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Additional Plaintiffs' Counsel on Next Page

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

ANTONIO MUNOZ, individually, and on
behalf of other members of the general
public similarly situated,

Plaintiff,

v.

FAMILY HEALTHCARE NETWORK, a
California corporation; and DOES 1 to 100,
inclusive,

Defendants.

VERONICA FERRUFINO, on behalf of
herself and all others similarly situated,

Plaintiffs,

v.

FAMILY HEALTHCARE NETWORK, a
California corporation; and DOES 1 to 100,
inclusive,

Defendants.

Lead Case No.: VCU282194
Consolidated with Case No.: VCU283726

Honorable Nathan D. Ide
Department 2

CLASS ACTION

**DECLARATION OF EDWIN AIWAZIAN
IN SUPPORT OF PLAINTIFFS' MOTION
FOR FINAL APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT,
ATTORNEYS' FEES, COSTS, AND
CLASS REPRESENTATIVE SERVICE
AWARDS**

[Notice of Motion and Motion for Final
Approval of Class Action and PAGA
Settlement, Attorneys' Fees, Costs, and Class
Representative Service Awards; Declarations
of Class Counsel (Kevin T. Barnes and Walter
L. Haines); Declaration of Settlement
Administrator (Abigail Schwartz); and
[Proposed] Final Approval Order and
Judgment filed concurrently herewith]

Date: October 24, 2022
Time: 8:30 a.m.
Department: 2

Munoz Complaint filed: February 24, 2020
Trial Date: None Set

Ferrufino Complaint filed: July 29, 2020
Trial Date: None Set

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Attorneys for Plaintiff Veronica Ferrufino and the Class

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 Antonio Munoz (“Plaintiff Munoz”) and the Class, in the above-captioned consolidated proceeding. 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 February 28, 2022, in Department 2 of the above-entitled Court, the Honorable Nathan D. Ide preliminarily approved the Amended Joint Stipulation of Class Action and PAGA Settlement and Release (“Settlement,” “Agreement,” or “Settlement Agreement”) entered into between Plaintiffs Antonio Munoz and Veronica Ferrufino (together, “Plaintiffs”) and Defendant Family HealthCare Network (“Defendant”), and conditionally certified the Class for settlement purposes. The Court preliminarily appointed Plaintiffs Antonio Munoz and Veronica Ferrufino to represent the Class (together, “Class Representatives”). The Court also preliminarily appointed and designated Lawyers *for* Justice, PC, Law Offices of Kevin T. Barnes, and United Employees Law Group, PC to represent the Class (together, Lawyers *for* Justice, PC, Law Offices of Kevin T. Barnes, and United Employees Law Group, PC are referred to as “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 Rust Consulting, Inc. (“Rust Consulting” or “Settlement Administrator”) to serve as the third-party settlement administrator and handle the notice and settlement administration process.

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

1 Labor Code section 2698, *et seq.* (“PAGA”).

2 **WORK PERFORMED BY CLASS COUNSEL**

3 4. I have been actively engaged in this litigation from the inception of Plaintiff
4 Antonio Munoz’s putative class action case entitled *Antonio Munoz v. Family HealthCare*
5 *Network*, County of Tulare Superior Court Case No. VCU282194 (“Munoz Action”) which was
6 filed on February 24, 2020, as have several other attorneys and staff members at Lawyers *for*
7 Justice, PC. Lawyers *for* Justice, PC has fully and actively participated in the litigation process
8 throughout the pendency of the Munoz Action.

9 5. On October 26, 2020, the Munoz Action was consolidated with the putative class
10 action entitled *Veronica Ferrufino v. Family HealthCare Network*, County of Tulare Superior
11 Court Case No. VCU283726 (“Ferrufino Action”) which was filed on July 29, 2020, with the
12 Munoz Action designated as the lead case. Eventually, Plaintiff Ferrufino alleged an additional
13 cause of action, under PAGA, through an amended complaint on November 25, 2020, and
14 Plaintiffs filed a First Amended Consolidated First Amended Class Action Complaint for
15 Damages & Enforcement Under the Private Attorneys General Act, California Labor Code §
16 2698, Et. Seq. on June 18, 2021. Since joining forces with other plaintiff’s counsel, Law Offices
17 of Kevin T. Barnes and United Employees Law Group, PC, who were pursuing the Ferrufino
18 Action, our work with other plaintiffs’ counsel has been a coordinated and combined effort.
19 Ultimately, Class Counsel’s efforts and the efforts of Plaintiffs have been successful in reaching
20 the Settlement.

21 6. Before initiating the Munoz Action, Lawyers *for* Justice, PC conducted extensive
22 investigation and research into the facts and circumstances underlying the pertinent factual and
23 legal issues and applicable law. This required thorough discussions and interviews between
24 attorneys at our firm and Plaintiff Munoz, and research into the various legal issues involved in
25 the Munoz Action, namely, the current state of the law as it applied to certification, off-the-clock
26 theory, meal and rest periods, wage-and-hour enforcement, Plaintiff Munoz’s allegations, and
27 potential defenses. After conducting initial investigation, our firm determined that Plaintiff
28 Munoz’s claims were well-suited for adjudication on a class-wide basis owing to what appeared

1 to be a common course of conduct affecting a similarly-situated group of current and former
2 hourly-paid or non-exempt employees who worked for Defendant within the State of California,
3 who were not properly compensated for, *inter alia*, all hours worked, non-compliant meal and
4 rest periods, and unreimbursed business expenses.

5 7. Since teaming up to pursue the cases, Lawyers for Justice, PC's work with the
6 Law Offices of Kevin T. Barnes and United Employees Law Group, PC, has been a coordinated
7 and combined effort. With respect to the Munoz Action, Lawyers for Justice, PC undertook
8 extensive investigation and research, preparation of the pleadings, discovery motion practice,
9 formal discovery, claims evaluation and analysis, and multiple mediations. Upon joining forces
10 with other plaintiff's counsel, Lawyers for Justice, PC collaborated and coordinated with the
11 Law Offices of Kevin T. Barnes and United Employees Law Group, PC regarding mediation and
12 settlement discussions and preparation of settlement-related papers.

13 8. Counsel for the Parties conducted significant investigation of the facts and law
14 during the prosecution of the cases, and engaged in extensive settlement negotiations to try to
15 resolve the cases. These efforts included preparing for and attending a formal mediation on
16 January 29, 2021, conducted by the Hon. Howard R. Broadman (Ret.), preparing for a second
17 formal mediation that was scheduled to take place in June 2021 but then re-scheduled, and then
18 finally, preparing for and attending the second formal mediation on September 1, 2021,
19 conducted by the Hon. Howard R. Broadman (Ret.). The mediator is a well-respected mediator
20 who is experienced in mediating complex labor and employment matters. The second mediation
21 resulted in the issuance of a Mediator's Proposal, and with the aid of the mediator's evaluations,
22 the parties ultimately reached a settlement of the Munoz Action and the Ferrufino Action
23 (together, the "Actions"). During all settlement discussions, the parties conducted their
24 negotiations at arm's length in an adversarial position. The claims asserted in the Actions are
25 highly disputed and arriving at a settlement that was acceptable to the parties was not easy.
26 Collectively, Class Counsel extensively investigated and considered the veracity, strength, and
27 scope of the claims, and engaged in extensive litigation in anticipation of class certification and
28 trial, prior to reaching the Settlement.

1 9. Prior to reaching the Settlement, the parties undertook extensive formal and
2 informal discovery and exchange of class information, engaged in motion practice, and engaged
3 in extensive discussions regarding their evaluations of the cases and various aspects of the cases,
4 including but not limited to, the risks and delays of further litigation, the risks to the parties of
5 proceeding with class certification and/or representative adjudication, the law relating to off-the-
6 clock theory, meal and rest periods, wage-and-hour enforcement, and PAGA representative
7 claims, as well as the evidence produced and analyzed, and the possibility of appeals, among
8 other things. Defendant and its counsel felt strongly about their ability to prevail on the merits
9 and at certification, and Plaintiffs and Class Counsel believed that they would be able to obtain
10 class certification and prevail at trial. With the aid of the mediator's evaluations, the Parties have
11 agreed that the matter is well-suited for settlement given the legal issues relating to Plaintiffs'
12 principal claims, as well as the costs and risks to all sides that would attend further litigation. The
13 Settlement is a fair, reasonable, and adequate resolution of Plaintiffs and Participating Class
14 Members' Released Claims against the Released Parties and Plaintiffs and Class Members'
15 PAGA Released Claims against the Released Parties.

16 10. In the Munoz Action, Lawyers *for* Justice, PC conducted significant investigation
17 and formal and informal discovery regarding the facts of the case, including and not limited to,
18 the exchange, review, and analysis of thousands of pages of documents and data obtained from
19 Plaintiff Munoz, Defendant, and other sources. Lawyers *for* Justice, PC propounded multiple
20 sets of formal written discovery requests onto Defendant, reviewed Defendant's responses
21 thereto, noticed the depositions of Defendant's Person(s) Most Knowledgeable designees
22 (regarding organizational structure, job duties, wage and hour policies and practices, and
23 Defendant's affirmative defenses), reviewed Defendant's objections to notices of deposition,
24 reviewed Defendant's original and amended objections and responses to written discovery
25 requests, and worked with Plaintiff Munoz to provide responses to multiple sets of discovery
26 requests that were propounded by Defendant. The volume of data and documents that Lawyers
27 *for* Justice, PC reviewed and analyzed included and was not limited to: employment records of
28 Plaintiff Munoz, a detailed sampling of Class Members' time and pay records, redacted class

1 data and list, job position lists, employee handbooks, company policy acknowledgements, forms,
2 internal memoranda, job descriptions, and operations and employment policies, practices, and
3 procedures, among other information and documents. Lawyers for Justice, PC interviewed
4 Plaintiff Munoz, putative class members, and other percipient witnesses to gather facts and to
5 identify potential witnesses. Counsel for the Parties also met and conferred on numerous
6 occasions, e.g., to discuss issues relating to the pleadings, discovery, motion practice, and the
7 production of documents and data prior to the mediations. Lawyers for Justice, PC also drafted
8 pleadings, discovery motion papers, and the mediation brief, and prepared for and attended court
9 proceedings, mediations, and settlement negotiations, among other tasks.

10 11. As set forth more fully in the accompanying Motion for Final Approval, Class
11 Counsel seek attorneys' fees in the total amount of \$1,500,000.00, which is one-third (33.33%)
12 of the Maximum Settlement Amount of \$4,500,000.00, as set forth in the Settlement Agreement
13 and the Class Notice. The attorneys' fees sought are commensurate with: (1) the risk that Class
14 Counsel took in commencing the cases; (2) the time, effort, and expense that Class Counsel
15 dedicated to the cases; (3) the skill and determination that Class Counsel have shown; (4) the
16 results that Class Counsel have achieved throughout the litigation of the cases; (5) the value of
17 the settlement that Class Counsel have achieved; and (6) the other cases that Class Counsel have
18 turned down in order to devote their time and efforts to the cases.

19 12. I am aware that the common and acceptable rate for contingency representation in
20 wage and hour class action litigation is normally 40% before trial, with the range being from
21 33.3% up to 50%.

22 13. While not necessarily required to be demonstrated because the contingent fee is
23 proper for this settlement, Class Counsel have incurred many hours of work in connection with
24 prosecuting the cases such that the award of attorneys' fees is also justified under a lodestar
25 analysis with a multiplier of 1.68. Lawyers for Justice, PC, Law Offices of Kevin T. Barnes, and
26 United Employees Law Group, PC have collectively spent a total of **1,143.60 hours**, with **890.60**
27 **hours** spent by Lawyers for Justice, PC, **224.90 hours** spent by the Law Offices of Kevin T.
28 Barnes, and **28.10 hours** spent by United Employees Law Group, PC, performing tasks and

obtaining recovery in the cases. The base lodestar for the three firms is \$895,260.50. Attached hereto as “EXHIBIT A” is an Attorney Task and Time Chart that sets forth in detail the nature of the legal services provided by attorneys at Lawyers for Justice, PC and the time incurred in performing those services. These hours include work done by myself and several other attorneys at the firm. Additionally, Lawyers for Justice, PC had litigation support personnel actively engaged in assisting with the prosecution of this matter.

14. The work performed in this particular matter, the background of our firm, as well as the individual backgrounds, training, and experience of the attorneys who worked on this matter, in litigating complex wage-and-hour actions, and in particular, employment class actions, support a reasonable blended hourly rate of compensation at the rate of \$785 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 \$785 per hour for legal services performed, by courts granting approval in other wage and hour 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 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 *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

15. 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

16. 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

17. 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*.

18. 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.

19. 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, we are the attorneys of record in over a dozen employment-related putative
2 class actions in both state and federal courts in the State of California. Lawyers *for* Justice, PC
3 has successfully litigated cases involving the executive, administrative, and other overtime
4 exemptions to the State of California and federal overtime compensation requirements. During
5 this relatively short time, in association with other law firms, Lawyers *for* Justice, PC has
6 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 20. 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 represented the plaintiff in a PAGA representative action, against the
15 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 LAWYERS FOR JUSTICE, PC**

19 21. To date, Class Counsel have borne all the risks and costs of litigation and will not
20 receive any compensation until recovery is obtained in the cases. Lawyers *for* Justice, PC seeks
21 reimbursement of **\$17,537.81** in litigation costs and expenses as reflected in "**EXHIBIT B**"
22 attached hereto. These expenses were reasonable and necessary in the prosecution of the Munoz
23 Action and to reach the settlement of the cases.

24 **CLASS REPRESENTATIVE SERVICE AWARDS TO PLAINTIFFS**

25 22. In recognition of their efforts and work serving as the Class Representatives, the
26 Settlement provides for Class Representative Service Awards in the amount of \$7,500.00 each to
27 Plaintiffs Antonio Munoz and Veronica Ferrufino, to compensate Plaintiffs for the time and
28 effort that they expended in the cases. The service awards are to be paid out of the Maximum

1 Settlement Amount subject to approval by the Court. The requested Class Representative
2 Service Awards are fair and appropriate. Plaintiffs spent considerable time and effort to produce
3 relevant documents and past employment records and to provide the facts and evidence
4 necessary to facilitate the prosecution of the class and PAGA claims. For example, Plaintiff
5 Munoz reviewed Requests for Production of Documents (Set One) and Special Interrogatories
6 (Set One) propounded by Defendant, gathered information and documents responsive to the
7 discovery requests, and worked with Lawyers for Justice, PC to provide discovery responses.
8 Plaintiff Munoz was available whenever his counsel needed him and actively tried to obtain and
9 provide information that would aid in the pursuit of the claims. Accordingly, it is fair and
10 appropriate for Plaintiffs to each receive a Class Representative Service Award for their services
11 in this matter, in addition to their Individual Settlement Payments and Individual PAGA
12 Payments (if applicable) under the Settlement.

13 23. I submit that the Settlement is fair, reasonable, and adequate. In addition, the
14 Settlement is in the best interests of Plaintiffs, Class Members, the State of California, and
15 Participating PAGA Members.

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

18 Executed this 30th day of September 2022, at Glendale, California.

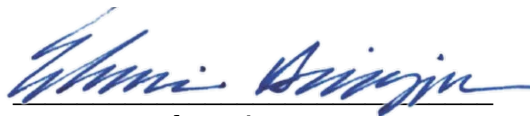
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EXHIBIT A

**ANTONIO MUNOZ V. FAMILY HEALTHCARE NETWORK
(TULARE COUNTY SUPERIOR COURT CASE NO. VCU282194)
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 Class Certification Elements, including Adequacy, Typicality, Superiority, and Commonality	15.40
Pre-Lawsuit Investigation of the Merits of Plaintiff Antonio Munoz’s (“Plaintiff”) Claims and the Merits of the Claims of the Putative Class Members	13.50
Pre-Lawsuit Investigation of Potential Damages Exposure of Defendant Family HealthCare Network (“Defendant”) with Respect to the Damages Sustained by Plaintiff Antonio Munoz and the Putative Class	12.60
Pre-Lawsuit Legal Research & Analysis of Latest Off-the-Clock, Meal and Rest Break Law, Wage Order, and Certification Decisions in California, including all Relevant and New Guidance and DLSE Materials	10.50
Investigation of Defendant, Defendant’s Business Relationships and Contracts, and the Industry in which Defendant Operates	9.40
Investigation of Defendant’s Licenses and Registrations	6.10
Investigation of Defendant’s Organizational and Corporate Structure, and Executive Reporting Structure as It Relates to the Employment and Management of the Putative Class Members	7.80
Investigation of Defendant’s Executives, Officers, and Leadership with a Focus on Involvement in Wage-and-Hour Issues and Establishing Willfulness and Uniformity	6.20

Analysis of Competitors within Various Relevant Geographic Areas within which Defendant Operates, and Comparing and Contrasting Defendant's Policies, Practices, and Procedures with the Policies, Practices, and Procedures of Defendant's Competitors	7.70
Research and Investigation Re: Location(s), Division(s), and/or Department(s) Owned, Managed, Services, and/or Operated by Defendant in California During the Class Period, Including Differences Between the Various Location(s), Division(s), and/or Department(s) to Determine Whether Those Differences Will Cause Individual Issues to Predominate Over Common Issues	7.20
Comparative Analysis and Cross-Checking of All Available Job Postings by Defendant in Order to Determine Any Variation and Identify Job Duties and Responsibilities That Would Be Susceptible to Being Performed Off-the-Clock or During Meal or Rest Breaks	8.20
Research and Investigation Re: Workforce, Staffing Models, and Staffing Levels at Locations Throughout California at which Putative Class Members Worked	7.30
Research and Investigation Re: Defendant's Policies, Practices, and Procedures Relating to Patient Care, Inspections, Driving, Reporting Time, Scheduled Shifts, Clock-In Stations, Timekeeping, Timesheets, Rounding, Meal/Rest Breaks, On-Premises Breaks, On-Duty Breaks, Non-Discretionary Bonus/Incentive/Performance/Shift Differential Pay, Overtime Compensation, Use of Personal Cellphone, Use of Personal Vehicle, Equipment/Supplies/PPE, and Reimbursement of Business-Related Expenses	38.80
Research and Investigation Re: Software Programs, Systems, and Other Technology Defendant Uses to Conduct Everyday Business, Including Timekeeping, GPS/Logistics, Patient Care, and Case Management Systems, with a Focus on What Documents (Both Paper and Electronic) Are Created in the Normal Course of Business Relating to Overtime Worked, Off-the-Clock Time Worked Pre/Post Shift, and During Meal Breaks	7.40
Research and Investigation of Impact of COVID-19 on Defendant's Location, Putative Class Members, and Defendant's Operations and Employment Practices	8.20

Research and Analysis of Potential Defenses Defendant May Raise, Including <i>De Minimis</i> Work, Non-Compensable Off-the-Clock Work, Waiver, and Compliant Policies	10.20
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	7.50
Research and Analysis of Defendant's Litigation History Involving Wage-and-Hour Issues and Other Related Employment Issues	5.40
Prepare a Discovery Strategy Plan of Action, including Identifying Witnesses and Topics of Inquiry Important to Certification, Manageability, Liability, and Damages/Penalties	9.50
Research, Analyze, Plan, Outline, and Draft Briefing of Certification Issues and Theories in Anticipation of Moving to Certify Class	26.50
Meet and Communicate with Plaintiff Antonio Munoz throughout the Pendency of the Case	55.50
Meet, Communicate, Conduct Interviews, and/or Outreach with Putative Class Members	43.50
Review and Analyze Pleadings in the Case <i>Ferrufino v. Family Healthcare Network</i> (Tulare County Superior Court Case No. VCU283726) ("Ferrufino Action")	4.70
Pleadings and Court Filings	
Draft Plaintiff Antonio Munoz's Class Action Complaint for Damages and Legal Research and Analysis of All Claims Involved (filed on February 24, 2020)	10.30
Review and Analyze Defendant's Answer to Plaintiff's Class Action Complaint (served on March 25, 2020), and Research Affirmative Defenses in Defendant's Answer	4.60
Draft Plaintiff's Case Management Conference Statement (filed on June 17, 2020)	1.90

Review Defendant's Case Management Conference Statement (filed on June 23, 2020)	0.30
Review Defendant's Notice of Continuance of Case Management Conference (served on June 24, 2020)	0.20
Review Defendant's Notice of Posting Jury Fees (filed on July 10, 2020)	0.10
Draft Plaintiff's Case Management Conference Statement (filed on July 2, 2020)	0.70
Draft Plaintiff's Notice of Posting Jury Fees (filed on July 14, 2020)	0.20
Review Plaintiff Veronica Ferrufino's [Proposed] First Amended Complaint, Stipulation Regarding Filing of First Amended Complaint, and [Proposed] Order Thereon (filed on November 20, 2020)	1.80
Meet and Confer with Defense Counsel, and Draft Joint Case Management Conference Statement and Stipulation, and [Proposed] Order Thereon (submitted on November 25, 2020)	2.20
Review Plaintiff Veronica Ferrufino's First Amended Complaint (filed on November 25, 2020)	1.50
Review Court's Order Re: Stipulation Re: Status Conference (filed on December 2, 2020)	0.30
Meet and Confer with Defense Counsel, and Draft Joint Case Management Conference Statement and Stipulation to Continue the Case Management Conference, and [Proposed] Order Thereon (submitted on February 25, 2021)	2.10
Review Order Granting Stipulation to Continue Case Management Conference (entered February 26, 2021)	0.20
Meet and Confer with Other Plaintiff's Counsel and Draft First Amended Consolidated First Amended Class Action Complaint for Damages & Enforcement Under the Private Attorneys General Act, California Labor Code § 2698, Et Seq. and Legal Research and Analysis of All Claims Involved; Meet and Confer with Defense Counsel, and Draft Joint Stipulation and [Proposed] Order Granting Plaintiffs Antonio Munoz and Veronica Ferrufino ("Plaintiffs") Leave to File [Proposed] First Amended Consolidated First	5.80

Amended Class Action Complaint for Damages & Enforcement Under the Private Attorneys General Act, California Labor Code § 2698, Et Seq. (submitted on May 6, 2021)	
Review Order Granting Plaintiffs Leave to File [Proposed] First Amended Consolidated First Amended Class Action Complaint for Damages & Enforcement Under the Private Attorneys General Act, California Labor Code § 2698, Et Seq. (entered on May 6, 2021)	0.30
Meet and Confer with Other Plaintiff's Counsel and Defense Counsel, and Draft Joint Case Management Conference Statement and Stipulation and [Proposed] Order (filed on July 13, 2021)	2.30
Review Court's Order Granting Joint Stipulation (filed on July 13, 2021)	0.20
Meet and Confer with Other Plaintiffs' Counsel and Defense Counsel, and Draft Joint Stipulation to Continue Trial Date and Related Deadlines; [Proposed] Order (submitted on July 16, 2021)	1.80
Review Court's Order Re: Joint Case Management Conference Statement and Stipulation (filed on July 26, 2021)	0.20
Meet and Confer with Other Plaintiffs' Counsel and Defense Counsel, and Draft Joint Status Conference Statement (filed on September 29, 2021)	1.50
Review Court's Order Re: Joint Status Conference Statement and Stipulation (filed on October 5, 2021)	0.20
Review Court's Notice of Hearing Re: Status Conference (filed on April 29, 2022)	0.20
Meet and Confer with Other Plaintiffs' Counsel and Defense Counsel, and Draft, Review, and/or Revise Joint Conference Statement and Stipulation; [Proposed] Order Re: Joint Conference Statement and Stipulation (submitted on May 12, 2022)	0.50
Review Court's Order Granting Joint Stipulation (filed on May 12, 2022)	0.20
Review Defendant's Notice of Substitution of Attorney (filed on September 1, 2022)	0.20

Meet and Confer with Other Plaintiffs' Counsel and Defense Counsel, and Draft, Review, and/or Revise Joint Conference Statement (filed on September 7, 2022)	0.50
Appearances	
Prepare for and/or Appear at Case Management Conference (June 24, 2020)	1.50
Prepare for and/or Appear at Case Management Conference (July 10, 2020)	1.50
Prepare for and/or Appear at Hearing on Defendant's Motion to Consolidate Cases (October 26, 2020)	2.50
Prepare for and Attend Hearing on Plaintiffs' Motion for Preliminary Approval of Class Action Settlement (January 31, 2022)	0.80
Prepare for and Attend Hearing on Plaintiffs' Motion for Preliminary Approval of Class Action Settlement (February 28, 2022)	2.40
Prepare for and Attend Hearing on Plaintiffs' Motion for Final Approval of Class Action Settlement, Class Counsel Award, Costs, and Class Representative Service Awards (October 24, 2022) (Anticipated)	2.50
Discovery and Deposition	
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Antonio Munoz (served on June 7, 2019)	1.90
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Antonio Munoz (served on July 5, 2019)	15.50
Draft Plaintiff Antonio Munoz's Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (noticed for July 1, 2020; Organizational Structure) (served on May 7, 2020)	5.80

Draft Plaintiff Antonio Munoz's Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (noticed for July 2, 2020; Job Titles, Job Positions, Duties and Activities, Hours, Wage and Hour Policies and Practices, Compensation, Meal and Rest Breaks, and Business Expenses) (served on May 7, 2020)	6.90
Draft Plaintiff Antonio Munoz's Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (noticed for July 3, 2020; Affirmative Defenses) (served on May 7, 2020)	6.30
Draft Plaintiff Antonio Munoz'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 (served on May 7, 2020)	9.60
Review and Analyze Defendant's Responses to Plaintiff Antonio Munoz'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) (served on June 12, 2020)	11.40
Review and Analyze Defendant's Special Interrogatories (Set One) and Request for Production of Documents (Set One) (served on June 12, 2020)	3.70
Review and Analyze Defendant's Objection to Plaintiff Antonio Munoz's Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (noticed for July 1, 2020; Organizational Structure) (served on June 25, 2020)	1.60
Review and Analyze Defendant's Objection to Plaintiff Antonio Munoz's Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (noticed for July 2, 2020; Job Titles, Job Positions, Duties and Activities, Hours, Wage and Hour Policies and Practices, Compensation, Meal and Rest Breaks, and Business Expenses) (served on June 25, 2020)	1.80

Review and Analyze Defendant's Objection to Plaintiff Antonio Munoz's Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (noticed for July 3, 2020; Affirmative Defenses) (served on June 25, 2020)	3.90
Draft Plaintiff Antonio Munoz's Responses to Defendant's Special Interrogatories (Set One) and Request for Production of Documents (Set One), and CD with Exhibit A to Plaintiff's Responses to Defendant's Request for Production of Documents (Set One) (served on August 17, 2020)	20.20
Review and Analyze Defendant's Responses to Plaintiff Ferrufino's Special Interrogatories (Set One) and Attachment, and Request for Production of Documents (Set One) (served on October 21, 2020)	11.50
Review Plaintiff Ferrufino's Notice of Taking Deposition(s) of Defendant's Person(s) Most Qualified and Request for Production of Documents (noticed for February 24, 2021) (served on November 5, 2020)	1.60
Review Plaintiff Ferrufino's Special Interrogatories (Set Two) and Request for Production of Documents (Set Two) (served on November 5, 2020)	0.90
Review and Analyze Defendant's Amended Responses to Plaintiff Antonio Munoz's Form Interrogatories – General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), and Special Interrogatories (Set Three) (served on July 26, 2021)	6.20
Review and Analyze Defendant's Amended Responses to Plaintiff Antonio Munoz's Request for Production of Documents (Set One) (served on August 26, 2021)	5.90
Draft <i>Belaire-West</i> Administration Notice and Opt-Out Postcard (July 6, 2021)	1.50
Letters and Correspondence	
Meet with, Draft Correspondence to, and Review and Respond to Correspondence from, Defense Counsel	43.50
Meet with, Draft Correspondence to, and Review and Respond to Correspondence from, Plaintiff Veronica Ferrufino's Counsel	30.50

Mediation/Settlement	
Review and Analyze Mediation Data and Documents in Advance of January 2021 Mediation	85.50
Prepare for Mediation, Including Researching Settlement Related Issues and Merits of Claims, Drafting the Mediation Brief, Compiling the Mediation Exhibits in Support of Plaintiffs' Mediation Brief, and Performing Damages and Penalties Analysis and Calculations (submitted on January 27, 2021)	20.80
Prepare for and Telephonically Attend Mediation Session (January 29, 2021; Zoom Video Conference)	14.50
Review and Analyze Mediation Data and Documents in Advance of Scheduled June 2021 Mediation	9.50
Prepare for Mediation, Including Researching Settlement Related Issues and Merits of Claims, Drafting the Mediation Brief, and Compiling the Mediation Exhibits in Support of Plaintiffs' Mediation Brief, and Performing Damages and Penalties Analysis and Calculations (submitted on June 25, 2021)	12.30
Review and Analyze Mediation Data and Documents Produced by Defendant in Advance of September 2021 Mediation	11.80
Prepare for Mediation, Including Researching Settlement Related Issues and Merits of Claims, Drafting the Mediation Brief, Compiling the Mediation Exhibits in Support of Plaintiffs' Mediation Brief, and Performing Damages and Penalties Analysis/Calculations (submitted on August 25, 2021)	13.90
Prepare for and Telephonically Attend Mediation Session (September 1, 2021; Zoom Video Conference)	13.50
Review and Analyze Mediator's Proposal (issued September 1, 2021 and accepted September 10, 2021)	3.50
Review, Revise, Negotiate, and Finalize Joint Stipulation of Class Action and PAGA Settlement and Release, and Proposed Notice of Class Action Settlement (executed on January 11, 2022)	12.20
Review, Revise, Negotiate, and Finalize Amended Joint Stipulation of Class Action and PAGA Settlement and Release, and Proposed Notice of Class Action Settlement (executed on February 18, 2022)	2.80

Coordinate Settlement Administration with Settlement Administrator, Ongoing Monitoring of Settlement Administration, and Respond to Class Inquiries	18.50
Law and Motion	
Review and Analyze Defendant's Notice of Motion and Motion to Consolidate Cases, Memorandum of Points and Authorities in Support Thereof, Declaration of Sara J. Woods in Support Thereof, and [Proposed] Order Thereon (served on September 25, 2020)	1.60
Draft Plaintiff's Opposition to Motion to Consolidate Cases, and Declaration of Daniel J. Kramer in Support Thereof (filed on October 13, 2020)	6.60
Review and Analyze Defendant's Reply to Plaintiff's Opposition to Motion to Consolidate Cases (served on October 16, 2020)	1.50
Draft Plaintiff's Notice of Motion and Motion to Compel Defendant Family Healthcare Network, Inc. to Provide Further Responses to Plaintiff's Form Interrogatories (Set One) and Request for Monetary Sanctions, Declaration of Daniel J. Kramer in Support Thereof, Rule 3.1345 Separate Statement in Support Thereof, and [Proposed] Order Thereon (filed on July 30, 2021)	7.10
Draft Plaintiff's Notice of Motion and Motion to Compel Defendant Family Healthcare Network, Inc. to Provide Further Responses to Plaintiff's Special Interrogatories (Set One) and Request for Monetary Sanctions, Declaration of Daniel J. Kramer in Support Thereof, Rule 3.1345 Separate Statement in Support Thereof, and [Proposed] Order Thereon (filed on July 30, 2021)	7.30
Draft Plaintiff's Notice of Motion and Motion to Compel Defendant Family Healthcare Network, Inc. to Provide Further Responses to Plaintiff's Special Interrogatories (Set Two) and Request for Monetary Sanctions, Declaration of Daniel J. Kramer in Support Thereof, Rule 3.1345 Separate Statement in Support Thereof, and [Proposed] Order Thereon (filed on July 30, 2021)	7.10
Draft Plaintiff's Notice of Motion and Motion to Compel Defendant Family Healthcare Network, Inc. to Provide Further Responses to Plaintiff's Requests for Production of Documents (Set One) and Request for	7.20

Monetary Sanctions, Declaration of Daniel J. Kramer in Support Thereof, Rule 3.1345 Separate Statement in Support Thereof, and [Proposed] Order Thereon (filed on July 30, 2021)	
Review and Analyze Defendant's Opposition to Plaintiff's Motion to Compel Further Responses to Plaintiff's Form Interrogatories (Set One) (served on August 17, 2021)	2.60
Review and Analyze Defendant's Opposition to Plaintiff's Motion to Compel Further Responses to Plaintiff's Special Interrogatories (Set One) (served on August 17, 2021)	2.50
Review and Analyze Defendant's Opposition to Plaintiff's Motion to Compel Further Responses to Plaintiff's Special Interrogatories (Set Two) (served on August 17, 2021)	2.10
Review and Analyze Defendant's Opposition to Plaintiff's Motion to Compel Further Responses to Plaintiff's Request for Production of Documents (Set One) (served on August 17, 2021)	2.20
Draft Plaintiff Antonio Munoz's Reply in Support of Motion to Compel Defendant Family Healthcare Network, Inc. to Provide Further Responses to Plaintiff's Requests for Production of Documents (Set One) (filed on August 23, 2021)	2.40
Draft Plaintiff Antonio Munoz's Notice of Taking Plaintiff's Motion to Compel Defendant Family Healthcare Network, Inc. to Provide Further Responses to Plaintiff's Form Interrogatories (Set One) and Request for Monetary Sanctions Off Calendar (filed on August 23, 2021)	0.30
Draft Plaintiff Antonio Munoz's Notice of Taking Plaintiff's Motion to Compel Defendant Family Healthcare Network, Inc. to Provide Further Responses to Special Interrogatories (Sets One) and Request for Monetary Sanctions Off Calendar (filed on August 23, 2021)	0.30
Draft Plaintiff Antonio Munoz's Notice of Taking Plaintiff's Motion to Compel Defendant Family Healthcare Network, Inc. to Provide Further Responses to Special Interrogatories (Sets Two) and Request for Monetary Sanctions Off Calendar (filed on August 23, 2021)	0.30

Draft Plaintiff Antonio Munoz's Notice of Taking Plaintiff's Motion to Compel Defendant Family Healthcare Network, Inc. to Provide Further Responses to Plaintiff's Requests for Production of Documents (Set One) and Request for Monetary Sanctions Off Calendar (filed on August 27, 2021)	0.30
Meet and Confer with Other Plaintiff's Counsel and Research, Draft, Review, and/or Revise the Plaintiffs' Notice of Motion and Motion for Preliminary Approval of Class Action Settlement; Memorandum of Points and Authorities, and [Proposed] Order Granting Preliminary Approval of Class Action Settlement (filed on January 6, 2022)	6.80
Draft Declarations of Edwin Aiwarzian and Antonio Munoz in Support of Plaintiffs' Motion for Preliminary Approval of Class Action Settlement (filed on January 6, 2022)	7.50
Review Declarations of Kevin T. Barnes and Walter L. Haines in Support of Plaintiffs' Motion for Preliminary Approval of Class Action Settlement (filed on January 6, 2022)	0.90
Review Supplemental Declaration of Kevin T. Barnes in Support of Plaintiffs' Motion for Preliminary Approval of Class Action and PAGA Settlement (filed on January 12, 2022)	0.20
Review Court's Tentative Ruling Re: Motion for Preliminary Approval of Class Action Settlement and PAGA Settlement and Meet and Confer with Other Plaintiff's Counsel and Defense Counsel (issued on January 28, 2022)	0.90
Review Minute Order Re: Motion for Preliminary Approval of Class Action Settlement and PAGA Settlement (filed on January 31, 2022)	0.20
Draft Supplemental Declaration of Edwin Aiwarzian in Support of Plaintiffs' Motion for Preliminary Approval of Class Action and PAGA Settlement (February 18, 2022)	1.50
Review Supplemental Declaration of Kevin T. Barnes in Support of Plaintiffs' Motion for Preliminary Approval of Class Action and PAGA Settlement (filed on February 18, 2022)	1.40

Review Second Supplemental Declaration of Walter L. Haines in Support of Plaintiffs' Motion for Preliminary Approval of Class Action and PAGA Settlement (filed on February 18, 2022)	0.60
Review Third Supplemental Declaration of Kevin T. Barnes in Support of Plaintiffs' Motion for Preliminary Approval of Class Action and PAGA Settlement (filed on February 22, 2022)	0.80
Review Court's Minute Order Re: Motion for Preliminary Approval of Class Action and PAGA Settlement (filed on March 1, 2022)	0.30
Research and Draft Plaintiffs' Motion for Final Approval of Class Action Settlement, Class Counsel Award, and Class Representative Service Awards, Declaration of Edwin Aiwasian in Support Thereof, and [Proposed] Final Approval Order and Judgment; and Review Declarations of Kevin T. Barnes, Walter L. Haines, and Settlement Administrator in Support Thereof (filed on September 30, 2022) (Anticipated)	28.50
Total Hours:	890.60

EXHIBIT B

LAWYERS for JUSTICE PC CASE COST DETAIL

Munoz v. Family Healthcare Network

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
2/24/2020	Legal Document Server, Inc.	Attorney Service	200.22
2/24/2020	Tulare County Superior Court	Court Filing Fee	435.00
2/24/2020	Tulare County Superior Court	Complex Filing Fee	1,000.00
3/3/2020	Legal Document Server, Inc.	Attorney Service	150.00
5/7/2020	General Logistics Systems US, Inc.	Courier Service	11.77
6/2/2020	Legal Document Server, Inc.	Attorney Service	140.00
6/17/2020	Legal Document Server, Inc.	Attorney Service	150.00
6/22/2020	CourtCall, LLC	Attorney Service	94.00
7/8/2020	Legal Document Server, Inc.	Attorney Service	150.00
7/9/2020	CourtCall, LLC	Attorney Service	94.00
7/14/2020	Legal Document Server, Inc.	Attorney Service	135.25
7/14/2020	Tulare County Superior Court	Jury Filing Fee	150.00
8/3/2020	General Logistics Systems US, Inc.	Courier Service	27.17
8/12/2020	FedEx Express	Courier Service	21.65
10/13/2020	General Logistics Systems US, Inc.	Courier Service	20.08
10/13/2020	Legal Document Server, Inc.	Attorney Service	150.00
10/21/2020	CourtCall, LLC	Attorney Service	94.00
11/18/2020	General Logistics Systems US, Inc.	Courier Service	20.22
12/9/2020	FedEx Express	Courier Service	21.81
1/29/2021	Howard R. Broadman	Mediation Fee	4,500.00
2/25/2021	General Logistics Systems US, Inc.	Courier Service	31.31
2/25/2021	Legal Document Server, Inc.	Courier Service	305.70
2/25/2021	Tulare County Superior Court	Filing Fee	20.00
4/27/2021	General Logistics Systems US, Inc.	Courier Service	87.46
4/28/2021	Legal Document Server, Inc.	Attorney Service	235.70
4/28/2021	Tulare County Superior Court	Filing Fee	20.00
6/17/2021	General Logistics Systems US, Inc.	Courier Service	61.28
6/18/2021	Legal Document Server, Inc.	Attorney Service	170.00
7/9/2021	General Logistics Systems US, Inc.	Courier Service	59.78
7/9/2021	Legal Document Server, Inc.	Attorney Service	150.00
7/9/2021	Tulare County Superior Court	Filing Fee	20.00
7/11/2021	General Logistics Systems US, Inc.	Courier Service	20.25
7/16/2021	General Logistics Systems US, Inc.	Courier Service	57.84
7/16/2021	Legal Document Server, Inc.	Attorney Service	150.70
7/16/2021	Tulare County Superior Court	Filing Fee	20.00
7/29/2021	CourtCall, LLC	Attorney Service	94.00
7/30/2021	General Logistics Systems US, Inc.	Courier Service	149.58
7/30/2021	Legal Document Server, Inc.	Attorney Service	2,592.05
7/30/2021	Tulare County Superior Court	Filing Fee	330.00
8/23/2021	Legal Document Server, Inc.	Attorney Service	150.00

LAWYERS for JUSTICE PC CASE COST DETAIL
Munoz v. Family Healthcare Network

8/24/2021	General Logistics Systems US, Inc.	Courier Service	30.91
8/27/2021	General Logistics Systems US, Inc.	Courier Service	58.08
8/27/2021	Legal Document Server, Inc.	Attorney Service	150.00
9/2/2021	Howard R. Broadman	Mediation Fee	4,500.00
1/7/2022	Legal Document Server, Inc.	Attorney Service	170.00
1/27/2022	CourtCall, LLC	Attorney Service	94.00
2/18/2022	Legal Document Server, Inc.	Attorney Service	150.00
2/25/2022	CourtCall, LLC	Attorney Service	94.00
Total:			<u>17,537.81</u>