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SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF ORANGE

REX TULLIO, 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.

DACM INC. dba DEL AMO
MOTORSPORTS, a California corporation;
TOO FAST, INC., a California corporation;
CALIFORNIA MOTORCYCLE
ASSESSORIES, INC., a California
corporation; DASB, INC., a California
corporation; DAMLA, INC., a California
corporation; and DOES 5 through 100,
inclusive,

Defendants.

Case No.: 30-2020-01147256-CU-OE-CXC

Honorable William D. Claster
Department CX104

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
(Rex Tullio); Declaration of Settlement
Administrator (Lindsay Kline); and [Proposed]
Final Approval Order and Judgment filed
concurrently herein]

Date: October 28, 2022
Time: 9:00 a.m.
Department: CX104

Complaint Filed: July 8, 2020
FAC Filed: October 6, 2021
Trial Date: None Set

DECLARATION OF EDWIN AIWAZIAN

I, Edwin Aiwazian, hereby declare as follows:

1. I am an attorney licensed to practice law in the State of California. I am a member of Lawyers *for* Justice, PC, attorneys of record for Plaintiff Rex Tullio (“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 April 1, 2022, in Department CX104 of the above-entitled Court, the Honorable William D. Cluster preliminarily approved the First Amended Joint Stipulation of Class Action and PAGA Settlement and Release (“Settlement,” “Agreement,” or “Settlement Agreement”) entered into between Plaintiff and Defendants DACM, Inc. dba Del Amo Motorsports, Too Fast, Inc., California Motorcycle Assessories, Inc., DASB, Inc., and DMLA, Inc. (collectively, “Defendants”), and conditionally certified the Class for settlement purposes. The Court preliminarily appointed Plaintiff Rex Tullio as representative of the Class (“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”), Workweeks Dispute Form (“Dispute Form”), and Request for Exclusion Form (“Exclusion Form”) (together, “Notice Packet”), adopted the notice, opt-out, and objection procedures, and ordered their implementation. The Court appointed Simpluris, Inc. (“Simpluris” or “Settlement Administrator”) to serve as the third-party settlement administrator for handling 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 request for Attorneys’ Fees and Costs, Enhancement Payment, Settlement Administration Costs, or allocation for the penalties under the Private Attorneys General Act of 2004, California Labor

Code section 2698, et seq. (“PAGA”).

WORK PERFORMED BY CLASS COUNSEL

4. I have been actively engaged in litigating this matter since prior to the commencement of the above-captioned action on July 8, 2020, as have several other attorneys and members in our firm.

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 certification, representative PAGA claims, arbitration agreements, off-the-clock theory, meal and rest periods, wage-and-hour enforcement, the claims of Plaintiff, 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 individuals who worked as hourly-paid or non-exempt employees at Defendants’ California Store Locations, who were not properly compensated for, *inter alia*, all hours worked, non-compliant meal and rest periods, and business expenses.

6. Prior to reaching the Settlement, the parties investigated the veracity, strength, and scope of the claims, and were preparing for class certification and trial. The parties conducted significant formal and informal discovery and investigation into the facts of the case, and also informally exchanged a large number of documents, information, and data in preparation for mediation. Class Counsel propounded multiple sets of written discovery requests in various forms (specifically, Request for Production of Documents (Sets One & Two); Special Interrogatories (Sets One, Two, & Three); and Form Interrogatories (Set One)); and prepared and served numerous notices of deposition of Person(s) Most Knowledgeable along with accompanying requests for production of documents. Class Counsel also interviewed and obtained information from Plaintiff and other Class Members, including and not limited to the names of potential witnesses, and reviewed and analyzed thousands of pages of documents and

1 data obtained from Plaintiff, Defendants, and other sources. The documents and data reviewed
2 and analyzed by Class Counsel included, and were not limited to Plaintiff and other Class
3 Members' employment records, a detailed sampling of Class Members' time and pay data,
4 Defendants' Employee Handbook, company policy acknowledgements, agreements, and forms
5 (including, but not limited to, Acknowledgment of Receipt of Employee Handbook, California
6 Automotive Technician Tool Acknowledgment & Agreement, Mutual Agreement to Arbitrate
7 Disputes, and Uniform Release Form), and Defendants' operations and employment practices,
8 policies, and procedures documents (including, but not limited to, Time Records policy, Rest and
9 Meal Periods (Non-Exempt Employees) policy, Overtime (Non-Exempt Employees) policy, Cell
10 Phone Reimbursement policy, and Reimbursement of Business Expenses policy), among other
11 information and documents. Class Counsel researched applicable law, developed violation,
12 damages, and penalties valuation models in preparation for mediation, and met and conferred
13 with Defendants' counsel on numerous occasions, e.g., to discuss issues relating to the pleadings,
14 case management, Defendants' contemplated motion for summary judgment, discovery, and
15 production of various documents and data in the course of litigation and prior to mediation.
16 Class Counsel also invested time researching and investigating the applicable law, which is
17 constantly evolving as it relates to certification, PAGA representative claims, arbitration
18 agreements, off-the-clock theory, meal and rest periods, wage-and-hour enforcement, Plaintiff's
19 claims and allegations, and Defendants' defenses thereto, as well as facts discovered. Other
20 work performed by Class Counsel included, and was not limited to, case strategy and analysis;
21 drafting, reviewing, and revising pleadings and the mediation brief; preparing and appearing for
22 court proceedings; and preparing for and engaging in mediation and settlement negotiations,
23 among other tasks.

24 7. As outlined herein, the parties have conducted significant formal and informal
25 discovery and investigation during the course of litigating the case. Class Counsel analyzed a
26 large volume of documents and data either produced by Plaintiff, Defendants, or other sources.
27 These documents and data provided a critical understanding of the nature of the work performed
28 by the Class Members, as well as Defendants' operations and employment policies, practices,

1 and procedures, and were used in analyzing liability, damages, and valuation issues in
2 connection with all phases of the litigation, and ultimately with the mediation and settlement
3 negotiation process.

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

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1 9. As set forth more fully in the accompanying Motion for Final Approval, Class
2 Counsel seeks attorneys' fees in the amount of \$1,066,666.67, which is one-third (33.33%) of the
3 Total Settlement Amount of \$3,200,000.00, as set forth in the Settlement Agreement and the
4 Class Notice. Pursuant to the contingency-fee agreement entered into by and between Plaintiff
5 and Class Counsel, Plaintiff has agreed to a contingency fee of at least one-third (33.33%) of the
6 recovery. The attorneys' fees sought are commensurate with: (1) the risk that Class Counsel
7 took in commencing the case; (2) the time, effort, and expense that Class Counsel dedicated to
8 the case; (3) the skill and determination that Class Counsel has shown; (4) the results that Class
9 Counsel has achieved throughout the litigation; (5) the value of the settlement that Class Counsel
10 has achieved in the case; and (6) the other cases that Class Counsel has turned down in order to
11 devote their time and efforts to this matter.

12 10. I am aware that the common and acceptable rate for contingency representation in
13 wage and hour class action litigation is normally 40% before trial, with the range being from
14 33.3% up to 50%.

15 11. While not necessarily required to be demonstrated because the percentage fee is
16 proper for this settlement, Class Counsel has incurred many hours of work in connection with
17 prosecuting the case such that the award of attorneys' fees is also justified under a lodestar
18 analysis with a multiplier of 2. Attorneys at Lawyers *for* Justice, PC have spent a total of **711.40**
19 **hours** performing tasks and obtaining recovery in the case. Attached hereto as "**EXHIBIT A**" is
20 an Attorney Task and Time Chart that sets forth in detail the nature of the legal services provided
21 by attorneys at Lawyers *for* Justice, PC and the time incurred in performing those services.
22 These hours include work done by myself and several other attorneys at the firm. Additionally,
23 Lawyers *for* Justice, PC had litigation support personnel actively engaged in assisting with the
24 prosecution of this matter.

25 12. The work performed in this particular case, the background of our firm, as well as
26 the individual backgrounds, training, and experience of the attorneys who worked on this case, in
27 litigating complex wage-and-hour actions, and in particular, employment class actions, support a
28 reasonable hourly rate of compensation at the rate of \$750 for work performed by Lawyers *for*

Justice, PC. Lawyers *for* Justice, PC has been awarded attorneys' fees, compensating the firm at the rate of at least \$750 per hour for legal services performed, by courts granting approval of wage-and-hour settlements in other cases: final approval of the class and representative action settlement in *David Dugan v. TEC Equipment, Inc., et al.* (Los Angeles Superior Court Case No. 19STCV01591) was granted on July 8, 2021, and the award of attorneys' fees involved an hourly rate of \$936.47; final approval of the class and representative action settlement in *Larry Greenwood, et al. v. Scan Health Plan* (Los Angeles Superior Court Case No. BC715157) was granted on April 20, 2021, and the award of attorneys' fees involved an hourly rate of \$919.57; final approval of the class action settlement in *Thereasa Carrozzella v. Basalite Concrete Products, LLC* (Sacramento County Superior Court Case No. 34-2017-00220214-CU-OE-GDS) was granted on February 21, 2020, and the award of attorneys' fees involved an hourly rate of \$766.05; final approval of the class and representative action settlement in *Alice Rutledge, et al. v. Healthport Technologies, LLC* (Alameda County Superior Court Case No. RG16835813) was granted on June 11, 2019, and the award of attorneys' fees involved an hourly rate of \$764.82; 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 an hourly rate of \$855.96; final approval of the class and representative action settlement in *Stanley Bland, et al. v. Telecare Corporation* (Alameda County Superior Court Case No. RG16811450) was granted on November 21, 2018, and the award of attorneys' fees involved an hourly rate of \$831.38; final approval of the class and representative action settlement in *Maryjo Ungerbuhler Anderson v. Boyett Petroleum* (Stanislaus County Superior Court Case No. 2020582) was granted on May 15, 2018, and the award of attorney's fees involved an hourly rate of \$780.77; and final approval of the class and representative action settlement in *Demetrius Camarillo v. Blue Diamond Growers* (Sacramento County Superior Court Case No. 34-2015-00175871) was granted on June 30, 2017, and the award of attorneys' fees involved an hourly rate of \$845.64.

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ADEQUACY OF LAWYERS *for* JUSTICE, PC

EDUCATION

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

JUDICIAL EXTERNSHIPS

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

LITIGATION AND CLASS ACTION EXPERIENCE

15. In December of 2004, I obtained a license to practice law from the California State Bar. From approximately December 2004 to approximately August 2008, I was employed by *Girardi & Keese*.

16. At *Girardi & Keese*, my practice focused on class actions and other complex cases involving toxic torts and products liability. In addition, I gained substantial experience on cases involving insurance bad faith, premises liability, and medical negligence. While employed by *Girardi & Keese*, I argued approximately 100 motions, took or defended approximately 150 depositions, and prepared dozens of expert witnesses for deposition or trial.

17. Since its inception, in or around October of 2008, *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

1 fraud. Currently, Lawyers *for* Justice, PC is attorney of record in well over a dozen
2 employment-related putative class actions in both state and federal courts in the State of
3 California. The firm has successfully litigated cases involving the executive, administrative, and
4 other overtime exemptions to the State of California and federal overtime compensation
5 requirements. During this relatively short time, in association with other law firms, Lawyers *for*
6 Justice, PC has recovered millions of dollars on behalf of thousands of individuals in California.

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

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

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

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

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

26 d) LFJ, in association with co-counsel therein, represented the plaintiffs in a
27 wage-and-hour class action against a national retailer involving allegations of misclassification
28 of the “Store Manager” position. On June 10, 2011, the court granted plaintiffs’ motion for class

1 certification. On August 26, 2013, the court granted final approval of the class action settlement.
2 The Los Angeles County Superior Court Case Number is BC424012.

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

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

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

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

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

Number is BC474784.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

26 ee) LFJ, in association with co-counsel therein, represents the plaintiff in a
27 wage-and-hour class action against a parking company on behalf of non-exempt employees. On
28 September 3, 2019, the court granted the plaintiff's motion for class certification and certified a

1 class. The Santa Clara County Superior Court Case Number is 16CV292208 and the Judicial
2 Council Coordination Proceeding Number is 4886.

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

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

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

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

26 jj) LFJ, in association with co-counsel therein, represents the plaintiff in a
27 wage-and-hour class and PAGA representative action against a large national drug testing
28 laboratory on behalf of non-exempt employees. On February 21, 2020, the court granted the

1 plaintiff's motion for class certification and certified a class. The San Diego County Superior
2 Court Case Number is 37-2018-00019611-CU-OE-CTL.

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

9 ll) LFJ, in association with co-counsel therein, represents the plaintiffs in a
10 wage-and-hour class action against manufacturer and supplier of power products and services on
11 behalf of non-exempt employees. On July 31, 2020, the court granted in part the plaintiffs'
12 motion for class certification and certified a class. The San Diego County Superior Court Case
13 Number is 37-2015-00025968-CU-OE-CTL.

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

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

19 19. To date, Class Counsel has borne all the risks and costs of litigation and will not
20 receive any compensation until recovery is obtained in the above-captioned action. Lawyers *for*
21 Justice, PC seeks reimbursement of \$14,984.74 in litigation costs and expenses incurred in this
22 matter, as reflected in "**EXHIBIT B**" attached hereto. These expenses were reasonable and
23 necessary in the prosecution of the case and to obtain the Settlement.

24 **ENHANCEMENT PAYMENT TO PLAINTIFF**

25 20. In recognition of his efforts and work serving as the Class Representative, the
26 Settlement provides for an Enhancement Payment in the amount of \$7,500.00 to Plaintiff Rex
27 Tullio. The requested Enhancement Payment is fair and appropriate. Plaintiff spent a substantial
28 amount of time and effort in producing relevant documents and information and provided the

1 facts and evidence necessary to attempt to prove the allegations. Plaintiff spent numerous hours
2 speaking with Class Counsel about his claims, describing his work experience with Defendants,
3 and gathering and reviewing documents. Plaintiff was available whenever Class Counsel needed
4 him and actively tried to obtain and provide information to support the pursuit of the class and
5 PAGA claims. Accordingly, it is appropriate for Plaintiff Rex Tullio to receive \$7,500.00 as a
6 reasonable Enhancement Payment for his services in the case, in addition to his Individual
7 Settlement Payment and Individual PAGA Payment.

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

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

12 Executed this 6th day of October 2022, at Glendale, California.

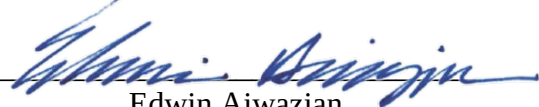
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EXHIBIT A

TULLIO V. DACM INC. DBA DEL AMO MOTORSPORTS, ET AL.
(ORANGE COUNTY SUPERIOR COURT CASE NO. 30-2020-01147256-CU-OE-CXC)

ATTORNEY TASK AND TIME CHART

TASK	LAWYERS <i>for</i> JUSTICE, PC
Investigation and Research / Due Diligence	
Pre-Lawsuit Investigation of the Key Facts with a Focus on the Merits of Plaintiff Rex Tullio's ("Plaintiff") Claims and the Merits of the Claims of the State of California with Respect to Aggrieved Employees and Putative Class Members	15.50
Pre-Lawsuit Investigation of Potential Damages and Penalties Exposure of Defendants DACM, Inc. dba Del Amo Motorsports, Too Fast, Inc., California Motorcycle Assessories, Inc., DASB, Inc., and DAMLA, Inc. (collectively, "Defendants") with Respect to Plaintiff, Aggrieved Employees, and Putative Class Members	12.60
Pre-Lawsuit Investigation of the Key Facts with a Focus on Class Certification Elements, including Adequacy, Typicality, Superiority, and Commonality	14.30
Legal Research and Analysis of Latest Off-the-Clock, Meal and Rest Breaks, Private Attorneys General Act, Statute of Limitations, Arbitration Agreement, Class Action Waiver, and Certification Decisions in California, Including all New and Relevant DLSE Materials	13.40
Investigation of Defendants, Defendants' Business Relationships, and the Industry in which Defendants Operate	11.20

Investigation of Defendants' Organizational and Corporate Structure, and Executive Reporting Structure as They Relate to the Employment and Management of the Aggrieved Employees and Putative Class Members	7.50
Investigation of Defendants' Executives, Officers, and Leadership with a Focus on Involvement in Wage-and-Hour Issues and Establishing Willfulness and Uniformity	4.20
Analysis of Competitors in Various Relevant Geographic Areas within which Defendants Operate, and Comparing and Contrasting Defendants' Policies, Practices, and Procedures with the Policies, Practices, and Procedures of Defendants' Competitors	5.30
Research and Investigation Re: Location(s), Division(s), and/or Department(s) Owned, Managed, Serviced and/or Operated by Defendants in California, Including Differences Them to Determine Whether Those Differences Will Cause Individual Issues to Predominate Over Common Issues	12.80
Research and Investigation Re: Workforce, Staffing Models, and Staffing Levels at Locations Throughout California Where Aggrieved Employees and Putative Class Members Worked	7.90
Research and Investigation Re: Defendants' Written and Unwritten Policies, Practices, and Procedures Relating to Timekeeping, Opening and Closing/Shutdown Procedures, Meal and Rest Break Attestation, Time Change Requests, Scheduling, Reporting Time, Customer Service, Meal/Rest Breaks, On-Premises Breaks, Meals Premiums, Non-Discretionary Bonus/Incentive/Production/Performance/Shift Differential/Commission Pay, Pay Plans, Payroll Vouchers, Off-Site Training, Overtime Compensation, Tools/Equipment/PPE, Uniforms, Use of Personal Celle Phone, Use of Personal Vehicle, Reimbursement of Business-Related Expenses, and Arbitration Agreements	42.50
Research and Investigation Re: Various Software Programs, Systems, and Other Technology Defendants Use to Conduct Everyday Business, Including Timekeeping, Sales, Inventory, and CRM Systems, with a Focus on What Documents (Both Paper and Electronic) Are	6.50

Created in the Normal Course of Business Relating to Overtime Worked, Off-the-Clock Time Worked Pre/Post-Shift, and During Meal Breaks	
Research and Analysis of Potential Defenses Defendants May Raise, Including <i>De Minimis</i> Work, Non-Compensable Off-the-Clock Work, Waiver, and Compliant Policies	7.50
Research and Investigation Regarding Trial Manageability Issues, including Research Regarding Which Experts to Retain and For What Purpose	6.50
Research and Analysis of Defendants' Litigation History Involving Wage-and-Hour Issues and Other Related Employment Issues	2.90
Prepare a Discovery Strategy and Plan of Action, including Topics of Inquiry Important to Certification, Liability, Damages, and Penalties	8.30
Research and Draft Outline of Anticipated Class Certification Issues and Preliminarily Brief Anticipated Class Certification Motion	46.90
Research and Investigation of Impact of COVID-19 Pandemic on Defendants, Their Operations, and Aggrieved Employees and Putative Class Members' Work	10.30
Meet and Communicate with Plaintiff Rex Tullio Throughout the Pendency of the Case	39.50
Meet, Communicate, and/or Conduct Interviews with Aggrieved Employees, Putative Class Members, and Percipient Witnesses	23.50
Pleadings and Court Filings	
Research and Draft Plaintiff's Complaint for Enforcement Under the Private Attorneys General Act, California Labor Code § 2698, Et Seq. and Legal Research and Analysis of All Allegations Involved (filed on July 8, 2020)	8.50

Review Defendant DACM, Inc. dba Del Amo Motorsports' Peremptory Challenge Pursuant to Code of Civil Procedure Section 170.6; Declaration of Barbora Pulmanova (served on July 31, 2020)	0.50
Review Court's Minute Order (filed on August 3, 2020)	0.10
Review Court's Minute Order (filed on August 12, 2020)	0.30
Review and Analyze Defendant DACM, Inc. dba Del Amo Motorsports' Answer to Plaintiff's Complaint, and Research Affirmative Defenses in Answer (served on August 18, 2020)	2.80
Meet and Confer with Defendants' Counsel, and Draft Joint Case Management Conference Statement (filed on September 28, 2020)	1.90
Review Court's Minute Order (filed on October 5, 2020)	0.10
Meet and Confer with Defendants' Counsel, and Draft Joint Status Conference Statement (filed on February 3, 2021)	1.10
Review Court's Minute Order (filed on February 4, 2021)	0.10
Meet and Confer with Defendants' Counsel, and Draft Joint Notice of Settlement and Status Conference Statement (filed on April 26, 2021)	1.40
Review Court's Minute Order (filed on May 6, 2021)	0.10
Meet and Confer with Defendants' Counsel, and Draft Joint Status Conference Statement (filed on September 2, 2021)	1.60
Review Court's Minute Order (filed on September 3, 2021)	0.10

Research and Draft Plaintiff's First Amended Class Action Complaint for Damages and Enforcement Under the Private Attorneys General Act, California Labor Code § 2698, Et Seq. and Legal Research and Analysis of All Claims Involved (filed on October 6, 2021); Meet and Confer with Defendants' Counsel, and Draft Joint Stipulation Granting Plaintiff Leave to File First Amended Complaint; and [Proposed] Order (submitted on September 24, 2021)	6.30
Review Court's Order Granting Plaintiff Leave to File First Amended Complaint (filed on October 4, 2021)	0.10
Meet and Confer with Defendants' Counsel, and Draft Joint Status Conference Report (filed on November 22, 2021)	1.50
Review Court's Minute Order (filed on November 29, 2021)	0.10
Draft Plaintiff's Notice of Errata and Correction to Plaintiff's First Amended Class Action Complaint for Damages and Enforcement Under the Private Attorneys General Act, California Labor Code § 2698, Et Seq. (filed on December 14, 2021)	0.70
Meet and Confer with Defendants' Counsel, and Draft Joint Status Conference Report (filed on December 29, 2021)	1.60
Review Court's Minute Order (filed on January 3, 2022)	0.10
Meet and Confer with Defendants' Counsel, and Draft Joint Status Conference Report (filed on February 18, 2022)	1.40
Review Court's Minute Order (filed on February 23, 2022)	0.10
Appearances	
Prepare for and Telephonically Attend Status Conference Hearing (October 5, 2020)	0.50

Prepare for and Telephonically Attend Status Conference Hearing (November 29, 2021)	0.40
Prepare for and Telephonically Attend Hearing on Plaintiff's Motion for Preliminary Approval of Class Action Settlement (February 4, 2022)	2.20
Prepare for and Telephonically Attend Hearing on Plaintiff's Motion for Preliminary Approval of Class Action Settlement (April 1, 2022)	1.10
Prepare for and Telephonically Attend Hearing on Plaintiff's Motion for Final Approval of Class Action Settlement, Attorneys' Fees, Costs, and Enhancement Payment (October 28, 2022) (Anticipated)	2.50
Discovery and Deposition	
Draft Letter to Defendant Del Amo Motorsports Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Rex Tullio (served on July 31, 2019)	1.90
Review and Analyze Documents Produced by Defendants in Response to Request for Personnel Files, Pay Stubs, and Time Records for Plaintiff Rex Tullio (served on August 30, 2019)	6.50
Draft Plaintiff's Form Interrogatories – General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), Special Interrogatories (Set Three), Requests for Production of Documents (Set One), and Requests for Production of Documents (Set Two) to Defendant DACM, Inc. (served on September 23, 2020)	7.20
Draft Plaintiff's Form Interrogatories – General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), Special Interrogatories (Set Three), Requests for Production of Documents (Set One), and Requests for Production of Documents (Set Two) to Defendant Del Amo Motorsports (served on September 23, 2020)	6.50

Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant Del Amo Motorsports and Requests for Production of Documents (Organizational Structure; Noticed for October 28, 2020) (served on September 23, 2020)	4.60
Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant Del Amo Motorsports and Requests for Production of Documents (Wage and Hour Practices; Noticed for October 29, 2020) (served on September 23, 2020)	5.20
Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant Del Amo Motorsports and Requests for Production of Documents (Affirmative Defenses; Noticed for October 30, 2020) (served on September 23, 2020)	7.30
Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant DACM Inc. and Requests for Production of Documents (Organizational Structure; Noticed for November 2, 2020) (served on September 23, 2020)	3.60
Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant DACM Inc. and Requests for Production of Documents (Wage and Hour Practices; Noticed for November 3, 2020) (served on September 23, 2020)	4.20
Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant DACM Inc. and Requests for Production of Documents (Affirmative Defenses; Noticed for November 4, 2020) (served on September 23, 2020)	6.30
Draft Letter to Defendant DACM, Inc. dba Del Amo Motorsports Re: Request for Personnel File, Pay Stubs, and Time Records for Putative Class Member (served on October 15, 2020)	1.90
Review and Analyze Documents Produced by Defendants in Response to Request for Personnel Files, Pay Stubs, and Time Records for Putative Class Member (served on October 30, 2020)	5.50

Draft Letter to Defendant DACM, Inc. dba Del Amo Motorsports Re: Request for Personnel File, Pay Stubs, and Time Records for Putative Class Member (served on November 23, 2020)	1.90
Draft Letter to Defendant DACM, Inc. dba Del Amo Motorsports Re: Request for Personnel File, Pay Stubs, and Time Records for Putative Class Member (served on December 30, 2020)	1.90
Review and Analyze Documents Produced by Defendants in Response to Request for Personnel Files, Pay Stubs, and Time Records for Putative Class Member (served on January 20, 2021)	5.50
Letters and Correspondence	
Draft Notice to California Labor and Workforce Development Agency re: Claims of Plaintiff Rex Tullio for Penalties Under California Labor Code section 2698, <i>et seq.</i> ("PAGA") (served on May 4, 2020)	4.50
Meet with, Draft Correspondence to, and Respond to Correspondence from, Defendant's Counsel	32.50
Mediation/Settlement	
Review and Analyze Data and Documents Obtained from Defendants and Other Sources Prior to Mediation (in excess of 12,000 pages) (served on February 26, 2021, March 4, 2021, and March 24, 2021) • Employee Handbook and Policies • Sampling of Employee Time Data • Sampling of Employee Payroll Data	75.30

Prepare for Mediation Session, Including Researching Settlement Related Issues and Merits of Claims, Drafting the Mediation Brief, Compiling the Mediation Exhibits in Support of Plaintiff's Mediation Brief, and Performing Violation, Damages, and Penalties Analysis/Calculations (submitted on April 1, 2021)	38.40
Review and Analyze Defendants' Mediation Brief and Research and Investigate Issues Referenced Therein (dated April 6, 2021)	12.30
Attend Mediation Session (April 8, 2021; Zoom Video Conference) and Review and Analyze Mediator's Proposal	30.50
Draft, Review, Revise, Negotiate, and Finalize Joint Stipulation of Class Action and PAGA Settlement Agreement and Release and Draft Exhibit (fully executed on January 3, 2022)	25.40
Review, Revise, Negotiate, and Finalize First Amended Joint Stipulation of Class Action and PAGA Settlement and Release and Draft Exhibits (fully executed on March 18, 2022)	8.20
Meet and Confer with Settlement Administrator Regarding Workweeks Calculation and Escalator Clause, Review Mailing Documents and Monitor Settlement Administration, Review Weekly Reports, and Respond to Inquiries	8.50
Law and Motion	
Research and Draft Plaintiff's Notice of Motion and Motion for Preliminary Approval of Class Action Settlement, Declaration of Edwin Aiwasian in Support Thereof, Declaration of Rex Tullio in Support Thereof, and [Proposed] Order Granting Preliminary Approval of Class Action Settlement (filed on January 4, 2022)	23.60
Review Court's Minute Order re Motion for Preliminary Approval of Class Action Settlement (filed on February 4, 2022)	0.60

Meet and Confer with Defendants' Counsel, and Research and Draft Joint Supplemental Brief in Support of Motion for Preliminary Approval of Class Action Settlement, Supplemental Declaration of Edwin Aiwasian in Support Thereof, and [Revised Proposed] Order Granting Preliminary Approval of Class Action Settlement (submitted on March 22, 2022)	17.40
Review Declaration of Barbora Pulmanova in Support of Motion for Preliminary Approval of Class Action Settlement (submitted on March 22, 2022)	1.20
Draft Plaintiff's [Further Revised Proposed] Order Granting Preliminary Approval of Class Action Settlement (filed on March 31, 2022)	0.60
Review Court's Minute Order and Order Granting Preliminary Approval of Class Action Settlement (filed on April 1, 2022)	0.60
Draft Notice of Entry of Judgment or Order (filed on April 6, 2022)	0.30
Review and Analyze Settlement Administrator's Declaration Regarding Notice and Settlement Administration; Research and Draft Plaintiff's Motion for Final Approval of Class Action Settlement, Attorneys' Fees, Costs, and Enhancement Payment, Declaration of Edwin Aiwasian in Support Thereof, and [Proposed] Final Approval Order and Judgment (filed on October 6, 2022)	25.20
Total Hours:	711.40

EXHIBIT B

LAWYERS for JUSTICE PC CASE COST DETAIL

Tullio v. Del Amo Motorsports

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
5/4/2020	U.S. Postmaster	Postage	14.60
5/4/2020	Labor & Workforce Development Agency	Court Filing Fee	75.00
7/8/2020	Legal Document Server, Inc.	Attorney Service	62.25
7/8/2020	Orange County Superior Court	Court Filing Fee	435.00
7/8/2020	Orange County Superior Court	Complex Court Filing Fee	1,000.00
7/13/2020	Legal Document Server, Inc.	Attorney Service	110.00
7/15/2020	Legal Document Server, Inc.	Attorney Service	110.00
7/17/2020	General Logistics Systems US, Inc.	Attorney Service	11.93
7/24/2020	Legal Document Server, Inc.	Attorney Service	220.00
7/30/2020	General Logistics Systems US, Inc.	Attorney Service	11.93
9/23/2020	One Legal	Attorney Service	2.00
9/28/2020	Legal Document Server, Inc.	Attorney Service	11.00
10/7/2020	CourtCall, LLC	Attorney Service	94.00
2/3/2021	Legal Document Server, Inc.	Attorney Service	13.25
2/4/2021	Legal Document Server, Inc.	Attorney Service	155.00
3/8/2021	Jams, Inc.	Mediation Fee	8,450.00
4/19/2021	Jams, Inc.	Supplemental Mediation Fee	3,392.00
4/26/2021	Legal Document Server, Inc.	Attorney Service	13.25
5/5/2021	CourtCall, LLC	Attorney Service	94.00
9/2/2021	Legal Document Server, Inc.	Attorney Service	13.25
10/4/2021	One Legal	Attorney Service	15.26
10/4/2021	Orange County Superior Court	Court Filing Fee	20.00
10/7/2021	One Legal	Attorney Service	14.67
11/22/2021	Legal Document Server, Inc.	Attorney Service	13.25
11/23/2021	CourtCall, LLC	Attorney Service	94.00
12/14/2021	Legal Document Server, Inc.	Attorney Service	13.25
12/29/2021	Legal Document Server, Inc.	Attorney Service	13.25
1/4/2022	Legal Document Server, Inc.	Attorney Service	13.25
1/5/2022	Legal Document Server, Inc.	Attorney Service	2.85
1/5/2022	Orange County Superior Court	Court Filing Fee	60.00
2/3/2022	CourtCall, LLC	Attorney Service	188.00
2/22/2022	Legal Document Server, Inc.	Attorney Service	13.25
3/22/2022	Legal Document Server, Inc.	Attorney Service	13.25
3/29/2022	CourtCall, LLC	Attorney Service	94.00
3/29/2022	CourtCall, LLC	Attorney Service	94.00
4/1/2022	Legal Document Server, Inc.	Attorney Service	13.25
4/5/2022	Orange County Superior Court	Document Download Fee	7.50
4/6/2022	Legal Document Server, Inc.	Attorney Service	13.25
Total:			14,984.74