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

ROBERTO HERNANDEZ, individually, and
on behalf of other members of the general
public similarly situated and on behalf of
other aggrieved employees pursuant to the
California Private Attorneys General Act,

Plaintiff,

v.

MAR-CONE APPLIANCE PARTS CO., an
unknown business entity; and DOES 1
through 100, inclusive,

Defendant.

Case No.: 34-2020-00281810-CU-OE-GDS

Honorable Jill H. Talley
Department 23

CLASS ACTION

**DECLARATION OF DANIEL BASS IN
SUPPORT OF PLAINTIFF'S
UNOPPOSED MOTION FOR FINAL
APPROVAL OF CLASS ACTION
SETTLEMENT, ATTORNEYS' FEES
AND COSTS, AND SERVICE PAYMENT**

[Plaintiff's Motion for Final Approval of Class
Action Settlement, Attorneys' Fees and Costs,
and Enhancement Payment; Declaration of
Class Representative (Roberto Hernandez);
Declaration of Bentley Conn on Behalf of
Simpluris, Inc. Regarding Class Notice and
Settlement Administration; and [Proposed]
Final Approval Order and Judgment filed
concurrently herewith]

Date: December 12, 2025
Time: 9:00 a.m.
Department: 23

Complaint Filed: July 15, 2020
FAC Filed: September 3, 2020
SAC Filed: December 3, 2020
Trial Date: None Set

DECLARATION OF DANIEL BASS

I, Daniel Bass, 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 Roberto Hernandez (“Plaintiff”) and the Class in the above-captioned action. 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 thereto.

PROCEDURAL POSTURE AND PRELIMINARY APPROVAL OF SETTLEMENT

2. Defendant is a supplier of appliance repair parts, including HVAC and plumbing supplies. Plaintiff is a former employee of Defendant

3. On September 18, 2018, former Plaintiff Carmen Ramirez commenced a putative class action entitled *Carmen Ramirez v. Mar-Cone Appliance Parts Co.*, Superior Court of California for the County of Fresno, Case No. 18CECG03479 (“*Ramirez Action*”) against Defendant.

4. On November 1, 2018, Carmen Ramirez filed a First Amended Class Action Complaint for Damages in the *Ramirez Action*.

5. On January 16, 2019, Defendant filed an Answer to former Plaintiff Carmen Ramirez’s First Amended Class Action Complaint in the *Ramirez Action*.

6. On March 4, 2019, former Plaintiff Carmen Ramirez propounded multiple sets of discovery requests, including Requests for Production of Documents (Set One), Special Interrogatories (Sets One and Two), and Form Interrogatories-General (Set One), on Defendant. On June 6, 2019, former plaintiff Carmen Ramirez propounded additional sets of discovery requests, including Requests for Production of Documents (Set Two) and Special Interrogatories (Set Three) on Defendant, and noticed the deposition of Defendant’s person(s) most knowledgeable. Thereafter, on April 5, 2019, May 10, 2019, August 6, 2019, September 26, 2019, and January 31, 2020, Defendant responded to former plaintiff Carmen Ramirez’s discovery requests. On January 25, 2019, Defendant propounded Special Interrogatories (Set One) and Request for Production of Documents (Set One) on former plaintiff Carmen Ramirez,

1 and on February 28, 2019, former plaintiff Carmen Ramirez provided her responses to the
2 discovery requests. Furthermore, Class Counsel prepared for and took the depositions of
3 Defendant's Regional Distribution Manager and Northern California Regional Branch Manager
4 (who was also a Branch Manager in Sacramento until May 2019) over the course of three (3)
5 separate days in August 2019 and December 2019, and prepared for and defended the deposition
6 of former plaintiff Carmen Ramirez in February 2020. Parties also engaged in a *Belaire-West*
7 privacy notice and opt-out process with a neutral third-party, Simpluris, Inc. (the same third-party
8 administrator acting as the Settlement Administrator for the settlement), and after this process was
9 completed, the class contact information was produced to former plaintiff Carmen Ramirez and
10 Class Counsel in October 2019.

11 7. On May 7, 2020, Plaintiff Roberto Hernandez ("Plaintiff") provided written notice,
12 in conformity with the Private Attorneys General Act of 2004, California Labor Code section
13 2698, *et seq.* ("PAGA"), to the LWDA and Defendant of the specific provisions of the California
14 Labor Code that were alleged to be violated by Defendant, for which Plaintiff seeks civil penalties
15 under PAGA ("PAGA Notice").

16 8. On June 10, 2020, Plaintiff and Defendant Mar-Cone Appliance Parts Co.
17 (collectively with Plaintiff, the "Parties") participated in a formal, full-day mediation conducted
18 by Paul Grossman, Esq., a well-regarded mediator experienced in mediating complex labor and
19 employment matters. With the aid of the mediator's evaluation, the Parties ultimately reached the
20 Settlement described herein to resolve the class and PAGA claims, which they seek approval of in
21 the above-captioned action.

22 9. On July 15, 2020, Roberto Hernandez commenced a putative class and
23 representative PAGA action entitled *Roberto Hernandez v. Mar-Cone Appliance Parts Co.*,
24 Superior Court of California for the County of Sacramento ("Court"), Case No. 34-2020-00281810
25 (the "*Hernandez* Action" or "Action") against Defendant.

26 10. On September 3, 2020, Plaintiff filed a First Amended Class Action Complaint for
27 Damages & Enforcement Under the Private Attorneys General Act, California Labor Code § 2698,
28 Et Seq., adding former plaintiff Carmen Ramirez as a named plaintiff in the Action.

1 11. On December 3, 2020, Plaintiff filed a Second Amended Class Action Complaint
2 for Damages & Enforcement Under the Private Attorneys General Act, California Labor Code §
3 2698, Et Seq. in the Action, adding Fair Labor Standards Act causes of action (“Operative
4 Complaint”).

5 12. On February 17, 2022, the Superior Court of California for the County of Fresno
6 dismissed the *Ramirez* Action in its entirety; former Plaintiff Carmen Ramirez’s individual claims
7 and putative class claims in the *Ramirez* Action were dismissed without prejudice.

8 13. On February 22, 2022, the Court entered an order granting Plaintiff’s Request for
9 Dismissal of Carmen Ramirez’s Claims, dismissing former Plaintiff Carmen Ramirez’s individual
10 claims and putative class claims in the *Hernandez* Action without prejudice.

11 14. On November 14, 2022, Plaintiff filed his Motion for Preliminary Approval of Class
12 Action Settlement (“Motion for Preliminary Approval”) and supporting documents seeking
13 preliminary approval of the Joint Stipulation of Class Action and PAGA Settlement and Release
14 (“Original Agreement”) entered into by the Parties.

15 15. On December 8, 2022, the Court issued a tentative ruling wherein the Court denied
16 Plaintiff’s Motion for Preliminary Approval without prejudice and raised concerns regarding the
17 Motion for Preliminary Approval, basing its denial on the Court’s objection to having Participating
18 Class Members receive a single check that includes payment both the release of class and PAGA
19 claims, instead of two separate payments.

20 16. On November 7, 2023, Plaintiff filed his Renewed Motion for Preliminary Approval
21 of Class Action Settlement (“Renewed Motion” or “Renewed Motion for Preliminary Approval”)
22 and supporting documents seeking preliminary approval of the First Amended Joint Stipulation of
23 Class Action and PAGA Settlement and Release entered into by the Parties.

24 17. On November 30, 2023, the Court issued a tentative ruling wherein the Court raised
25 points of inquiry regarding the Motion for Preliminary of Approval, continued the hearing on
26 Plaintiff’s Motion for Preliminary Approval to February 2, 2024, and instructed Plaintiff’s Counsel
27 to file supplemental papers addressing the Court’s concerns regarding Plaintiff’s Renewed Motion
28 for Preliminary Approval. However, the motion ultimately was denied without prejudice because

1 the Parties were unable to finalize and file timely supplemental papers addressing the points of
2 inquiry raised by the Court.

3 18. On March 17, 2025, Plaintiff filed a renewed Motion for Preliminary Approval of
4 Class Action Settlement and supporting documents (“Motion for Preliminary Approval”) seeking
5 preliminary approval of the Third Amended Joint Stipulation of Class Action and PAGA
6 Settlement and Release (“Amended Agreement,” “Settlement,” or “Settlement Agreement”). On
7 June 13, 2025, the Court issued a tentative ruling in which it granted Plaintiff’s Motion for
8 Preliminary Approval.

9 19. On June 24, 2025, the Court entered an Order Granting Preliminary Approval of
10 Class Action Settlement (“Preliminary Approval Order”), thereby preliminarily approving the
11 terms of the Settlement, and the proposed notice administration procedures and associated
12 deadlines. The Court preliminarily appointed Plaintiff to represent the Class (“Class
13 Representative”). The Court also preliminarily appointed Lawyers *for* Justice, PC, as counsel for
14 the Class (“Class Counsel”). The Court also approved the contents of and ordered the mailing of
15 the Notice of Class Action Settlement (“Class Notice”), and adopted the notice, opt-out, and
16 objection procedures, and ordered their implementation. The Court appointed Simpluris, Inc.
17 (“Simpluris” or “Settlement Administrator”) to serve as the third-party administrator and handle
18 the notice and settlement administration process.

19 20. As of the date of filing the accompanying Motion for Final Approval of Class Action
20 Settlement, Attorneys’ Fees and Costs, and Enhancement Payment (“Motion for Final Approval”),
21 no Class Members have objected to the Class Settlement or the request for Attorneys’ Fees and
22 Costs, Enhancement Payment, Settlement Administration Costs, or allocation for penalties under
23 PAGA.

24 **WORK PERFORMED BY LAWYERS *FOR* JUSTICE, PC**

25 21. Several attorneys at Lawyers *for* Justice, PC have performed work in the above-
26 captioned putative class action since prior to the commencement of the *Ramirez* Action, which
27 was commenced on September 18, 2018.

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22. Before initiating this action and the *Ramirez* Action, Lawyers *for* Justice, PC conducted extensive investigations and research into the facts and circumstances underlying the pertinent factual and legal issues and applicable law. This required thorough discussions and interviews between attorneys at Lawyers *for* Justice, PC and former Plaintiff Carmen Ramirez (“Former Plaintiff Ramirez”) and Plaintiff, and research into the various legal issues involved in the case, namely, the current state of the law as it applied to, *inter alia*, class certification, manageability, off-the-clock theory, meal and rest periods, representative PAGA claims, wage-and-hour enforcement and penalties, Former Plaintiff Ramirez and Plaintiff’s claims and allegations, and potential defenses. After conducting initial investigation, Lawyers *for* Justice, PC determined that Former Plaintiff Carmen Ramirez and Plaintiff’s claims were well-suited for class and representative adjudication, owing to what appeared to be a common course of conduct affecting a similarly situated group of current and former employees of Defendant in the State of California, who were not properly compensated for, *inter alia*, all hours worked, non-compliant meal and rest periods, and unreimbursed expenses.

23. Class Counsel conducted significant formal and informal discovery and investigated into the facts of the case, to assess the veracity, strength, and scope of the claims, and worked on preparing the case for class certification and trial prior to reaching the Settlement. The Parties exchanged a volume of information, documents, and data throughout the course of litigation and in connection with mediation and settlement negotiations. Class Counsel had the opportunity to interview and obtain information from Former Plaintiff Ramirez, Plaintiff, and other percipient witnesses and reviewed and analyzed a volume of information, documents, and data obtained from Former Plaintiff Ramirez, Plaintiff, Defendant, and other sources. Class Counsel propounded multiple sets of written discovery requests and notices of deposition on Defendant, as discussed above. The information, documents, and data reviewed and analyzed by Class Counsel included, and were not limited to, Plaintiff’s employment records, Former Plaintiff Ramirez’s employment records, a detailed sampling of class time and pay data, company policy acknowledgements (e.g., the Handbook Acknowledgement Form), internal memoranda, and Defendant’s operations and employment practices, policies, and procedures (including but not limited to Defendant’s Policies

1 and Procedures Manual for Employees, Employment Practices and Procedures, Complaint
2 Resolution Procedure, Hours and Pay Practice, Drug and Alcohol Free Workplace Policy,
3 Operations Policies, and Leave of Absence Policies), among other information and documents.
4 Class Counsel developed liability, damages, and penalties valuation models in the course of
5 litigation and in connection with settlement negotiations, and met and conferred with Defendant's
6 counsel on numerous occasions, e.g., to discuss issues relating to the pleadings, motion practice,
7 case management, discovery, and the production of information, documents, and data in the course
8 of litigation, settlement negotiations, and mediation. Other work performed by Class Counsel
9 included, and was not limited to, case strategy and analysis; drafting, reviewing, and revising the
10 pleadings, motion-related papers, and settlement-related papers; and preparing for and attending
11 court proceedings and mediation and settlement negotiations, among other tasks.

12 24. As outlined herein, significant formal and informal discovery and investigations
13 have been conducted during the course of litigation and in connection with mediation and
14 settlement negotiations. Class Counsel analyzed a large volume of pages of information,
15 documents, and data obtained from Former Plaintiff Ramirez, Plaintiff, Defendant, and other
16 sources, that provided a critical understanding of the nature of the work performed by Class
17 Members and Aggrieved Employees, as well as Defendant's operations and employment policies,
18 practices, and procedures, and were used in analyzing liability, damages, and penalties valuation
19 issues in connection with all phases of the litigation, and ultimately in connection with the
20 mediation and settlement negotiation process. Class Counsel also performed research regarding
21 applicable law, which is evolving as it relates to class certification, manageability, off-the-clock
22 theory, meal and rest periods, representative PAGA claims and penalties, wage-and-hour law and
23 enforcement, Former Plaintiff Ramirez and Plaintiff's claims and allegations, and Defendant's
24 defenses thereto, as well as facts discovered. Accordingly, sufficient investigation and review of
25 information have taken place in order for the Parties to be adequately informed of the nature and
26 extent of the claims, and to enable them to fully evaluate the Settlement for its fairness, adequacy,
27 and reasonableness.

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1 25. After conducting significant investigation of the facts and law during the prosecution
2 of the case, counsel for the parties engaged in extensive settlement negotiations to try to resolve
3 the matter. These efforts included participating in a formal, full-day mediation conducted by Paul
4 Grossman, Esq., a well-regarded mediator experienced in mediating complex labor and
5 employment matters. Prior to and during mediation and settlement discussions, the Parties
6 exchanged information and data, and discussed various aspects of the case, including and not
7 limited to, the risks and delays of further litigation, the risks to the Parties of proceeding with class
8 certification and/or representative adjudication, the law relating to class certification,
9 manageability, off-the-clock theory, regular rate, meal and rest periods, PAGA representative
10 actions, and federal and state wage-and-hour law and enforcement, as well as the evidence
11 produced and analyzed, and the possibility of appeals, among other things.

12 26. During all settlement discussions, the Parties conducted their negotiations at arm's
13 length in an adversarial position. Arriving at a settlement that was acceptable to the Parties was
14 not easy. Defendant and its counsel felt strongly about Defendant's ability to avoid class
15 certification and representative adjudication and prevail on the merits, while Plaintiff and Class
16 Counsel believed that they would be able to obtain relief in court, obtain class certification, and
17 prevail at trial. After conducting significant formal and informal discovery and investigations and
18 extensive settlement negotiations, with the aid of the mediator's evaluation, the Parties agreed that
19 the matter was well-suited for settlement given the legal issues relating to Plaintiff's principal
20 claims, as well as the costs and risks to the Parties that would attend further litigation. These risks
21 of further litigation include, and are not limited to, a determination that the claims are unsuitable
22 for class treatment and/or representative adjudication, class de-certification after certification of a
23 class, allowing a jury to decide the claims, and the real possibility of no monetary recovery after
24 years of litigation.

25 27. The Settlement takes into account the strengths and weaknesses of each side's
26 position and the uncertainty of litigation, through certification, trial, and/or appeals. Class
27 Counsel analyzed a large volume of information, documents, and data obtained from Defendant,
28 former Plaintiff Ramirez, Plaintiff, and other sources and performed research regarding applicable

1 law, which is evolving as it relates to class certification, manageability, off-the-clock theory, meal
2 and rest periods, representative PAGA claims and penalties, wage-and-hour law and enforcement,
3 Plaintiff's claims and allegations, and Defendant's defenses thereto, as well as facts discovered.
4 The Settlement was based on this large volume of facts, evidence, and investigation.

5 28. By way of the accompanying Motion for Final Approval, Class Counsel seeks
6 attorneys' fees in the amount of \$273,000, which is 35% of the Total Settlement Amount of
7 \$780,000.00. Pursuant to the contingency-fee agreement entered into by and between Plaintiff
8 and Lawyers *for* Justice, PC, Plaintiff has agreed to a contingency fee of at least 35% of the
9 recovery.

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

17 30. While not necessarily required to be demonstrated because the percentage fee is
18 proper for this settlement, Class Counsel has incurred many hours of work in connection with
19 prosecuting the matter, such that the award of attorneys' fees is also justified under a lodestar
20 analysis. Attorneys at Lawyers *for* Justice, PC have spent a total of **519.90 hours** performing tasks
21 in the *Hernandez* Action and the *Ramirez* Action, ultimately obtaining the recovery in this matter.
22 Attached hereto as "**EXHIBIT A**" is an Attorney Task and Time Chart that sets forth in detail the
23 nature of the legal services provided by attorneys at Lawyers *for* Justice, PC, and the time incurred
24 in performing those services. The hours include work done by myself and several other attorneys
25 at Lawyers *for* Justice, PC. Additionally, separate from the hours of work referenced herein and
26 in the attached chart, Lawyers *for* Justice, PC had litigation support personnel actively engaged in
27 assisting with the prosecution of this matter.

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31. The attorneys identified below have worked on this matter, and they have performed their work in this matter exclusively on a contingency basis.

Attorney	Title	Bar No	Years Admitted & Practicing in CA	Rate	Total Hours	Lodestar
Edwin Aiwazian	Managing Attorney & Shareholder	232943	2004 (21 years)	\$1,495	81.00	\$121,095.00
Arby Aiwazian	Shareholder	269827	2010 (15 years)	\$1,295	13.50	\$17,482.50
Joanna Ghosh	Managing Attorney	272479 (CA); 518149 (NY)	2010 (CA); 2013 (NY) (15 years)	\$1,295	17.80	\$23,051.00
Daniel J. Bass	Senior Attorney	287466	2012 (13 years)	\$850	14.20	\$12,070.00
Brian J. St. John	Senior Attorney	304112	2015 (10 years)	\$850	13.60	\$11,560.00
Tara Zabehe	Senior Attorney	314706	2017 (8 years)	\$725	36.60	\$26,535.00
Yasmin Hosseini	Senior Attorney	326399	2019 (6 years)	\$725	48.10	\$34,872.50
Travis J. Maher	Senior Attorney	327206	2019 (6 years)	\$725	7.20	\$5,220.00
Connie Lee	Junior Attorney	357364	2024 (1 year)	\$575	11.40	\$6,555.00
Melissa A. LeBlanc-Mansell	Senior Attorney (former)	283080	2012 (13 years)	\$850	61	\$51,850.00
Stephanie S. Ponck	Senior Attorney (former)	306205	2015 (10 years)	\$850	12.10	\$10,285.00
Tiffany J. Hyun	Senior Attorney (former)	311743	2016 (9 years)	\$850	31.70	\$26,945.00
Benjamin H. Haber	Junior Attorney (former)	315664	2017 (8 years)	\$575	59.60	\$34,270.00
Melissa A. Huether	Junior Attorney (former)	316604	2017 (8 years)	\$575	14.50	\$8,337.50
Cinela Aziz	Junior Attorney (former)	318192	2017 (8 years)	\$575	55.80	\$32,085.00
Alik S. Ourfalian	Junior Attorney (former)	322686	2018 (7 years)	\$575	2.50	\$1,437.50

Shahin Y. Mehvary	Junior Attorney (former)	323455	2018 (7 years)	\$575	17.10	\$9,832.50
Erin A. Lim	Junior Attorney (former)	323930	2018 (7 years)	\$575	17.50	\$10,062.50
Giovani Pimentel-Galvan	Junior Attorney (former)	345232	2022 (3 years)	\$575	2.20	\$1,265.00
Matthew R. Soto	Junior Attorney (former)	353499	2023 (2 years)	\$575	2.50	\$1,437.50
Total:					519.90	\$446,248.50

32. Each of the attorneys identified above performed their work in this matter exclusively on a contingency basis. Neither Plaintiff nor former Plaintiff Ramirez has been billed for, nor have they paid for, any of the work performed in the instant action to date by attorneys at Lawyers for Justice, PC.

33. The billing rates for each of the attorneys listed above, who worked on this matter, are reasonable, usual, and commensurate with the individual backgrounds, training, and experience of the attorneys, in litigating complex wage-and-hour actions, and in particular, employment class actions and representative actions. These rates are the reasonable and usual hourly rates for the referenced attorneys' services in wage and hour class action cases handled by Lawyers for Justice, PC, and are commensurate with rates charged in the community by other plaintiffs-side and defense-side attorneys in this practice area. Lawyers for Justice, PC almost exclusively handles the prosecution of plaintiffs' side cases.

34. The work performed in this matter, the background of Lawyers for Justice, PC, as well as the individual backgrounds, training, and experience of the attorneys who worked on this matter, in litigating complex wage-and-hour cases, and in particular, employment class actions and representative actions, support a reasonable blended hourly rate of compensation at the rate of at least \$800 per hour for work performed by Lawyers for Justice, PC. Lawyers for Justice, PC has been awarded attorneys' fees, compensating the firm at the rate of at least \$800 per hour for legal services performed, by courts granting approval of settlements in other wage-and-hour class action and/or representative action cases: final approval of the class and representative action settlement in *David Dugan v. TEC Equipment, Inc., et al.* (Los Angeles County Superior Court

Case No. 19STCV01591) was granted on July 8, 2021, and the award of attorneys' fees involved compensation at the rate of \$936.47 per hour; final approval of the class and representative action settlement in *Larry Greenwood, et al. v. Scan Health Plan* (Los Angeles County Superior Court Case No. BC715157) was granted on April 20, 2021, and the award of attorneys' fees involved compensation at the rate of \$919.57 per hour; and 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.

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

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

36. Edwin Aiwazian is a Managing Member and Shareholder of Lawyers for Justice, PC. He received his Bachelor of Arts degree from Pepperdine University in April of 1999 and earned a Juris Doctor degree from Pepperdine University School of Law in May of 2004. He has extensive formal training in dispute resolution and negotiation from the Straus Institute for Dispute

1 Resolution as part of its Masters in Dispute Resolution degree program. In addition, he has
2 previously served as a pro bono mediator for the Los Angeles County Superior Court. In October
3 of 2000, he obtained a Litigation Paralegal Certificate from the UCLA Extension Program. During
4 the summer of 2000, he studied Legal Writing at Harvard University. From approximately
5 September 2002 to approximately December 2002, he served as a Judicial Extern to the Honorable
6 Kim McLane Wardlaw of the United States Court of Appeals for the Ninth Circuit. From
7 approximately June 2002 to approximately August 2002, he served as a Judicial Extern to the
8 Honorable Earl Johnson, Jr. of the California Court of Appeal for the Second Appellate District.
9 In December of 2004, he obtained a license to practice law from the California State Bar. Since
10 in or around October of 2008, through his work at Lawyers *for* Justice, PC, he has almost
11 exclusively focused on the prosecution of consumer and employment class actions. While
12 employed by Lawyers *for* Justice PC, he has argued over one hundred (100) motions, taken or
13 defended over one hundred fifty (150) depositions, prepared dozens of expert witnesses for
14 deposition or trial, and attended over one hundred seventy-five (175) mediations. Together with
15 other attorneys at the firm, and in some cases in conjunction with co-counsel, he has successfully
16 litigated cases involving the executive, administrative, and other overtime exemptions to the State
17 of California and federal overtime compensation requirements. Under his supervision, Lawyers
18 *for* Justice, PC has successfully obtained class certification by contested motion practice in
19 approximately sixteen (16) cases in the last decade and litigated over 1,000 class action or
20 representative action cases.

21 37. Arby Aiwarzian is a Member and Shareholder of Lawyers *for* Justice, PC. He
22 received his Bachelor of Arts degree from University of California, Los Angeles and graduated
23 magna cum laude. He earned a Juris Doctor degree, cum laude, from Southwestern Law School.
24 From approximately May 2007 to approximately July 2007, he served as a Judicial Extern to the
25 Honorable Earl Johnson, Jr. of the California Court of Appeal for the Second Appellate District.
26 From approximately August 2008 to approximately December 2008, he served as a Judicial Extern
27 to the Honorable Kim McLane Wardlaw of the United State Court of Appeals for the Ninth Circuit.
28 He was admitted to practice law in California in 2010. He is admitted to practice before all courts

of the State of California and all United States District Courts in the State of California. He has worked on many wage-and-hour class action and representative action cases, taking the lead in taking and defending depositions, arguing motions, and attending mediations. He has played an integral role in preparing matters for class certification, including and not limited to, successful certification of a class in *Upson v. Sur La Table* (Los Angeles County Superior Court Case No. BC424012), *Montazemi v. Regus Management* (Los Angeles County Superior Court Case No. BC478769), and *Abdulhaqq v. Urban Outfitters* (Alameda County Superior Court Case No. RG13680477). Under his supervision, dozens of class action or representative action cases have resulted in settlements that have been granted court approval. He has handled over one hundred and fifty (150) mediations and worked on over two hundred and fifty (250) class action or representative action cases which have resulted in settlement.

38. Joanna Ghosh is a Managing Member of Lawyers for Justice, PC. She received a Bachelor of Arts degree from California State University, Los Angeles in 2006, a Master of Science degree from the London School of Economics in 2007, and a Juris Doctor degree from Georgetown University Law Center in 2010. She is admitted to practice in California (since 2010) and in New York (since 2013) and she is also admitted to practice in all U.S. District Courts in California, the U.S. Bankruptcy Court for the Central District of California, and the U.S. Supreme Court. She has taken and defended dozens of depositions and successfully handled motion practice in class action cases regarding discovery (including and not limited to, regarding class contact information), class certification (both contested class certification and stipulated class certification), arbitration agreements, coordination, and intervention. She has successfully handled briefing and oral arguments on appeal and obtained notable decisions regarding Private Attorneys General Act claims and employer efforts to compel arbitration of such claims, e.g., *Roberto Betancourt v. Prudential Overall Supply* (Cal. Ct. App., Mar. 7, 2017) 9 Cal.App.5th 439, cert. denied (Cal., May 24, 2017), cert. denied (U.S., Dec. 11, 2017) and *ZB, N.A. v. Superior Court* (2019) 8 Cal.5th 175. She has significant experience with class actions, including and not limited to working on cases to obtain class certification through contested motion practice and working on cases in the post-certification stage (e.g., post-certification discovery, appeal,

1 statistical sampling and pilot study, and trial preparation in conjunction with co-counsel in a case
2 involving a certified class consisting of approximately 2,600 individuals). She has extensive
3 experience with class action and/or representative action settlements, and has handled this process
4 in over five hundred (500) cases. Under her, Edwin Aiwasian, and Arby Aiwasian's supervision,
5 Lawyers for Justice, PC has handled the class certification and court approval process for hundreds
6 of class action and/or representative action matters that have successfully resolved. Joanna Ghosh
7 is a member of the California Employment Lawyers Association and, on several occasions, has
8 been a speaker regarding topics in wage and hour law at the organization's continuing legal
9 education events.

10 39. I am a Member of Lawyers for Justice, PC. I received my Bachelor of Science degree
11 in Psychology from Missouri State University in 2009, and a Juris Doctor
12 degree from Washington University in St. Louis, School of Law in 2012, where I served as a
13 Senior Editor of the Law Review and as a member of the Note Selection Committee. I am admitted
14 to practice before all courts in the State of California, the U.S. District Court for Central District
15 of California, and the U.S. District Court for the Northern District of California. From 2014
16 through and including the present, my practice consisted almost exclusively of complex wage and
17 hour class action and PAGA action matters in California. I have worked at several plaintiffs' side
18 law firms, and started the employment practice at one of them. I have taken and defended dozens
19 of depositions and have successfully handled motion practice in class action and PAGA cases
20 regarding discovery (including and not limited to motions regarding class contact information),
21 class certification (both contested class certification and stipulated class certification), dispositive
22 motions, arbitration agreements, coordination, and intervention. I have successfully handled a
23 complex wage and hour class action and PAGA case at every step prior to trial. I also successfully
24 handled briefing on appeals, including employer efforts to compel arbitration in *Jones v. UPS*
25 *Supply Chain Solutions, Inc.*, California Court of Appeals for the First District, Case No. A160726
26 (Cal. App. Jul 01, 2021) (unpublished decision). Further, I have extensive experience with
27 settlements of class actions and PAGA actions and have handled and supervised this process in
28 over fifty (50) cases.

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

40. To date, Class Counsel has borne all of the risks and costs of litigation and will not receive any compensation until recovery is obtained in this matter. The Settlement provides for reimbursement of litigation costs and expenses of up to \$45,000.00. Lawyers for Justice, PC seeks reimbursement of **\$35,488.67** in litigation costs and expenses incurred in the *Hernandez* Action (\$5,664.88) and the *Ramirez* Action (\$29,823.79), as reflected in “**EXHIBIT B**” attached hereto. These expenses were reasonable and necessary in the prosecution of the matter and to obtain the Settlement. The cost savings of \$9,511.33 will be a part of the Net Settlement Amount, which will be distributed to the Settlement Class Members in accordance with the Settlement.

ENHANCEMENT PAYMENT TO PLAINTIFF

41. In recognition of his efforts and work spearheading the prosecution of this matter and serving as the Class Representative, as well as his broader individual waiver and release of claims with a California Civil Code Section 1542 waiver, the Settlement provides for an Enhancement Payment in an amount of up to \$6,000 to Plaintiff. Plaintiff spent a substantial amount of time and effort discussing his employment with Class Counsel, gathering and providing relevant documents and information, and providing facts and evidence to support the prosecution of the claims. Plaintiff was available whenever Class Counsel needed him and actively tried to obtain and provide information that would help obtain a recovery in this matter. Accordingly, it is appropriate for Plaintiff to receive \$6,000.00 as a reasonable Enhancement Payment for his broader waiver and release of claims and services performed in this matter, in addition to his individual settlement payment(s).

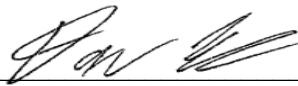
42. I submit that the settlement is fair, reasonable, and adequate, and in the best interests of Plaintiff, the Class Members, Aggrieved Employees, and the State of California.

43. A draft of Plaintiff’s Unopposed Motion for Final Approval of Class Action Settlement, Attorneys’ Fees and Costs, and Enhancement Payment as well as its supporting declarations and the [Proposed] Final Approval Order and Judgment in this matter were provided to counsel for Defendant on November 11, 2025. Counsel for Defendant has had the opportunity

1 to review these documents and has not stated an intention to oppose the motion or proposed any
2 revisions to the papers. Additionally, on November 14, 2025 Counsel for Defendant agreed in
3 writing to treat email service as personal service for purposes of this motion, allowing email
4 service to be timely effectuated on November 18, 2025 (16 court days in advance of the hearing
5 on this matter).

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 18th day of November 2025, at Glendale, California.

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11 Daniel Bass
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EXHIBIT A

ROBERTO HERNANDEZ V. MAR-CONE APPLIANCE PARTS CO.
Sacramento County Superior Court Case No. 34-2020-00281810-CU-OE-GDS (“Hernandez Action”)

CARMEN RAMIREZ V. MAR-CONE APPLIANCE PARTS CO.
Fresno County Superior Court Case No. 18CECG03479 (“Ramirez Action”)

ATTORNEY TASK AND TIME CHART

TASK	LAWYERS <i>for</i> JUSTICE, PC
Investigation and Research / Due Diligence	
Meet and Communicate with Plaintiff Roberto Hernandez (“Plaintiff Hernandez”) during the Case (Hernandez Action)	36.50
Meet and Communicate with Formerly Represented Plaintiff Carmen Ramirez during the Case	32.90
Investigate, Communicate with, and/or Interview Putative Class Members, Aggrieved Employees, and/or Percipient Witnesses	7.90
Pleadings and Court Filings	
Investigate the Merits of Formerly Represented Plaintiff Carmen Ramirez’s Class Claims, Conduct Legal Research and Analysis Regarding All Class Claims Involved, and Draft Formerly Represented Plaintiff Carmen Ramirez’s Class Action Complaint for Damages (filed on September 18, 2018) (Ramirez Action)	7.50
Review Court’s Notice of Case Management Conference and Assignment of Judge for All Purposes (filed on September 24, 2018) (Ramirez Action)	0.10
Research, Draft, Review, and/or Revise Formerly Represented Plaintiff Carmen Ramirez’s First Amended Class Action Complaint for Damages (filed on November 1, 2018) (Ramirez Action)	3.40
Review Court’s Notice of Calendar Setting (filed on December 20, 2018) (Ramirez Action)	0.10

Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Case Management Statement Per Local Rule 2.1.1(D) (filed on January 7, 2019) (Ramirez Action)	1.50
Review and Analyze Answer of Defendant Mar-Cone Appliance Parts Co. ("Defendant") to Formerly Represented Plaintiff Carmen Ramirez's First Amended Class Action Complaint (served on January 16, 2019), and Research Affirmative Defenses in Defendant's Answer (Ramirez Action)	1.40
Review Court's Case Management Conference Minutes/Order to Show Cause (filed on January 22, 2019) (Ramirez Action)	0.10
Review Defendant's Notice of Hearing and Application for Andrew J. Weissler, Cooper R. Page, and Randall Thompson to Appear Pro Hac Vice; Memorandum of Points and Authorities; Declarations of Andrew J. Weissler, Cooper R. Page, Randall Thompson, and Kate Juvinal in Support; [Proposed] Order (California Rules of Court, Rule 9.40) (served on February 8, 2019) (Ramirez Action)	0.60
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Supplemental Joint Case Management Statement (filed on March 11, 2019) (Ramirez Action)	1.10
Review Court's Minute Order Re: Case Management Conference (filed on March 19, 2019) (Ramirez Action)	0.10
Review Court's Order Granting Pro Hac Vice Application of Randall Thompson, Andrew J. Weissler, and Cooper R. Page (filed on April 3, 2019) (Ramirez Action)	0.10
Review Court's Tentative Ruling Re: Application for Admission Pro Hac Vice (published on April 3, 2019) (Ramirez Action)	0.20
Review Court's Minute Order Re: Pro Hac Vice Motion (filed on April 4, 2019) (Ramirez Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Stipulation and Protective Order – Confidential (submitted on May 16, 2019) (Ramirez Action)	1.10
Review Court's Protective Order – Confidential (filed on May 20, 2019) (Ramirez Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Case Management Statement (filed on July 9, 2019) (Ramirez Action)	1.20
Review Court's Minute Order Re: Case Management Conference (filed on July 17, 2019) (Ramirez Action)	0.10
Review Court's Notice of Calendar Setting (filed on September 27, 2019) (Hernandez Action)	0.10

Review Court's Notice of Calendar Setting (filed on September 27, 2019) (Ramirez Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Case Management Statement (filed on November 6, 2019) (Ramirez Action)	1.10
Review Court's Minute Order Re: Case Management Conference (filed on December 10, 2019) (Ramirez Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Stipulation to Continue Case Management Conference; and [Proposed] Order (submitted on April 7, 2020) (Ramirez Action)	0.90
Review Court's Notice of Calendar Setting (filed on April 9, 2020) (Ramirez Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Case Management Statement (filed on May 13, 2020) (Ramirez Action)	1.10
Review Court's Notice of Calendar Setting (filed on May 13, 2020) (Ramirez Action)	0.10
Review Court's Notice of Calendar Setting (filed on June 16, 2020) (Ramirez Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Stipulation to Continue Case Management Conference; and [Proposed] Order (submitted on June 30, 2020) (Ramirez Action)	0.70
Review Court's Notice of Assignment of Judge for All Purposes and Order to Continue Case Management Conference (filed on July 1, 2020) (Ramirez Action)	0.10
Review Notice of Calendar Setting (filed on July 13, 2020) (Ramirez Action)	0.10
Investigate the Merits of Plaintiff Hernandez's Claims, Conduct Legal Research and Analysis Regarding All Claims Involved, and Draft Plaintiff Hernandez's Class Action Complaint for Damages and Enforcement Under the Private Attorneys General Act, California Labor Code Section 2698, Et Seq. (filed on July 15, 2020) (Hernandez Action)	7.50
Review Court's Notice and Order of Complex Determination (filed on July 30, 2020) (Hernandez Action)	0.10
Review Court's Notice of Case Management Conference and Complex Case Management Procedures (filed on August 10, 2020) (Hernandez Action)	0.10
Research, Draft, Review, and/or Revise Plaintiff Hernandez and Formerly Represented Plaintiff Carmen Ramirez's First Amended Class Action Complaint for Damages and Enforcement Under the Private Attorneys General Act, California Labor Code Section 2698, Et Seq. (filed on September 3, 2020) (Hernandez Action)	3.30

Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Stipulation to Continue Case Management Conference; and [Proposed] Order (submitted on September 4, 2020) (Ramirez Action)	0.70
Review Court's Order to Continue Case Management Conference (filed on September 9, 2020) (Ramirez Action)	0.20
Research, Draft, Review, and/or Revise Plaintiff Hernandez and Formerly Represented Plaintiff Carmen Ramirez's Second Amended Class Action Complaint for Damages and Enforcement Under the Private Attorneys General Act, California Labor Code Section 2698, Et Seq. (filed on December 3, 2020), Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Stipulation Granting Plaintiff Leave to File Second Amended Complaint; [Proposed] Order Thereon (submitted on October 29, 2020) (Hernandez Action)	3.70
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Stipulation to Continue Case Management Conference; and [Proposed] Order (submitted on October 30, 2020) (Ramirez Action)	0.70
Review Court's Order to Continue Case Management Conference (filed on November 2, 2020) (Ramirez Action)	0.10
Review Court's Order Granting Plaintiff Hernandez's Leave to File Second Amended Complaint (filed on November 3, 2020) (Hernandez Action)	0.10
Review Defendant's Notice of Appearance of Amberly A. Morgan and Notice of Withdrawal of Kate Juvinal (served on December 4, 2020) (Ramirez Action)	0.10
Review Defendant's Notice of Change of Address or Other Contact Information (served on January 26, 2021) (Ramirez Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Stipulation to Continue Case Management Conference; and [Proposed] Order (submitted on February 2, 2021) (Ramirez Action)	0.70
Review Court's Order to Continue Case Management Conference (filed on February 2, 2021) (Ramirez Action)	0.10
Review Court's Tentative Ruling Re: Case Management Conference (published on February 16, 2021) (Hernandez Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Stipulation to Continue Case Management Conference; and [Proposed] Order (submitted on February 16, 2021) (Hernandez Action)	0.70
Review Defendant's Notice of Appearance of Amberly A. Morgan (served on February 16, 2021) (Hernandez Action)	0.10
Review Court's Order to Continue Case Management Conference (filed on February 18, 2021) (Hernandez Action)	0.10

Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Stipulation to Continue Case Management Conference; and [Proposed] Order (submitted on April 28, 2021) (Hernandez Action)	0.70
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Stipulation to Continue Case Management Conference; and [Proposed] Order (submitted on April 29, 2021) (Ramirez Action)	0.40
Review Court's Order to Continue Case Management Conference (filed on April 30, 2021) (Ramirez Action)	0.10
Review Defendant's Notice of Change of Address or Other Contact Information (served on May 18, 2021) (Ramirez Action)	0.10
Review Court's Tentative Ruling Re: Case Management Conference (published on May 19, 2021) (Hernandez Action)	0.10
Review Court's Minute Order Re: Case Management Conference (filed on May 21, 2021) (Hernandez Action)	0.10
Draft Plaintiff Hernandez and Formerly Represented Plaintiff Carmen Ramirez's Notice of Posting Jury and Complex Fees (filed on May 26, 2021) (Hernandez Action)	0.10
Draft Notice Regarding May 21, 2021 Case Management Conference (filed on May 26, 2021) (Hernandez Action)	0.20
Review Court's Minute Order Re: Case Management Conference (filed on July 26, 2021) (Ramirez Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Case Management Conference Statement (filed on August 12, 2021) (Ramirez Action)	0.70
Review Court's Notice of Calendar Setting (filed on August 18, 2021) (Ramirez Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Case Management Conference Statement (filed on September 9, 2021) (Hernandez Action)	0.70
Review Court's Tentative Ruling Re: Case Management Conference (published on September 22, 2021) (Hernandez Action)	0.10
Review Court's Minute Order Re: Case Management Conference (filed on September 24, 2021) (Hernandez Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Case Management Conference Statement (filed on September 29, 2021) (Ramirez Action)	0.50
Review Court's Minute Order Re: Case Management Conference (filed on October 6, 2021) (Ramirez Action)	0.10

Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Case Management Conference Statement (filed on October 12, 2021) (Hernandez Action)	0.70
Review Court's Tentative Ruling Re: Case Management Conference (published on October 18, 2021) (Hernandez Action)	0.10
Review Court's Minute Order Re: Case Management Conference (filed on October 22, 2021) (Hernandez Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Stipulation to Continue Deadline for Motion for Preliminary Approval; and [Proposed] Order (submitted on November 10, 2021) (Hernandez Action)	1.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Case Management Conference Statement (filed on November 15, 2021) (Ramirez Action)	0.70
Review Court's Minute Order Re: Case Management Conference (filed on November 17, 2021) (Ramirez Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Case Management Conference Statement (filed on November 22, 2021) (Hernandez Action)	0.50
Review Defendant's Notice of Withdrawal of Amberly W. Wood (served on November 24, 2021) (Hernandez Action)	0.10
Review Court's Tentative Ruling Re: Case Management Conference (published on November 30, 2021) (Hernandez Action)	0.10
Review Court's Minute Order Re: Case Management Conference (filed on December 3, 2021) (Hernandez Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Case Management Conference Statement (filed on January 4, 2022) (Hernandez Action)	0.50
Review Court's Minute Order Re: Case Management Conference (filed on January 4, 2022) (Ramirez Action)	0.10
Review Court's Tentative Ruling Re: Case Management Conference (published on January 12, 2022) (Hernandez Action)	0.10
Review Court's Minute Order Re: Case Management Conference (filed on January 14, 2022) (Hernandez Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Case Management Conference Statement (filed on February 8, 2022) (Hernandez Action)	0.50

Draft Request for Dismissal, Declaration of Edwin Aiwasian in Support Thereof, and [Proposed] Order Granting Dismissal of Action (submitted on February 14, 2022) (Ramirez Action)	0.90
Draft Request for Dismissal of Formerly Represented Plaintiff Carmen Ramirez's Claims, Declaration of Edwin Aiwasian in Support Thereof, and [Proposed] Order Thereon (submitted on February 15, 2022) (Hernandez Action)	0.90
Review Court's Tentative Ruling Re: Case Management Conference (published on February 15, 2022) (Hernandez Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Case Management Conference Statement (filed on February 15, 2022) (Ramirez Action)	0.70
Review Court's Order Granting Dismissal of Action (filed on February 17, 2022) (Ramirez Action)	0.10
Review Court's Minute Order Re: Case Management Conference (filed on February 18, 2022) (Hernandez Action)	0.10
Review Court's Order Granting Dismissal of Carmen Ramirez's Claims (filed on February 22, 2022) (Hernandez Action)	0.10
Draft Notice of Entry of Judgment or Order (filed on February 28, 2022) (Ramirez Action)	0.30
Draft Notice Regarding February 18, 2022 Minute Order (filed on March 1, 2022) (Hernandez Action)	0.30
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Case Management Conference Statement (filed on April 11, 2022) (Hernandez Action)	0.70
Review Court's Tentative Ruling Re: Case Management Conference (published on April 21, 2022) (Hernandez Action)	0.10
Review Court's Minute Order Re: Order and Notice Reassigning Complex Case (filed on August 4, 2022) (Hernandez Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Case Management Conference Statement (filed on August 11, 2022) (Hernandez Action)	0.70
Draft Notice Regarding August 4, 2022 Minute Order and Reassignment of Complex Case (filed on August 12, 2022) (Hernandez Action)	0.30
Review Court's Tentative Ruling Re: Case Management Conference (published on August 25, 2022) (Hernandez Action)	0.10

Review Court's Minute Order Re: Case Management Conference (filed on August 29, 2022) (Hernandez Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Case Management Conference Statement (filed on November 7, 2022) (Hernandez Action)	0.70
Review Court's Tentative Ruling Re: Case Management Conference (published on November 16, 2022) (Hernandez Action)	0.10
Review Court's Minute Order Re: Case Management Conference (filed on November 17, 2022) (Hernandez Action)	0.10
Review Court's Minute Order Re: Notice of Change in Department (filed on March 23, 2023) (Hernandez Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Case Management Conference Statement (filed on May 11, 2023) (Hernandez Action)	0.70
Review Court's Tentative Ruling Re: Case Management Conference (published on May 24, 2023) (Hernandez Action)	0.10
Review Court's Minute Order Re: Case Management Conference (filed on May 25, 2023) (Hernandez Action)	0.10
Draft Notice Regarding May 25, 2023 Minute Order (filed on May 30, 2023) (Hernandez Action)	0.20
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Further Case Management Conference Statement (filed on June 8, 2023) (Hernandez Action)	0.70
Review Court's Tentative Ruling Re: Case Management Conference (published on June 21, 2023) (Hernandez Action)	0.10
Review Court's Minute Order Re: Case Management Conference (filed on June 22, 2023) (Hernandez Action)	0.10
Review Court's Notice of Department Relocation (filed on January 9, 2024) (Hernandez Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Stipulation to Continue Plaintiff Hernandez's Hearing and Deadline to File Supplemental Papers in Support of Motion for Preliminary Approval of Class Action Settlement; [Proposed] Order (submitted on January 11, 2024) (Hernandez Action)	0.70
Review Court's Order to Continue Plaintiff Hernandez's Hearing and Deadline to File Supplemental Papers in Support of Motion for Preliminary Approval of Class Action Settlement (filed on January 30, 2024) (Hernandez Action)	0.10
Draft Notice of Entry of Judgment or Order (filed on February 1, 2024) (Hernandez Action)	0.10

Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Stipulation to Continue Plaintiff Hernandez's Hearing and Deadline to File Supplemental Papers in Support of Motion for Preliminary Approval of Class Action Settlement; [Proposed] Order (submitted on February 7, 2024) (Hernandez Action)	0.50
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Stipulation to Continue Plaintiff Hernandez's Hearing and Deadline to File Supplemental Papers in Support of Motion for Preliminary Approval of Class Action Settlement; [Proposed] Order (submitted on March 21, 2024) (Hernandez Action)	0.50
Review Court's Order to Continue Plaintiff Hernandez's Hearing and Deadline to File Supplemental Papers in Support of Motion for Preliminary Approval of Class Action Settlement (filed on April 10, 2024) (Hernandez Action)	0.10
Draft Notice of Minute Order Re: Hearing on Motion for Preliminary Approval of Class Action Settlement (filed on July 24, 2024) (Hernandez Action)	0.20
Draft Notice of Change of Address or Other Contact Information (filed on January 30, 2025) (Hernandez Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Stipulation to Continue Plaintiff Hernandez's Five-Year Trial Deadline; [Proposed] Order Thereon (submitted on March 26, 2025) (Hernandez Action)	1.10
Review Court's Order to Continue Plaintiff Hernandez's Five-Year Trial Deadline (filed on April 22, 2025) (Hernandez Action)	0.10
Draft Notice of Entry of Judgment or Order Re: Order to Continue Plaintiff's Five-Year Trial Deadline (filed on April 30, 2025) (Hernandez Action)	0.10
Draft Notice of Entry of Judgment or Order (filed on June 25, 2025) (Hernandez Action)	0.10
Appearances	
Prepare for, Travel To, and Attend Case Management Conference (January 22, 2019) (Ramirez Action)	7.50
Prepare for, Travel To, and Attend Case Management Conference (December 10, 2019) (Ramirez Action)	7.20
Prepare for and Remotely Attend Case Management Conference (May 21, 2021) (Hernandez Action)	0.70
Prepare for and Remotely Attend Hearing on Plaintiff's Motion for Preliminary Approval of Class Action Settlement (September 7, 2023) (Hernandez Action)	0.90

Discovery and Deposition	
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Formerly Represented Plaintiff Carmen Ramirez (served on June 20, 2018)	1.80
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Formerly Represented Plaintiff Carmen Ramirez	3.40
Review Defendant's Notice of Deposition of Formerly Represented Plaintiff Carmen Ramirez's (served on January 25, 2019) (Ramirez Action)	0.10
Review and Analyze Defendant's Requests for Production of Documents (Set One) and Special Interrogatories (Set One) to Formerly Represented Plaintiff Carmen Ramirez (served on January 25, 2019) (Ramirez Action)	0.30
Draft Formerly Represented Plaintiff Carmen Ramirez's Responses to Defendant's Requests for Production of Documents (Set One) and Special Interrogatories (Set One) (served on February 28, 2019) (Ramirez Action)	10.50
Draft Formerly Represented Plaintiff Carmen Ramirez's Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (Organizational Structure; noticed for April 11, 2019) (served on March 4, 2019) (Ramirez Action)	1.20
Draft Formerly Represented Plaintiff Carmen Ramirez's Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (Wage and Hour Practices; noticed for April 12, 2019) (served on March 4, 2019) (Ramirez Action)	1.40
Draft Formerly Represented Plaintiff Carmen Ramirez'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 March 4, 2019) (Ramirez Action)	4.50
Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (Wage and Hour Practices; noticed for April 12, 2019) (served on March 4, 2019)	1.10
Review and Analyze Defendant's Response to Formerly Represented Plaintiff Carmen Ramirez's Special Interrogatories (Set One) (served on April 5, 2019) (Ramirez Action)	0.50
Review and Analyze Defendant's Responses to Formerly Represented Plaintiff Carmen Ramirez's Form Interrogatories – General (Set One), Special Interrogatories (Set Two), Special Interrogatories (Set Two), and Requests for Production of Documents (Set One) (served on May 10, 2019) (Ramirez Action)	3.10

Draft Formerly Represented Plaintiff Carmen Ramirez's Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (Affirmative Defenses; noticed for July 5, 2019) (served on June 6, 2019) (Ramirez Action)	1.80
Draft Formerly Represented Plaintiff Carmen Ramirez's Special Interrogatories (Set Three) and Requests for Production of Documents (Set Two) to Defendant (served on June 6, 2019) (Ramirez Action)	2.50
Draft Formerly Represented Plaintiff Carmen Ramirez's Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (Affirmative Defenses; noticed for August 15, 2019) (served on July 9, 2019) (Ramirez Action)	1.60
Draft Formerly Represented Plaintiff Carmen Ramirez's Re-Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (Wage and Hour Practices; noticed for August 15, 2019) (served on July 9, 2019) (Ramirez Action)	0.40
Draft Formerly Represented Plaintiff Carmen Ramirez's Re-Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (Organizational Structure; noticed for August 15, 2019) (served on July 9, 2019) (Ramirez Action)	0.4 0
Draft <i>Belaire-West</i> Administration Notice and Opt-Out Postcard (sent on July 9, 2019), Monitor Notice Administration Process, and Review Non-Opt Out Contact List (Ramirez Action)	2.70
Review and Analyze Documents Produced by Defendant (served on July 19, 2019) (Ramirez Action)	4.60
Review and Analyze Defendant's Answers to Formerly Represented Plaintiff Carmen Ramirez's Special Interrogatories (Set Three) and Requests for Production of Documents (Set Two) to Defendant (served on August 6, 2019) (Ramirez Action)	4.10
Review Defendant's Objections to Formerly Represented Plaintiff Carmen Ramirez's Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (noticed for August 15, 2019) (served on August 8, 2019) (Ramirez Action)	1.20
Review Defendant's Deposition Designations to Formerly Represented Plaintiff Carmen Ramirez's Notice of Deposition of Person Most Knowledgeable at Defendant and Request for Production of Documents (served on August 13, 2019) (Ramirez Action)	0.60
Prepare for, Travel to/from, and Take the Deposition of Defendant's Person Most Knowledgeable Doug Farmer Vol. 1 (August 15, 2019; Fresno, California) and Review Deposition Transcript (Ramirez Action)	16.10

Review and Analyze Documents Produced by Defendant (served on September 25, 2019) (Ramirez Action)	2.40
Review and Analyze Defendant's Supplemental Response to Formerly Represented Plaintiff Carmen Ramirez's Form Interrogatories – General (Set One), Special Interrogatories (Set Two), and Requests for Production of Documents (Set One) (served on September 26, 2019) (Ramirez Action)	3.60
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Roberto Hernandez (served on September 27, 2019)	1.80
Review Defendant's Deposition Designations to Formerly Represented Plaintiff Carmen Ramirez's Notice of Deposition of Person Most Knowledgeable and Requests for Production of Documents (served on October 3, 2019) (Ramirez Action)	1.30
Review and Analyze Documents Produced by Defendant (served on October 9, 2019)	0.30
Draft Formerly Represented Plaintiff Carmen Ramirez's Re-Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (noticed for November 12, 2019 and November 13, 2019; Affirmative Defenses) (served on October 14, 2019) (Ramirez Action)	0.50
Draft Formerly Represented Plaintiff Carmen Ramirez's Re-Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (noticed for November 12, 2019 and November 13, 2019; Wage and Hour Practices) (served on October 14, 2019) (Ramirez Action)	0.40
Draft Formerly Represented Plaintiff Carmen Ramirez's Re-Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (noticed for November 12, 2019 and November 13, 2019; Organizational Structure) (served on October 14, 2019) (Ramirez Action)	0.30
Draft Formerly Represented Plaintiff Carmen Ramirez's Re-Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (noticed for November 19, 2019 and November 20, 2019; Affirmative Defenses) (served on October 17, 2019) (Ramirez Action)	0.20
Draft Formerly Represented Plaintiff Carmen Ramirez's Re-Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (noticed for November 19, 2019 and November 20, 2019; Wage and Hour Practices) (served on October 17, 2019) (Ramirez Action)	0.20
Draft Formerly Represented Plaintiff Carmen Ramirez's Re-Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (noticed for November 19, 2019 and November 20, 2019; Organizational Structure) (served on October 17, 2019) (Ramirez Action)	0.20

Review and Analyze Documents Produced by Defendant (served on October 19, 2019) (Ramirez Action)	20.20
Draft Follow-Up Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Roberto Hernandez (served on October 23, 2019)	1.20
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Roberto Hernandez (served on October 28, 2019)	3.10
Review and Analyze Documents Produced by Defendant (served on November 8, 2019) (Ramirez Action)	9.60
Review and Analyze Defendant's Objection to Formerly Represented Plaintiff Carmen Ramirez's Re-Notice of Deposition of Person Most Knowledgeable at Defendant and Request for Production of Documents (noticed for November 19, 2019 and November 20, 2019) (served on November 12, 2019) (Ramirez Action)	1.10
Draft Formerly Represented Plaintiff Carmen Ramirez's Re-Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (noticed for December 12, 2019 and December 13, 2019; Organizational Structure) (served on November 19, 2019) (Ramirez Action)	0.40
Draft Formerly Represented Plaintiff Carmen Ramirez's Re-Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (noticed for December 12, 2019 and December 13, 2019; Affirmative Defenses) (served on November 19, 2019) (Ramirez Action)	0.40
Draft Formerly Represented Plaintiff Carmen Ramirez's Re-Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (noticed for December 12, 2019 and December 13, 2019; Wage and Hour Practices) (served on November 19, 2019) (Ramirez Action)	0.40
Review and Analyze Defendant's Objection to Formerly Represented Plaintiff Carmen Ramirez's Re-Notice of Deposition of Person Most Knowledgeable at Defendant and Request for Production of Documents (noticed for December 12, 2019 and December 13, 2019) (served on December 3, 2019) (Ramirez Action)	1.10
Prepare for, Travel to, and Take the Deposition of Defendant's Person Most Knowledgeable Lisa Manochehri Vol. I (December 12, 2019; Sacramento, California) and Review Deposition Transcript (Ramirez Action)	10.40
Prepare for, Travel from, and Take the Deposition of Defendant's Person Most Knowledgeable Lisa Manochehri Vol. II (December 13, 2019; Sacramento, California) and Review Deposition Transcript (Ramirez Action)	5.90
Review Defendant's Amended Notice of Deposition of Formerly Represented Plaintiff Carmen Ramirez (served on January 16, 2020) (Ramirez Action)	0.10

Review and Analyze Defendant's Supplemental Responses to Formerly Represented Plaintiff Carmen Ramirez's Special Interrogatories (Set Two), Special Interrogatories (Set Three), and Requests for Production of Documents (Set One) (served on January 31, 2020) (Ramirez Action)	3.90
Review and Analyze Defendant's Second Supplemental Response to Formerly Represented Plaintiff Carmen Ramirez's Form Interrogatories – General (Set One) (served on February 4, 2020) (Ramirez Action)	0.90
Review and Analyze Documents Produced by Defendant (served on February 4, 2020) (Ramirez Action)	0.20
Review and Analyze Documents Produced by Defendant (served on February 9, 2020) (Ramirez Action)	0.20
Review Defendant's Amended Notice of Deposition of Formerly Represented Plaintiff Carmen Ramirez (served on February 20, 2020) (Ramirez Action)	0.10
Prepare for, Travel to/from, and Defend the Deposition of Formerly Represented Plaintiff Carmen Ramirez (February 28, 2020; Sacramento, California) and Review Deposition Transcript (Ramirez Action)	16.50
Review and Analyze Documents Produced by Defendant (Ramirez Action)	0.90
Letters and Correspondence	
Draft Notice to California Labor and Workforce Development Agency Re: Claim of Plaintiff Hernandez under the Private Attorneys General Act (served on May 7, 2020)	4.50
Meet With, Draft Correspondence to, and/or Respond to Correspondence from, Defendant's Counsel	23.70
Mediation/Settlement	
Review and Analyze Information, Data, and Documents Obtained from Plaintiff, Defendant, and Other Sources Prior to Mediation (over 4,700 pages)	48.60
Prepare for Mediation, Including Researching Settlement and Merits-Related Issues, Drafting the Mediation Brief and Compiling the Exhibits in Support of the Mediation Brief, and Performing Damages and Penalties Analyses and Calculations (submitted on June 8, 2020)	37.20
Attend Mediation Session and Review and Analyze Mediator's Proposal (June 10, 2020; Via Zoom Video Conference)	20.10
Draft, Review, Revise, Negotiate, and Finalize Joint Stipulation of Class Action and PAGA Settlement and Release (executed on August 24, 2022), and Draft Notice of Class Action Settlement	16.40

Draft, Review, Revise, Negotiate, and Finalize First Amended Joint Stipulation of Class Action and PAGA Settlement and Release (executed on January 3, 2023), and Draft Notice of Class Action Settlement	4.50
Draft, Review, Revise, Negotiate, and Finalize Second Amended Joint Stipulation of Class Action and PAGA Settlement and Release (executed on November 8, 2024), and Draft Revised Notice of Class Action Settlement	5.50
Draft, Review, Revise, Negotiate, and Finalize Third Amended Joint Stipulation of Class Action and PAGA Settlement and Release (executed on December 12, 2024), and Draft Revised Notice of Class Action Settlement	2.10
Coordinate Settlement Administration with Settlement Administrator, Ongoing Monitoring of Settlement Administration, and Respond to Class Inquiries	2.40
Law and Motion	
Research, Draft, Review, and/or Revise Plaintiff Hernandez's Notice of Motion and Motion for Preliminary Approval of Class Action Settlement; Memorandum of Points and Authorities, Declaration of Yasmin Hosseini in Support Thereof, Declaration of Plaintiff Hernandez in Support Thereof, and [Proposed] Order Granting Preliminary Approval of Class Action Settlement (filed on November 14, 2022) (Hernandez Action)	12.50
Review Court's Tentative Ruling Re: Motion for Preliminary Approval of Class Action Settlement (published on December 8, 2022) (Hernandez Action)	0.10
Review Court's Minute Order Re: Motion for Preliminary Approval of Class Action Settlement (filed on December 9, 2022) (Hernandez Action)	0.10
Review Court's Tentative Ruling Re: Motion for Preliminary Approval of Class Action Settlement (published on August 31, 2023) (Hernandez Action)	0.10
Review Court's Minute Order Re: Motion for Preliminary Approval of Class Action Settlement (filed on September 1, 2023) (Hernandez Action)	0.10
Research, Draft, Review, and/or Revise Plaintiff Hernandez's Notice of Motion and Motion for Preliminary Approval of Class Action Settlement; Memorandum of Points and Authorities, Declaration of Yasmin Hosseini in Support Thereof, Declaration of Plaintiff Hernandez in Support Thereof, and [Proposed] Order Granting Preliminary Approval of Class Action Settlement (filed on November 7, 2023) (Hernandez Action)	8.70
Review Court's Tentative Ruling Re: Motion for Preliminary Approval of Class Action Settlement (published on November 30, 2023) (Hernandez Action)	0.10

Review Court's Minute Order Re: Motion for Preliminary Approval of Class Action Settlement (filed on December 1, 2023) (Hernandez Action)	0.10
Review Court's Tentative Ruling Re: Motion for Preliminary Approval of Class Action Settlement (published on March 12, 2024) (Hernandez Action)	0.10
Review Court's Minute Order Re: Motion for Preliminary Approval of Class Action Settlement (filed on March 15, 2024) (Hernandez Action)	0.10
Review Court's Tentative Ruling Re: Motion for Preliminary Approval of Class Action Settlement (published on March 21, 2024) (Hernandez Action)	0.40
Review Court's Minute Order Re: Motion for Preliminary Approval of Class Action Settlement (filed on March 22, 2024) (Hernandez Action)	0.10
Research, Draft, Review, and/or Revise Plaintiff Hernandez's Notice of Motion and Motion for Preliminary Approval of Class Action Settlement; Memorandum of Points and Authorities, Declaration of Roberto Hernandez in Support Thereof, Declaration of Tara Zabehe in Support Thereof (filed on March 17, 2025) (Hernandez Action)	7.30
Review Court's Tentative Ruling Re: Motion for Preliminary Approval of Class Action Settlement (published on June 12, 2025) (Hernandez Action)	0.30
Review Court's Minute Order re: Motion for Preliminary Approval of Class Action Settlement (filed on June 13, 2025) (Hernandez Action)	0.10
Review Court's Order Granting Preliminary Approval of Class Action Settlement (filed on June 24, 2025) (Hernandez Action)	0.30
Review Declaration of Settlement Administration, and Research, Draft, Review, and/or Revise Plaintiffs' Notice of Motion and Motion for Final Approval of Class Action Settlement, Attorneys' Fees and Costs, and Enhancement Payment; Memorandum of Points and Authorities in Support Thereof, Declaration of Daniel Bass in Support Thereof, Declaration of Plaintiff Roberto Hernandez in Support Thereof, and [Proposed] Final Approval Order and Judgment	15.60
Total Hours:	519.90

EXHIBIT B

LAWYERS *for* JUSTICE, PC CASE COST DETAIL
Ramirez v. Mar-Cone Appliance Parts Co.

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
6/20/2018	U.S. Postmaster	Postage	\$6.70
9/18/2018	Fresno Superior Court	Complaint Filing Fee	\$435.00
9/18/2018	Fresno Superior Court	Complex Filing Fee	\$1,000.00
9/18/2018	One Legal	Attorney Service	\$60.96
10/8/2018	ProLegal	Attorney Service	\$33.00
11/2/2018	One Legal	Attorney Service	\$13.55
11/13/2018	One Legal	Attorney Service	\$13.55
12/5/2018	FedEx Express	Courier Service	\$32.50
12/18/2018	FedEx Express	Courier Service	\$32.27
12/21/2018	One Legal	Attorney Service	\$13.55
12/31/2018	One Legal	Attorney Service	\$9.95
1/7/2019	One Legal	Attorney Service	\$13.55
1/10/2019	One Legal	Attorney Service	\$13.55
1/22/2019	Melissa LeBlanc	Travel Reimbursement	\$255.96
2/6/2019	Golden State Overnight	Courier Service	\$12.42
2/14/2019	FedEx Express	Courier Service	\$33.11
3/4/2019	FedEx Express	Courier Service	\$124.77
3/11/2019	One Legal	Attorney Service	\$13.55
6/6/2019	FedEx Express	Courier Service	\$113.73
7/3/2019	U.S. Postmaster	Postage	\$2.05
7/9/2019	FedEx Express	Courier Service	\$113.20
7/9/2019	One Legal	Attorney Service	\$13.55
7/25/2019	CourtCall, LLC	Attorney Service	\$94.00
8/15/2019	Esquire Deposition Solutions, LLC	Videography Service	\$1,617.95
8/15/2019	Esquire Deposition Solutions, LLC	Court Reporter	\$1,969.08
8/16/2019	Benjamin Haber	Travel Reimbursement	\$1,198.48
8/30/2019	Simpluris, Inc.	Notice Mailing	\$300.00
10/9/2019	FedEx Express	Courier Service	\$71.65
10/9/2019	U.S. Postmaster	Postage	\$70.95
10/15/2019	FedEx Express	Courier Service	\$112.93
10/17/2019	FedEx Express	Courier Service	\$112.93
10/31/2019	Golden State Overnight	Courier Service	\$15.74
11/1/2019	FedEx Express	Courier Service	\$35.86
11/6/2019	Legal Document Server, Inc	Attorney Service	\$13.60
11/19/2019	Esquire Deposition Solutions, LLC	Videography Service Cancellation	\$325.00
11/19/2019	Esquire Deposition Solutions, LLC	Court Reporter Cancellation	\$250.00
11/19/2019	U.S. Postmaster	Postage	\$4.10

LAWYERS *for* JUSTICE, PC CASE COST DETAIL
Ramirez v. Mar-Cone Appliance Parts Co.

12/10/2019	Travis Maher	Travel Reimbursement	\$246.62
12/12/2019	Esquire Deposition Solutions, LLC	Court Reporter	\$1,852.25
12/12/2019	Esquire Deposition Solutions, LLC	Videography Service	\$1,152.95
12/13/2019	Esquire Deposition Solutions, LLC	Videography Service	\$597.95
12/13/2019	Esquire Deposition Solutions, LLC	Court Reporter	\$1,174.15
12/13/2019	Benjamin Haber	Travel Reimbursement	\$1,584.45
2/28/2020	Benjamin Haber	Travel Reimbursement	\$578.57
2/28/2020	Esquire Deposition Solutions, LLC	Court Reporter	\$1,407.60
4/9/2020	FedEx Express	Courier Service	\$51.22
4/22/2020	Legal Document Server, Inc	Attorney Service	\$10.00
6/8/2020	Paul Hastings LLP	Mediation Fee	\$12,000.00
6/8/2020	Golden State Overnight	Courier Service	\$33.34
7/1/2020	Legal Document Server, Inc.	Attorney Service	\$14.45
7/1/2020	Fresno Superior Court	Stipulation & Order Fee	\$20.00
9/8/2020	Legal Document Server, Inc.	Attorney Service	\$15.45
9/8/2020	Fresno Superior Court	Stipulation & Order Fee	\$20.00
11/2/2020	Legal Document Server, Inc.	Attorney Service	\$15.45
11/2/2020	Fresno Superior Court	Stipulation & Order Fee	\$20.00
1/6/2021	General Logistics Systems, Inc.	Courier Service	\$59.74
2/2/2021	Legal Document Server, Inc.	Attorney Service	\$15.85
2/2/2021	Fresno Superior Court	Stipulation & Order Fee	\$20.00
4/29/2021	Legal Document Server, Inc.	Attorney Service	\$11.00
4/30/2021	Legal Document Server, Inc.	Attorney Service	\$15.45
4/30/2021	Fresno Superior Court	Stipulation & Order Fee	\$20.00
8/12/2021	Legal Document Server, Inc.	Attorney Service	\$14.75
9/29/2021	One Legal	Attorney Service	\$16.06
11/16/2021	Legal Document Server, Inc.	Attorney Service	\$14.75
11/29/2021	Legal Document Server, Inc.	Attorney Service	\$230.00
1/4/2022	Legal Document Server, Inc.	Attorney Service	\$14.75
2/14/2022	Legal Document Server, Inc.	Attorney Service	\$14.75
2/16/2022	Legal Document Server, Inc.	Attorney Service	\$14.75
2/28/2022	Legal Document Server, Inc.	Attorney Service	\$14.75
Total:			<u>\$29,823.79</u>

LAWYERS *for* JUSTICE, PC CASE COST DETAIL
Hernandez vs. Mar-Cone Appliance Parts Co.

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
5/7/2020	U.S. Postmaster	Postage	\$6.95
5/7/2020	Labor & Workforce Development Agency	PAGA Filing Fee	\$75.00
5/7/2020	Labor & Workforce Development Agency	PAGA Filing Fee	\$75.00
7/16/2020	Legal Document Server, Inc.	Attorney Service	\$145.23
7/16/2020	Sacramento Superior Court	Complaint Filing Fee	\$435.00
7/28/2020	Legal Document Server, Inc.	Attorney Service	\$110.00
8/13/2020	Sacramento Superior Court	Document Download Fee	\$5.00
8/14/2020	Legal Document Server, Inc.	Attorney Service	\$120.00
9/3/2020	Legal Document Server, Inc.	Attorney Service	\$120.00
12/3/2020	Legal Document Server, Inc.	Attorney Service	\$130.00
5/20/2021	Legal Document Server, Inc.	Attorney Service	\$110.70
5/20/2021	Sacramento Superior Court	Stipulation & Order Fee	\$20.00
5/24/2021	Sacramento Superior Court	Document Download Fee	\$2.00
5/26/2021	Legal Document Server, Inc.	Attorney Service	\$260.25
5/26/2021	Sacramento Superior Court	Jury Fee	\$150.00
5/26/2021	Sacramento Superior Court	Complex Filing Fee	\$1,000.00
9/9/2021	Legal Document Server, Inc.	Attorney Service	\$110.00
10/12/2021	Legal Document Server, Inc.	Attorney Service	\$110.00
10/22/2021	Sacramento Superior Court	Document Download Fee	\$1.00
11/10/2021	Legal Document Server, Inc.	Attorney Service	\$90.00
11/22/2021	Legal Document Server, Inc.	Attorney Service	\$110.00
1/4/2022	Legal Document Server, Inc.	Attorney Service	\$90.00
2/8/2022	Legal Document Server, Inc.	Attorney Service	\$110.00
2/15/2022	Legal Document Server, Inc.	Attorney Service	\$101.35
2/15/2022	Sacramento Superior Court	Stipulation & Order Fee	\$20.00
2/28/2022	Sacramento Superior Court	Document Download Fee	\$3.00
3/1/2022	Legal Document Server, Inc.	Attorney Service	\$120.00
4/11/2022	Legal Document Server, Inc.	Attorney Service	\$100.00
8/11/2022	Legal Document Server, Inc.	Attorney Service	\$105.00
8/12/2022	Legal Document Server, Inc.	Attorney Service	\$105.00
8/23/2022	Legal Document Server, Inc.	Attorney Service	\$105.00
11/7/2022	Legal Document Server, Inc.	Attorney Service	\$125.00
11/14/2022	Legal Document Server, Inc.	Attorney Service	\$205.30
11/14/2022	Sacramento Superior Court	Motion Fee	\$60.00
12/9/2022	Sacramento Superior Court	Document Download Fee	\$2.00
5/11/2023	Legal Document Server, Inc.	Attorney Service	\$125.00
5/30/2023	Legal Document Server, Inc.	Attorney Service	\$125.00

LAWYERS *for* JUSTICE, PC CASE COST DETAIL
Hernandez vs. Mar-Cone Appliance Parts Co.

6/8/2023	Legal Document Server, Inc.	Attorney Service	\$125.00
11/7/2023	Legal Document Server, Inc.	Attorney Service	\$206.92
11/7/2023	Sacramento Superior Court	Motion Fee	\$60.00
11/8/2023	Legal Document Server, Inc.	Attorney Service	\$122.75
1/11/2024	Legal Document Server, Inc.	Attorney Service	\$126.39
1/11/2024	Sacramento Superior Court	Stipulation & Order Fee	\$20.00
2/1/2024	Legal Document Server, Inc.	Attorney Service	\$14.90
2/8/2024	Legal Document Server, Inc.	Attorney Service	\$16.29
2/8/2024	Sacramento Superior Court	Stipulation & Order Fee	\$20.00
3/22/2024	Legal Document Server, Inc.	Attorney Service	\$16.29
3/22/2024	Sacramento Superior Court	Stipulation & Order Fee	\$20.00
7/25/2024	Legal Document Server, Inc.	Attorney Service	\$14.90
1/31/2025	Legal Document Server, Inc.	Attorney Service	\$16.45
3/17/2025	Legal Document Server, Inc.	Attorney Service	\$20.62
3/17/2025	Sacramento Superior Court	Motion Fee	\$60.00
3/25/2025	Legal Document Server, Inc.	Attorney Service	\$12.95
3/26/2025	Legal Document Server, Inc.	Attorney Service	\$17.84
3/26/2025	Sacramento Superior Court	Stipulation & Order Fee	\$20.00
5/1/2025	Legal Document Server, Inc.	Attorney Service	\$16.45
6/4/2025	Legal Document Server, Inc.	Attorney Service	\$16.45
6/23/2025	Legal Document Server, Inc.	Attorney Service	\$16.45
6/27/2025	Legal Document Server, Inc.	Attorney Service	\$16.45
Total:			<u>\$5,664.88</u>