

Edwin Aiwarzian, SBN 232943  
edwin@calljustice.com  
**LAWYERS for JUSTICE, PC**  
410 West Arden Avenue, Suite 203  
Glendale, California 91203  
Tel: (818) 265-1020 / Fax: (818) 265-1021

Heather Davis, SBN 239372  
heather@protectionlawgroup.com  
Amir Nayebdadash, SBN 232204  
amir@protectionlawgroup.com  
Luke Clapp, SBN 306040  
luke@protectionlawgroup.com  
**PROTECTION LAW GROUP, LLP**  
237 California Street  
El Segundo, California 90245  
Tel: (424) 290-3095 / Fax: (866) 264-7880

*Attorneys for Plaintiffs*

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

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

Plaintiffs,

vs.

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

Defendants.

Case No.: 20STCV07994 (Lead Case)  
20CMCV00227

*Assigned for all purposes: Hon. Stuart M. Rice,  
Department 1*

**CLASS ACTION**

**DECLARATION OF HEATHER DAVIS IN  
SUPPORT OF MOTION FOR FINAL  
APPROVAL OF CLASS ACTION AND PAGA  
SETTLEMENT**

Hearing Date: February 15, 2024

Hearing Time: 10:30 a.m.

Dept: 1

Complaint Filed: February 28, 2020

FAC Filed: February 2, 2021

Trial Date: None Set

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**DECLARATION OF HEATHER DAVIS**

I, Heather Davis, declare as follows:

1. I am an attorney duly admitted to the Bar of the State of California and all United States District Courts in the State of California. I am a Partner with Protection Law Group, LLP, counsel of record for Plaintiffs PAULINA CAMPOS and CINDY VELASQUEZ (“Plaintiffs”). I have personal knowledge of the facts stated herein and if called as a witness I could and would competently testify thereto.

2. I make this declaration in support of Plaintiffs’ Motion for Final Approval of Class Action and PAGA Settlement.

**CLASS COUNSEL’S BACKGROUND AND EXPERIENCE**

4. I am a duly licensed attorney and have been a member of the Colorado State Bar since 1998, the California State Bar since 2005, and the Arizona State Bar since 2007. I graduated from the University of Denver School of Law in 1998, and I am licensed to practice before all courts of the State of California and Colorado as well as the State of Arizona and District Courts throughout the country.

5. Prior to opening my law firm, I developed particular experience in the area of wage and hour litigation. For instance, between 2007 and 2013, I joined the law firm of Littler Mendelson, P.C., the largest labor and employment law firm in the United States.

6. During my employment with Littler Mendelson, P.C., I continued my practice of employment law and was responsible for and defended dozens of complex class actions involving some of the largest representative and class actions brought under the California Labor Code, including meal and rest break violations, overtime, minimum wage claims, off-the-clock work, and other related wage claims. My practice included the management of dozens of class actions. My management of these cases included taking and defending hundreds of depositions and interviewing hundreds of putative class members as well as drafting extensive state, federal and appellate briefing on hundreds of wage and hour issues involving class actions.

7. During my employment at Littler Mendelson, I played a significant role in the class actions for which I was responsible. In particular, I was often in charge of leading the strategy of the

1 cases and drafting all of the briefs. I received a wide-array of wage and hour class action experience  
2 performing the following types of tasks: drafting demurrers; motions to strike and/or dismiss;  
3 removing actions from state court to federal court; drafting and responding to written discovery;  
4 drafting and opposing discovery related motions; arguing discovery related motions; drafting motions  
5 to consolidate related matters; interviewing putative class members and obtaining declarations in  
6 connection with class certification; drafting oppositions to motions for class certification; drafting  
7 motions for decertification following class certification; conducting exposure analyses to assess the  
8 strengths and weaknesses of asserted claims, the likelihood of prevailing at class certification and  
9 potential damages resulting from such claims; drafting mediation briefs; serving as the primary  
10 contact to in-house counsel; deposing plaintiff and putative class members; deposing retained expert  
11 witnesses; and defending the depositions of corporate witnesses. In short, I played an integral role in  
12 all aspects of litigation from the inception of a matter through and beyond class certification.

13 8. During my practice in other jurisdictions and continuing today, I have been primarily  
14 devoted to working in employment law and on complex class action and representative litigation and  
15 multi-plaintiff work.

16 9. Protection Law Group, LLP is a law firm specifically devoted to the representation of  
17 employees against employers in California involving claims relating to violations of the California  
18 Labor Code, including claims for failure to pay all wages owed, failure to pay overtime premiums,  
19 failure to pay any meal and rest premiums and failure to provide accurate wage records. The practice  
20 of employment law is a very specific, narrow field which requires diligence in an ever-evolving field  
21 of substantive and procedural law.

22 10. Although not exhaustive, below is a representative list of several of the wage and hour  
23 class actions that I performed substantial work on while I was an attorney with Littler Mendelson,  
24 including, but not limited to: *Villacres v. ABM Industries, Inc.*, 189 Cal.App.4th 562 (2010); *Brizuela*  
25 *v. Copart, Inc.*, CIVRS11101592, (San Bernardino Superior Court class action settlement); *Augustus*  
26 *v. ABM Industries, Inc.*, BC336416, 2 Cal. 5th 257 (2016); *Tagaki v. United Airlines*, 2:11-CV9191  
27 (Central District class action settlement); *Babasa v. Comerica, Inc.*, 3:11-CV00595; *Leyva v. Medline*  
28 *Industries, Inc.* 5:11-cv-00164 (Central District); *Blue v. Coldwell Banker Residential Brokerage Co.*,

BC417335, (Los Angeles Superior Court, class action settlement); and *Acosta v. Texwood Industries, Inc.*, 2:07-cv-03237-DDP-PLA (Central District class action settlement).

11. Since opening my firm, I have served as lead counsel or co-class counsel in several wage and hour class and/or representative actions seeking wages and penalties owed on behalf of employees for which final approval of the settlement or class certification has been granted, including, but not limited to the following:

- *Holzer v. Wedbush Securities, Inc.*, BC 550462 (Los Angeles County Superior Court wage and hour class action certifying class of independent contractors and appointing Protection Law Group, LLP as class counsel);
- *White v. Windy Pizza Plus, LLC*, BC593377 (Los Angeles County Superior Court wage and hour class action certifying class of all non-exempt employees and appointing Protection Law Group, LLP as class counsel);
- *Morera v. Continental Assets Mgmt.*, BC502003, (Los Angeles County Superior Court wage and hour class action appointing Protection Law Group, LLP as class counsel in settlement);
- *Fong et al. v. Regis Corporation*, 3:13-cv-13-04497 VC, (United States District Court, Northern District of California, wage and hour class action settlement and appointment Protection Law Group, LLP as class counsel in settlement);
- *Espinoza v. Financial Partners Credit Union*, BC502165 (Los Angeles County Superior Court wage and hour Class action appointing Protection Law Group, LLP as class counsel in settlement);
- *Lemus v. Slater Inc.*, CIVDS1703633 (San Bernardino County Superior Court wage and hour class action appointing Protection Law Group, LLP as class counsel in settlement);
- *Deluna v. Amerit Fleet Solutions et al.*, CIVDS1721564 (San Bernardino County Superior Court wage and hour class action appointing Protection Law Group, LLP as class counsel in settlement);
- *Stone v. Universal Protection Services*, AAA Case No. 01-15-0002-7497 (American Arbitration Association wage and hour class action appointing Protection Law Group, LLP as class counsel in settlement on behalf of class of 75,000+ putative class members);

- 1 • *Commick v. Prometheus Real Estate Group*, CIV531264 (San Mateo County Superior Court  
2 wage and hour class action appointing Protection Law Group, LLP as class counsel in  
3 settlement);
- 4 • *Martinez v. AMRO Fabricating Corp.*, BC681938 (Los Angeles County Superior Court wage  
5 and hour class action appointing Protection Law Group, LLP as class counsel in settlement);
- 6 • *Ramirez v. Western National Properties*, BC639319 (Los Angeles County Superior Court  
7 wage and hour class action appointing Protection Law Group, LLP as class counsel in  
8 settlement);
- 9 • *Hernandez v. Access Dental Plan et. al*, 34-2017-00220944 (Sacramento County Superior  
10 Court wage and hour class action appointing Protection Law Group, LLP as class counsel in  
11 settlement);
- 12 • *Fernandez v. Sumitomo Rubber North America, Inc.*, CIVDS 1803211 (San Bernardino  
13 County Superior Court wage and hour class action appointing Protection Law Group, LLP as  
14 class counsel in settlement);
- 15 • *Gomez v. Fairway Staffing Services, Inc.*, BC689771 (Los Angeles County Superior Court  
16 wage and hour class action appointing Protection Law Group, LLP as class counsel in  
17 settlement);
- 18 • *Fuentes v. Communications Test Design, Inc.*, CIVDS1802427 (San Bernardino County  
19 Superior Court wage and hour class action appointing Protection Law Group, LLP as class  
20 counsel in settlement);
- 21 • *Hartline v. Senior Operations, LLC*, BC697665 (Los Angeles County Superior Court wage  
22 and hour class action appointing Protection Law Group, LLP as class counsel in settlement);
- 23 • *Carrozzella v. Basalite Concrete Products, LLC*, 34-2014-00220214 (Sacramento County  
24 Superior Court wage and hour class action appointing Protection Law Group, LLP as class  
25 counsel in settlement);
- 26 • *Howey v. Battery Systems, Inc.*, 2026114 (Stanislaus County Superior Court wage and hour  
27 class action appointing Protection Law Group, LLP as class counsel in settlement);
- 28 • *Correa v. Cashbak, LLC*, BC723845 (Los Angeles County Superior Court wage and hour

- class action appointing Protection Law Group, LLP as class counsel in settlement);
- *Lemus v. Cass Construction*, 37-2017-00028180 (San Diego County Superior Court wage and hour class action appointing Protection Law Group, LLP as class counsel in settlement);
  - *Sales v. J.S. International Shipping Corp.*, 18CIV05048 (San Mateo County Superior Court wage and hour class action appointing Protection Law Group, LLP as class counsel in settlement);
  - *Aparicio v. Advantage Painting*, CIVDS2013809 (San Bernardino County Superior Court approving PAGA Settlement);
  - *Rodriguez v. TheRealReal, Inc.*, CGC-19-574661 (San Francisco County Superior Court approving PAGA Settlement);
  - *Parm v. Think Together*, CIVDS1823659 (San Bernardino County Superior Court approving PAGA Settlement);
  - *Casey-Neith v. Pacific Union Financial*, 30-2018-01014980 (Orange County Superior Court approving PAGA Settlement);
  - *Wallace v. Alvarado Restaurant Group, LLC*, 20STCV26260 (Los Angeles County Superior Court approving PAGA Settlement);
  - *Adams v. West Marine Products, Inc.*, 19CIV00436 (San Mateo Superior Court wage and hour class action appointing Protection Law Group, LLP as class counsel in settlement)
  - *Coronel, et al. v. CMH Manufacturing, Inc., et al.*, RIC2003070 (Riverside County Superior Court approving PAGA Settlement)
  - *Tiscareno, et al. v. Broadway Typewriter Company, Inc. dba Arey Jones Educational Solutions*, BC695668 (Los Angeles County Superior Court approving Class Action and PAGA Settlement) (2021)
  - *Herrera et al. v. Anixter, Inc. et al.*, 30-2020-01142893-CU-OE-CXC (Orange County Superior Court approving Class Action and PAGA Settlement)
  - *Alvarez v. 2H Construction, Inc.*, 21STCV05675 (Los Angeles County Superior Court approving Class Action and PAGA Settlement)
  - *Bahena v. New Way Landscape & Tree Services*, 37-2020-00030533-CU-OE-CTL (San

Diego County Superior Court approving Class Action and PAGA Settlement)

- *Alvarado v. Kiwi II Construction, Inc.*, RIC2001558 (Riverside County Superior Court approving Class Action and PAGA Settlement)
- *Gonzalez v. Vista Pacifica Enterprises, Inc.*, RIC2001557 (Riverside County Superior Court approving PAGA Settlement)
- *Maldonado v. P&K Investment Co., LLC*, RIC2002722 (Riverside County Superior Court approving PAGA Settlement)
- *Sanchez v. MBK Senior Living*, 30-2019-01115793-CU-OE-CXC (Orange County Superior Court approving PAGA Settlement)\
- *Aguirre v. Prudential Overall Supply*, RICJCCP5046 (Riverside County Superior Court approving PAGA Settlement)
- *Collie, et al. v. The ICEE Company, et al.*, CIVDS1611741 (San Bernardino County Superior Court approving Class Action and PAGA Settlement)
- *Carrillo v. Weartech International, Inc.*, 30-2020-01151333-CU-OE-CXC (Orange County Superior Court approving Class Action and PAGA Settlement)
- *Salinas v. Brasstech Inc., et al.*, 30-2020-01141960-CU-OE-CXC (Orange County Superior Court approving PAGA Settlement)
- *Sanchez, et al. v. Community Tree Service, Inc.*, CIVSB2116442 (San Bernardino County Superior Court approving Class Action and PAGA Settlement)
- *McCrumb v. Trifecta Management Group, Inc. et al.*, BCV-19-100621 (Kern County Superior Court approving Class Action and PAGA Settlement)
- *Andrade v. Dirt Movers, Inc.*, STK-CV-UOE-2021-0008346 (San Joaquin County Superior Court approving Class Action and PAGA Settlement)
- *McCoy v. Road Runner Sports, Inc.* 19STCV37733 (Los Angeles County Superior Court approving Class Action and PAGA Settlement)
- *Lopez v. Bio-Reference, LLC*, 21STCV46533 (Los Angeles County Superior Court approving Class Action and PAGA Settlement)
- *Holladay v. Grandcare Health Services, LLC et al.*, 20STCV42115 (Los Angeles County

Superior Court approving Class Action and PAGA Settlement)

- *Brooks v. Younger MFG, Co.*, 19STCV20386 (Los Angeles County Superior Court approving Class Action and PAGA Settlement)

12. I am fully familiar with the legal and factual issues in the Action and have specific experience litigating complex wage and hour actions as class actions, including employment cases as set forth above.

13. The Settlement presented here only resulted after having engaged in extensive informal discovery and investigation and is the product of hard-fought litigation and extensive arms' length negotiations. In my opinion as an experienced class counsel, the Settlement is fair, reasonable, adequate, and in the best interests of the Class, Aggrieved Employees, and State of California.

#### **PRELIMINARY APPROVAL OF CLASS ACTION AND PAGA SETTLEMENT**

14. On August 7, 2023, in Department SSC-1 of the Los Angeles Superior Court, the Honorable Stuart M. Rice granted preliminary approval of Plaintiffs' Class Action and PAGA Settlement ("Settlement," "Agreement," or "Settlement Agreement") entered into between Plaintiffs and Defendant Amada Enterprises, Inc. ("Defendant"), and conditionally certified the Class for settlement purposes only. The Court also preliminarily appointed Plaintiffs Cindy Velasquez and Paulina Campos as the representatives of the Class (together, "Class Representatives") and 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 Proposed Settlement of Class Action Settlement ("Class Notice"), approved the notice, opt-out, and objection procedures, and ordered their implementation. The Court appointed Phoenix Settlement Administrators ("Settlement Administrator") to serve as the third-party administrator and handle the notice and settlement administration process

#### **THE SETTLEMENT IS REASONABLE**

15. The preliminarily approved settlement is the result of intense and hotly contested litigation between the Parties. At all times, the negotiations leading to this settlement were adversarial, non-collusive, and at arms' length.

16. Prior to reaching a settlement, Class Counsel conducted significant investigation and

1 discovery into the claims alleged by Plaintiffs. My office researched the enforceability of Defendant's  
2 arbitration agreement and engaged in motion practice in opposing Defendant's petition to compel  
3 arbitration. Class Counsel further conducted legal research regarding the applicable Labor Code  
4 Sections and reviewed and analyzed the Class Members' time and pay records, as well as its relevant  
5 employment policies, practices, and procedures. This investigation allowed Class Counsel to  
6 effectively and intelligently negotiate the Settlement.

7 17. The Settlement provides a significant recovery for the Class: (1) the Settlement Class  
8 will obtain recovery over a reasonably short period of time as opposed to waiting years for the same,  
9 or possibly a worse result; (2) a guaranteed result that compares favorably with other similar class  
10 action settlements of this type; (3) significant savings in Class Counsel's fees and costs which would  
11 have only increased significantly had the case progressed through trial, appeals, etc. The settlement  
12 has also received substantial support from the Class.

13 18. I am fully familiar with the legal and factual issues in this case, and have specific  
14 experience litigating and settlement complex and class actions, including employment cases as set  
15 forth above. I have diligently pursued an investigation of the claims asserted against Defendant while  
16 Defendant vigorously defended against such claims. Based on my experience for more than 15 years  
17 as a defense attorney in wage and hour employment cases and now working as a plaintiffs' attorney  
18 for many years puts me in a unique position to evaluate the strengths and weakness of a case and has  
19 helped to prosecute matter.

20 19. Accordingly, for the reasons set forth above as well as in Plaintiffs' Motions for  
21 Preliminary and Final Approval, I submit that the settlement is fair, reasonable, adequate and in the  
22 best interest of Plaintiffs and the other Class Members.

23 **WORK PERFORMED BY PROTECTION LAW GROUP, LLP**

24 20. Class Counsel seeks attorneys' fees in the amount of \$150,000.00, which is one-third  
25 (1/3) of the Total Settlement Amount and this has not been objected to by any member of the Class.  
26 I am aware that the common and acceptable rate for representation in wage-and-hour class action  
27 litigation is normally twenty-five (25) to thirty-five (35) percent. A fee of one-third (1/3) of the Total  
28 Settlement Amount is appropriate here because of the excellent result achieved for the Class, the

1 Aggrieved Employees, and State of California despite the substantial risks, including the risk that the  
2 Class Members, the Aggrieved Employees, and State of California could recover nothing at all.

3 21. Protection Law Group has spent extensive time litigating these matters including  
4 conducting extensive investigation and research into the facts and circumstances underlying the  
5 pertinent factual and legal issues and applicable law to initiate litigation, I actively participated in  
6 opposing Defendant's motion to compel arbitration, litigation and case strategy, investigation,  
7 meeting and conferring with Defendant's counsel, performing legal research, and engaging in  
8 settlement discussion, among other things. As such, it is my opinion that the percentage fee request  
9 is fair and reasonable in light of the work performed and results achieved. It should also be noted that  
10 Class Counsel have borne all of the risks and costs of litigation and will not receive any compensation  
11 until recovery is obtained. Therefore, the requested fees are reasonable in light of the litigation.

12 22. Protection Law Group is a small law firm specifically devoted to the representation of  
13 employees against employers in California involving claims relating to violations of the California  
14 Labor Code, including claims for failure to pay all wages owed, failure to pay overtime premiums,  
15 failure to pay meal and rest premiums and failure to provide accurate wage records. The practice of  
16 employment law is a very specific, narrow field which requires diligence in an ever-evolving field of  
17 substantive and procedural law. Class Counsel have devoted significant time and attention to this  
18 matter on a contingent basis. The significant time and attention spent on this matter was time we  
19 could not spend on other cases or clients.

20 23. Including myself, Protection Law Group currently includes nine (9) attorneys, all of  
21 whom actively and continuously represent plaintiffs in employment class actions and representative  
22 actions, in Superior Courts throughout the State of California, in the Court of Appeal, and in various  
23 Federal courts. Because of the unique history and nature of our practice, all of the attorneys at  
24 Protection Law Group have a high level of knowledge and experience in labor and employment law.  
25 Besides myself the following attorneys at Protection Law Group spent significant time working on  
26 this matter:

- 27 a. Amir Nayebdadash – Founding Partner of Protection Law Group, LLP. Mr. Nayebdadash  
28 received his Bachelor of Arts degree from University of California, Los Angeles and a

1 Juris Doctor degree from Pepperdine University School of Law. He was admitted to  
2 practice law in California in November of 2004, and has been admitted to practice in all  
3 federal district courts in the State of California. Prior to founding Protection Law Group,  
4 LLP, Mr. Nayebdadash worked at Littler Mendelson, P.C., the largest labor and  
5 employment law firm in the United States. In 2013, Mr. Nayebdadash and I founded  
6 Protection Law Group LLP. Since the inception of Protection of Law Group, LLP, Mr.  
7 Nayebdadash has focused his practice on the representation of employees against  
8 employers in California. Mr. Nayebdadash has extensive experience in all aspects of  
9 employment litigation, with a focus on wage and hour class and representative action,  
10 including, but not limited to taking and defending depositions, briefing and arguing  
11 motions, preparing for class certification, negotiating complex wage and hour settlements,  
12 trial and appeal.

13 b. D. Luke Clapp – Senior Associate at Protection Law Group, LLP. Mr. Clapp received his  
14 Bachelor of Arts degree from Macalester College, and a Juris Doctor degree from Indiana  
15 University Maurer School of Law. He was admitted to practice law in California in  
16 December of 2015, and has also been admitted to the Central District of California. Since  
17 being admitted to California State Bar, Mr. Clapp’s practice has focused on the  
18 representation of employee plaintiffs in complex wage and hour class and representative  
19 actions. Mr. Clapp has extensive in briefing and arguing motions, managing written  
20 discovery, preparing for class certification, and drafting mediation briefs and complex  
21 wage and hour settlements.

22 c. Priscilla Gamino – Senior Associate at Protection Law Group, LLP. Ms. Gamino received  
23 her Bachelor of Arts degree from Brown University and a Juris Doctorate degree from  
24 California Western School of Law. Ms. Gamino was admitted to practice in California in  
25 June 2017 and is admitted to practice law in all California Federal Courts and United  
26 States Court of Appeals for the Ninth Circuit. Since being admitted to the California State  
27 Bar, Ms. Gamino’s practice has focused on the representation of employee plaintiffs in  
28 complex wage and hour class and representative actions. Ms. Gamino has extensive

1 experience briefing and arguing motions, managing written discovery, and many other  
2 aspects of complex wage and hour disputes.

3 d. Jeffrey Jimenez – Associate at Protection Law Group, LLP. Mr. Jimenez received his  
4 Bachelor of Arts degree from the University of California at Irvine and a Juris Doctor  
5 degree from Southwestern School of Law. Mr. Jimenez was admitted to practice in  
6 California in August 2021 and is admitted to practice law in the Southern District of  
7 California Federal Court. Since being admitted to the California State Bar, Mr. Jimenez’s  
8 practice has focused on the representation of employee plaintiffs in complex wage and  
9 hour class and representative actions. Mr. Jimenez has extensive experience briefing  
10 motions, written discovery, and many other aspects of complex wage and hour disputes.

11 e. Arnel Tan – Associate at Protection Law Group, LLP. Mr. Tan received his Bachelor of  
12 Arts degree in 1996 and his Juris Doctor degree from the Ateneo de Manila University in  
13 the Philippines in 2000. He was admitted to practice law in California in December 2010,  
14 and has also been admitted to the Central District of California. Since being admitted to  
15 the California State Bar, Mr. Tan has represented a wide-range of plaintiffs in personal  
16 injury cases as well as employees in their discrimination, harassment, retaliation and  
17 unlawful termination cases. Mr. Tan has extensive practice experience briefing and  
18 arguing motions, managing discovery, and drafting mediation briefs and settlement  
19 agreements. Since joining Protection Law Group, LLP in March 2022, Mr. Tan’s practice  
20 has centered on representing employee plaintiffs in complex wage and hour class and  
21 representative actions.

22 24. My billing rate and the actual rate I currently charge if billing on an hourly basis is  
23 \$875 per hour. My partner, Amir Nayebedadash’s currently bills at a rate of \$800 per hour. Luke Clapp,  
24 a Senior Associate with the firm who worked on the matter currently bills at rates of \$725 per hour.  
25 Ms. Gamino is a Senior Associate with Protection Law Group who worked on the matter currently  
26 bills at a rate of \$650 per hour. Jeffrey Jimenez’s current billing rate is \$500 per hour. Finally, Arnel  
27 Tan bills at a rate of \$550 per hour. While the overwhelming majority of my firm’s practice is  
28

contingency-based, this is the actual rate we charge billing clients if retained on an hourly basis to handle employment-law related issues.

25. Based on my familiarity with prevailing market rates for work of similar complexity in California, including my extensive involvement in fee application work on my own behalf and on behalf of others, I can attest that these hourly rates are within the prevailing market rate for work of similar complexity performed by attorneys of similar skill and experience. I have extensive knowledge of the prevailing hourly rates in the community for work of similar nature and complexity to the work in this case. My experience and knowledge in this regard comes from a variety of sources, including: (a) reviewing dozens of fee applications in other matters; (b) my familiarity with fee application orders in other cases; and (c) my independent research and knowledge of the prevailing market rates based on fee requests of other counsel and my familiarity with rates charged in other law firms; and (d) my independent reading and research regarding law firm billing rates.

26. As such, it is my opinion that our requested hourly rates of \$875 for myself, \$800 for Mr. Amir Nayebedadash, \$725 for Mr. Clapp, \$650 for Ms. Gamino, \$500 for Mr. Jimenez and \$550 for Mr. Tan and the use of a blended rate of at least \$650 for Protection Law Group based on the work performed in this matter is well within the range of a reasonable rates for attorneys of our skill, knowledge, experience, and ability.

27. Since beginning work on this matter, Protection Law Group has spent a total of approximately 60.50 hours litigating this case. To date, applying a blended rate of \$650.00 per hour, this results in an estimated lodestar for my office of \$39,325.00. Attached hereto as **Exhibit 1** is a time and task sheet detailing the estimated hours, Protection Law Group, LLP has spent on the different tasks associated with the Action.

28. The Action was litigated on a contingent basis, meaning Class Counsel bore all the risks should the Action have failed and still bear the risk of taking whatever actions are necessary if Defendants fail to pay. This risk is particularly acute in light of the broad economic uncertainty faced by many businesses as a result of the Covid-19 pandemic. Class Counsel took on the risk that they could ultimately recover nothing from the litigation if they were unsuccessful or if the organization experienced the financial difficulties faced by so many organizations during the pandemic. These

1 increased risks were real, challenging, and significantly increased the contingent risk associated with  
2 litigating this matter.

3 29. Given the complex nature of these claims and daunting legal challenges, I believe  
4 there are very few law firms who could have obtained the settlement obtained here by my office and  
5 co-counsel. My office has devoted itself to pursuing and understanding these types of cases and was  
6 able litigate this matter despite risks that may have dissuaded other counsel from pursuing this case.

7 30. I believe that the efforts of my office and co-counsel have resulted in substantial  
8 benefits to the Settlement Class, in the form of a substantial settlement fund established to compensate  
9 Class Members for Defendant's wage and hour violations. Through the efforts of my office and co-  
10 counsel and Plaintiffs in the Action, a fair and reasonable resolution has been reached that includes a  
11 non-reversionary settlement payment by Defendant of \$450,000.00. I am informed and believe that,  
12 without the efforts of my office and co-counsel, the Labor Code and Wage Order violations alleged  
13 in the Complaints would have gone completely unremedied. The allocation of one-third (1/3) of this  
14 amount to fees as provided for in the Settlement is therefore reasonable given the result achieved.

#### 15 **PROTECTION LAW GROUP LLP'S COSTS**

16 31. To date, Class Counsel has borne all risks and costs of litigation and will not receive  
17 any compensation until recovery is obtained by Plaintiffs and the participating members of the  
18 Settlement Class. Protection Law Group, LLP has incurred approximately \$2,964.99 in costs and  
19 litigation expenses and seeks reimbursement of this amount. Attached hereto as **Exhibit 2** is a costs  
20 sheet detailing the various costs incurred by Protection Law Group, LLP with this matter that were  
21 reasonable and necessary in prosecuting this matter and in obtaining the Settlement.

#### 22 **PLAINTIFFS' ENHANCEMENT AWARD**

23 32. Here, the requested Class Representative Enhancement Payments of \$7,500.00 to  
24 Plaintiff Cindy Velasquez and \$7,500.00 to Plaintiff Paulina Campos, for a total of \$15,000.00 is  
25 justified. It is very reasonable in my experience for Class and PAGA Representatives to recover up  
26 to \$7,500.00 as a service/enhancement award. Here, the amounts are justified because of the extensive  
27 time Plaintiffs have spent and the assistance they have provided to Class Counsel for the past years.  
28 Plaintiffs have been intimately involved in the prosecution of the Action and served as an

1 indispensable resource to Class Counsel. Plaintiffs have taken actions throughout the litigation to  
2 protect the interests of those they now represent. Plaintiffs provided valuable information regarding  
3 the allegations, kept themselves informed of the development of the matter, and participated in  
4 decisions concerning the Action. *See* Declarations of Plaintiffs Paulina Campos and Cindy Velasquez  
5 in Support of Plaintiffs' Motion for Final Approval. The information provided by Plaintiffs were  
6 instrumental in establishing the wage and hour violations alleged in the Action, and the recovery  
7 provided for in the Settlement Agreement would have been impossible to obtain without his  
8 participation.

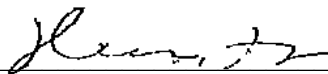
9 33. Additionally, Plaintiffs face actual risks with their future employment and new careers  
10 by putting themselves on public record in an employment lawsuit. As this Court is aware, prospective  
11 employers conduct searches on job applicants. One type of search is to learn about an applicant's  
12 litigation history. These searches are easy to run on the internet and relatively inexpensive.

13 34. As a result of Plaintiffs' actions, other employees have the opportunity to participate  
14 in a settlement, reimbursing them for wage violations they may have never known about or been  
15 willing to pursue on their own.

16 35. As such, Plaintiffs did more than simply lend their names for the lawsuit, and I believe  
17 they deserve the requested Enhancement Awards.

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

21 Executed on January 23, 2023.

22  
23 

24 Heather Davis  
25  
26  
27  
28

# Exhibit 1

***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 |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------|---------------------------|
| <b>Investigation and Research / Due Diligence</b>                                                                                                                                                                                                        |                         |                           |
| 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 |

| <b>Pleadings and Court Filings</b>                                                                                                                                                                                                                              |      |     |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------|-----|
| 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 |
| <b>Appearances</b>                                                                                                                              |      |      |
| 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 |
| <b>Discovery and Deposition</b>                                                                                                                                                                        |      |     |
| 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 |

| <b>Letters and Correspondence</b>                                                                                                                                                                                                                                                         |       |      |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------|------|
| 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 |
| <b>Mediation/Settlement</b>                                                                                                                                                                                                                                                               |       |      |
| 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 |
| <b>Law and Motion</b>                                                                                                                                                                                                                                                                                                                                                                                                          |       |     |
| 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   |
| <b>Total Hours:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                | 554.10 | 60.50  |
| <b>Grand Total Hours:</b>                                                                                                                                                                                                                                                                                                                                                                                                                          |        | 614.60 |

# Exhibit 2

***Campos et. al v. Amada Enterprises, Inc. et al***

**Los Angeles County Superior Court Case No. 20STCV07994 (Lead Case)**

**Los Angeles County Superior Court Case No. 20CMCV00227**

**PROTECTION LAW GROUP LLP - EXPENSE REPORT**

| <b>Date</b>                | <b>Memo</b>                                                            | <b>Debit</b>       |
|----------------------------|------------------------------------------------------------------------|--------------------|
| March 2021 - Janaury 2024  | PAGA Filings, Court Filings, Attorney Service Fees and Court Documents | \$ 901.99          |
| March 2021 - January 2024  | CaseAnywhere                                                           | \$ 1,452.00        |
| March 2021 - August 2021   | LA Court Connect                                                       | \$ 38.00           |
| May 2021                   | Court Reporter Fees                                                    | \$ 573.00          |
| <b>TOTAL CURRENT COSTS</b> |                                                                        | <b>\$ 2,964.99</b> |