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*Attorneys for Plaintiff and the Class*

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

CHIDIMMA IGBOAKAEZE, 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,

vs.

VERA BRADLEY SALES, LLC, an  
unknown business entity; VERA BRADLEY  
DESIGNS, INC., an unknown business  
entity; and DOES 1 through 100, inclusive,

Defendants.

Case No.: 20STCV04294

Honorable Yvette M. Palazuelos  
Department SSC-9

**CLASS ACTION**

**DECLARATION OF EDWIN AIWAZIAN  
IN SUPPORT OF PLAINTIFF’S MOTION  
FOR FINAL APPROVAL OF CLASS  
ACTION SETTLEMENT, ATTORNEYS’  
FEES, COSTS, AND ENHANCEMENT  
PAYMENT**

[Notice of Motion and Motion for Final  
Approval of Class Action Settlement,  
Attorneys’ Fees, Costs, and Enhancement  
Payment; Declaration of Class Representative  
(Chidimma Igboakaeze); Declaration of  
Settlement Administrator (Taylor Mitzner); and  
[Proposed] Final Approval Order and  
Judgment filed concurrently herein]

Date: July 18, 2023  
Time: 10:00 a.m.  
Department: SSC-9

Complaint Filed: February 3, 2020  
FAC Filed: July 15, 2020  
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 Chidimma Igboakaeze (“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 January 24, 2023, in Department 9 of the above-entitled Court, the Honorable Yvette M. Palazuelos preliminarily approved the Second Amended Stipulation of Class Action and PAGA Settlement (“Settlement,” “Agreement,” or “Settlement Agreement,”) entered into between Plaintiff and Defendants Vera Bradley Sales, LLC and Vera Bradley Designs, Inc. (together, “Defendants”), and conditionally certified the Class for settlement purposes. The Court preliminarily appointed Plaintiff Chidimma Igboakaeze to represent the Class (“Plaintiff” or “Class Representative”). The Court also 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 (“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, Costs, and Enhancement Payment (“Motion for Final Approval”), no Class Members have objected to the Class Settlement or the contemplated request for Attorneys’ Fees and Costs, Enhancement Payment, Settlement Administration Costs, Workweeks, 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 putative class action (“Action”) since prior to its commencement on February 3, 2020.

5. Before initiating the Action, Lawyers *for* Justice, PC investigated and researched the facts and circumstances underlying the pertinent factual and legal issues and applicable law. This required thorough discussions and interviews between attorneys at our firm and Plaintiff, and research into the various legal issues involved in the case, namely, the current state of the law as it applied to class certification, off-the-clock theory, meal and rest periods, on-premises breaks, rounding, regular rate of pay, bag checks, representative PAGA claims, wage-and-hour enforcement, Plaintiff’s claims and allegations, and potential defenses. After conducting 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 Defendants within the State of California, who were not properly compensated for, *inter alia*, all hours worked, non-compliant meal and rest periods, and business expenses.

6. Class Counsel investigated 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 conducted formal and informal discovery and investigation into the facts of the case, and exchanged a large volume of information, documents, and data throughout the course of the litigation and in connection with mediation and settlement negotiations. Class Counsel had the opportunity to interview and obtain information from Plaintiff and other Class Members and reviewed and analyzed a large volume of information, documents, and data obtained from Plaintiff, Defendants, and other sources. The information, documents, and data reviewed and analyzed by Class Counsel included but was not limited to: Plaintiff’s employment records, a detailed sampling of Class Members’ time and pay data, several versions of Defendants’ Associate Handbooks, company policy acknowledgements, agreements (including but not limited to, California Meal Break Waiver Agreement), internal memoranda, job descriptions,

Defendants' operations and employment practices, policies (including but not limited to, Travel and Entertainment Policy, Non-Exempt Associate Electronic Communications Policy, and Appearance and Dress policy), and procedures (including but not limited to Defendants' Attendance Incident Tab, Behavioral Rules of Conduct, and Quarterly Connections), among other information and documents. Class Counsel researched applicable law, developed liability, damages, and penalties valuation models in connection with mediation and settlement negotiations, and met and conferred with Defendants' counsel on numerous occasions, e.g., to discuss issues relating to the pleadings, case management, discovery, and the production of information, documents, and data in the course of litigation as well as in connection with mediation and settlement negotiations. Other work performed by Class Counsel included, and was not limited to, case strategy and analysis; drafting, reviewing, and revising pleadings, the mediation brief, and settlement documents; drafting and propounding multiple sets of formal written discovery requests on Defendants and noticing the depositions of Defendants' Person 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 formal and informal discovery and investigation during the course of litigating the case and mediation and settlement negotiations. Class Counsel analyzed a large volume of information, documents, and data obtained from Plaintiff, Defendants, and other sources. The information, documents, and data that were considered provided a critical understanding of the nature of the work performed by the Class Members and Aggrieved Employees, as well as Defendants' 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 significant research into the applicable law, which is evolving as it relates to class certification, off-the-clock theory, meal and rest periods, rounding, regular rate of pay, on-premises breaks, *de minimis* theory, wage statement claims, bag checks, representative PAGA claims, waiver, wage-and-hour enforcement, Plaintiff's claims and allegations, and Defendants' defenses thereto, as

1 well as facts discovered.

2       8. After conducting significant investigation of the facts and law during the  
3 prosecution of the case, counsel for the parties engaged in extensive settlement negotiations to  
4 try to resolve the case. These efforts included participating in a formal, full-day mediation  
5 conducted by Jeffrey A. Ross, Esq., a well-regarded mediator experienced in mediating complex  
6 labor and employment matters. During all settlement discussions, the parties conducted their  
7 negotiations at arm's length in an adversarial position. In the course of mediation and settlement  
8 negotiations, the parties exchanged information, documents, and data, and discussed all aspects  
9 of the case, including but not limited to Defendants' financial condition, the risks and delays of  
10 further litigation, the risks to the parties of proceeding with class certification and trial, the law  
11 relating to class certification, off-the-clock theory, meal and rest periods, wage-and-hour  
12 enforcement, rounding, regular rate of pay, on-premises breaks, *de minimis* theory, wage  
13 statement claims, bag checks, and representative PAGA claims, as well as the evidence produced  
14 and analyzed, and the possibility of appeals, among other things. Arriving at a settlement that  
15 was acceptable to the parties was not easy. Defendants contended that individualized questions  
16 of fact would predominate over any common issues, and these issues would pose challenges to  
17 certification and representative adjudication. Defendants and their counsel felt strongly about  
18 Defendants' ability to prevail on the merits and obtain a denial of class certification and avoid  
19 representative adjudication, while Plaintiff and Class Counsel believed that they would be able to  
20 obtain class certification and prevail at trial. With the aid of the mediator's evaluation, the  
21 parties ultimately agreed that the case was well-suited for settlement given the legal issues  
22 relating to Plaintiff's principal claims, as well as the costs and risks to the parties that would  
23 attend further litigation. These risks of further litigation include, and are not limited to, a  
24 determination that the claims are unsuitable for class treatment and/or representative  
25 adjudication, class de-certification after certification of a class, allowing a jury to decide the  
26 claims asserted in the case, and the real possibility of no recovery after years of litigation.

27       9. Pursuant to the Escalator Clause in Paragraph 36 of the Settlement Agreement, if  
28 the actual number of Workweeks for the time period of February 3, 2016 to April 22, 2021

1 exceeds eight thousand (8,000) Workweeks by more than ten percent (10%), the Total  
2 Settlement Amount will increase on a proportional basis by the same number of percentage  
3 points above 10% (e.g., if the number of Workweeks for the time period of February 3, 2016  
4 through July 22, 2021 actually exceeds 8,000 by 11% to 8,880 Workweeks, the Total Settlement  
5 Amount will increase by 1%). The Settlement Administrator's declaration confirms that the total  
6 number of Workweeks during the Release Period was seven thousand two hundred sixty-two  
7 (7,262). As such, it was determined that the Escalator Clause in the Settlement Agreement was  
8 not triggered, and the Total Settlement Amount will not increase.

9 10. By way of the accompanying Motion for Final Approval, Class Counsel seeks  
10 attorneys' fees in the amount of \$87,500.00, which is thirty-five percent (35%) of the Total  
11 Settlement Amount of \$250,000.00, as set forth in the Settlement Agreement and the Class  
12 Notice. Pursuant to the contingency-fee agreement entered into by and between Plaintiff and  
13 Class Counsel, Plaintiff has agreed to a contingency fee of at least thirty-five percent (35%) of  
14 the recovery. The attorneys' fees sought are commensurate with: (1) the risk that Class Counsel  
15 took in commencing the case; (2) the time, effort, and expense that Class Counsel dedicated to  
16 the case; (3) the skill and determination that Class Counsel has shown; (4) the results that Class  
17 Counsel has achieved throughout the litigation; (5) the value of the settlement that Class Counsel  
18 has achieved in the case; and (6) the other cases that Class Counsel has turned down in order to  
19 devote their time and efforts to this matter.

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

22 12. While not necessarily required to be demonstrated because the percentage fee is  
23 proper for this settlement, Class Counsel has incurred many hours of work in connection with  
24 prosecuting the case such that the award of attorneys' fees is also justified under a simple  
25 lodestar analysis. Attorneys at Lawyers for Justice, PC have spent a total of **423.80 hours**  
26 performing tasks and obtaining recovery in this matter. Attached hereto as "**EXHIBIT A**" is an  
27 Attorney Task and Time Chart that sets forth in detail the nature of the legal services provided by  
28 attorneys at Lawyers for Justice, PC and the time incurred in performing those services. These

1 hours include work done by myself and several other attorneys at Lawyers for Justice, PC. Also,  
2 separate from the hours referenced herein, Lawyers for Justice, PC had litigation support  
3 personnel actively engaged in assisting with the adjudication of this matter.

4 13. The work performed in this particular matter, the background of our firm, as well  
5 as the individual backgrounds, training, and experience of the attorneys who worked on this  
6 matter, in litigating complex wage-and-hour actions, and in particular, employment class and  
7 representative actions, support a reasonable blended hourly rate of compensation of at least \$750  
8 per hour for work performed by Lawyers for Justice, PC. Lawyers for Justice, PC has been  
9 awarded attorneys' fees, compensating the firm at the rate of at least \$750 per hour for legal  
10 services performed, by courts granting approval of wage-and-hour settlements in other case: final  
11 approval of the class and representative action settlement in *David Dugan v. TEC Equipment,*  
12 *Inc., et al.* (Los Angeles Superior Court Case No. 19STCV01591) was granted on July 8, 2021,  
13 and the award of attorneys' fees involved an hourly rate of \$936.47; final approval of the class  
14 and representative action settlement in *Larry Greenwood, et al. v. Scan Health Plan* (Los  
15 Angeles Superior Court Case No. BC715157) was granted on April 20, 2021, and the award of  
16 attorneys' fees involved an hourly rate of \$919.57; final approval of the class action settlement in  
17 *Thereasa Carrozzella v. Basalite Concrete Products, LLC* (Sacramento County Superior Court  
18 Case No. 34-2017-00220214-CU-OE-GDS) was granted on February 21, 2020, and the award of  
19 attorneys' fees involved an hourly rate of \$766.05; final approval of the class and representative  
20 action settlement in *Alice Rutledge, et al. v. Healthport Technologies, LLC* (Alameda County  
21 Superior Court Case No. RG16835813) was granted on June 11, 2019, and the award of  
22 attorneys' fees involved an hourly rate of \$764.82; final approval of the class and representative  
23 action settlement in *Seth Swan v. Pace Supply Corp.* (Sonoma County Superior Court Case No.  
24 SCV258764) was granted on February 6, 2019, and the award of attorneys' fees involved an  
25 hourly rate of \$855.96; final approval of the class and representative action settlement in *Stanley*  
26 *Bland, et al. v. Telecare Corporation* (Alameda County Superior Court Case No. RG16811450)  
27 was granted on November 21, 2018, and the award of attorneys' fees involved an hourly rate of  
28 \$831.38; final approval of the class and representative action settlement in *Maryjo Ungerbuhler*

1 *Anderson v. Boyett Petroleum* (Stanislaus County Superior Court Case No. 2020582) was  
2 granted on May 15, 2018, and the award of attorney's fees involved an hourly rate of \$780.77;  
3 and final approval of the class and representative action settlement in *Demetrius Camarillo v.*  
4 *Blue Diamond Growers* (Sacramento County Superior Court Case No. 34-2015-00175871) was  
5 granted on June 30, 2017, and the award of attorneys' fees involved an hourly rate of \$845.64.

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

7 ***EDUCATION***

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

16 ***JUDICIAL EXTERNSHIPS***

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

22 ***LITIGATION AND CLASS ACTION EXPERIENCE***

23 16. In December of 2004, I obtained a license to practice law from the California  
24 State Bar. From approximately December 2004 to approximately August 2008, I was employed  
25 by a prominent plaintiff-side law firm.

26 17. At the prominent plaintiff-side law firm, my practice focused on class actions and  
27 other complex cases involving toxic torts and products liability. In addition, I gained substantial  
28 experience on cases involving insurance bad faith, premises liability, and medical negligence.

1           18.     Since its inception, in or around October of 2008, Lawyers *for* Justice, PC has  
2 almost exclusively focused on the prosecution of consumer and employment class actions,  
3 involving wage-and-hour claims, race discrimination, unfair business practices or consumer  
4 fraud. Currently, Lawyers *for* Justice, PC is the attorney of record in well over a dozen  
5 employment-related putative class actions in both state and federal courts in the State of  
6 California. Lawyers *for* Justice, PC has successfully litigated cases involving the executive,  
7 administrative, and other overtime exemptions to the State of California and federal overtime  
8 compensation requirements. In association with other law firms, Lawyers *for* Justice, PC has  
9 recovered millions of dollars on behalf of thousands of individuals in California.

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

12           19.     What follows are just a few examples of the type of results Lawyers *for* Justice,  
13 PC (“LFJ”) has achieved on behalf of its clients:

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

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

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

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

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

11           f)     LFJ, in association with co-counsel therein, represented the plaintiff in a  
12 wage-and-hour class and PAGA representative action against a national wholesale distributor of  
13 plumbing and builder supplies, involving allegations of misclassification of multiple salaried  
14 “manager” positions. On May 22, 2014, the court granted final approval of the class and PAGA  
15 representative action settlement. The Sacramento County Superior Court Case Number is 34-  
16 2012-00136285.

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

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

27           i)     LFJ, in association with co-counsel therein, represented the plaintiff in a  
28 wage-and-hour class and PAGA representative action involving allegations of misclassification

1 of the salaried residential “Property Manager” position. On September 17, 2015, the court  
2 granted plaintiff’s motion for class certification. On October 20, 2017, the court granted final  
3 approval of the class and PAGA representative action settlement. The Los Angeles County  
4 Superior Court Case Number is BC474784.

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

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

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

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

25 n) LFJ, in association with co-counsel therein, represented the plaintiffs in a  
26 wage-and-hour class and PAGA representative action against a full-service bank, on behalf of  
27 non-exempt employees. On November 18, 2016, the court granted final approval of the class and  
28

1 PAGA representative action settlement. The San Francisco County Superior Court Case Number  
2 is CJC-13-004839 and the Judicial Council Coordination Proceeding Number is 4839.

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

7 p) LFJ, on behalf of the plaintiff and respondent in a PAGA representative  
8 action, successfully opposed in the trial court, and briefed and argued an appeal with respect to  
9 the employer's motion to compel arbitration, which resulted in a published opinion by the  
10 California Court of Appeal in favor of employees. *Roberto Betancourt v. Prudential Overall*  
11 *Supply* (Cal. App. 4th Dist., Mar. 7, 2017) 9 Cal.App.5th 439, review denied, cert. denied (U.S.  
12 Supreme Court Docket No. 17-254). The Riverside County Superior Court Case Numbers are  
13 RIC1503952 and RICJCCP5046, and the Judicial Council Coordination Proceeding Number is  
14 5046.

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

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

25 s) LFJ, in association with co-counsel therein, represented the plaintiffs in a  
26 wage-and-hour class and PAGA representative action against a lumber and hardware company  
27 on behalf of non-exempt employees. On April 26, 2017, the court granted final approval of the  
28

1 class and PAGA representative action settlement. The Orange County Superior Court Case  
2 Number is 30-2014-00747750-CU-OE-CXC.

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

8 u) LFJ represented the plaintiff in a wage-and-hour class and PAGA  
9 representative action against a food company on behalf of non-exempt employees. On June 30,  
10 2017, the court granted final approval of the class and PAGA representative action settlement.  
11 The Sacramento County Superior Court Case Number is 34-2015-00175871.

12 v) LFJ represented the plaintiffs in a wage-and-hour class and PAGA  
13 representative action against a chocolate company on behalf of non-exempt employees. On July  
14 19, 2017, the court granted final approval of the class and PAGA representative action  
15 settlement. The Alameda County Superior Court Case Number is RG15764300.

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

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

25 y) LFJ, in association with co-counsel therein, represented the plaintiffs in a  
26 wage-and-hour class and PAGA representative action against a bank on behalf of non-exempt  
27 employees. On December 11, 2017, the court granted final approval of the class and PAGA  
28

1 representative action settlement. The Los Angeles County Superior Court Case Number is  
2 BC569646.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

24           20.     To date, Class Counsel has borne all of the risks and costs of litigation and will  
25 not receive any compensation until recovery is obtained in this matter. Lawyers *for* Justice, PC  
26 seeks reimbursement of **\$11,958.23** in litigation costs and expenses incurred in the Action, as  
27 reflected in "**EXHIBIT B**" attached hereto. These expenses were reasonable and necessary in  
28 the prosecution of the case and to obtain the Settlement.

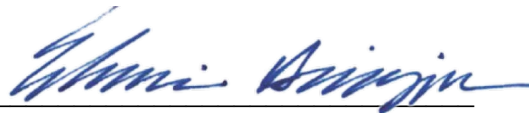
**ENHANCEMENT PAYMENT TO PLAINTIFF**

21. In recognition of her efforts and work serving as the Class Representative, the Settlement provides for an Enhancement Payment in the amount of \$7,500.00 to Plaintiff Chidimma Igboakaeze. The requested Enhancement Payment is fair and appropriate. Plaintiff spent a considerable amount of time and effort to produce relevant documents and past employment records and to provide the facts and evidence necessary to attempt to prove the allegations. Plaintiff was available whenever Class Counsel needed Plaintiff and actively tried to obtain and provide information that would facilitate the pursuit of the class and PAGA claims. For example, Plaintiff spent numerous hours speaking with Class Counsel about her claims, describing her work experiences with Defendants, and gathering and reviewing documents. Accordingly, it is appropriate for Plaintiff Chidimma Igboakaeze to receive \$7,500.00 as a reasonable Enhancement Payment, for her services on behalf of the Class Members, State of California, and PAGA Members, in addition to her individual settlement payments.

22. I submit that the Settlement is fair, reasonable, and adequate. In addition, the Settlement is in the best interests of Plaintiff, other Class Members, the State of California, and PAGA Members.

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

Executed on June 21, 2023, in Glendale, California.



Edwin Aiwarzian

# **EXHIBIT A**

**CHIDIMMA IGBOAKAEZE V. VERA BRADLEY SALES, LLC, ET AL.**  
**(SUPERIOR COURT OF CALIFORNIA, LOS ANGELES, CASE NO. 20STCV04294)**

**ATTORNEY TASK AND TIME CHART**

| <b>TASK</b>                                                                                                                                                                                                 | <b>LAWYERS FOR JUSTICE, PC</b> |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------|
| <b>Investigation and Research / Due Diligence</b>                                                                                                                                                           |                                |
| Pre-Lawsuit Investigation of the Key Facts with a Focus on Class Certification Elements, Including Adequacy, Typicality, Superiority, and Commonality, and Manageability                                    | 8.50                           |
| Pre-Lawsuit Investigation of the Merits of Plaintiff Chidimma Igboakaeze's ("Plaintiff") Claims and the Merits of the Claims of the Putative Class Members                                                  | 7.10                           |
| Pre-Lawsuit Investigation of Potential Damages Exposure of Defendants Vera Bradley Designs Inc. & Vera Bradley Sales, LLC (together, "Defendants") with Respect to Plaintiff and the Putative Class Members | 7.70                           |
| 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                       | 6.80                           |
| Pre-Notice Investigation of Potential Civil Penalties Exposure of Defendants with Respect to Plaintiff and the Aggrieved Employees                                                                          | 7.50                           |
| Legal Research and Analysis of Latest Decisions Regarding Off-the-Clock, Meal and Rest Break, Wage Order, PAGA, and Class Certification in California, Including all New and Relevant DLSE Materials        | 7.20                           |
| Investigation of Defendants, Defendants' Business Relationships, and the Industry in which Defendants Operate                                                                                               | 3.00                           |

|                                                                                                                                                                                                                                                                                                                                                                                                                        |       |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------|
| Investigation of Defendants' Organizational and Corporate Structure, and Executive Reporting Structure, as They Relate to the Employment and Management of the Putative Class Members and Aggrieved Employees                                                                                                                                                                                                          | 4.10  |
| Investigation, Research, and Analysis Regarding Defendants' 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; and Research and Analysis of Defendants' Litigation History Involving Wage-and-Hour Issues and Other Related Employment Issues | 3.40  |
| Analysis of Competitors within Various Relevant Geographic Areas within which Defendants Operates, and Comparing and Contrasting Defendants' Policies, Practices, and Procedures with the Policies, Practices, and Procedures of Defendants' Competitors                                                                                                                                                               | 4.20  |
| Research and Investigation Re: Location(s), Division(s), and/or Department(s) Owned, Managed, Serviced, or Operated by Defendants in California During the Class Period, Including Differences Between Them to Determine Whether Those Differences Will Cause Individual Issues to Predominate Over Common Issues                                                                                                      | 4.50  |
| Comparative Analysis and Cross-Checking of All Available Job Postings, Job Reviews, and/or Consumer Reviews Regarding Defendants 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                                                                                                             | 6.80  |
| Research and Investigation Re: Workforce, Staffing Models, and Staffing Levels at Location(s) at Which Putative Class Members Worked Throughout California                                                                                                                                                                                                                                                             | 5.60  |
| Research and Investigation Re: Defendants' Written and Non-Written Policies, Practices, and Procedures Relating to Store Operations and Hours, Opening and Closing Procedures, Bag Checks, Customer Service, Scheduling, Reporting Time, Timekeeping, Meal/Rest Breaks, On-Premises Breaks, Meal Waivers, Overtime Compensation, Non-Discretionary Bonus/Incentive/Performance/Shift Differential Pay, <i>De</i>       | 15.00 |

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |       |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------|
| <i>Minimis</i> , Rounding Time Records, Wage Statements, Dress Code, Personal Cell Phone Use, and Reimbursement of Business-Related Expenses                                                                                                                                                                                                                                                                                                                         |       |
| Research and Investigation Re: Various Software Programs, Systems, and Other Technology Defendants Use to Conduct Its Everyday Business, Including Timekeeping, Payroll, Billing, Cashier/Point of Sale, Management, Safety, and Security Systems, with a Focus on What Documents (Both Paper and Electronic) Are Created in the Normal Course of Business Relating to Overtime Worked, Off-the-Clock Time Worked Pre/Post Shift, and Time Worked During Meal Breaks | 4.50  |
| Research and Analysis of Potential Defenses Defendants May Raise, Including <i>De Minimis</i> Work, Non-Compensable Off-the-Clock Work, Fair and Neutral Rounding, Waiver, and Compliant Policies                                                                                                                                                                                                                                                                    | 7.80  |
| Research and Investigation Re: Post- <i>Duran</i> vs. <i>U.S. Bank</i> Trial Manageability Issues, including Research Regarding Which Experts to Retain and For What Purpose                                                                                                                                                                                                                                                                                         | 5.10  |
| Prepare a Discovery Strategy Plan of Action, including Topics of Inquiry Important to Certification, Liability, and Damages/Civil Penalties                                                                                                                                                                                                                                                                                                                          | 4.30  |
| Research and Investigation of Impact of COVID-19 Pandemic on Defendant, Their Operations, and Class Members' and Aggrieved Employees' Work                                                                                                                                                                                                                                                                                                                           | 6.50  |
| Meet and Communicate with Plaintiff Chidimma Igboakaeze Throughout the Pendency of the Case                                                                                                                                                                                                                                                                                                                                                                          | 41.50 |
| Investigate, Meet and Communicate with, and/or Conduct Interviews of Putative Class Members and Percipient Witnesses                                                                                                                                                                                                                                                                                                                                                 | 13.50 |

| <b>Pleadings and Court Filings</b>                                                                                                                                                                                                                    |      |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------|
| Draft Plaintiff's Class Action Complaint for Damages and Legal Research and Analysis of All Claims Involved (filed on February 3, 2020)                                                                                                               | 6.10 |
| Review Court's Notice of Case Assignment (filed on February 3, 2020)                                                                                                                                                                                  | 0.10 |
| Review Court's Minute Order re: Setting Initial Status Conference (filed on February 20, 2020)                                                                                                                                                        | 0.10 |
| Review Court's Class Action Initial Status Conference Order (filed on February 20, 2020)                                                                                                                                                              | 0.20 |
| Review Defendants' Notice of Appearance (served on April 1, 2020)                                                                                                                                                                                     | 0.10 |
| Review Defendants' Notice of Deposit of Complex Litigation Fees (served on April 8, 2020)                                                                                                                                                             | 0.10 |
| Review Court's Minute Order re: Initial Status Conference (filed on April 19, 2020)                                                                                                                                                                   | 0.10 |
| Meet and Confer with Defendants' Counsel, and Draft Joint Initial Status Conference Report (submitted on June 23, 2020)                                                                                                                               | 1.70 |
| Review Court's Minute Order re: Initial Status Conference (filed on June 30, 2020)                                                                                                                                                                    | 0.10 |
| Review Court's Order Authorizing Electronic Service (filed on June 30, 2020)                                                                                                                                                                          | 0.20 |
| Review Court's Case Management Order (filed on June 30, 2020)                                                                                                                                                                                         | 0.20 |
| Draft Plaintiff's Notice of Orders Made at June 30, 2020 Initial Status Conference (filed on July 7, 2020)                                                                                                                                            | 0.30 |
| Draft Plaintiff's First Amended Class Action Complaint for Damages & Enforcement Under the Private Attorneys General Act, California Labor Code Section 2698, Et Seq. and Legal Research and Analysis of All Claims Involved (filed on July 15, 2020) | 4.10 |

|                                                                                                                                                                                                                                 |      |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------|
| Review and Analyze Defendants' Answer to Plaintiff's Unverified First Amended Complaint (served on August 12, 2020)                                                                                                             | 2.20 |
| Review and Analyze Defendants' Amended Answer to Plaintiff's Unverified First Amended Complaint (served on September 8, 2020)                                                                                                   | 1.20 |
| Meet and Confer with Defendants' Counsel, and Draft Joint Stipulation to Vacate Class Certification Deadline and Non-Appearance Case Review; [Proposed] Order (submitted on May 4, 2021)                                        | 1.00 |
| Review Court's Order Granting Joint Stipulation to Vacate Class Certification Deadline and Non-Appearance Case Review (filed on May 6, 2021)                                                                                    | 0.10 |
| Draft Plaintiff's Notice of Entry of Judgment or Order (filed May 17, 2021)                                                                                                                                                     | 0.10 |
| Meet and Confer with Defendants' Counsel, and Draft Joint Stipulation to Vacate Class Certification-Related Deadline and Non-Appearance Case Review; [Proposed Order] (submitted on September 23, 2021)                         | 1.00 |
| Review Court's Order Granting Joint Stipulation to Vacate Class Certification-Related Deadline and Non-Appearance Case Review (filed on October 1, 2021)                                                                        | 0.10 |
| Draft Plaintiff's Notice of Order Granting Joint Stipulation to Vacate Class Certification-Related Deadline and Non-Appearance Case Review (filed on October 5, 2021)                                                           | 0.30 |
| Meet and Confer with Defendants' Counsel, and Draft Joint Stipulation to Continue Plaintiff's Deadline to File Motion for Preliminary Approval and Non-Appearance Case Review; [Proposed Order] (submitted on December 3, 2021) | 1.20 |
| Review Court's Order Granting Joint Stipulation to Continue Plaintiff's Deadline to File Motion for Preliminary Approval and Non-Appearance Case Review (filed on December 6, 2021)                                             | 0.10 |

|                                                                                                                                                                                                                                         |      |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------|
| Meet and Confer with Defendants' Counsel, and Draft Joint Stipulation to Continue Plaintiff's Deadline to File Motion for Preliminary Approval and Non-Appearance Case Review; [Proposed] Order Thereon (submitted on January 21, 2022) | 1.20 |
| Review Court's Order Granting Joint Stipulation to Continue Plaintiff's Deadline to File Motion for Preliminary Approval and Non-Appearance Case Review (filed on January 24, 2022)                                                     | 0.10 |
| Draft Plaintiff's Notice Regarding May 4, 2022 Minute Order (filed on May 10, 2022)                                                                                                                                                     | 0.10 |
| Meet and Confer with Defendants' Counsel, and Draft Joint Status Conference Statement (filed on January 13, 2023)                                                                                                                       | 0.60 |
| Review Court's Minute Order re: Status Conference (filed on January 17, 2023)                                                                                                                                                           | 0.10 |
| Draft Plaintiff's Notice Regarding January 17, 2023 and January 24, 2023 Minute Orders (filed on January 24, 2023)                                                                                                                      | 0.30 |
| <b>Appearances</b>                                                                                                                                                                                                                      |      |
| Prepare for and Telephonically Attend Initial Status Conference (June 30, 2020)                                                                                                                                                         | 1.00 |
| Prepare for and Telephonically Attend Hearing on Motion for Preliminary Approval of Settlement (August 10, 2022)                                                                                                                        | 2.00 |
| Prepare for and Telephonically Attend Hearing on Motion for Final Approval of Settlement (July 18, 2023) (Anticipated)                                                                                                                  | 1.50 |

| <b>Discovery and Deposition</b>                                                                                                                                                                                                                        |      |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------|
| Draft Letter to Defendants Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Chidimma Igboakaeze (served on November 19, 2019)                                                                                                 | 1.90 |
| Review and Analyze Documents Produced by Defendants in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Chidimma Igboakaeze (served on December 11, 2019)                                                         | 3.80 |
| Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant Vera Bradley Sales, LLC and Requests for Production of Documents (noticed for August 17, 2020; Organizational Structure) (served on July 14, 2020)                    | 3.50 |
| Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant Vera Bradley Sales, LLC and Requests for Production of Documents (noticed for August 18, 2020; Wage and Hour Practices) (served on July 14, 2020)                     | 4.30 |
| Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant Vera Bradley Designs, Inc., and Requests for Production of Documents (noticed for August 19, 2020; Organizational Structure) (served on July 14, 2020)                | 3.50 |
| Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant Vera Bradley Designs, Inc., and Requests for Production of Documents (noticed for August 20, 2020; Wage and Hour Practices) (served on July 14, 2020)                 | 4.30 |
| 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 Vera Bradley Sales, LLC (served on July 14, 2020)    | 5.90 |
| 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 Vera Bradley Designs, Inc. (served on July 14, 2020) | 5.90 |

| <b>Letters and Correspondence</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |       |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------|
| Research and Draft Notice to California Labor and Workforce Development Agency Re: Claims of Plaintiff Chidimma Igboakaeze for Penalties Under California Labor Code section 2698, <i>et seq.</i> (served on May 6, 2020)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | 7.00  |
| Draft Letter to Defendants' Counsel Re: Information, Documents, and Data Required for Case Valuation in Preparation for Mediation (sent on June 23, 2020)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | 2.50  |
| Research and Draft Letter to Defendants' Counsel Re: Demurrer to Defendants' Answer to Plaintiff Chidimma Igboakaeze's First Amended Class Action Complaint for Damages & Enforcement under the Private Attorneys General Act, California Labor Code § 2698, <i>Et Seq.</i> (sent on August 19, 2020)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | 4.30  |
| Meet with, Draft Correspondence to, and Respond to Correspondence from, Defendants' Counsel                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | 20.40 |
| <b>Mediation/Settlement</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |       |
| <p>Review and Analyze Information, Data, and Documents Obtained from Plaintiff, Defendants, and Other Sources, in excess of approximately 4,664 pages, prior to Mediation (served on April 1, 2021, April 6, 2021, and April 7, 2021):</p> <ul style="list-style-type: none"> <li>● Retail Associate Handbooks and Employment Operations Policies, Practices, and Procedures</li> <li>● Time Records Sampling</li> <li>● Earnings Statements Sampling</li> <li>● Plaintiff's Personnel File</li> <li>● Plaintiff's Time and Wage Records</li> <li>● California Meal Break Waiver Agreement</li> <li>● Earnings Time Sheet Sample</li> <li>● 2019-03-07 to 2021-04-02 CA Time Blocks</li> <li>● 2019-03-07 to 2021-04-02 CA Retail Bonus</li> <li>● 2019-03-07 to Current Time Block Audit</li> <li>● 2021-03-21 CA Putative Class Members List</li> </ul> | 42.50 |

|                                                                                                                                                                                                                                                                                                                                  |       |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------|
| ● 20201-03-23 Pay Calculation Results – CA Meal Premium Register                                                                                                                                                                                                                                                                 |       |
| 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 Analysis/Calculations (submitted on April 15, 2021 for April 22, 2021 Mediation)                               | 25.50 |
| Attend Mediation Session (April 22, 2021; Zoom Video Conference)                                                                                                                                                                                                                                                                 | 8.70  |
| Draft, Review, Revise, Negotiate, and Finalize Memorandum of Understanding – Class Action/PAGA Settlement (executed on April 27, 2021)                                                                                                                                                                                           | 4.50  |
| Draft, Review, Revise, Negotiate, and Finalize Stipulation of Class Action and PAGA Settlement (executed on March 23, 2022) and Notice of Class Action Settlement                                                                                                                                                                | 17.50 |
| Draft, Review, Revise, Negotiate, and Finalize First Amended Stipulation of Class Action and PAGA Settlement (executed on July 20, 2022)                                                                                                                                                                                         | 5.40  |
| Draft, Review, Revise, Negotiate, and Finalize Second Amended Stipulation of Class Action and PAGA Settlement (executed on August 10, 2022)                                                                                                                                                                                      | 1.50  |
| <b>Law and Motion</b>                                                                                                                                                                                                                                                                                                            |       |
| Draft Declaration of Yasmin Hosseini re: Filing Motion for Preliminary Approval of Class Action Settlement (filed on February 25, 2022)                                                                                                                                                                                          | 1.60  |
| Review Court’s Minute Order re: Non-Appearance Case Review re: Filing Motion for Preliminary Approval (filed on February 25, 2022)                                                                                                                                                                                               | 0.10  |
| Research and Draft Plaintiff’s Notice of Motion and Motion for Preliminary Approval of Class Action Settlement; Declaration of Edwin Aiwazian in Support Thereof; Declaration of Chidimma Igboakaeze in Support Thereof, and [Proposed] Order Granting Preliminary Approval of Class Action Settlement (filed on March 28, 2022) | 16.50 |

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|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------|
| Review Court's Minute Order re: Filing of Motion for Preliminary Approval or Responsive Pleading (filed on April 4, 2022)                                                                                                                                                                                                                                          | 0.10 |
| Draft Plaintiff's Amended Notice of Motion (filed on April 5, 2022)                                                                                                                                                                                                                                                                                                | 0.90 |
| Review Court's Tentative Ruling re: Motion for Preliminary Approval of Class Action Settlement; Addendum (checklist) (filed May 2, 2022)                                                                                                                                                                                                                           | 0.10 |
| Review Court's Minute Order re: Hearing on Motion for Preliminary Approval of Settlement (filed on May 4, 2022)                                                                                                                                                                                                                                                    | 0.20 |
| Review Court's Final Rulings/Orders re: Motion for Preliminary Approval of Class Action Settlement; Addendum (checklist) (filed on May 4, 2022)                                                                                                                                                                                                                    | 0.70 |
| Draft Plaintiff's Supplemental Brief in Support of Motion for Preliminary Approval of Class Action Settlement, Declaration of Yasmin Hosseini in Support Thereof, Supplemental Declaration of Chidimma Igboakaeze in Support Thereof, Declaration of Caroline C. Dickey Regarding Cy Pres Recipient, and [Revised Proposed] Order Thereon (filed on July 20, 2022) | 5.70 |
| Review Court's Minute Order re: Filing and Serving of Supplemental Papers in Support of Preliminary Approval (filed on July 27, 2022)                                                                                                                                                                                                                              | 0.10 |
| Draft Supplemental Declaration of Yasmin Hosseini in Support of Plaintiff's Motion for Preliminary Approval of Class Action Settlement and [Further Revised Proposed] Order (filed on August 10, 2022)                                                                                                                                                             | 1.20 |
| Review Court's Tentative Rulings/Orders Re: Motion for Preliminary Approval and Associated Case Anywhere Message Board Posting (issued on August 5, 2022)                                                                                                                                                                                                          | 0.10 |
| Review Court's Final Rulings/Orders re: Motion for Preliminary Approval of Class Action Settlement (filed on August 10, 2022)                                                                                                                                                                                                                                      | 0.10 |
| Review Court's Minute Order re: Hearing on Motion for Preliminary Approval of Settlement (filed on August 10, 2022)                                                                                                                                                                                                                                                | 0.10 |

|                                                                                                                                                                                                                                                                                                                                                                                                                                  |        |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------|
| Review Court's Minute Order re: Filing of Supplemental Papers in Support of Preliminary Approval (filed on January 3, 2023)                                                                                                                                                                                                                                                                                                      | 0.10   |
| Review Court's Minute Order re: Hearing on Motion for Preliminary Approval of Settlement as a Status Conference (filed on January 11, 2023)                                                                                                                                                                                                                                                                                      | 0.10   |
| Draft Supplemental Declaration of Yasmin Hosseini in Support of Plaintiff's Motion for Preliminary Approval of Class Action Settlement (filed on January 13, 2023)                                                                                                                                                                                                                                                               | 2.10   |
| Review Court's Tentative Rulings/Orders re: Motion for Preliminary Approval of Class Action Settlement (issued on January 19, 2023)                                                                                                                                                                                                                                                                                              | 0.20   |
| Review Court's Minute Order re: Hearing on Motion for Preliminary Approval of Settlement (filed on January 24, 2023)                                                                                                                                                                                                                                                                                                             | 0.10   |
| Review Court's Final Rulings/Orders re: Motion for Preliminary Approval of Class Action Settlement (filed on January 24, 2023)                                                                                                                                                                                                                                                                                                   | 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, Costs, and Enhancement Payment, and Declaration of Edwin Aiwezian in Support Thereof, Declaration of Chidimma Igboakaeze and [Proposed] Final Approval Order and Judgment (filed on June 21, 2023) (Anticipated) | 18.50  |
| <b>Total Hours:</b>                                                                                                                                                                                                                                                                                                                                                                                                              | 423.80 |

# **EXHIBIT B**

**LAWYERS for JUSTICE PC CASE COST DETAIL**  
**Igboakaeze v. Vera Bradley Sales, LLC**

| <b><u>Date</u></b> | <b><u>Payee</u></b>                  | <b><u>Expense Description</u></b> | <b><u>Amount</u></b> |
|--------------------|--------------------------------------|-----------------------------------|----------------------|
| 2/3/2020           | Los Angeles Superior Court           | Court Filing Fee                  | 435.00               |
| 2/3/2020           | Los Angeles Superior Court           | Complex Filing Fee                | 1,000.00             |
| 2/12/2020          | Legal Document Server, Inc.          | Attorney Service                  | 220.00               |
| 5/6/2020           | Labor & Workforce Development Agency | PAGA Filing Fee                   | 75.00                |
| 5/6/2020           | Legal Document Server, Inc.          | Attorney Service                  | 60.00                |
| 5/6/2020           | Legal Document Server, Inc.          | Attorney Service                  | 35.00                |
| 5/6/2020           | U.S. Postmaster                      | Postage                           | 14.60                |
| 6/15/2020          | Legal Document Server, Inc.          | Attorney Service                  | 110.00               |
| 6/25/2020          | Legal Document Server, Inc.          | Attorney Service                  | 175.00               |
| 6/26/2020          | CourtCall, LLC                       | Attorney Service                  | 94.00                |
| 7/7/2020           | Legal Document Server, Inc.          | Attorney Service                  | 105.00               |
| 7/15/2020          | Legal Document Server, Inc.          | Attorney Service                  | 175.00               |
| 9/3/2020           | Case Anywhere LLC                    | Attorney Service                  | 193.20               |
| 12/2/2020          | Case Anywhere LLC                    | Attorney Service                  | 120.00               |
| 1/21/2021          | Jeffrey A. Ross                      | Mediation Fee                     | 7,000.00             |
| 3/3/2021           | Case Anywhere LLC                    | Attorney Service                  | 120.00               |
| 5/4/2021           | Legal Document Server, Inc.          | Attorney Service                  | 205.70               |
| 5/4/2021           | Los Angeles Superior Court           | Stipulation Fee                   | 20.00                |
| 5/17/2021          | Legal Document Server, Inc.          | Attorney Service                  | 175.00               |
| 6/3/2021           | Case Anywhere LLC                    | Attorney Service                  | 132.00               |
| 9/2/2021           | Case Anywhere LLC                    | Attorney Service                  | 120.00               |
| 9/23/2021          | Los Angeles Superior Court           | Stipulation Fee                   | 20.00                |
| 9/23/2021          | One Legal                            | Attorney Service                  | 17.27                |
| 10/5/2021          | One Legal                            | Attorney Service                  | 16.68                |
| 10/8/2021          | One Legal                            | Attorney Service                  | 16.68                |
| 12/6/2021          | Case Anywhere LLC                    | Attorney Service                  | 138.00               |
| 12/6/2021          | Legal Document Server, Inc.          | Attorney Service                  | 16.05                |
| 12/6/2021          | Los Angeles Superior Court           | Stipulation Fee                   | 20.00                |
| 1/21/2022          | Legal Document Server, Inc.          | Attorney Service                  | 16.15                |
| 1/21/2022          | Los Angeles Superior Court           | Stipulation Fee                   | 20.00                |
| 2/25/2022          | Legal Document Server, Inc.          | Attorney Service                  | 15.20                |
| 3/3/2022           | Case Anywhere LLC                    | Attorney Service                  | 138.00               |
| 3/28/2022          | Legal Document Server, Inc.          | Attorney Service                  | 19.25                |
| 3/28/2022          | Los Angeles Superior Court           | Motion Fee                        | 60.00                |
| 3/29/2022          | Legal Document Server, Inc.          | Attorney Service                  | 172.25               |
| 4/6/2022           | Legal Document Server, Inc.          | Attorney Service                  | 15.20                |
| 5/10/2022          | Legal Document Server, Inc.          | Attorney Service                  | 15.20                |
| 6/6/2022           | Case Anywhere LLC                    | Attorney Service                  | 162.00               |
| 7/21/2022          | Legal Document Server, Inc.          | Attorney Service                  | 15.95                |
| 8/10/2022          | Legal Document Server, Inc.          | Attorney Service                  | 15.95                |

**LAWYERS for JUSTICE PC CASE COST DETAIL**  
**Igboakaeze v. Vera Bradley Sales, LLC**

|               |                             |                  |                  |
|---------------|-----------------------------|------------------|------------------|
| 9/8/2022      | Case Anywhere LLC           | Attorney Service | 174.00           |
| 12/6/2022     | Case Anywhere LLC           | Attorney Service | 120.00           |
| 1/13/2023     | Legal Document Server, Inc. | Attorney Service | 15.95            |
| 1/25/2023     | Legal Document Server, Inc. | Attorney Service | 15.95            |
| 3/2/2023      | Case Anywhere LLC           | Attorney Service | 138.00           |
| <b>Total:</b> |                             |                  | <b>11,958.23</b> |