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Attorneys for Plaintiff and the Class

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF ALAMEDA**

SAUL ANDRADE, individually, and on
behalf of other aggrieved employees pursuant
to the California Private Attorneys General
Act;

Plaintiff,

vs.

MACH 1 GLOBAL SERVICES, INC., an
unknown business entity; and DOES 1
through 100, inclusive,

Defendants.

SAUL ANDRADE, individually, and on
behalf of other members of the general public
similarly situated;

Plaintiff,

vs.

MACH 1 GLOBAL SERVICES, INC., an
unknown business entity; and DOES 1
through 100, inclusive,

Defendants.

Case No.: RG20069104
[consolidated with RG21108078]

Honorable Evelio Grillo
Department 21

CLASS ACTION

**DECLARATION OF EDWIN AIWAZIAN
IN SUPPORT OF PLAINTIFF'S MOTION
FOR FINAL APPROVAL OF CLASS
ACTION SETTLEMENT, ATTORNEYS'
FEES AND COSTS, AND CLASS
REPRESENTATIVE SERVICE AWARD**

[Notice of Motion and Motion for Final
Approval of Class Action Settlement,
Attorneys' Fees and Costs, and Class
Representative Service Award; Declaration of
Class Representative (Saul Andrade);
Declaration of Settlement Administrator (Yami
Burns); and [Proposed] Final Approval Order
and Judgment filed concurrently herewith]

<u>Reservation ID:</u>	399878076048
Date:	October 27, 2023
Time:	9:00 a.m.
Department:	21

PAGA Complaint Filed:	July 28, 2020
Class Complaint Filed:	June 25, 2021
Trial Date:	None Set

DECLARATION OF EDWIN AIWAZIAN

I, Edwin Aiwazian, hereby declare as follows:

1. I am an attorney licensed to practice law in the State of California. I am a member of Lawyers *for* Justice, PC, attorneys of record for Plaintiff Saul Andrade (“Plaintiff”) and the Class. The facts set forth in this declaration are within my personal knowledge or based on information and belief, and, if called as a witness, I could and would competently testify as follows.

PRELIMINARY APPROVAL OF SETTLEMENT

2. On March 23, 2023, in Department 21 of the above-entitled Court, the Honorable Evelio Grillo preliminarily approved the First Amended Class and Representative Action Settlement Agreement and Release of Claims entered into between Plaintiff and Defendant Mach 1 Global Services, Inc. (“Defendant”) (together, Plaintiff and Defendant are referred to as the “Parties”), conditionally certified the Class for settlement purposes, preliminarily appointed Plaintiff Saul Andrade to represent the Class (“Class Representative”), and preliminarily appointed and designated Lawyers *for* Justice, PC as counsel for the Class (“Class Counsel”). The Court approved and ordered the mailing of the Notice of Class Action Settlement (“Class Notice”), adopted the notice, opt-out, and objection procedures and ordered their implementation. The Court appointed Phoenix Settlement Administrators, also known as Phoenix Class Action Settlement Administration Solutions (“Phoenix” or “Settlement Administrator”), to serve as the third-party settlement administrator and to handle the notice and settlement administration process.

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

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WORK PERFORMED BY CLASS COUNSEL

4. I and several other attorneys at Lawyers for Justice, PC have been actively engaged in litigating the above-captioned action (“PAGA Action”) since prior to its commencement on July 28, 2020, as well as the putative class action entitled *Saul Andrade v. Mach 1 Global Services, Inc.*, Alameda County Superior Court, Case No. RG21108078 (“Class Action”). On April 11, 2022, the PAGA Action and Class Action were consolidated and the PAGA Action was deemed the lead case.

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

6. Class Counsel conducted significant formal and informal discovery and investigation into the facts of the cases, to assess the veracity, strength, and scope of the claims, and was preparing the matter for class certification and trial prior to reaching the Settlement. The Parties exchanged a volume of information, documents, and data throughout the course of the litigation and in connection with mediation and settlement negotiations. Class Counsel had the opportunity to interview and obtain information from Plaintiff and other Class Members and percipient witnesses, and reviewed and analyzed a volume of information, data, and documents obtained from Plaintiff, Defendant, and other sources. The information, documents, and data

1 reviewed and analyzed by Class Counsel included and were not limited to: Plaintiff's and other
2 Class Member's employment records, Class Members' time and pay data, company policy
3 acknowledgements (including but not limited to acknowledgements of Privacy Practices, Code
4 of Business Conduct, Mach 1 Company Computer and Internet Policy, Drivers Manual Receipt,
5 Receipt of Equipment, Permission to Obtain Driving Record, Company Policy and Procedures
6 on Driver and Vehicle Tickets, Fuel Grade Agreement, Portable 2 Way Radios/Cellular Phones,
7 Mach 1 Handheld Communication Devices, Driver's Manual Receipt, Driver Certification for
8 Other Compensated Work, Code of Safe Practices, Mach 1 Receipt of Equipment, and
9 Employee Release Authorization), internal memoranda, job descriptions, new hire orientation
10 checklists, and operations and employment policies, practices, and procedures documents
11 (including but not limited to United States Personnel Policy Handbook, Driver's Pick Up and
12 Delivery Handbook, Driver Safety Award Program, CSA Factsheets, Driver Daily Production,
13 Accident Information Guide, Driver Break Period Off-Duty, Driver Certification for Other
14 Compensated Work, Driver Data Sheet for Casuals, New Hires, & Temporary Employees,
15 Drivers Daily Pick Up and Delivery Log, Inspection Checklist, Weekly Vehicle Odometer, Tire
16 Pressure, and Tire Depth Report, New Employee HR Form, Drug and Alcohol Policy, Policy re
17 hours of service, rest break, meal break, timed records, etc., Policy re Commercial Vehicle
18 Inspections, Accident check list, Policy re Handheld Communication Devices while operating
19 a commercial motor vehicle, Company Policy and Procedures on Driver and Vehicle Tickets,
20 Seat Belt Policy, Hourly Employee Lunch Break Policy, and Payroll Distribution Policy),
21 among other information and documents. Class Counsel developed liability, damages, and
22 penalties valuation models in the course of litigation and in connection with mediation and
23 settlement negotiations, and met and conferred with Defendant's counsel on numerous
24 occasions, e.g., to discuss issues relating to the pleadings, case management, discovery and the
25 production of information, documents, and data in the course of litigation and in connection
26 with mediation and settlement negotiations, as well as mediation and settlement negotiations.
27 Other work performed by Class Counsel included, and was not limited to, case strategy and
28 analysis; drafting, reviewing, and revising the pleadings, the mediation brief, and settlement

documents; drafting and propounding multiple sets of formal written discovery requests on Defendant; noticing the depositions of Defendant's Persons Most Knowledgeable designees; preparing for and attending court proceedings; and preparing for and participating in mediation and settlement negotiations, among other tasks.

7. As outlined herein, the Parties have conducted significant investigation and formal and informal discovery during the course of litigating the case and mediation and settlement negotiations. Class Counsel analyzed a volume of information, documents, and data obtained from Plaintiff, Defendant, and other sources. The information, documents, and data considered provided a critical understanding of the nature of the work performed by the Class Members and PAGA Aggrieved Employees, as well as Defendant's operations and employment policies, practices, and procedures, and were used in analyzing liability, damages, penalties, and valuation issues in connection with all phases of the litigation, and ultimately, in connection with the mediation and settlement negotiation process. Class Counsel also performed research regarding applicable law, which is evolving as it relates to class certification, off-the-clock theory, regular rate, reporting time pay, waiting time penalties, exemption, preemption, meal and rest periods, representative PAGA claims, wage-and-hour law and enforcement, Plaintiff's claims and allegations, and Defendant's defenses thereto, as well as facts discovered.

8. After conducting significant investigation of the facts and law during the prosecution of the cases, counsel for the Parties engaged in extensive settlement negotiations to try to resolve the cases. These efforts included preparing for mediation and participating in a formal, full-day mediation conducted by Hon. Suzanne H. Segal (Ret.), a well-regarded mediator experienced in mediating complex labor and employment matters. During all settlement discussions, the Parties conducted their negotiations at arm's length in an adversarial position. In the course of mediation and settlement negotiations, the Parties exchanged information, documents, and data, and discussed all aspects of the cases, including the risks and delays of further litigation, the risks to the Parties of proceeding with class certification and trial, the law relating to class certification, off-the-clock theory, regular rate, reporting time pay, meal and rest periods, representative PAGA claims, exemption, preemption, and wage-and-hour law

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

15 **ATTORNEYS' FEES TO CLASS COUNSEL**

16 9. By way of the accompanying Motion for Final Approval, Class Counsel seeks
17 attorneys' fees in the amount of \$120,000.00, which is one-third (1/3) of the Gross Settlement
18 Amount of \$360,000.00, as set forth in the Settlement Agreement and the Class Notice. Pursuant
19 to the contingency-fee agreement entered into by and between Plaintiff and Class Counsel,
20 Plaintiff has agreed to a contingency fee of at least one-third (1/3) of the recovery. The
21 attorneys' fees sought are commensurate with: (1) the risk that Class Counsel took in
22 commencing the case; (2) the time, effort, and expense that Class Counsel dedicated to the case;
23 (3) the skill and determination that Class Counsel has shown; (4) the results that Class Counsel
24 has achieved throughout the litigation; (5) the value of the settlement that Class Counsel has
25 achieved in the case; and (6) the other cases that Class Counsel has turned down in order to
26 devote its time and efforts to this matter.

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1 10. I am aware that common and acceptable rates for contingency representation in
2 wage and hour class action and representative action litigation are normally in the range of
3 33.3% to 50%.

4 11. While not necessarily required to be demonstrated because the percentage fee is
5 proper for this settlement, Class Counsel has incurred many hours of work in connection with
6 prosecuting the cases such that the award of attorneys' fees is also justified under a simple
7 lodestar analysis. Attorneys at Lawyers for Justice, PC have spent a total of **354.50 hours**
8 performing tasks and obtaining recovery in this matter. Attached hereto as "**EXHIBIT A**" is
9 an Attorney Task and Time Chart that sets forth in detail the nature of the legal services provided
10 by attorneys at Lawyers for Justice, PC and the time incurred in performing those services.
11 These hours include work done by myself and several other attorneys at Lawyers for Justice,
12 PC. Additionally, separate from the hours referenced herein, Lawyers for Justice, PC had
13 litigation support personnel actively engaged in assisting with the prosecution of this matter.

14 12. The work performed in this particular case, the background of Lawyers for Justice,
15 PC, as well as the individual backgrounds, training, and experience of the attorneys who worked
16 on this matter, in litigating complex wage-and-hour actions, and in particular, employment class
17 and representative actions, support a reasonable blended hourly rate of compensation of at least
18 \$700 per hour for work performed by Lawyers for Justice, PC. Lawyers for Justice, PC has
19 been awarded attorneys' fees, compensating the firm at the blended rate of at least \$700 per hour
20 for legal services performed, by courts granting approval of settlements in other wage-and-hour
21 cases: final approval of the class and representative action settlement in *David Dugan v. TEC*
22 *Equipment, Inc., et al.* (Los Angeles Superior Court Case No. 19STCV01591) was granted on
23 July 8, 2021, and the award of attorneys' fees involved compensation at the rate of \$936.47 per
24 hour; final approval of the class and representative action settlement in *Larry Greenwood, et al.*
25 *v. Scan Health Plan* (Los Angeles Superior Court Case No. BC715157) was granted on April
26 20, 2021, and the award of attorneys' fees involved compensation at the rate of \$919.57 per
27 hour; final approval of the class action settlement in *Thereasa Carrozzella v. Basalite Concrete*
28 *Products, LLC* (Sacramento County Superior Court Case No. 34-2017-00220214-CU-OE-GDS)

was granted on February 21, 2020, and the award of attorneys' fees involved compensation at the rate of \$766.05 per hour; final approval of the class and representative action settlement in *Alice Rutledge, et al. v. Healthport Technologies, LLC* (Alameda County Superior Court Case No. RG16835813) was granted on June 11, 2019, and the award of attorneys' fees involved compensation at the rate of \$764.82 per hour; final approval of the class and representative action settlement in *Seth Swan v. Pace Supply Corp.* (Sonoma County Superior Court Case No. SCV258764) was granted on February 6, 2019, and the award of attorneys' fees involved compensation at the rate of \$855.96 per hour; final approval of the class and representative action settlement in *Stanley Bland, et al. v. Telecare Corporation* (Alameda County Superior Court Case No. RG16811450) was granted on November 21, 2018, and the award of attorneys' fees involved compensation at the rate of \$831.38 per hour; final approval of the class and representative action settlement in *Maryjo Ungerbuhler Anderson v. Boyett Petroleum* (Stanislaus County Superior Court Case No. 2020582) was granted on May 15, 2018, and the award of attorney's fees involved compensation at the rate of \$780.77 per hour; and final approval of the class and representative action settlement in *Demetrius Camarillo v. Blue Diamond Growers* (Sacramento County Superior Court Case No. 34-2015-00175871) was granted on June 30, 2017, and the award of attorneys' fees involved compensation at the rate of \$845.64 per hour.

ADEQUACY OF LAWYERS for JUSTICE, PC

EDUCATION

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

JUDICIAL EXTERNSHIPS

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

LITIGATION AND CLASS ACTION EXPERIENCE

15. In December of 2004, I obtained a license to practice law from the California State Bar.

16. For over a decade, Lawyers for Justice, PC has almost exclusively focused on the prosecution of consumer and employment class and representative actions, involving wage-and-hour claims, race discrimination, unfair business practices or consumer fraud. Currently, Lawyers for Justice, PC is the attorney of record in well over a dozen employment-related putative class actions in both state and federal courts in the State of California. Lawyers for Justice, PC has successfully litigated cases involving the executive, administrative, and other overtime exemptions to the State of California and federal overtime compensation requirements. In association with other law firms, Lawyers for Justice, PC has recovered millions of dollars on behalf of thousands of individuals in California.

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

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

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

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

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

11 d) LFJ, in association with co-counsel therein, represented the plaintiffs in a
12 wage-and-hour class action against a national retailer involving allegations of misclassification
13 of the “Store Manager” position. On June 10, 2011, the court granted plaintiffs’ motion for class
14 certification. On August 26, 2013, the court granted final approval of the class action settlement.
15 The Los Angeles County Superior Court Case Number is BC424012.

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

21 f) LFJ, in association with co-counsel therein, represented the plaintiff in a
22 wage-and-hour class and PAGA representative action against a national wholesale distributor
23 of plumbing and builder supplies, involving allegations of misclassification of multiple salaried
24 “manager” positions. On May 22, 2014, the court granted final approval of the class and PAGA
25 representative action settlement. The Sacramento County Superior Court Case Number is 34-
26 2012-00136285.

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

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

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

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

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

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

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

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

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

20 p) LFJ, on behalf of the plaintiff and respondent in a PAGA representative
21 action, successfully opposed in the trial court, and briefed and argued an appeal with respect to
22 the employer's motion to compel arbitration, which resulted in a published opinion by the
23 California Court of Appeal in favor of employees. *Roberto Betancourt v. Prudential Overall*
24 *Supply* (Cal. App. 4th Dist., Mar. 7, 2017) 9 Cal.App.5th 439, review denied, cert. denied (U.S.
25 Supreme Court Docket No. 17-254). The Riverside County Superior Court Case Numbers are
26 RIC1503952 and RICJCCP5046, and the Judicial Council Coordination Proceeding Number is
27 5046.

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

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

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

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

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

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

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

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

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

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

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

26 bb) LFJ, in association with co-counsel therein, represents the plaintiff in a
27 wage-and-hour class action against a container manufacturer, on behalf of non-exempt
28 employees. On October 15, 2018, the court granted the plaintiff's motion for class certification.

1 The Tulare County Superior Court Case Number is VCU264528.

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

7 dd) LFJ, in association with co-counsel therein, represented the plaintiff in a
8 PAGA representative action against a global provider of products and services to the energy
9 industry, on behalf of hourly-paid and non-exempt employees. On November 19, 2018, the
10 court granted approval of the PAGA representative action settlement. The Kern County
11 Superior Court Case Number is S-1500-CV-280215-SDC.

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

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

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

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

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

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

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

25 ll) LFJ, in association with co-counsel therein, represented the plaintiffs in a
26 wage-and-hour class action against manufacturer and supplier of power products and services
27 on behalf of non-exempt employees. On July 31, 2020, the court granted in part the plaintiffs'
28 motion for class certification and certified a class. On August 27, 2021, the court granted final

1 approval of the class action settlement. The San Diego County Superior Court Case Number is
2 37-2015-00025968-CU-OE-CTL.

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

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

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

13 18. To date, Lawyers *for* Justice, PC has borne all of the risks and costs of litigation
14 and will not receive any compensation until recovery is obtained in this matter. Lawyers *for*
15 Justice, PC seeks reimbursement of **\$10,480.92** in litigation costs and expenses incurred in this
16 matter, as reflected in "**EXHIBIT B**" attached hereto. These expenses were reasonable and
17 necessary in the prosecution of the cases and to obtain the Settlement.

18 **CLASS REPRESENTATIVE SERVICE AWARD TO PLAINTIFF**

19 19. In recognition of his efforts and work serving as the Class Representative, the
20 Settlement provides for a Class Representative Service Award in the amount of \$5,000.00 to
21 Plaintiff Saul Andrade. The requested Class Representative Service Award is fair and
22 appropriate. Plaintiff spent a substantial amount of time and effort to produce relevant
23 documents and information, and he provided facts and evidence to support the prosecution of
24 the claims. Plaintiff was available whenever Class Counsel needed him and actively tried to
25 obtain and provide information that would facilitate the pursuit of the cases. Plaintiff spent
26 numerous hours speaking with Class Counsel about his claims, describing his work experiences
27 with Defendant, and gathering and reviewing documents. Accordingly, it is appropriate for
28 Plaintiff Saul Andrade to receive \$5,000.00 as a reasonable Class Representative Service Award,

1 for his services on behalf of the Class Members, State of California, and the PAGA Aggrieved
2 Employee Group, in addition to his individual settlement payment.

3 20. I submit that the Settlement is fair, reasonable, and adequate. In addition, the
4 Settlement is in the best interests of Plaintiff, Class Members, the State of California, and the
5 PAGA Aggrieved Employee Group.

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

8 Executed this 3rd day of October 2023, at Glendale, California.

9 

10 Edwin Aiwasian

EXHIBIT A

SAUL ANDRADE V. MACH 1 GLOBAL SERVICES, INC.
(Alameda County Superior Court Case No. RG20069104 (“PAGA Action”))

SAUL ANDRADE V. MACH 1 GLOBAL SERVICES, INC.
(Alameda County Superior Court Case No. RG21108078 (“Class Action”))

ATTORNEY TASK AND TIME CHART

TASK	LAWYERS FOR JUSTICE, PC
Investigation and Research / Due Diligence	
Pre-Lawsuit Investigation of the Key Facts with a Focus on Class Certification Elements, Including Adequacy, Typicality, Superiority, Commonality, and Manageability	7.80
Pre-Lawsuit Investigation of the Merits of Plaintiff Saul Andrade’s (“Plaintiff”) Claims and the Merits of the Claims of the Putative Class Members	8.10
Pre-Lawsuit Investigation of Potential Damages Exposure of Defendant Mach 1 Global Services, Inc. (“Defendant”) with Respect to the Damages Sustained by Plaintiff and the Putative Class Members	7.90
Pre-Notice Investigation of the Merits of the Private Attorneys General Act (“PAGA”) Claim on Behalf of the State of California with Respect to Plaintiff and the Aggrieved Employees	7.50
Pre-Notice Investigation of Potential Civil Penalties Exposure of Defendant with Respect to Plaintiff and the Aggrieved Employees	5.80
Legal Research and Analysis of Latest Decisions Regarding Off-the-Clock, Regular Rate, Reporting Time Pay, Meal and Rest Break, Representative PAGA Claims, and Class Certification Decisions in California, Including all New and Relevant DLSE Materials	7.50

Investigation of Defendant, Defendant's Business Relationships, and the Industry in which Defendant Operates	2.80
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	3.10
Investigation, Research, and Analysis Regarding 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	2.70
Analysis of Competitors in Various Relevant Geographic Areas within which Defendant Operates, and Comparing and Contrasting Defendant's Policies, Practices, and Procedures with the Policies, Practices, and Procedures of Defendant's Competitors	3.30
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	3.90
Comparative Analysis and Cross-Checking of All Available Job Postings, Job Reviews, and/or Other Reviews Regarding Work With 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	2.90
Research and Investigation Re: Workforce, Staffing Models, and Staffing Levels at Location(s) at Which Putative Class Members and Aggrieved Employees Worked Throughout California	3.50
Research and Investigation Re: Defendant's Written and Non-Written Policies, Practices, and Procedures Relating to Customer Service and Customer Requirements, Drivers, Non-Drivers, Daily Logs, Deliveries, Non-Discretionary Bonuses/Incentive/Performance Pay, Scheduling, Routes, Regular Rate, Timekeeping, Down Time, Meal and Rest Breaks, Reporting Time Pay, Overtime Compensation, Company-Provided	14.50

Radios/Pages/Phones, Cell Phone Use, Supplies/Equipment, Uniform, Dress Code, Footwear, and Reimbursement of Business-Related Expenses	
Research and Investigation Re: Various Software Programs, Systems, and Technological Devices Defendant Uses to Conduct Its Everyday Business, Including Timekeeping, GPS, Logistics, Dispatch, Inventory, Communications, Safety, and Surveillance Systems and Electronic Tablets, 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 Time Worked During Meal Breaks	4.10
Research and Analysis of Potential Defenses Defendant May Raise, Including <i>De Minimis</i> Work, Non-Compensable Off-the-Clock Work, Waiver, Federal Preemption, Exemption, and Compliant Policies	8.50
Research and Investigation Re: Post- <i>Duran</i> vs. <i>U.S. Bank</i> Trial Manageability Issues, including Research Regarding Which Experts to Retain and For What Purpose	3.20
Prepare a Discovery Strategy and Plan of Action, Including Topics of Inquiry Important to Certification, Liability, and Damages/Civil Penalties	3.20
Review and Investigate Impact of COVID-19 Pandemic on Defendant, Its Operations, and Class Members' and Aggrieved Employees' Work	5.30
Meet and Communicate with Plaintiff Saul Andrade Throughout the Pendency of the Case	30.50
Investigate, Meet, Communicate with, and/or Conduct Interviews of Putative Class Members and/or Percipient Witnesses	9.50
Pleadings and Court Filings	
Draft Plaintiff's Complaint for Enforcement Under the Private Attorneys General Act, California Labor Code § 2698, Et Seq. and Legal Research and Analysis of All Allegations Involved (filed on July 28, 2020) (PAGA Action)	6.90

Review Court's Notice of Case Management Conference and Order and Notice of Assignment of Judge for All Purposes (filed on August 5, 2020) (PAGA Action)	0.10
Review and Analyze Defendant's Answer to Plaintiff's Complaint for Enforcement Under the Private Attorneys General Act and Research Allegations and Affirmative Defenses in Defendant's Answer (served on September 16, 2020) (PAGA Action)	1.40
Draft Plaintiff's Notice of Posting Jury Fees (filed on November 24, 2020) (PAGA Action)	0.10
Review Defendant's Case Management Statement (served on November 30, 2020) (PAGA Action)	0.10
Draft Plaintiff's Case Management Statement (filed on December 1, 2020) (PAGA Action)	0.50
Review Court's Tentative Case Management Order (issued on December 10, 2020) (PAGA Action)	0.10
Review Court's Case Management Order (filed on December 15, 2020) (PAGA Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Case Management Statement (filed on April 28, 2021) (PAGA Action)	0.70
Review Court's Case Management Order (filed on May 13, 2021) (PAGA Action)	0.10
Review Defendant's Notice of Related Case Re: <i>Castro, et al. v. Mach 1 Global Services</i> (Alameda County Case No. RG21099380) (served on May 27, 2021) (PAGA Action)	0.10
Draft Plaintiff's Class Action Complaint for Damages and Legal Research and Analysis of All Claims Involved (filed on June 25, 2021) (Class Action)	7.80
Review Court's Notice of Assignment of Judge for All Purposes (filed on August 9, 2021) (Class Action)	0.10
Review Court's Notice of Case Management Conference and Order (filed on August 10, 2021) (Class Action)	0.10

Meet and Confer with Defendant's Counsel, and Draft Joint Case Management Statement (filed on August 19, 2021) (PAGA Action)	0.70
Review Court's Tentative Case Management Order (issued on August 31, 2021) (PAGA Action)	0.10
Review Court's Case Management Order (filed on September 2, 2021) (PAGA Action)	0.10
Review and Analyze Defendant's Answer to Class Action Complaint and Research Allegations and Affirmative Defenses in Defendant's Answer (served on September 23, 2021) (Class Action)	1.40
Review Court's Notice of Case Reassignment (filed on October 29, 2021) (Class Action)	0.10
Review Defendant's Notice of Settlement (served on November 22, 2021) (PAGA Action)	0.10
Review Defendant's Notice of Settlement (served on November 22, 2021) (Class Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Case Management Statement (filed on December 6, 2021) (Class Action)	0.80
Review Court's Notice of Hearing (filed on December 7, 2021) (Class Action)	0.10
Review Court's Notice of Hearing (filed on December 27, 2021) (PAGA Action)	0.10
Review Court's Notice of Case Reassignment (filed on January 4, 2022) (PAGA Action)	0.10
Review Court's Notice of Case Rescheduling or Relocation (filed on February 23, 2022) (PAGA Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Status Report (filed on March 17, 2022) (Class Action)	0.90
Review Court's Tentative Ruling Re: Compliance Hearing (issued on March 23, 2022) (Class Action)	0.10

Review Court's Minute Order Re: Compliance Hearing (filed on March 23, 2022) (Class Action)	0.10
Draft Plaintiff's Notice of Continued Compliance Hearing (filed on March 23, 2022) (Class Action)	0.20
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation to Consolidate RG20069104 and RG21108078 for Purposes of Class Action and PAGA Settlement; [Proposed] Order (submitted on April 5, 2022) (Class Action and PAGA Action)	1.10
Review Court's Order to Consolidate RG20069104 and RG21108078 for Purposes of Class Action and PAGA Settlement (filed on April 11, 2022) (Class and PAGA Actions)	0.10
Review Court's Minute Order and Order Re: Compliance Hearing (filed on April 12, 2022) (PAGA Action)	0.10
Review Court's Notice of Case Reassignment (filed on January 25, 2023) (PAGA Action)	0.10
Review Court's Minute Order Re: Reassignment of Judge (filed on January 25, 2023) (PAGA Action)	0.10
Draft Plaintiff's Notice of Entry of Judgment or Order (filed on March 27, 2023) (PAGA Action)	0.10
Appearances	
Prepare for and Telephonically Attend Hearing on Plaintiff's Motion for Preliminary Approval of Class Action Settlement (February 28, 2023) (PAGA Action)	0.70
Prepare for and Telephonically Attend Hearing on Plaintiff's Motion for Final Approval of Class Action Settlement, Attorneys' Fees and Costs, and Class Representative Service Award (October 27, 2023) (Anticipated)	1.50

Discovery and Deposition	
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 (served on September 18, 2020) (PAGA Action)	5.80
Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (noticed for October 22, 2020; Organizational Structure) (served on September 18, 2020) (PAGA Action)	3.10
Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (noticed for October 23, 2020; Wage and Hour Practices) (served on September 18, 2020) (PAGA Action)	3.30
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Saul Andrade (served on July 1, 2021)	1.90
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Saul Andrade (served on August 18, 2021)	4.50
Letters and Correspondence	
Draft Notice to California Labor and Workforce Development Agency Re: Claims of Plaintiff Saul Andrade for Penalties Under California Labor Code section 2698, <i>et seq.</i> (served on May 21, 2020)	4.50
Meet with, Draft Correspondence to, and Respond to Correspondence from, Defendant's Counsel	19.50
Mediation/Settlement	
Review and Analyze Information, Data, and Documents Obtained from Plaintiff, Defendant, and Other Sources Prior to Mediation	39.50

Prepare for Mediation, Including Researching Settlement-Related Issues and Merits of Claims, Drafting the Mediation Brief, Compiling the Mediation Exhibits in Support of Mediation Brief, and Performing Damages and Penalties Analysis and Calculations (submitted on August 24, 2021)	25.80
Attend Mediation Session (August 26, 2021; Zoom Video Conference)	11.50
Draft, Review, Revise, Negotiate, and Finalize Class and Representative Action Settlement Agreement and Release of Claims (executed on October 25, 2022) and Notice of Class Action Settlement and Hearing Date for Final Approval	16.50
Draft, Review, Revise, and Finalize First Amended Class and Representative Action Settlement Agreement and Release of Claims (executed on March 15, 2023) and Revised Notice of Class Action Settlement	1.60
Coordinate Settlement Administration with Settlement Administrator, Ongoing Monitoring of Settlement Administration Process, Respond to Inquiries, and Review Weekly Reports	5.20
Law and Motion	
Research and Draft Plaintiff's Notice of Motion and Motion for Preliminary Approval of Class Action and PAGA Settlement; Memorandum of Points and Authorities, Declaration of Ovsanna Takvoryan in Support Thereof, Declaration of Saul Andrade in Support Thereof, and [Proposed] Order Thereon (filed on December 29, 2022) (PAGA Action)	17.20
Review Court's Tentative Ruling Re: Motion for Preliminary Approval of Class Action Settlement (issued on January 25, 2023) (PAGA Action)	0.10
Review Court's Order Re: Hearing on Motion – Other Motion for Preliminary Approval of Class Action Settlement (filed on January 26, 2023) (PAGA Action)	0.10
Review Court's Tentative Ruling Re: Motion for Preliminary Approval of Class Action Settlement (issued on February 22, 2023) (PAGA Action)	0.10

Review Court's Minute Order Re: Hearing on Motion – Other Motion for Preliminary Approval of Class Action Settlement (filed on February 28, 2023) (PAGA Action)	0.10
Draft Declaration of Annabel Blanchard in Support of Plaintiff's Motion for Preliminary Approval of Class Action and PAGA Settlement (filed on March 16, 2023) (PAGA Action)	3.50
Review Defendant's Declaration of Timothy M. Hoppe in Support of Motion for Preliminary Approval of Class Action Settlement (served on March 21, 2023) (PAGA Action)	0.10
Draft [Revised Proposed] Order Granting Preliminary Approval of Class Action Settlement (submitted on March 21, 2023) (PAGA Action)	0.10
Review Court's Tentative Ruling Re: Hearing on Motion – Other Motion for Preliminary Approval of Class Action Settlement (issued on March 21, 2023) (PAGA Action)	0.10
Review Court's Order Re: Hearing on Motion – Other Motion for Preliminary Approval of Class Action Settlement (filed on March 22, 2023) (PAGA Action)	0.10
Review Court's Order Granting Preliminary Approval of Class Action Settlement (filed on March 23, 2023) (PAGA Action)	0.10
Review and Analyze Settlement Administrator's Declaration Regarding Settlement Notice Administration; and Research and Draft Plaintiff's Motion for Final Approval of Class Action Settlement, Attorneys' Fees and Costs, and Class Representative Service Award, Declaration of Edwin Aiwazian in Support Thereof, and [Proposed] Final Approval Order and Judgment (filed on October 3, 2023) (Anticipated)	17.50
Total Hours:	354.50

EXHIBIT B

LAWYERS for JUSTICE PC CASE COST DETAIL
Andrade v. Mach 1 Global Services, Inc. (PAGA)

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
5/21/2020	Labor & Workforce Development Agency	PAGA Fee	75.00
5/22/2020	U.S. Postmaster	Postage	7.65
8/3/2020	Legal Document Server, Inc.	Attorney Service	150.48
8/3/2020	Alameda Superior Court	Complaint Filing Fee	435.00
8/3/2020	Alameda Superior Court	Jury Fee	150.00
8/17/2020	Legal Document Server, Inc.	Attorney Service	110.00
9/18/2020	General Logistics System US, Inc.	Courier Service	27.48
9/22/2020	General Logistics System US, Inc.	Courier Service	17.63
9/23/2020	Legal Document Server, Inc.	Attorney Service	185.00
11/24/2020	Legal Document Server, Inc.	Attorney Service	135.25
11/24/2020	Alameda Superior Court	Document Download Fee	6.00
11/24/2020	Legal Document Server, Inc.	Attorney Service	135.25
11/24/2020	Alameda Superior Court	Jury Fee	150.00
12/1/2020	Legal Document Server, Inc.	Attorney Service	130.00
12/18/2020	Alameda Superior Court	Jury Fee	150.00
4/28/2021	Legal Document Server, Inc.	Attorney Service	195.00
8/19/2021	Legal Document Server, Inc.	Attorney Service	130.00
3/17/2022	Legal Document Server, Inc.	Attorney Service	17.95
3/24/2022	Legal Document Server, Inc.	Attorney Service	17.95
4/6/2022	Legal Document Server, Inc.	Attorney Service	19.30
4/6/2022	Alameda Superior Court	Stipulation Fee	20.00
12/19/2022	Alameda Superior Court	Document Download Fee	1.00
12/30/2022	Legal Document Server, Inc.	Attorney Service	22.75
12/30/2022	Alameda Superior Court	Motion Fee	60.00
1/11/2023	Legal Document Server, Inc.	Attorney Service	18.70
1/11/2023	Legal Document Server, Inc.	Attorney Service	18.70
1/25/2023	Alameda Superior Court	Document Download Fee	5.00
3/16/2023	Alameda Superior Court	Document Download Fee	5.50
3/17/2023	Legal Document Server, Inc.	Attorney Service	18.70
3/21/2023	Legal Document Server, Inc.	Attorney Service	18.70
3/28/2023	Legal Document Server, Inc.	Attorney Service	18.70
Total:			2,452.69

LAWYERS for JUSTICE PC CASE COST DETAIL
Andrade v. Mach 1 Global Services, Inc.

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
5/21/2020	U.S. Postmaster	Postage	7.65
6/25/2021	Legal Document Server, Inc.	Attorney Service	200.23
6/25/2021	Alameda Superior Court	Complaint Filing Fee	435.00
6/25/2021	Alameda Superior Court	Complex Filing	1,000.00
8/6/2021	Signature Resolution	Mediation Fee	5,950.00
8/19/2021	ProLegal	Attorney Service	248.50
8/20/2021	Alameda Superior Court	Document Download Fee	10.00
10/4/2021	Legal Document Server, Inc.	Attorney Service	120.00
12/6/2021	Legal Document Server, Inc.	Attorney Service	18.95
12/20/2021	Alameda Superior Court	Document Download Fee	2.00
3/17/2022	Legal Document Server, Inc.	Attorney Service	17.95
3/24/2022	Legal Document Server, Inc.	Attorney Service	17.95
Total:			8,028.23