASS COUNSEL

4. I and several other attorneys at Lawyers *for* Justice, PC have been actively engaged in litigating this matter since the inception of the above-captioned action, which was filed on March 18, 2019.

5. Before initiating the action, Lawyers *for* Justice, PC investigated and researched the facts and circumstances underlying the pertinent factual and legal issues and applicable law. This required thorough discussions and interviews between attorneys at our firm and Plaintiff Ruben Alvarado, and research into the various legal issues involved in the case, namely, the current state of the law as it applied to certification, off-the-clock theory, meal and rest periods, wage-and-hour enforcement, Plaintiff Ruben Alvarado's claims and allegations, and potential defenses. After conducting initial investigation, our firm determined that the claims of Plaintiff Ruben Alvarado were well-suited for class-wide adjudication owing to what appeared to be a common course of conduct affecting a similarly situated group of current and former hourly-paid or non-exempt employees and employees classified as salaried, exempt who worked for Defendant in California, who were not properly compensated for, *inter alia*, all hours worked, non-compliant meal and rest periods, and business expenses.

6. Since associating Protection Law Group, LLP as co-counsel in the action, we have worked cooperatively with that firm to prosecute the cases. Class Counsel investigated the veracity, strength, and scope of the claims, and were preparing the matter for class certification and trial, prior to reaching the Settlement. The parties conducted significant investigation and extensive formal and informal discovery and exchange of a large volume of information, documents, and data in the course of litigation and in connection with mediation and settlement negotiations. Class Counsel served multiple sets of written discovery requests in various forms on Defendant (Form Interrogatories – General (Set One), Special Interrogatories (Set One, Set Two, Set Three, and Set Four), and Requests for Production of Documents (Set One and Set Two)) and prepared and served numerous notices of deposition of Defendant's person(s) most knowledgeable along with requests for production of documents. Class Counsel also interviewed and obtained information from Plaintiffs and putative class members, and reviewed

1 and analyzed information, documents, and data obtained from Plaintiffs, Defendant, and other
2 sources. The information, documents, and data reviewed and analyzed by Class Counsel
3 included, and were not limited to, Plaintiffs' employment records and a sampling consisting of
4 Class Member time and corresponding pay records (including but not limited to employee time
5 cards, punch detail reports, and payroll registers), Defendant's employee handbooks, company
6 policy receipts acknowledgements, internal memoranda and emails, job descriptions, checklists
7 (such as Defendant's New Hire Checklist and Termination Checklist), Defendant's operations
8 and employment practices, forms (including but not limited to Defendant's Position Change
9 Form and Rate Change Form), procedures, policies, and agreements (such as bonus agreements
10 and arbitration agreements), among other information and documents. Class Counsel developed
11 liability and damages valuation models in preparation for mediation and settlement negotiations,
12 and met and conferred with Defendant's counsel on numerous occasions, e.g., to discuss issues
13 relating to the pleadings, case management, motion practice, discovery, and production of
14 various information, documents, and data in the course of litigation and in connection with
15 mediation and settlement negotiations. Other work performed by Class Counsel included, and
16 was not limited to, case strategy and analysis; drafting, reviewing, and revising pleadings,
17 motion-related papers (including, *inter alia*, with respect to Defendant's Motion to Compel
18 Individual Arbitration and approval of the Settlement), and the mediation brief; preparing and
19 appearing for court proceedings; and preparing for and attending mediation and settlement
20 negotiations, among other tasks.

21 7. As outlined herein, the parties have conducted significant formal and informal
22 discovery and investigation during the course of litigating the case and mediation and settlement
23 negotiations. Class Counsel analyzed a large volume of information, documents, and data
24 obtained from Plaintiffs, Defendant, and other sources. These documents and data provided a
25 critical understanding of the nature of the work performed by the Non-Exempt Class Members
26 and Salaried Class Members, as well as Defendant's operations and employment policies,
27 practices, and procedures, and were used in analyzing liability and damages valuation issues in
28 connection with all phases of the litigation, and ultimately in connection with the mediation and

1 settlement negotiation process. Class Counsel also performed significant research into the
2 applicable law, which is evolving as it relates to certification, off-the-clock theory, overtime
3 exempt status, misclassification theory, meal and rest periods, PAGA representative claims,
4 arbitration agreements, wage-and-hour enforcement, Plaintiffs' claims and damages, and
5 Defendant's defenses.

6 8. After conducting significant investigation of the facts and law during the
7 prosecution of the case, counsel for the parties engaged in extensive settlement negotiations to
8 try to resolve the entire matter. These efforts included participating in a formal, full-day
9 mediation and extensive follow-up negotiations thereafter, conducted by Steven Serratore, Esq.,
10 Esq., a well-regarded mediator experienced in mediating complex labor and employment
11 matters. During all settlement discussions, the parties conducted their negotiations at arm's
12 length in an adversarial position. In the course of mediation and settlement negotiations, the
13 parties exchanged information and data, and discussed all aspects of the case, including the risks
14 and delays of further litigation (including and not limited to, Defendant's motion to compel
15 arbitration), the risks to the parties of proceeding with class certification and trial, the law
16 relating to certification, off-the-clock theory, meal and rest periods, overtime exempt status,
17 misclassification theory, PAGA claims, arbitration agreements, wage-and-hour enforcement, the
18 evidence produced and analyzed, and the possibility of appeals, among other things. Arriving at
19 a settlement that was acceptable to the parties was not easy. Defendant contended that
20 individualized questions of fact predominate over any common issues, and these issues would
21 pose challenges to class certification. Defendant and its counsel felt very strongly about
22 Defendant's ability to prevail on the merits and to obtain a denial of class certification.
23 Meanwhile, Plaintiffs and Class Counsel disagreed with these contentions and believed that class
24 certification would be obtained and that they would prevail at trial. With the aid of the
25 mediator's evaluation and based on the mediator's proposal, the parties ultimately agreed that the
26 matter was well-suited for settlement given the legal issues relating to Plaintiffs' principal
27 claims, factual circumstances, as well as the costs and risks to the parties that would attend
28 further litigation. These risks of further litigation include, and are not limited to, a determination

1 that the claims must be arbitrated, are unsuitable for class treatment, class de-certification after
2 certification of a class, allowing a jury to decide the claims asserted in the case, and the real
3 possibility of no monetary recovery after years of litigation.

4 9. By way of the accompanying Motion for Final Approval, Class Counsel seeks
5 attorneys' fees in the amount of \$316,635.00, which is thirty three point three three percent
6 (33.33%) of the Total Settlement Amount of \$950,000.00, as set forth in the Settlement
7 Agreement and the Class Notice. Pursuant to the contingency-fee agreements entered into by
8 and between Plaintiffs and Lawyers *for* Justice, PC, Plaintiffs have each agreed to a contingency
9 fee of at least 33.33% of the recovery.

10 10. The attorneys' fees sought are commensurate with: (1) the risk that Class Counsel
11 took in commencing the case; (2) the time, effort, and expense that Class Counsel dedicated to
12 the case; (3) the skill and determination that Class Counsel has shown; (4) the results that Class
13 Counsel has achieved throughout the litigation; (5) the value of the settlement that Class Counsel
14 has achieved in the case; and (6) the other cases that Class Counsel has turned down in order to
15 devote their time and efforts to this matter.

16 11. I am aware that common and acceptable rates for contingency representation in
17 wage and hour class action litigation are normally in the range of 33.3% to 50%.

18 12. While not necessarily required to be demonstrated because the percentage fee is
19 proper for this settlement, Class Counsel has incurred many hours of work in connection with
20 prosecuting the case such that the award of attorneys' fees is also justified under a simple
21 lodestar analysis. Attorneys at Lawyers *for* Justice, PC have spent a total of **413.10 hours**
22 performing tasks and obtaining recovery in the matter. Attached hereto as "**EXHIBIT A**" is an
23 Attorney Task and Time Chart that sets forth in detail the nature of the legal services provided by
24 attorneys at Lawyers *for* Justice, PC and the time incurred in performing those services. These
25 hours include work done by myself and several other attorneys at Lawyers *for* Justice, PC. Also,
26 separate from the hours referenced herein, Lawyers *for* Justice, PC had litigation support
27 personnel actively engaged in assisting with the prosecution of this matter.

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13. The work performed in this particular matter, the background of our firm, as well as the individual backgrounds, training, and experience of the attorneys who worked on this case, in litigating complex wage-and-hour actions, and in particular, employment class and representative actions, support a reasonable blended hourly rate of compensation at the rate of \$650 for work performed by Lawyers for Justice, PC. Lawyers for Justice, PC has been awarded attorneys' fees, compensating the firm at the blended rate of at least \$650 per hour for legal services performed, by courts granting approval of settlements in other wage-and-hour cases: final approval of the class and representative action settlement in *David Dugan v. TEC Equipment, Inc., et al.* (Los Angeles Superior Court Case No. 19STCV01591) was granted on July 8, 2021, and the award of attorneys' fees involved an hourly rate of \$936.47; final approval of the class and representative action settlement in *Larry Greenwood, et al. v. Scan Health Plan* (Los Angeles Superior Court Case No. BC715157) was granted on April 20, 2021, and the award of attorneys' fees involved an hourly rate of \$919.57; final approval of the class action settlement in *Thereasa Carrozzella v. Basalite Concrete Products, LLC* (Sacramento County Superior Court Case No. 34-2017-00220214-CU-OE-GDS) was granted on February 21, 2020, and the award of attorneys' fees involved an hourly rate of \$766.05; final approval of the class and representative action settlement in *Alice Rutledge, et al. v. Healthport Technologies, LLC* (Alameda County Superior Court Case No. RG16835813) was granted on June 11, 2019, and the award of attorneys' fees involved an hourly rate of \$764.82; final approval of the class and representative action settlement in *Seth Swan v. Pace Supply Corp.* (Sonoma County Superior Court Case No. SCV258764) was granted on February 6, 2019, and the award of attorneys' fees involved an hourly rate of \$855.96; final approval of the class and representative action settlement in *Stanley Bland, et al. v. Telecare Corporation* (Alameda County Superior Court Case No. RG16811450) was granted on November 21, 2018, and the award of attorneys' fees involved an hourly rate of \$831.38; final approval of the class and representative action settlement in *Maryjo Ungerbuhler Anderson v. Boyett Petroleum* (Stanislaus County Superior Court Case No. 2020582) was granted on May 15, 2018, and the award of attorney's fees involved an hourly rate of \$780.77; and final approval of the class and representative action settlement in *Demetrius Camarillo v.*

1 *Blue Diamond Growers* (Sacramento County Superior Court Case No. 34-2015-00175871) was
2 granted on June 30, 2017, and the award of attorneys' fees involved an hourly rate of \$845.64.

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

4 ***EDUCATION***

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

13 ***JUDICIAL EXTERNSHIPS***

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

19 ***LITIGATION AND CLASS ACTION EXPERIENCE***

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

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

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18. Since its inception, in or around October of 2008, Lawyers *for* Justice, PC 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, Lawyers *for* Justice, PC is attorney of record in well over a dozen employment-related putative class actions in both state and federal courts in the State of California. Lawyers *for* Justice, PC 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, Lawyers *for* Justice, PC has recovered millions of dollars on behalf of thousands of individuals in California.

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

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

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

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

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

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

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

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

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

17 l) LFJ, in association with co-counsel therein, represented the plaintiffs in a
18 wage-and-hour class action against a national retailer of apparel, accessories, and home products,
19 involving allegations of misclassification of the “Department Manager” position. On August 12,
20 2016, the court granted the plaintiffs’ motion for class certification in part and certified a class.
21 On August 6, 2019, the court granted final approval of the class action settlement. The Alameda
22 County Superior Court Case Number is RG13680477.

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

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

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

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

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

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

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

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

11 u) LFJ represented the plaintiff in a wage-and-hour class and PAGA
12 representative action against a food company on behalf of non-exempt employees. On June 30,
13 2017, the court granted final approval of the class and PAGA representative action settlement.
14 The Sacramento County Superior Court Case Number is 34-2015-00175871.

15 v) LFJ represented the plaintiffs in a wage-and-hour class and PAGA
16 representative action against a chocolate company on behalf of non-exempt employees. On July
17 19, 2017, the court granted final approval of the class and PAGA representative action
18 settlement. The Alameda County Superior Court Case Number is RG15764300.

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

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

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

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

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

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

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

26 dd) LFJ, in association with co-counsel therein, represented the plaintiff in a
27 PAGA representative action, against a global provider of products and services to the energy
28 industry, on behalf of hourly-paid and non-exempt employees. On November 19, 2018, the court

1 granted approval of the PAGA representative action settlement. The Kern County Superior
2 Court Case Number is S-1500-CV-280215-SDC.

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

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

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

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

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

1 approval of the PAGA representative action settlement. The San Diego County Superior Court
2 Case Number is 34-2015-00175330.

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

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

15 ll) LFJ, in association with co-counsel therein, represented the plaintiffs in a
16 wage-and-hour class action against manufacturer and supplier of power products and services on
17 behalf of non-exempt employees. On July 31, 2020, the court granted in part the plaintiffs'
18 motion for class certification and certified a class. On August 27, 2021, the court granted final
19 approval of the class action settlement. The San Diego County Superior Court Case Number is
20 37-2015-00025968-CU-OE-CTL.

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

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

26 20. To date, Class Counsel has borne all of the risks and costs of litigation and will
27 not receive any compensation until recovery is obtained in this matter. Lawyers for Justice, PC
28 seeks reimbursement of \$11,315.71 in litigation costs and expenses incurred in this matter, as

1 reflected in “EXHIBIT B” attached hereto. These expenses were reasonable and necessary in
2 the prosecution of the case and to obtain the Settlement.

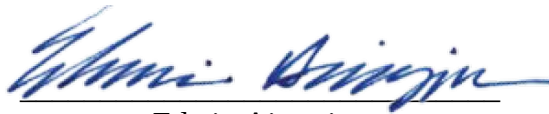
3 **SERVICE AWARDS TO PLAINTIFF**

4 21. In recognition of their efforts and work serving as the Class Representatives, the
5 Settlement provides for Service Awards in the amount of \$10,000.00 each to Plaintiffs Ruben
6 Alvarado and Whitey Davis. The requested Service Awards are fair and appropriate. Plaintiffs
7 spent a substantial amount of time and effort in producing relevant documents and information
8 and provided the facts and evidence necessary to attempt to prove the allegations. Plaintiffs were
9 available whenever Class Counsel needed them and actively tried to obtain information that
10 would facilitate the pursuit of the class and PAGA claims. Plaintiffs spent numerous hours
11 speaking with Class Counsel about their claims, describing their work experiences with
12 Defendant, and gathering and reviewing documents. Accordingly, it is appropriate for Plaintiffs
13 to each receive \$10,000.00 as reasonable Service Awards for their services in this matter, in
14 addition to their individual settlement payments under the Settlement.

15 22. I submit that the Settlement is fair, reasonable, and adequate. In addition, the
16 Settlement is in the best interests of Plaintiffs, the Non-Exempt Class, the Salaried Class, and the
17 State of California.

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

20 Executed this 18th day of May 2023, at Glendale, California.

21
22 

23 Edwin Aiwasian
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EXHIBIT A

RUBEN ALVARADO, ET AL. V. CITADEL SERVICING CORPORATION
Orange County Superior Court Case No. 30-2019-01057617-CU-OE-CXC

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, Commonality, and Manageability	8.50
Pre-Lawsuit Investigation of the Merits of Plaintiff Ruben Alvarado's ("Plaintiff Alvarado") Claims and the Merits of the Claims of the Putative Class Members	7.90
Pre-Lawsuit Investigation of Potential Damages Exposure of Defendant Citadel Servicing Corporation ("Defendant") with Respect to Plaintiff Alvarado and the Putative Class Members	7.10
Legal Research and Analysis of Latest Decisions Regarding Off-the-Clock, Meal and Rest Break, Wage Order, Overtime Exempt Status and Misclassification as Exempt, PAGA, and Class Certification in California, Including all New and Relevant DLSE Materials	7.50
Investigation of Defendant, Defendant's Business Relationships, and the Industry in which Defendant Operates	3.10
Investigation of Defendant's Organizational and Corporate Structure, and Executive Reporting Structure, as They Relate to the Employment and Management of the Putative Class Members and Aggrieved Employees	2.70

Investigation, Research, and Analysis Regarding Defendant's Executives, Officers, and Leadership with a Focus on Involvement in Wage-and-Hour Issues and Defendant's Litigation History Involving Wage-and-Hour Issues and Other Related Employment Issues, to Evaluate Willfulness and Uniformity	2.90
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	3.80
Research and Investigation Re: Location(s), Division(s), and/or Department(s) Owned, Managed, Serviced, and/or Operated by Defendant in California During the Class Period, Including Differences Between Them to Determine Whether Those Differences Will Cause Individual Issues to Predominate Over Common Issues	4.10
Comparative Analysis and Cross-Checking of All Available Job Postings, Job Reviews, and/or Consumer Reviews Regarding 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, and Job Duties that Support Classification as Non-Exempt versus Exempt	4.80
Research and Investigation Re: Workforce, Staffing Models, and Staffing Levels at Locations at Which Putative Class Members and Aggrieved Employees Worked Throughout California	3.40
Research and Investigation Re: Defendant's Written and Non-Written Policies, Practices, and Procedures Relating to Timekeeping, Rounding, Scheduling and Attendance, Customer Service, Misclassification, Job Positions, Meal and Rest Breaks, On Premises Breaks, Meal Waivers, Overtime Compensation, Non-Discretionary Bonus/Incentive/Commission/Performance/Shift Differential Pay, Profit Sharing, Regular Rate Calculations, Reporting Time Pay, Office Supplies, Use of Personal Cell Phones, Internet, and Computing Devices, Use of Personal Vehicles/Mileage, Reimbursement of Business-Related Expenses, and Arbitration Agreements	15.50
Research and Investigation Re: Various Software Programs, Systems, and Other Technology Defendant Uses to Conduct Its Everyday Business, Including Timekeeping, Payroll, Client Relations Management, Communications, Document Sharing, and Secured Entry Systems, with a Focus on What Documents	4.30

(Both Paper and Electronic) Are Created in the Normal Course of Business Relating to Overtime Worked, Off-the-Clock Time Worked Pre/Post-Shift, and Time Worked During Meal Breaks	
Research and Analysis of Potential Defenses Defendant May Raise, Including <i>De Minimis</i> Work, Non-Compensable Off-the-Clock Work, Waiver, Arbitration Agreements, and Compliant Policies	6.90
Research and Investigation Re: Post- <i>Duran</i> vs. <i>U.S. Bank</i> Trial Manageability Issues, including Research Regarding Which Experts to Retain and For What Purpose	5.10
Research and Investigation of Impact of COVID-19 Pandemic on Defendant, Its Operations, and Putative Class Members' and Aggrieved Employees' Work	4.90
Meet and Communicate with Plaintiff Alvarado Throughout the Pendency of the Case	40.50
Meet and Communicate with Plaintiff Whitey Davis ("Plaintiff Davis") Throughout the Pendency of the Case	42.50
Investigate, Meet and Communicate with, and/or Conduct Interviews of Putative Class Members and Percipient Witnesses	12.50
Pleadings and Court Filings	
Draft Plaintiff Alvarado's Class Action Complaint for Damages, and Legal Research and Analysis of All Claims Involved (filed on March 18, 2019)	7.30
Review Defendant's Notice of Appearance (served on April 26, 2019)	0.10
Review Court's Minute Order Re: Case Management Conference (filed on April 29, 2019)	0.10
Review Defendant's Substitution of Attorney (Form MC-050) (served on May 31, 2019)	0.10
Review and Analyze Defendant's Answer to Plaintiff's Class Action Complaint for Damages and Research Affirmative Defenses in Defendant's Answer (served on June 7, 2019)	1.50

Draft Plaintiff Alvarado's Notice of Posting Jury Fees (filed on June 20, 2019)	0.20
Meet and Confer with Defendant's Counsel, and Draft Joint Case Management Conference Statement (filed on June 21, 2019)	1.60
Review Court's Minute Order Re: Case Management Conference (filed on June 26, 2019)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation of the Parties to Stay Formal Discovery and Motion Practice Until After Mediation (filed on October 21, 2019)	1.40
Review Court's Minute Order Re: Case Management Conference (filed on October 23, 2019)	0.10
Review Minute Court's Order Re: Case Management Conference (filed on February 4, 2020)	0.10
Draft Plaintiff Alvarado's Notice of Association of Counsel (filed on March 2, 2020)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Status Report (filed on March 12, 2020)	0.30
Review Court's Minute Order Re: Status Conference (filed on May 26, 2020)	0.10
Meet and Confer with Defendant's Counsel, and Draft Notice of Settlement and Joint Stipulation to Request to Vacate the Upcoming CMC and Hearing on Defendant's Motion to Compel Arbitration; [Proposed] Order Thereon (submitted on July 2, 2020)	0.80
Meet and Confer with Defendant's Counsel, and Draft Joint Status Report (filed on October 28, 2020)	1.10
Review Court's Minute Order Re: Status Conference (filed on November 4, 2020)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Status Conference Statement (filed on January 5, 2021)	1.10

Review Court's Minute Order Re: Status Conference (filed on January 7, 2021)	0.10
Draft Plaintiff Alvarado and Plaintiff Davis's (together, "Plaintiffs") First Amended Class Action Complaint for Damages and Enforcement Under the Private Attorneys General Act, California Labor Code § 2698, Et Seq. (filed on March 3, 2021); Meet and Confer with Defendant's Counsel, and Draft Stipulation Granting Plaintiffs Leave to File First Amended Complaint; [Proposed] Order Thereon (submitted on February 19, 2021)	4.20
Review Court's Order Granting Plaintiff Leave to File First Amended Complaint (filed on February 22, 2021)	0.10
Defendant's Answer to Plaintiffs' First Amended Class Action Complaint for Damages and Enforcement Under the Private Attorneys General Act, California Labor Code § 2698, Et Seq. (served on March 10, 2021)	1.10
Meet and Confer with Defendant's Counsel, and Draft Joint Response to Order to Show Cause Regarding Dismissal (filed on April 2, 2021)	1.20
Review Court's Minute Order Re: Order to Show Cause Re Dismissal (filed on April 8, 2021)	0.10
Appearances	
Prepare for and Telephonically Attend Case Management Conference (June 26, 2019)	0.30
Prepare for and Telephonically Attend Status Conference (January 6, 2021)	0.30
Prepare for and Telephonically Attend Hearing on Plaintiffs' Motion for Preliminary Approval of Class Action Settlement (September 30, 2021)	0.80
Prepare for and Telephonically Attend Hearing on Plaintiffs' Motion for Final Approval of Class Action Settlement, Attorneys' Fees, Costs, and Service Awards (June 2, 2023) (Anticipated)	1.50

Discovery and Deposition	
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Alvarado (served on January 22, 2019)	1.90
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Alvarado (served on February 11, 2019)	2.10
Review and Analyze Additional Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Alvarado (served on February 22, 2019)	2.30
Draft Plaintiff Alvarado's Form Interrogatories – General (Set One), Request for Production of Documents (Set One), Request for Production of Documents (Set Two), Special Interrogatories (Set One), Special Interrogatories (Set Two), Special Interrogatories (Set Three), and Special Interrogatories (Set Four) to Defendant (served on September 30, 2019)	6.90
Draft Plaintiff Alvarado's Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (Organizational Structure; noticed for December 4, 2019) (September 30, 2019)	3.10
Draft Plaintiff Alvarado's Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (Wage and Hour Practices (Hourly-Paid/Non-Exempt); noticed for December 5, 2019) (September 30, 2019)	3.40
Draft Plaintiff Alvarado's Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (Wage and Hour (Salaried/Exempt); noticed for December 6, 2019) (September 30, 2019)	3.60
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Davis (served on February 7, 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 Alvarado (served on March 11, 2020)	0.50
Review and Analyze Additional Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Davis (served on March 20, 2020)	3.60
Letters and Correspondence	
Research and Draft Notice to California Labor and Workforce Development Agency Re: Claims of Plaintiff Davis for Penalties Under California Labor Code section 2698, <i>et seq.</i> (served on April 17, 2020)	4.40
Meet with, Draft Correspondence to, and Respond to Correspondence from, Defendant's Counsel	16.50
Mediation/Settlement	
Review and Analyze Information, Data and Documents Obtained from Defendant (served on January 9, 2020 and January 13, 2020), Plaintiffs, and Other Sources Prior to Mediation • Employee Handbooks and Employment and Operations Policies, Practices, and Procedures Documents (Including, <i>Inter Alia</i>, Arbitration Agreement) • Time Records Sampling • Payroll Records Sampling	35.50
Prepare for Mediation, Including Researching Settlement-Related Issues and Merits of Claims, Drafting the Mediation Brief, Compiling the Mediation Exhibits in Support of Mediation Brief, and Performing Damages and Penalties Analysis and Calculations (submitted on January 17, 2020)	24.50
Travel to/from and Attend Mediation Session (January 22, 2020; Los Angeles, California)	8.50
Post-Mediation Follow-Up Discussions with Mediator and Ongoing Post-Mediation Settlement Negotiations and Discussions; Review and Analyze Mediator's Proposal (issued on May 15, 2020; accepted on May 20, 2020)	6.90

Draft, Review, Revise, Negotiate, and Finalize Stipulation of Settlement (executed on February 19, 2021) and Notice of Class Action Settlement, [Proposed] Order Granting Preliminary Approval of Class Action Settlement, and [Proposed] Order Granting Final Approval of Class Action Settlement and Judgment	18.90
Draft, Review, Revise, Negotiate, and Finalize Amendment No. 1 to Stipulation of Settlement (executed on May 12, 2022) and Notice of Class Action Settlement	2.50
Law and Motion	
Review and Analyze Defendant's Notice of Motion and Motion to Compel Individual Arbitration, Memorandum of Points and Authorities in Support Thereof, Declaration of Andrew J. Deddeh in Support Thereof, Declaration of Paula Risetter in Support, and [Proposed] Order (served on February 27, 2020)	1.10
Draft, Review, and/or Revise Plaintiff Alvarado's Opposition to Defendant's Motion to Compel Individual Arbitration, Declaration of Plaintiff Alvarado in Support Thereof, Objections to Evidence Submitted in Support of Defendant's Motion to Compel Individual Arbitration, and [Proposed] Order Denying Defendant's Motion (filed on March 9, 2020)	0.50
Review Court's Minute Order Re: Continuance of Hearing on Defendant's Motion to Compel Arbitration (filed on March 17, 2020)	0.10
Review Court's Minute Order Re: Continuance of Hearing on Defendant's Motion to Compel Arbitration (filed on May 26, 2020)	0.10
Review Court's Minute Order Re: Request to Vacate Case Management Conference and Hearing on Defendant's Motion to Compel Arbitration (filed on August 5, 2020)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation to Deem Filing of Motion for Preliminary Approval of Class Action Settlement Timely; and [Proposed] Order (submitted on February 19, 2021)	0.50

Review Court's Order to Deem Filing of Motion for Preliminary Approval of Class Action Settlement Timely (filed on February 22, 2021)	0.10
Research and Draft Plaintiffs' Notice of Motion and Motion for Preliminary Approval of Class Action Settlement; Memorandum of Points and Authorities, Declaration of Edwin Aiwazian in Support Thereof, Declaration of Heather Davis in Support Thereof, Declaration of Ruben Alvarado in Support Thereof, Declaration of Whitey Davis in Support Thereof, and [Proposed] Order (filed on March 24, 2021)	15.30
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation to Deem Filing of Motion for Preliminary Approval of Class Action Settlement Timely; and [Proposed] Order (submitted on March 26, 2021)	0.30
Review Court's Minute Order Re: Motion for Preliminary Approval of Class Action Settlement (filed on April 1, 2021)	0.10
Review Court's Minute Order Re: Motion for Preliminary Approval of Class Action Settlement (filed on April 27, 2021)	0.10
Review Court's Minute Order Re: Motion for Preliminary Approval of Class Action Settlement (filed on May 26, 2021)	0.10
Review Court's Minute Order Re: Motion for Preliminary Approval of Class Action Settlement (filed on July 14, 2021)	0.10
Review Court's Minute Order Re: Motion for Preliminary Approval of Class Action Settlement (filed on August 18, 2021)	0.10
Review Court's Minute Order Re: Motion for Preliminary Approval of Class Action Settlement (filed on September 30, 2021)	0.40

Review Court's Minute Order Re: Motion for Preliminary Approval of Class Action Settlement (filed on October 19, 2021)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Application for Extension of Time to File Supplemental Briefing and Continue Hearing on Motion for Preliminary Approval of Class Action Settlement; [Proposed] Order Thereon (submitted on February 2, 2022)	0.90
Review Court's Minute Order Re: Motion for Preliminary Approval of Class Action Settlement (filed on February 3, 2022)	0.10
Review Court's Minute Order Re: Motion for Preliminary Approval of Class Action Settlement (filed on February 23, 2022)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation for an Order to Extend Time to File Supplemental Briefing and Continue Hearing on Motion for Preliminary Approval of Class Action Settlement; [Proposed] Order Thereon (submitted on May 12, 2022)	0.50
Review Court's Order to Extend Time to File Supplemental Briefing and Continue Hearing on Motion for Preliminary Approval of Class Action Settlement (filed on May 13, 2022)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation for an Order to Extend Time to File Supplemental Briefing and Continue Hearing on Motion for Preliminary Approval of Class Action Settlement; [Proposed] Order Thereon (submitted on June 27, 2022)	0.50
Review Court's Order to Extend Time to File Supplemental Briefing and Continue Hearing on Motion for Preliminary Approval of Class Action Settlement (filed on July 6, 2022)	0.10
Review Declaration of Joshua B. Wagner; and Research and Draft Plaintiffs' Supplemental Brief in Support of Renewed Motion for Preliminary Approval of Class Action Settlement, Declaration of Brian J. St. John in Support Thereof, and [Revised Proposed] Order (filed on August 12, 2022)	8.10

Review Court's Minute Order Re: Motion for Preliminary Approval of Class Action Settlement (filed on September 9, 2022)	0.20
Review Court's Minute Order Re: Motion for Preliminary Approval of Class Action Settlement (filed on September 14, 2022)	0.10
Review Supplemental Declaration of Joshua B. Wagner in Support and Declaration of Grace Castersen; and Research and Draft Plaintiffs' Further Revised Supplemental Brief in Support of Renewed Motion for Preliminary Approval of Class Action Settlement, Declaration of Brian J. St. John in Support Thereof, and [Revised Proposed] Order (filed on October 20, 2022)	3.50
Review Court's Minute Order Re: Motion for Preliminary Approval of Class Action Settlement (filed on November 7, 2022)	0.20
Review Court's Order Granting Preliminary Approval of Class Action Settlement (filed on January 9, 2023)	0.20
Research and Draft Plaintiffs' Motion for Final Approval of Class Action Settlement, Class Counsel Award, and Service Awards, Declaration of Edwin Aiwasian in Support Thereof, and [Proposed] Final Approval Order and Judgment (filed on May 18, 2023) (Anticipated)	18.50
Total Hours:	413.10

EXHIBIT B

LAWYERS for JUSTICE PC CASE COST DETAIL
Alvarado v. Citadel Servicing Corporation

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
1/22/2019	U.S. Postmaster	Postage	6.71
3/18/2019	One Legal, Inc.	Attorney Service	59.56
3/18/2019	Orange County Superior Court	Court Filing Fee	435.00
3/18/2019	Orange County Superior Court	Complex Filing Fee	1,000.00
4/1/2019	ProLegal	Attorney Service	136.85
6/20/2019	Golden State Overnight	Courier Service	19.15
6/20/2019	One Legal, Inc.	Attorney Service	29.35
6/20/2019	Orange County Superior Court	Jury Fee	150.00
6/21/2019	CourtCall, LLC	Attorney Service	94.00
6/21/2019	Golden State Overnight	Courier Service	13.58
6/21/2019	One Legal, Inc.	Attorney Service	12.20
6/25/2019	Golden State Overnight	Courier Service	11.83
9/30/2019	General Logistics Systems US, Inc.	Courier Service	15.43
10/24/2019	CourtCall, LLC	Attorney Service	94.00
1/7/2020	Serratore Law	Mediation Fee	7,500.00
2/3/2020	General Logistics Systems US, Inc.	Courier Service	18.96
2/4/2020	FedEx Express	Courier Service	33.37
2/6/2020	CourtCall, LLC	Attorney Service	94.00
2/7/2020	U.S. Postmaster	Postage	6.85
3/2/2020	Legal Document Server, Inc.	Attorney Service	12.25
3/11/2020	General Logistics Systems US, Inc.	Courier Service	18.29
4/17/2020	Labor & Workforce Development Agency	PAGA Fee	75.00
4/17/2020	U.S. Postmaster	Postage	29.10
10/28/2020	Legal Document Server, Inc.	Attorney Service	13.25
10/30/2020	CourtCall, LLC	Attorney Service	94.00
12/29/2020	CourtCall, LLC	Attorney Service	94.00
1/5/2021	Legal Document Server, Inc.	Attorney Service	128.25
1/20/2021	U.S. Postmaster	Postage	6.95
1/22/2021	Orange County Superior Court	Document Download Fee	7.50
2/9/2021	U.S. Postmaster	Postage	7.00
2/22/2021	Legal Document Server, Inc.	Attorney Service	26.50
2/23/2021	Orange County Superior Court	Stipulation Fee	40.00
3/4/2021	Legal Document Server, Inc.	Attorney Service	11.00
3/25/2021	Legal Document Server, Inc.	Attorney Service	15.35
3/25/2021	Orange County Superior Court	Motion Fee	60.00
3/30/2021	CourtCall, LLC	Attorney Service	188.00
4/2/2021	Legal Document Server, Inc.	Attorney Service	13.25
4/27/2021	CourtCall, LLC	Attorney Service	94.00
4/28/2021	Orange County Superior Court	Document Download Fee	7.50

LAWYERS for JUSTICE PC CASE COST DETAIL
Alvarado v. Citadel Servicing Corporation

7/12/2021	CourtCall, LLC	Attorney Service	94.00
7/14/2021	Orange County Superior Court	Document Download Fee	7.50
8/18/2021	Orange County Superior Court	Document Download Fee	7.50
10/5/2021	Orange County Superior Court	Document Download Fee	7.50
11/3/2021	Legal Document Server, Inc.	Attorney Service	13.25
2/2/2022	Legal Document Server, Inc.	Attorney Service	13.25
2/4/2022	Orange County Superior Court	Document Download Fee	7.50
2/25/2022	Orange County Superior Court	Document Download Fee	7.50
5/12/2022	Legal Document Server, Inc.	Attorney Service	13.25
5/16/2022	Legal Document Server, Inc.	Attorney Service	1.35
5/16/2022	Orange County Superior Court	Stipulation Fee	20.00
6/27/2022	Legal Document Server, Inc.	Attorney Service	13.25
7/6/2022	Legal Document Server, Inc.	Attorney Service	1.35
7/6/2022	Orange County Superior Court	Stipulation Fee	20.00
8/12/2022	Legal Document Server, Inc.	Attorney Service	14.00
9/20/2022	Orange County Superior Court	Document Download Fee	7.50
10/20/2022	Legal Document Server, Inc.	Attorney Service	14.00
5/8/2023	Orange County Superior Court	Document Download Fee	69.88
Total:			11,004.61