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Attorneys for Plaintiffs and the Class

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

CINDY VELASQUEZ, individually, and on behalf of other members of the general public similarly situated; PAULINA CAMPOS, 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.

AMADA ENTERPRISES, INC., a California corporation; VIEW HEIGHTS COVALESCENT HOSPITAL, INC., an unknown business entity; and DOES 1 through 100, inclusive,

Defendants.

Case Nos.: 20STCV07994 (Lead Case)
consolidated with 20CMCV00227

Honorable Stuart M. Rice
Department SSC-1

CLASS ACTION

DECLARATION OF JOANNA GHOSH IN SUPPORT OF PLAINTIFFS' MOTION FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT, ATTORNEYS' FEES AND COSTS, AND ENHANCEMENT AWARDS

[Notice of Motion and Motion for Final Approval of Class Action Settlement, Attorneys' Fees and Costs and Enhancement Awards; Declaration of Class Representatives (Cindy Velasquez and Paulina Campos); Declaration of Class Counsel (Heather Davis); Declaration of Settlement Administrator (Yami Burns); and [Proposed] Final Approval Order and Judgment filed concurrently herewith]

Date: February 15, 2024
Time: 10:30 a.m.
Department: SSC-1

Complaint Filed: February 28, 2020
FAC Filed: February 2, 2021
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 Plaintiffs Cindy Velasquez and Paulina Campos (together, "Plaintiffs") and the Class. The facts set forth in this declaration are within my personal knowledge, and, if called as a witness, I could and would competently testify as follows.

PRELIMINARY APPROVAL OF SETTLEMENT

2. On August 7, 2023, in Department SSC-1 of the above-entitled Court, the Honorable Stuart M. Rice preliminarily approved the Joint Stipulation of Class Action and PAGA Settlement and Release (referred to as "Settlement," "Agreement," or "Settlement Agreement,") entered into between Plaintiffs and Defendant Amada Enterprises, Inc., ("Defendant," together with Plaintiffs referred to as the "Parties") and conditionally certified the Class for settlement purposes. The Court preliminarily appointed Plaintiffs Cindy Velasquez and Paulina Campos as the representatives of the Class (together, "Class Representatives"). The Court also preliminarily appointed and designated Lawyers for Justice, PC and Protection Law Group, LLP as counsel for the Class (together, "Class Counsel"). The Court approved and ordered the mailing of the Notice of Class Action Settlement ("Class Notice"), adopted the notice, opt-out, and objection procedures and ordered their implementation. The Court appointed Phoenix Class Action Administration Solutions ("Phoenix" 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, Attorneys' Fees and Costs, and Enhancement Awards ("Motion for Final Approval"), no Class Members have objected to the Class Settlement or the contemplated request for Attorneys' Fees and Costs, Enhancement 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 the above-captioned putative class action, entitled *Cindy Velasquez v. Amada Enterprises, Inc., et al.*, Superior Court of the State of California, County of Los Angeles, Case No. 20STCV07994 filed on February 28, 2020 (“Velasquez Action”), as well as the putative class action entitled *Paulina Campos v. Amade Enterprises, Inc.*, Superior Court of the State of California, County of Los Angeles, Case No. 20STCV34673 filed on September 11, 2020 (“Campos Class Action”) and the PAGA representative action entitled *Paulina Campos v. Amada Enterprises, Inc., et al.*, Superior Court of the State of California, County of Los Angeles, Case No. 20CMCV00227 filed on September 15, 2020 (“Campos PAGA Action”) (collectively, the “Actions”). The Campos Class Action was dismissed on or about February 26, 2021 after Plaintiff Campos’ claims were added to the Velasquez Action on or about February 2, 2021, and on or about October 25, 2022, the Campos PAGA Action and Velasquez Action were consolidated for purposes of the Settlement.

5. Lawyers for Justice, PC has actively participated in the litigation of the matter, including and not limited to, preparing the pleadings, engaging in motion practice, case strategy, undertaking investigation and formal and informal discovery, performing legal research, conducting claims evaluation and analysis, and engaging in settlement negotiations. Since joining forces with and associating in Protection Law Group, LLP as co-counsel in the above-captioned case, we have worked cooperatively with them to strategize and prosecute the matter, and our work with them has been a coordinated and combined effort. Ultimately, Class Counsel’s efforts and the efforts of Plaintiffs have been successful in reaching the Settlement.

6. Before initiating the cases, 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 Plaintiffs and research into the various legal issues involved in the cases, namely, the current state of the law as it applied to class certification, off-the-clock theory, meal and rest periods, representative PAGA claims, wage-and-hour enforcement and penalties, arbitration agreements, Plaintiffs’

claims and allegations, and potential defenses. After conducting an initial investigation, our firm determined that the claims of Plaintiffs were well-suited for class-wide and/or representative adjudication owing to what appeared to be a common course of conduct affecting a similarly situated group of current and former hourly-paid or non-exempt employees of Defendant in California, who were not properly compensated for, *inter alia*, all hours worked, non-compliant meal and rest periods, and business expenses.

7. Collectively, Class Counsel conducted significant litigation and formal and informal discovery and investigation into the facts of the cases, to assess the veracity, strength, and scope of the claims, and was preparing the cases 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 mediation and settlement negotiations. Class Counsel had the opportunity to interview and obtain information from Plaintiffs, other Class Members and PAGA Members, and percipient witnesses, and reviewed and analyzed a large volume of information, data, and documents obtained from Plaintiffs, Defendant, and other sources. The information, documents, and data reviewed and analyzed by Class Counsel included and were not limited to: employment records of Plaintiffs and other Class Members, a detailed sampling of Class Members' time and pay data, Defendant's Employee Handbook and other employment and operations policies, practices, and procedures documents, and extensive documentation regarding Defendant's financial circumstances, among other information and documents. Class Counsel developed liability, damages, and penalties valuation models in the course of litigation and in connection with the mediations and settlement negotiations, and met and conferred with Defendant's counsel on numerous occasions, e.g., to discuss issues relating to the pleadings, motions, case management, discovery, and the production of information, documents, and data in the course of litigation and in connection with the mediations and settlement negotiations. Other work performed by Class Counsel included, and was not limited to, case strategy and analysis; drafting, reviewing, and revising the pleadings, motion-related papers, the mediation brief, and settlement documents; drafting and propounding multiple sets of formal written discovery requests on Defendant; reviewing

1 Defendant's responses and objections to written discovery requests and deposition notices;
2 preparing for and attending court proceedings; and preparing for and participating in two
3 mediations and additional settlement negotiations, among other tasks.

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

17 9. After conducting significant investigation of the facts and law during the
18 prosecution of the cases, counsel for the parties engaged in extensive settlement negotiations to
19 try to resolve the cases. These efforts included participating in two (2) mediation sessions
20 conducted by Joel P. Kelly, Esq., a well-regarded mediator experienced in handling complex
21 labor and employment matters. During all settlement discussions, the Parties conducted their
22 negotiations at arm's length in an adversarial position. In the course of the mediations and
23 settlement negotiations, the Parties exchanged information, documents, and data, and discussed
24 all aspects of the cases, including Defendant's financial circumstances, the risks and delays of
25 further litigation, the risks to the Parties of proceeding with class certification and trial, the law
26 relating to class certification, off-the-clock theory, meal and rest periods, representative PAGA
27 claims, wage-and-hour enforcement, and arbitration agreements, as well as the evidence
28 produced and analyzed, and the possibility of appeals, among other things. Arriving at a

1 settlement that was acceptable to the Parties was not easy. Defendant contended that
2 individualized questions of fact predominate over any common issues, and these issues would
3 pose challenges to class certification and representative adjudication. Defendant and its counsel
4 felt strongly about Defendant's ability to enforce its arbitration agreements (and compel the
5 claims to arbitration) and to prevail on the merits and to avoid class certification and
6 representative adjudication, while Plaintiffs and Class Counsel believed that they would be able
7 to obtain class certification and prevail at trial. With the aid of the mediator's evaluation, the
8 Parties ultimately agreed that the cases were well-suited for settlement given the legal issues
9 relating to Plaintiffs' 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 must be arbitrated, that the claim are unsuitable for class treatment
12 and/or representative adjudication, class de-certification after certification of a class, allowing a
13 jury to decide the claims asserted in the cases, and the real possibility of no monetary recovery
14 after years of litigation, especially in light of Defendant's financial circumstances.

15 10. By way of the accompanying Motion for Final Approval, Class Counsel seeks
16 attorneys' fees in the amount of \$150,000.00, which is one-third (1/3) of the Total Settlement
17 Amount of \$450,000.00. Pursuant to the contingency-fee agreement entered into by and between
18 Plaintiffs and Class Counsel, Plaintiffs have each agreed contingency fees of at least one-third
19 (1/3) of the recovery.

20 11. The attorneys' fees sought are commensurate with: (1) the risk that Class Counsel
21 took in commencing the cases; (2) the time, effort, and expense that Class Counsel dedicated to
22 the cases; (3) the skill and determination that Class Counsel have shown; (4) the results that
23 Class Counsel have achieved throughout the litigation; (5) the value of the settlement that Class
24 Counsel have achieved in the cases; and (6) the other cases that Class Counsel have turned down
25 in order to devote their time and efforts to this matter.

26 12. I am aware that common and acceptable rates for contingency representation in
27 wage and hour class action and representative action litigation are normally in the range of
28 33.3% to 50%.

13. 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 the cases 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 **554.10 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 Protection Law Group, LLP and the time incurred by them in performing those services. The hours attributable to Lawyers for Justice, PC include work done by several other attorneys at the firm and myself. Additionally, separate from the hours referenced herein and in the attached chart, Lawyers for Justice, PC had litigation support personnel actively engaged in assisting with the prosecution of this matter.

14. The work performed in this particular matter, the background of our firm, as well as the individual backgrounds, training, and experience of the attorneys who worked on this matter, in litigating complex wage-and-hour actions, and in particular, employment class and representative actions, support a reasonable blended hourly rate of compensation of at least \$750 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 \$750 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 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' fees involved compensation at the rate of \$919.57 per hour; 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 compensation at the rate of \$766.05 per hour; 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 compensation at the rate of \$764.82 per hour; 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 compensation at the rate of \$855.96 per hour; 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 compensation at the rate of \$831.38 per hour; 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 compensation at the rate of \$780.77 per hour; and final approval of the class and representative action settlement in *Demetrius Camarillo v. Blue Diamond Growers* (Sacramento County Superior Court Case No. 34-2015-00175871) was granted on June 30, 2017, and the award of attorneys' fees involved compensation at the rate of \$845.64 per hour.

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

15. For over a decade, 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 dozens of employment-related putative class actions in both state and federal courts in the State of California. Lawyers for Justice, PC is comprised of attorneys who focus on litigating complex wage-and-hour class and Private Attorneys General Act ("PAGA") representative actions. The firm has successfully litigated cases involving nearly every aspect of California wage and hour law, including payment of overtime and minimum wages, provision of meal and rest breaks and/or premiums wages for same, timely payment of wages, provision of compliant wage statements, reimbursement of business expenses, executive, administrative, and

1 other overtime exemptions to the State of California and federal overtime compensation
2 requirements, PAGA claims, and sister statutes under federal law. Lawyers *for* Justice, PC has
3 recovered (sometimes in association with other law firms) millions of dollars on behalf of
4 thousands of individuals in California. Below is a summary of the experience and qualifications
5 of attorneys at Lawyers *for* Justice, PC who most recently and primarily have been responsible
6 for the representation of Plaintiffs in this matter. Additional attorney and non-attorney staff have
7 also worked on the matter.

8 16. Edwin Aiwarzian is a Managing Member and Shareholder of Lawyers *for* Justice,
9 PC. He received his Bachelor of Arts degree from Pepperdine University in April of 1999 and
10 earned a Juris Doctor degree from Pepperdine University School of Law in May of 2004. He has
11 extensive formal training in dispute resolution and negotiation from the Straus Institute for
12 Dispute Resolution as part of its Masters in Dispute Resolution degree program. In addition, he
13 has previously served as a pro bono mediator for the Los Angeles County Superior Court. In
14 October of 2000, he obtained a Litigation Paralegal Certificate from the UCLA Extension
15 Program. During the summer of 2000, he studied Legal Writing at Harvard University. From
16 approximately September 2002 to approximately December 2002, he served as a Judicial Extern
17 to the Honorable Kim McLane Wardlaw of the United States Court of Appeals for the Ninth
18 Circuit. From approximately June 2002 to approximately August 2002, he served as a Judicial
19 Extern to the Honorable Earl Johnson, Jr. of the California Court of Appeal for the Second
20 Appellate District. In December of 2004, he obtained a license to practice law from the
21 California State Bar. Since in or around October of 2008, through his work at Lawyers *for*
22 Justice, PC, he has almost exclusively focused on the prosecution of consumer and employment
23 class actions. While employed by Lawyers *for* Justice PC, he has argued over one hundred (100)
24 motions, taken or defended over one hundred fifty (150) depositions, prepared dozens of expert
25 witnesses for deposition or trial, and attended over one hundred seventy-five (175) mediations.
26 Together with other attorneys at the firm, and in some cases in conjunction with co-counsel, he
27 has successfully litigated cases involving the executive, administrative, and other overtime
28 exemptions to the State of California and federal overtime compensation requirements. Under

1 his supervision, Lawyers *for* Justice, PC has successfully obtained class certification by
2 contested motion practice in approximately fifteen (15) cases in the last decade and litigated over
3 1,000 class action or representative action cases.

4 17. Arby Aiwazian is a Member and Shareholder of Lawyers *for* Justice, PC. He
5 received his Bachelor of Arts degree from University of California, Los Angeles and graduated
6 magna cum laude. He earned a Juris Doctor degree, cum laude, from Southwestern Law School.
7 From approximately May 2007 to approximately July 2007, he served as a Judicial Extern to the
8 Honorable Earl Johnson, Jr. of the California Court of Appeal for the Second Appellate District.
9 From approximately August 2008 to approximately December 2008, he served as a Judicial
10 Extern to the Honorable Kim McLane Wardlaw of the United State Court of Appeals for the
11 Ninth Circuit. He was admitted to practice law in California in 2010. He is admitted to practice
12 before all courts of the State of California and all United States District Courts in the State of
13 California. He has worked on many wage-and-hour class action and representative action cases,
14 taking the lead in taking and defending depositions, arguing motions, and attending mediations.
15 He has played an integral role in preparing matters for class certification, including and not
16 limited to, successful certification of a class in *Upson v. Sur La Table* (Los Angeles County
17 Superior Court Case No. BC424012), *Montazemi v. Regus Management* (Los Angeles County
18 Superior Court Case No. BC478769), and *Abdulhaqq v. Urban Outfitters* (Alameda County
19 Superior Court Case No. RG13680477). Under his supervision, dozens of class action or
20 representative cases have resulted in settlements that have been granted court approval, including
21 and not limited to, those listed in paragraph 20 herein. He has handled over one hundred and
22 fifty (150) mediations and worked on over two hundred and fifty (250) class action or
23 representative action cases which have resulted in settlement.

24 18. Yasmin Hosseini is a Member of Lawyers for Justice, PC. She received her
25 Bachelor of Arts degree from University of California, Santa Barbara in 2013 and earned her
26 Juris Doctor degree from Pepperdine University School of Law in 2017. She was admitted to
27 practice law in California in 2019. She is admitted to practice before all courts of the State of
28 California and all federal district courts in the State of California. She has worked on many

wage and hour class action and PAGA representative matters, and her work has included, *inter alia*, researching and drafting pleadings, administrative notice exhaustion, drafting, negotiating, and finalizing stipulations and settlement agreements, engaging in motion practice, claims evaluation and analysis, and making court appearances. Prior to working at Lawyers *for* Justice, PC, she represented filmmakers and talent, negotiating and structuring various types of agreements on their behalf. She is a member of the California Employment Lawyers Association, Beverly Hills Bar Association, and Iranian American Bar Association.

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

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

20. 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.

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

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

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

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

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

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

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

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

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

n) LFJ, in association with co-counsel therein, represented the plaintiffs in a wage-and-hour class and PAGA representative action against a full-service bank, on behalf of 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 foodservice 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
9 settlement. 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 in part and certified a class. The Alameda County Superior Court Case Number is RG15757606 and the Judicial Council Coordination Proceeding Number is 4921.

gg) 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 apparel and fashion accessories, on behalf of non-exempt employees. On October 9, 2019, the court granted the plaintiffs' motion for class certification in part and certified a class. On May 14, 2021, the court granted final approval of the class and PAGA representative action settlement. The Sacramento County Superior Court Case Number is 34-2015-00175330-CU-OE-GDS.

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

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

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

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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 action against manufacturer and supplier of power products and services on
9 behalf of non-exempt employees. On July 31, 2020, the court granted in part the plaintiffs'
10 motion for class certification and certified a class. On August 27, 2021, the court granted final
11 approval of the class action settlement. The San Diego County Superior Court Case Number is
12 37-2015-00025968-CU-OE-CTL.

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

17 nn) LFJ represents the plaintiffs in a wage-and-hour class action against a
18 manufacturer and distributor of commercial dish and glass cleaning machines and supplies for
19 the restaurant and hospitality industries, on behalf of hourly-paid or non-exempt employees. On
20 July 13, 2023, the court granted the plaintiffs' motion for class certification and certified a class.
21 The Los Angeles County Superior Court Case Number is BC707670.

22 **LITIGATION COSTS AND EXPENSES INCURRED BY**

23 **LAWYERS FOR JUSTICE, PC**

24 21. To date, Class Counsel have borne all of the risks and costs of litigation and will
25 not receive any compensation until recovery is obtained in this matter. Lawyers for Justice, PC
26 seeks reimbursement of **\$37,325.35** in litigation costs and expenses incurred in the Actions, as
27 reflected in "**EXHIBIT B**" attached hereto. These expenses were reasonable and necessary in
28 the prosecution of the cases and to obtain the Settlement.

ENHANCEMENT AWARDS TO PLAINTIFFS

22. In recognition of their efforts and work expended in the cases and serving as the Class Representatives, the Settlement provides for enhancement awards in the amount of \$7,500.00 each to Plaintiffs (for a total of \$15,000.00). The requested enhancement awards are fair and appropriate. Plaintiffs spent a substantial amount of time and effort to produce relevant documents and information, and provided the facts and evidence to support the prosecution of the claims. Plaintiffs were available whenever Class Counsel needed them and actively tried to obtain and provide information that would facilitate the pursuit of the cases. Plaintiffs spent numerous hours speaking with Class Counsel about their claims, describing their work experiences with Defendant, and gathering and reviewing documents. Accordingly, it is appropriate for Plaintiffs Cindy Velasquez and Paulina Campos to receive \$7,500.00 each as reasonable enhancement awards, for their services in the cases, in addition to their individual settlement payments.

23. I submit that the Settlement is fair, reasonable, and adequate, and is in the best interests of Plaintiffs, the Class, PAGA Members, and the State of California.

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

Executed this 23rd day of January 2024, at Glendale, California.



Joanna Ghosh

EXHIBIT A

CINDY VELASQUEZ, ET AL. V. AMADA ENTERPRISES, INC., ET AL.
Los Angeles County Superior Court Case No. 20STCV07994 (“Velasquez Action”) (Lead Case)

PAULINA CAMPOS V. AMADA ENTERPRISES, INC., ET AL.
Los Angeles County Superior Court Case No. 20CMCV00227 (“Campos PAGA Action”)

PAULINA CAMPOS V. AMADA ENTERPRISES, INC., ET AL.
Los Angeles County Superior Court Case No. 20STCV34673 (“Campos Class Action”)

ATTORNEY TASK AND TIME CHART

TASK	LAWYERS FOR JUSTICE, PC	PROTECTION LAW GROUP, LLP
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	0.0
Pre-Lawsuit Investigation of the Merits of Plaintiff Cindy Velasquez (“Plaintiff Velasquez”) and Paulina Campos’ (“Plaintiff Campos,” together with Plaintiff Velasquez, “Plaintiffs”) Claims and the Merits of the Claims of the Putative Class Members	7.50	0.0
Pre-Lawsuit Investigation of Potential Damages Exposure of Defendant Amada Enterprises, Inc. (“Defendant”) with Respect to the Damages Sustained by Plaintiffs and the Putative Class Members	7.30	0.0
Pre-Lawsuit Investigation of the Merits of the Private Attorneys General Act (“PAGA”) Claim on Behalf of the State of California With Respect to Plaintiff Campos and the Aggrieved Employees	6.90	0.0

Pre-Lawsuit Investigation of Potential Civil Penalties Exposure of Defendant with Respect to Alleged California Labor Code and IWC Wage Order Violations with Respect to Plaintiff Campos and the Aggrieved Employees Pursuant to PAGA	5.50	0.0
Legal Research and Analysis of Latest Decisions Regarding Off-the-Clock, Meal and Rest Break, IWC Wage Orders, PAGA, Class Certification, and Arbitration Agreements in California, Including all New and Relevant DLSE Materials	6.50	1.50
Investigation of Defendant, Defendant's Business Relationships, Clients, and the Industry in Which Defendant Operates	3.10	0.0
Investigation of Defendant's Organizational, Corporate, and Executive Reporting Structures as They Relate to the Employment and Management of the Putative Class Members and Aggrieved Employees	3.50	0.0
Investigation of Defendant's Executives, Officers, and Leadership With a Focus on Involvement in Wage-and-Hour Issues and Litigation History Involving Wage-and-Hour Issues and Other Related Employment Issues, to Evaluate Willfulness and Uniformity	3.30	0.0
Analysis of Competitors in Various Relevant Geographic Areas Within Which Defendant Operates, and Comparing and Contrasting Defendant's Policies, Practices, and Procedures With the Policies, Practices, and Procedures of Defendant's Competitors	4.10	0.0
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	4.80	0.0
Comparative Analysis and Cross-Checking of All Available Job Postings and 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	2.50	0.0

Research and Investigation Re: Workforce, Staffing Models, and Staffing Levels at Location(s) at Which Putative Class Members Worked Throughout California	4.50	0.0
Research and Investigation Re: Defendant's Written and Non-Written Policies, Practices, and Procedures Relating to Timekeeping, Scheduling, Attendance, On-Site and Off-Site Meetings, Patient Care, Meal/Rest Breaks, On-Premises Breaks, Meal/Rest Premiums, Rounding, Overtime Compensation, Bonuses/Incentive/Shift Differential Pay, Reporting Time Pay, Dress Code/Uniform, Footwear, Supplies/PPE, Use of Personal Cell Phones and Other Equipment and Devices, Use of Personal Vehicle, Arbitration Agreements, and Reimbursement of Business-Related Expenses	12.50	0.0
Research and Investigation Re: Various Software Programs, Systems, and Other Technology Defendant Uses to Conduct Everyday Business, Including Timekeeping, Payroll, Patient Management, Resource Management, Scheduling, Document and Information Sharing, Communication, Surveillance, and Security Systems, with a Focus on What Documents (Both Paper and Electronic) Are Created in the Normal Course of Business Relating to Overtime Worked, Off-the-Clock Time Worked Pre/Post Shift, and During Meal and Rest Breaks	4.30	0.0
Research and Analysis of Potential Defenses Defendant May Raise, Including <i>De Minimis</i> Work, Non-Compensable Off-the-Clock Work, Waiver, and Compliant Policies	7.30	0.0
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	0.0
Meet and Communicate with Plaintiff Cindy Velasquez Throughout the Pendency of the Case	36.50	0.0
Meet and Communicate with Plaintiff Paulina Campos Throughout the Pendency of the Case	36.50	0.0
Investigate, Meet, Communicate with, and/or Conduct Interviews of Putative Class Members, Aggrieved Employees, and/or Percipient Witnesses	12.50	0.0

Pleadings and Court Filings		
Draft Plaintiff Cindy Velasquez's Class Action Complaint for Damages and Legal Research and Analysis of All Claims Involved (filed on February 28, 2020) (Velasquez Action)	7.10	0.0
Review Court's Notice of Case Assignment (filed on February 28, 2020) (Velasquez Action)	0.10	0.0
Review Court's Initial Status Conference Order and Minute Order Re: Court Order Re: Newly Filed Class Action (filed on March 20, 2020) (Velasquez Action)	0.10	0.0
Review Defendant's Notice of Appearance (filed on April 8, 2020) (Velasquez Action)	0.10	0.0
Review Court's Minute Order Re: Non-Appearance Case Review Re: Continuance (filed on April 22, 2020) (Velasquez Action)	0.10	0.0
Review Court's Minute Order Re: Non-Appearance Case Review Re: E-Service Provider (filed on May 28, 2020) (Velasquez Action)	0.10	0.0
Meet and Confer with Defendant's Counsel, and Draft Joint Initial Status Conference Statement (filed on July 7, 2020) (Velasquez Action)	1.30	0.0
Review Court's Minute Order Re: Non-Appearance Case Review Re: Continuance of Initial Status Conference (filed on July 10, 2020) (Velasquez Action)	0.10	0.0
Draft Plaintiff Paulina Campos's Class Action Complaint for Damages (filed on September 11, 2020) and Legal Research and Analysis of All Claims Involved (Campos Class Action)	6.90	0.0
Review Court's Notice of Case Assignment (filed on September 11, 2020) (Campos Class Action)	0.10	0.0
Draft Plaintiff Paulina Campos's Complaint for Enforcement Under the Private Attorneys General Act, California Labor Code Section 2698, Et. Seq. (filed on September 15, 2020) and Legal Research and Analysis of All Allegations Involved (Campos PAGA Action)	6.50	0.0

Review Court's Notice of Case Assignment (filed on September 15, 2020) (Campos PAGA Action)	0.10	0.0
Review Court's Notice of Case Management Conference (filed on September 16, 2020) (Campos PAGA Action)	0.10	0.0
Review Court's Initial Status Conference Order and Minute Order Re: Court Order Re: Complex Designation (filed on September 29, 2020) (Campos Class Action)	0.10	0.0
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation and [Proposed] Order to Continue Status Conference (filed on November 17, 2020) (Velasquez Action)	0.90	0.0
Draft Plaintiff's Notice of Posting Jury Fees (filed on November 23, 2020) (Campos Class Action)	0.10	0.0
Review Court's Order Granting Joint Stipulation to Continue Status Conference (filed on November 23, 2020) (Velasquez Action)	0.10	0.0
Review Defendant's Declaration of Geoffrey Lee Re: Meet and Confer Efforts Per Code of Civil Procedure Section 430.41 (November 24, 2020) (Campos PAGA Action)	0.10	0.0
Review Defendant's Notice of Appearance and Payment of Complex Case Fee (filed on November 24, 2020) (Campos Class Action)	0.10	0.0
Review Defendant's Notice of Related Case (served on November 23, 2020) (Campos PAGA Action)	0.10	0.0
Review Defendant's Notice of Related Case (filed on November 24, 2020) (Campos Class Action)	0.10	0.0
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation and [Proposed] Order to Continue Initial Status Conference (filed on December 2, 2020) (Campos Class Action)	0.80	0.0

Review Court's Order Granting Joint Stipulation to Continue Initial Status Conference (filed on December 4, 2020) (Campos Class Action)	0.10	0.0
Review Defendant's Notice of Appearance and Payment of Complex Case Fee and Notice of Related Case (filed on December 4, 2020) (Campos Class Action)	0.10	0.0
Review Court's Minute Order Re: Court Order Re: Notice of Related Case (filed on December 4, 2020) (Campos PAGA Action)	0.10	0.0
Review Court's Minute Order Re: Court Order Re: Notice of Related Case (filed on December 8, 2020) (Campos Class Action)	0.10	0.0
Review Court's Minute Order Re: Nunc Pro Tunc Order (filed on December 8, 2020) (Campos Class Action)	0.10	0.0
Review Court's Minute Order Re: Court Order Re: Notice of Related Case (filed on December 8, 2020) (Velasquez Action)	0.10	0.0
Review Defendant's Notice of Order Re: Related Cases (filed on December 15, 2020) (Campos Class Action)	0.10	0.0
Review Defendant's Notice of Order Re: Related Cases (filed on December 15, 2020) (Velasquez Action)	0.10	0.0
Draft Plaintiff Campos' Notice of Entry of Order to Continue Initial Status Conference (filed on December 15, 2020) (Campos Class Action)	0.10	0.0
Draft Plaintiff Velasquez's Notice of Entry of Order Granting Joint Stipulation to Continue Status Conference (filed on December 23, 2020) (Velasquez Action)	0.10	0.0
Review Defendant's Supplemental Declaration of Geoffrey Lee Re: Meet and Confer Efforts Per Code of Civil Procedure Section 430.41 (December 28, 2020) (Campos PAGA Action)	0.10	0.0

Meet and Confer with Defendant's Counsel, and Draft Joint Initial Status Conference Statement (filed on January 6, 2021) (Velasquez Action)	1.20	0.0
Meet and Confer with Defendant's Counsel, and Draft Joint Case Management Conference Statement (filed on January 6, 2021) (Campos Class Action)	0.80	0.0
Draft Plaintiff's Notice of Posting Jury Fees (filed on January 8, 2021) (Velasquez Action)	0.10	0.0
Review Court's Minute Order Re: Status Conference (filed on January 13, 2021) (Velasquez Action)	0.10	0.0
Review Court's Minute Order Re: Initial Status Conference (filed on January 13, 2021) (Campos Class Action)	0.10	0.0
Draft Plaintiffs' First Amended Class Action Complaint for Damages and Legal Research and Analysis of All Claims Involved (filed on February 2, 2021) (Velasquez Action)	4.50	0.0
Review Court's Notice of Case Reassignment and Order for Plaintiff to Give Notice (Dates Remain) (filed on February 10, 2021) (Campos PAGA Action)	0.10	0.0
Review and Analyze Defendant's Answer to Plaintiff Campos' Unverified Complaint and Research Affirmative Defenses in Defendant's Answer (served on February 16, 2021) (Campos PAGA Action)	1.30	0.0
Draft Plaintiff Campos' Request for Dismissal, Declaration of Edwin Aiwasian in Support Thereof, and [Proposed] Order (filed on February 16, 2021) (Campos Class Action)	1.50	0.0
Draft Plaintiff Campos's Notice of Posting Jury Fees (filed on February 18, 2021) (Campos PAGA Action)	0.10	0.0
Review Defendant's Case Management Statement (filed on February 23, 2021) (Campos PAGA Action)	0.10	0.0

Draft Plaintiff's Case Management Statement (filed on February 23, 2021) (Campos PAGA Action)	0.90	0.0
Review Court's Order Granting Plaintiff Campos' Request for Dismissal (filed on February 26, 2021) (Campos Class Action)	0.10	0.0
Draft Plaintiffs' Notice of Association of Counsel (filed on March 4, 2021) (Velasquez Action)	0.10	0.10
Draft Plaintiff's Notice of Ruling (filed on March 10, 2021) (Campos PAGA Action)	0.10	0.0
Review Defendant's Notice of Errata on Previous Notice Appearance and Payment of Complex Case Fee (filed on March 11, 2021) (Velasquez Action)	0.10	0.10
Meet and Confer with Defendant's Counsel, and Draft, Revise, and/or Review Joint Status Conference Statement (filed on March 22, 2021) (Velasquez Action)	0.10	0.30
Review Court's Message Board Posting Re: Motion to Compel Arbitration and Status Conference Continued (submitted on March 24, 2021) (Campos Class Action) (Velasquez Action)	0.10	0.10
Review Court's Order Appointing Court Approved Reporter as Official Reporter Pro Tempore (filed on March 25, 2021) (Velasquez Action)	0.10	0.0
Plaintiff's Case Management Statement (filed on March 30, 2021) (Campos PAGA Action)	0.80	0.0
Draft Plaintiff's Response to Order to Show Cause Re: Sanctions Regarding Entry of Default as to Defendant View Hights Convalescent Hospital (filed on April 6, 2021) (Campos PAGA Action)	0.90	0.0
Meet and Confer with Defendant's Counsel, and Draft, Revise, and/or Review Joint Status Conference Statement (filed on April 27, 2021) (Velasquez Action)	0.10	0.30

Review Court's Minute Order Re: Court Order Re: Resetting May 4, 2021 Hearings (April 30, 2021) (Velasquez Action)	0.10	0.10
Review Court's Order Appointing Court Approved Reporter as Official Reporter Pro Tempore (filed on May 4, 2021) (Velasquez Action)	0.10	0.10
Draft Plaintiff's Case Management Statement (filed on May 5, 2021) (Campos PAGA Action)	0.80	0.0
Review Court's Minute Order Re: Case Management Conference (filed on May 20, 2021) (Campos PAGA Action)	0.10	0.0
Draft Plaintiff's Notice of Ruling (filed on June 2, 2021) (Campos PAGA Action)	0.10	0.0
Meet and Confer with Defendant's Counsel, and Draft, Revise, and/or Review Joint Status Conference Statement (filed on June 2, 2021) (Velasquez Action)	0.10	0.30
Review Court's Minute Order Re: Court Order Re: Continuance of Status Conference (filed on June 7, 2021) (Velasquez Action)	0.10	0.10
Draft Plaintiff Campos' Request for Dismissal (filed on June 10, 2021) (Campos PAGA Action)	0.20	0.0
Review Court's Notice of Case Reassignment and Order for Plaintiff to Give Notice (filed on June 29, 2021) (Campos PAGA Action)	0.10	0.0
Draft Plaintiff's Case Management Statement (filed on July 6, 2021) (Campos PAGA Action)	0.80	0.0
Review Defendant's Case Management Statement (filed on July 6, 2021) (Campos PAGA Action)	0.10	0.0
Review Court's Minute Order Re: Case Management Conference (filed on July 21, 2021) (Campos PAGA Action)	0.10	0.0

Meet and Confer with Defendant's Counsel, and Draft, Revise, and/or Review Joint Status Conference Statement (filed on August 2, 2021) (Velasquez Action)	0.10	0.30
Review Court's Minute Order Re: Status Conference (filed on August 9, 2021) (Velasquez Action)	0.10	0.10
Meet and Confer with Defendant's Counsel, and Draft, Revise, and/or Review Joint Status Conference Statement and Request for Continuance (filed on October 6, 2021) (Velasquez Action)	0.10	0.30
Review Court's Minute Order Re: Court Order Re: Continuance of Status Conference (filed on October 12, 2021) (Velasquez Action)	0.10	0.10
Draft Plaintiff's Case Management Statement (filed on November 15, 2021) (Campos PAGA Action)	0.80	0.0
Meet and Confer with Defendant's Counsel, and Draft, Revise, and/or Review Joint Status Conference Statement and Request for Continuance (filed on November 17, 2021) (Velasquez Action)	0.10	0.30
Review Court's Minute Order Re: Court Order Re: Continuance of Status Conference (filed on November 17, 2021) (Velasquez Action)	0.10	0.10
Review Defendant's Case Management Statement (filed on November 29, 2021) (Campos PAGA Action)	0.10	0.0
Review Court's Minute Order Re: Status Conference (filed on November 30, 2021) (Campos PAGA Action)	0.10	0.0
Meet and Confer with Defendant's Counsel, and Draft, Revise, and/or Review Joint Status Conference Statement and Request for Continuance (filed on January 11, 2022) (Velasquez Action)	0.10	0.30

Review Court's Minute Order Re: Court Order Re: Continuance of Status Conference (filed on January 18, 2022) (Velasquez Action)	0.10	0.10
Meet and Confer with Defendant's Counsel, and Draft, Revise, and/or Review Joint Status Conference Statement and Request for Continuance (filed on March 17, 2022) (Velasquez Action)	0.10	0.30
Review Court's Minute Order Re: Court Order Re: Continuance of Status Conference (filed on March 18, 2022) (Velasquez Action)	0.10	0.10
Meet and Confer with Defendant's Counsel, and Draft, Revise, and/or Review Joint Status Conference Statement (filed on June 14, 2022) (Velasquez Action)	0.10	0.30
Review Court's Message Board Posting (submitted on June 20, 2022) (Velasquez Action)	0.10	0.10
Meet and Confer with Defendant's Counsel, and Draft, Revise, and/or Review Joint Stipulation to Consolidate Case Nos. 20STCV07994 And 20CMCV00227 for Purposes of Class Action and PAGA Settlement; [Proposed Order] (filed on October 21, 2022) (Velasquez Action)	0.10	0.40
Review Court's Order Granting Joint Stipulation to Consolidate Case Nos. 20STCV07994 And 20CMCV00227 for Purposes of Class Action and PAGA Settlement and Minute Order Re: Court Order Re: Consolidation of 20STCV07994 and 20CMCV00227 (filed on October 25, 2022) (Consolidated Action)	0.10	0.10
Draft Plaintiff's Case Management Statement (filed on January 14, 2022) (Campos PAGA Action)	0.80	0.0
Review Defendant's Case Management Statement (filed on January 14, 2022) (Campos PAGA Action)	0.10	0.0
Review Court's Minute Order Re: Status Conference (filed on January 28, 2022) (Campos PAGA Action)	0.10	0.0

Draft Plaintiff's Case Management Statement (filed on February 17, 2022) (Campos PAGA Action)	0.80	0.0
Review Court's Notice of Case Reassignment and Order for Plaintiff to Give Notice (filed on July 8, 2022) (Campos PAGA Action)	0.10	0.0
Meet and Confer with Defendant's Counsel, and Draft Notice of Conditional Settlement (filed on July 26, 2022) (Campos PAGA Action)	0.80	0.0
Review Court's Order to Show Cause Re: Dismissal (Settlement) (filed on August 11, 2022) (Campos PAGA Action)	0.10	0.0
Review Court's Notice of Case Reassignment and Order for Plaintiff to Give Notice (filed on September 22, 2022) (Campos PAGA Action)	0.10	0.0
Review Court's Minute Order Re: Court Order Re: Order to Show Cause Re: Dismissal (Settlement) (filed on October 20, 2022) (Campos PAGA Action)	0.10	0.0
Review Court's Minute Order Re: Court Order Re: Consolidation of 20STCV07994 and 20CMCV00227) (filed on October 25, 2022) (Velasquez Action)	0.10	0.10
Appearances		
Prepare for and Telephonically Attend Status Conference (January 13, 2021) (Velasquez Action)	1.50	0.0
Prepare for and Telephonically Attend Initial Status Conference (January 13, 2021) (Campos Class Action)	1.50	0.0
Prepare for and Telephonically Attend Hearing on Motion to Strike (February 4, 2021) (Campos PAGA Action)	1.10	0.0
Prepare for and Telephonically Attend Case Management Conference (March 10, 2021) (Campos PAGA Action)	1.10	

Prepare for and Telephonically Attend Hearing on Motion to Compel Arbitration Plaintiff Cindy Velasquez and Hearing on Motion to Compel Arbitration Plaintiff Paulina Campos (March 25, 2021) (Velasquez Action)	0.00	1.00
Prepare for and Telephonically Attend Hearing on Motion for Determination of a Jury Trial and Order to Show Cause Re: Sanctions Regarding Entry of Default as to Defendant (April 13, 2021) (Campos PAGA Action)	2.60	0.0
Prepare for and Telephonically Attend Continued Hearing on Motion to Compel Arbitration Plaintiff Cindy Velasquez and Hearing on Motion to Compel Arbitration Plaintiff Paulina Campos (May 4, 2021) (Velasquez Action)	0.00	0.80
Prepare for and Telephonically Attend Case Management Conference (May 20, 2021) (Campos PAGA Action)	1.10	0.0
Prepare for and Telephonically Attend Case Management Conference and Order to Show Cause Re: Dismissal as to Defendant View Hights Convalescent Hospital Pursuant to Government Code Section 68608(B) (July 21, 2021) (Campos PAGA Action)	1.10	0.0
Prepare for and Telephonically Attend Status Conference (August 9, 2021) (Velasquez Action)	0.00	0.80
Prepare for and Telephonically Attend Trial Setting Conference (November 30, 2021) (Campos PAGA Action)	0.60	0.0
Prepare for and Telephonically Attend Status Conference (January 28, 2022) (Campos PAGA Action)	0.50	0.0
Prepare for and Telephonically Attend Case Management Conference (March 4, 2023) (Campos PAGA Action)	0.60	0.0
Prepare for and Telephonically Attend Hearing on Plaintiffs' Motion for Preliminary Approval of Class Action Settlement (July 20, 2023) (Velasquez Action)	1.20	1.0

Prepare for and Telephonically Attend Hearing on Plaintiffs' Motion for Final Approval of Class Action Settlement, Attorneys' Fees and Costs, and Enhancement Awards (February 15, 2024) (Anticipated)	1.50	0.0
Discovery and Deposition		
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Putative Class Member (served on October 29, 2019)	1.90	0.0
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Putative Class Member (served on November 4, 2019)	1.50	0.0
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Putative Class Member (served on November 5, 2019)	1.50	0.0
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Putative Class Member (served on November 6, 2019)	1.50	0.0
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Putative Class Member (served on November 8, 2019)	1.50	0.0
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Putative Class Member (served on November 15, 2019)	1.50	0.0
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Paulina Campos (served on November 15, 2019)	1.50	0.0
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Cindy Velasquez (served on November 19, 2019)	1.50	0.0
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Putative Class Member (served on November 20, 2019)	2.90	0.0

Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Putative Class Member (served on December 4, 2019)	1.50	0.0
Draft Letter to Defendant Re: Follow-Up Request for Personnel File, Pay Stubs, and Time Records for Putative Class Member (served on December 5, 2019)	1.20	0.0
Draft Letter to Defendant Re: Follow-Up Request for Personnel File, Pay Stubs, and Time Records for Putative Class Member (served on December 5, 2019)	1.10	0.0
Draft Letter to Defendant Re: Follow-Up Request for Personnel File, Pay Stubs, and Time Records for Putative Class Member (served on December 5, 2019)	1.10	0.0
Draft Letter to Defendant Re: Follow-Up Request for Personnel File, Pay Stubs, and Time Records for Putative Class Member (served on December 6, 2019)	1.10	0.0
Draft Letter to Defendant Re: Follow-Up Request for Personnel File, Pay Stubs, and Time Records for Putative Class Member (served on December 6, 2019)	1.10	0.0
Draft Letter to Defendant Re: Follow-Up Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Cindy Velasquez (served on December 16, 2019)	1.10	0.0
Draft Letter to Defendant Re: Follow-Up Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Paulina Campos (served on December 16, 2019)	1.10	0.0
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Putative Class Member (served on December 16, 2019)	3.50	0.0
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Putative Class Member (served on December 16, 2019)	3.10	0.0

Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Putative Class Member (served on December 16, 2019)	3.30	0.0
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Putative Class Member (served on December 16, 2019)	4.10	0.0
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Putative Class Member (served on December 16, 2019)	3.10	0.0
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Putative Class Member (served on December 23, 2019)	0.10	0.0
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Cindy Velasquez (served on December 30, 2019)	5.10	0.0
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Putative Class Member (served on December 30, 2019)	2.40	0.0
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Paulina Campos (served on January 2, 2020)	5.50	0.0
Draft Plaintiff's Form Interrogatories - General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), and Requests for Production of Documents (Set One) to Defendant Amada Enterprises Inc. (served on March 18, 2020) (Campos PAGA Action)	4.80	0.0
Draft Plaintiff's Form Interrogatories - General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), and Requests for Production of Documents (Set One) to	2.10	0.0

Former Defendant View Heights Convalescent Hospital (served on March 18, 2020) (Campos PAGA Action)		
Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant Amada Enterprises, Inc. and Requests for Production of Documents (noticed for April 12, 2021; Organizational Structure) (served on March 18, 2021) (Campos PAGA Action)	2.70	0.0
Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant Amada Enterprises, Inc. and Requests for Production of Documents (noticed for April 13, 2021; Wage and Hour Practices) (served on March 18, 2021) (Campos PAGA Action)	2.50	0.0
Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Former Defendant View Heights Convalescent Hospital and Requests for Production of Documents (noticed for April 12, 2021; Organizational Structure) (served on March 18, 2021) (Campos PAGA Action)	1.70	0.0
Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Former Defendant View Heights Convalescent Hospital and Requests for Production of Documents (noticed for April 13, 2021; Wage and Hour Practices) (served on March 18, 2021) (Campos PAGA Action)	1.50	0.0
Review and Analyze Defendant Amada Enterprises Inc.'s Objection to Paulina Campos's Notice of Deposition of Person Most Knowledgeable at Defendant Amada Enterprises, Inc. and Requests for Production of Documents (served on April 8, 2021) (Campos PAGA Action)	0.90	0.0
Review and Analyze Defendant Amada Enterprises Inc.'s Response to Plaintiff's Form Interrogatories - General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), and Requests for Production of Documents (Set One) (served on April 20, 2021) (Campos PAGA Action)	2.50	0.0

Letters and Correspondence		
Draft Notice to California Labor and Workforce Development Agency Re: Claims of Plaintiff Paulina Campos for Penalties Under California Labor Code section 2698, <i>et seq.</i> (served on May 29, 2020) (Campos PAGA Action)	4.50	0.0
Meet with, Draft Correspondence to, and Respond to Correspondence from, Defendant's Counsel	16.50	12.0
Mediation/Settlement		
Review and Analyze Information, Data, and Documents Obtained from Plaintiffs, Defendant (approximately 18,259 pages), and Other Sources Prior to Mediation	58.50	6.0
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 November 3, 2020)	29.50	4.0
Remotely Attend First Mediation Session (November 10, 2020; Zoom Video Conference)	5.50	0.0
Remotely Attend Second Mediation Session (November 23, 2020; Zoom Video Conference)	10.50	0.0
Review and Analyze Mediator's Proposal(s), Review and Analyze Defendant's Financial Documents and Assess Defendant's Financial Circumstances, and Conduct Additional Settlement Negotiations and Discussions with Mediator and Defendant's Counsel (November 23, 2020 – July 8, 2022)	20.50	0.50

Draft, Review, Revise, Negotiate, and Finalize Joint Stipulation of Class Action and PAGA Settlement and Release (executed on March 27, 2023) and Notice of Class Action Settlement	17.50	0.0
Law and Motion		
Review and Analyze Defendant's Notice of Motion to Strike, Memorandum of Points and Authorities in Support Thereof, and Request for Judicial Notice in Support Thereof (filed on December 28, 2020) (Campos PAGA Action)	1.30	0.0
Research and Draft Plaintiff Paulina Campos's Opposition to Defendant's Motion to Strike, Opposition to Defendant's Request for Judicial Notice in Support of Defendant's Motion to Strike, and Declaration of Tara Zabehi in Support Thereof (January 22, 2021) (Campos PAGA Action)	12.20	0.0
Review and Analyze Defendant's Reply in Support of Motion to Strike (filed on January 28, 2021) (Campos PAGA Action)	1.50	0.0
Review Court's Minute Order Re: Hearing on Motion to Strike – Without Demurrer (filed on February 4, 2021) (Campos PAGA Action)	0.10	0.0
Review and Analyze Defendant's Notice of Ruling Re: Hearing on Motion to Strike (filed on February 4, 2021) (Campos PAGA Action)	0.10	0.0
Review and Analyze Defendant Amanda Enterprises, Inc.'s Notice of Motion to Compel Arbitration Against Plaintiff Cindy Velasquez, Memorandum of Points and Authorities in Support Thereof, Request for Judicial Notice, Declaration of Andrew S. Wellman in Support Thereof, Declaration of Cecille Faber in Support Thereof, and Declaration of John Jones in Support Thereof (filed on February 18, 2021) (Velasquez Action)	1.50	5

Research and Draft, Revise, and/or Review Plaintiff Cindy Velasquez's Opposition to Defendant's Motion to Compel Arbitration Against Plaintiff Cindy Velasquez, Declaration of Cindy Velasquez in Support of Opposition, Cindy Velasquez's Objections to Evidence Submitted in Support of Defendant's Motion, and [Proposed] Order Denying Defendant's Motion to Compel Arbitration (filed on March 10, 2021) (Velasquez Action)	0.10	16
Review and Analyze Defendant Amada Enterprises, Inc.'s Reply in Support of Motion to Compel Arbitration Against Plaintiff Cindy Velasquez and Paulina Campos (filed on March 17, 2021) (Velasquez Action)	0.80	3
Review and Analyze Defendant Amada Enterprises, Inc.'s Notice of Motion for Determination of a Jury Trial, Memorandum of Points and Authorities in Support Thereof, and Request for Judicial Notice in Support Thereof (filed on March 17, 2021) (Campos PAGA Action)	0.80	0.0
Review and Analyze Court's Tentative Ruling Re: Defendant Amada Enterprises, Inc.'s Motion to Compel Arbitration (posted on Case Anywhere on March 22, 2021) (Velasquez Action)	0.20	0.40
Review and Analyze Defendant's Notices of Withdrawal of Motion by Defendant Amada Enterprises, Inc. to Compel Arbitration (as to Plaintiff Cindy Velasquez and Plaintiff Paulina Campos) (filed on March 22, 2021) (Velasquez Action)	0.10	0.10
Review and Analyze Supplemental Declaration of John Jones in Support of Defendant Amada Enterprises, Inc.'s Motion to Compel Arbitration Against Plaintiff Paulina Campos (filed on March 23, 2021) (Velasquez Action)	0.10	0.20
Review Court's Minute Order Re: Court Order Re: Notice of Withdrawal of Motion to Compel Arbitration (filed on March 23, 2021) (Velasquez Action)	0.10	0.10
Review Court's Minute Order Re: Hearing on Motion to Compel Arbitration (filed on March 25, 2021) (Velasquez Action)	0.10	0.10

Research and Draft Plaintiff's Opposition to Defendant's Motion for Determination of a Jury Trial and Plaintiff's Opposition to Defendant's Request for Judicial Notice in Support of Defendant's Motion for Determination of a Jury Trial (filed on March 30, 2021) (Campos PAGA Action)	9.80	0.0
Review and Analyze Defendant Amada Enterprises, Inc.'s Reply in Support of Motion for Determination of a Jury Trial (filed on April 5, 2021) (Campos PAGA Action)	0.50	0.0
Review Court's Minute Order Re: Hearing on Motion for Determination of a Jury Trial; Order to Show Cause Re: Sanctions Regarding Entry of Default as to Defendant, View Hights Convalescent Hospital (filed on April 13, 2021) (Campos PAGA Action)	0.10	0.0
Draft Plaintiff's Notice of Ruling Re: Court's Minute Order Re: Hearing on Motion for Determination of a Jury Trial; Order to Show Cause Re: Sanctions Regarding Entry of Default as to Defendant, View Hights Convalescent Hospital (filed on April 14, 2021) (Campos PAGA Action)	0.10	0.0
Review Court's Minute Order Re: Hearing on Motion to Compel Arbitration (filed on May 4, 2021) (Velasquez Action)	0.10	0.10
Research and Draft Plaintiffs' Notice of Motion and Motion for Preliminary Approval of Class Action Settlement, Declaration of Yasmin Hosseini in Support Thereof, Declaration of Cindy Velasquez in Support Thereof, Declaration of Paulina Campos in Support Thereof, and [Proposed] Order (filed on June 27, 2023) (Velasquez Action)	18.50	0.0
Review Court's Order Re: Checklist for Preliminary Approval of Class Action Settlement (filed on July 18, 2023) (Velasquez Action)	0.50	0.20
Draft, Revise, and/or Review Plaintiffs' Supplemental Declaration of Heather Davis in Support of Motion for Preliminary Approval of Class Action and PAGA Settlement (filed on July 19, 2023) (Velasquez Action)	0.00	0.40

Review Court's Minute Order Re: Hearing on Motion for Preliminary Approval of Settlement (filed on July 20, 2023) (Velasquez Action)	0.10	0.10
Draft, Revise, and/or Review Plaintiffs' Declaration of Brian St. John in Support of Plaintiffs' Motion for Preliminary Approval of Class Action Settlement (filed on July 28, 2023) (Velasquez Action)	2.50	0.0
Review Court's Order Granting Preliminary Approval of Class Action Settlement and Minute Order Re: Court Order Re: Motion for Preliminary Approval of Class Action Settlement (filed on August 7, 2023) (Velasquez Action)	0.10	0.20
Review and Analyze Settlement Administrator's Declaration Regarding Settlement Notice Administration; and Research and Draft Plaintiffs' Motion for Final Approval of Class Action Settlement, Attorneys' Fees and Costs, and Enhancement Awards, Declaration of Joanna Ghosh in Support Thereof, Declaration of Heather Davis in Support Thereof, and [Proposed] Final Approval Order and Judgment (filed on January 23, 2024) (Velasquez Action)	21.50	2.50
Total Hours:	554.10	60.50
Grand Total Hours:		614.60

EXHIBIT B

LAWYERS for JUSTICE PC CASE COST DETAIL
Velasquez v. Amada Enterprises

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
10/29/2019	U.S. Postmaster	Postage	6.85
11/5/2019	U.S. Postmaster	Postage	6.85
11/6/2019	U.S. Postmaster	Postage	6.85
11/8/2019	U.S. Postmaster	Postage	6.85
11/14/2019	U.S. Postmaster	Postage	6.85
11/15/2019	U.S. Postmaster	Postage	6.85
11/19/2019	U.S. Postmaster	Postage	6.85
12/4/2019	U.S. Postmaster	Postage	6.85
12/5/2019	U.S. Postmaster	Postage	16.00
12/6/2019	U.S. Postmaster	Postage	16.00
12/16/2019	U.S. Postmaster	Postage	24.00
2/4/2020	General Logistics Systems US, Inc.	Courier Service	13.24
2/12/2020	General Logistics Systems US, Inc.	Courier Service	13.24
2/28/2020	Los Angeles Superior Court	Complaint Filing Fee	435.00
2/28/2020	Los Angeles Superior Court	Complex Filing Fee	1,000.00
3/9/2020	Legal Document Server, Inc.	Attorney Service	110.00
3/10/2020	Legal Document Server, Inc.	Attorney Service	110.00
4/23/2020	FedEx Express	Courier Service	16.37
5/6/2020	Legal Document Server, Inc.	Attorney Service	90.00
6/19/2020	Legal Document Server, Inc.	Attorney Service	90.00
7/7/2020	Legal Document Server, Inc.	Attorney Service	175.00
7/9/2020	Los Angeles Superior Court	Remote Appearance Fee	30.00
8/21/2020	Esquire Deposition Solutions	Court Reporter	1,673.10
8/21/2020	Esquire Deposition Solutions	Videography Service	695.00
8/27/2020	Esquire Deposition Solutions	Court Reporter	2,329.40
9/4/2020	Case Anywhere, LLC	Attorney Service	87.60
11/17/2020	Legal Document Server, Inc.	Attorney Service	205.70
11/27/2020	Codici	Analysis of Sampling of Time Records	4,650.00
11/30/2020	Burkey Cox Evans & Bradford CPAs	Review of Defendant(s) Financial Condition	2,200.00
12/3/2020	Case Anywhere, LLC	Attorney Service	120.00
12/23/2020	Legal Document Server, Inc.	Attorney Service	175.00
12/31/2020	Burkey Cox Evans & Bradford CPAs	Review of Defendant(s) Financial Condition	5,625.00
1/6/2021	Legal Document Server, Inc.	Attorney Service	205.00
1/8/2021	Legal Document Server, Inc.	Attorney Service	210.25
1/8/2021	Los Angeles Superior Court	Jury Fee	150.00
1/12/2021	Case Anywhere, LLC	Attorney Service	57.60
1/18/2021	Los Angeles Superior Court	Remote Hearing Fee	23.00
2/2/2021	Legal Document Server, Inc.	Attorney Service	245.00
3/4/2021	Legal Document Server, Inc.	Attorney Service	205.00
3/31/2021	Burkey Cox Evans & Bradford CPAs	Review of Defendant(s) Financial Condition	500.00

LAWYERS for JUSTICE PC CASE COST DETAIL
Velasquez v. Amada Enterprises

4/30/2021	Burkey Cox Evans & Bradford CPAs	Review of Defendant(s) Financial Condition	250.00
6/30/2021	Burkey Cox Evans & Bradford CPAs	Review of Defendant(s) Financial Condition	250.00
7/31/2021	Burkey Cox Evans & Bradford CPAs	Review of Defendant(s) Financial Condition	750.00
8/31/2021	Burkey Cox Evans & Bradford CPAs	Review of Defendant(s) Financial Condition	2,500.00
9/30/2021	Burkey Cox Evans & Bradford CPAs	Review of Defendant(s) Financial Condition	875.00
10/31/2021	Burkey Cox Evans & Bradford CPAs	Review of Defendant(s) Financial Condition	1,250.00
11/30/2021	Burkey Cox Evans & Bradford CPAs	Review of Defendant(s) Financial Condition	750.00
2/28/2022	Burkey Cox Evans & Bradford CPAs	Review of Defendant(s) Financial Condition	2,200.00
10/24/2022	Legal Document Server, Inc.	Attorney Service	17.30
10/24/2022	Los Angeles Superior Court	Filing Fee	20.00
6/28/2023	Legal Document Server, Inc.	Attorney Service	225.32
6/28/2023	Los Angeles Superior Court	Motion Fee	60.00
7/31/2023	Legal Document Server, Inc.	Attorney Service	16.15
11/1/2023	Case Anywhere, LLC	Attorney Service	120.00
11/7/2023	Los Angeles Superior Court	Filing Fee	20.00
Total:			30,854.07

LAWYERS for JUSTICE PC CASE COST DETAIL
Campos v. Amada Enterprises, Inc. (PAGA)

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
5/29/2020	Labor & Workforce Development Agency	PAGA Filing Fee	75.00
5/29/2020	U.S. Postmaster	Postage	15.40
7/7/2020	U.S. Postmaster	Postage	7.50
7/17/2020	General Logistics Systems US, Inc.	Courier Service	11.93
7/27/2020	General Logistics Systems US, Inc.	Courier Service	11.93
9/16/2020	Legal Document Server, Inc.	Attorney Service	30.43
9/16/2020	Los Angeles Superior Court	Court Filing Fee	435.00
9/29/2020	Legal Document Server, Inc.	Attorney Service	110.00
10/5/2020	Legal Document Server, Inc.	Attorney Service	110.00
10/23/2020	Legal Document Server, Inc.	Attorney Service	30.40
1/25/2021	Legal Document Server, Inc.	Attorney Service	15.20
2/16/2021	Legal Document Server, Inc.	Attorney Service	95.00
2/18/2021	Legal Document Server, Inc.	Attorney Service	35.65
2/18/2021	Los Angeles Superior Court	Jury Fee	150.00
2/23/2021	General Logistics Systems US, Inc.	Courier Service	19.56
2/23/2021	Legal Document Server, Inc.	Attorney Service	15.20
3/11/2021	Legal Document Server, Inc.	Attorney Service	15.20
3/30/2021	Legal Document Server, Inc.	Attorney Service	26.20
4/6/2021	General Logistics Systems US, Inc.	Courier Service	15.56
4/6/2021	Legal Document Server, Inc.	Attorney Service	15.20
4/14/2021	Legal Document Server, Inc.	Attorney Service	15.20
5/5/2021	Legal Document Server, Inc.	Attorney Service	15.20
6/2/2021	Legal Document Server, Inc.	Attorney Service	15.20
6/11/2021	Legal Document Server, Inc.	Attorney Service	15.20
7/7/2021	Legal Document Server, Inc.	Attorney Service	15.20
11/15/2021	Legal Document Server, Inc.	Attorney Service	15.20
1/14/2022	Legal Document Server, Inc.	Attorney Service	11.00
1/18/2022	Legal Document Server, Inc.	Attorney Service	15.20
2/17/2022	Legal Document Server, Inc.	Attorney Service	15.20
7/26/2022	Legal Document Server, Inc.	Attorney Service	15.95
10/24/2022	Legal Document Server, Inc.	Attorney Service	29.05
10/24/2022	Los Angeles Superior Court	Stipulation and Order Fee	20.00
Total:			1,437.96

LAWYERS for JUSTICE PC CASE COST DETAIL
Campos v. Amada Enterprises, Inc. (CLASS)

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
8/4/2020	Case Anywhere, LLC	Attorney Service	120.00
9/11/2020	Los Angeles Superior Court	Complaint Filing Fee	435.00
9/11/2020	Los Angeles Superior Court	Complex Filing Fee	1,000.00
9/11/2020	ProLegal	Attorney Service	268.76
10/19/2020	Legal Document Server, Inc.	Attorney Service	110.00
10/21/2020	Legal Document Server, Inc.	Attorney Service	110.00
10/27/2020	Legal Document Server, Inc.	Attorney Service	145.00
11/6/2020	Legal Document Server, Inc.	Attorney Service	175.00
11/23/2020	Legal Document Server, Inc.	Attorney Service	180.25
11/23/2020	Los Angeles Superior Court	Jury Fee	150.00
12/2/2020	Legal Document Server, Inc.	Attorney Service	205.70
12/2/2020	Los Angeles Superior Court	Stipulation and Order Fee	20.00
12/15/2020	Legal Document Server, Inc.	Attorney Service	205.00
1/7/2021	Legal Document Server, Inc.	Attorney Service	205.00
1/18/2021	Los Angeles Superior Court	Remote Appearance Fee	23.00
1/22/2021	General Logisitcs Systems US, Inc.	Courier Service	19.53
1/25/2021	Legal Document Server, Inc.	Attorney Service	15.20
2/3/2021	Case Anywhere, LLC	Attorney Service	112.80
2/16/2021	Legal Document Server, Inc.	Attorney Service	110.00
2/18/2021	Legal Document Server, Inc.	Attorney Service	35.65
3/4/2021	Legal Document Server, Inc.	Attorney Service	95.00
3/29/2021	General Logisitcs Systems US, Inc.	Courier Service	15.45
3/30/2021	General Logisitcs Systems US, Inc.	Courier Service	41.40
3/30/2021	Legal Document Server, Inc.	Attorney Service	15.20
4/6/2021	Legal Document Server, Inc.	Attorney Service	15.20
4/14/2021	Legal Document Server, Inc.	Attorney Service	15.20
5/4/2021	Case Anywhere, LLC	Attorney Service	156.00
5/5/2021	Legal Document Server, Inc.	Attorney Service	15.20
6/11/2021	Legal Document Server, Inc.	Attorney Service	15.20
7/7/2021	Legal Document Server, Inc.	Attorney Service	15.20
8/1/2021	Case Anywhere, LLC	Attorney Service	120.00
11/8/2021	Case Anywhere, LLC	Attorney Service	120.00
2/1/2022	Case Anywhere, LLC	Attorney Service	120.00
3/18/2022	General Logisitcs Systems US, Inc.	Courier Service	22.38
5/5/2022	Case Anywhere, LLC	Attorney Service	120.00
11/7/2022	Case Anywhere, LLC	Attorney Service	126.00
2/6/2023	Case Anywhere, LLC	Attorney Service	120.00
5/8/2023	Case Anywhere, LLC	Attorney Service	120.00
8/4/2023	Case Anywhere, LLC	Attorney Service	120.00
Total:			5,033.32