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Attorneys for Plaintiffs and the Class

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

ALBERT EBUEN, individually, and on
behalf of other members of the general
public similarly situated; MARICEL J.
SANTA ANA, 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,

Plaintiffs,

vs.

RED RIBBON BAKESHOP INC., a
California corporation; and DOES 1 through
100, inclusive,

Defendants.

Case No.: BC715064

Honorable Kenneth R. Freeman
Department SSC14

CLASS ACTION

**DECLARATION OF EDWIN AIWAZIAN
IN SUPPORT OF PLAINTIFFS' MOTION
FOR FINAL APPROVAL OF CLASS
ACTION SETTLEMENT, ATTORNEYS'
FEES, COSTS, AND ENHANCEMENT
PAYMENTS**

[Notice of Motion and Motion for Final
Approval of Class Action Settlement,
Attorneys' Fees, Costs, and Enhancement
Payments; Declarations of Class
Representatives (Albert Ebuén and Maricel J.
Santa Ana); Declaration of Settlement
Administrator (Lindsay Kline); and [Proposed]
Final Approval Order and Judgment filed
concurrently herein]

Date: June 28, 2022

Time: 10:00 a.m.

Department: SSC14

Complaint Filed: July 26, 2018

FAC Filed: January 25, 2021

Trial Date: None Set

DECLARATION OF EDWIN AIWAZIAN

I, Edwin Aiwazian, hereby declare as follows:

1. I am an attorney licensed to practice law in the State of California. I am a member of Lawyers *for* Justice, PC, attorneys of record for Plaintiffs Albert Ebuena and Maricel J. Santa Ana (together, "Plaintiffs") 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 December 14, 2021, in Department SSC14 of the above-entitled Court, the Honorable Kenneth R. Freeman preliminarily approved the Third Amended Stipulation of Settlement ("Settlement," "Agreement," or "Settlement Agreement") entered into between Plaintiffs and Defendant Red Ribbon Bake Shop, Inc. ("Defendant"), and conditionally certified the Class for settlement purposes. The Court preliminarily appointed Plaintiffs Albert Ebuena and Maricel J. Santa Ana as Class Representatives. The Court also preliminarily appointed and designated Lawyers *for* Justice, PC 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 Simpluris, Inc. ("Simpluris" or "Settlement Administrator") to handle the notice and settlement administration process.

3. As of the date of filing the accompanying Motion for Final Approval, no Class Members have objected to the Settlement or the request for Attorneys' Fees and Litigation Costs, Enhancement Payments, 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 the above-captioned action since prior to the commencement of the action on July 26, 2018, as have several other attorneys and members in our firm.

1 5. Lawyers *for* Justice, PC has actively participated in all phases of the litigation
2 process. Before initiating the action, Class Counsel investigated and researched the facts and
3 circumstances underlying the pertinent factual and legal issues and applicable law. This required
4 thorough discussions and interviews between attorneys at our firm and Plaintiff Albert Ebuén,
5 and research into the various legal issues involved in the case, namely, the current state of the
6 law as it applied to certification, off-the-clock theory, meal and rest periods, wage-and-hour
7 enforcement, the claims, and potential defenses. After conducting initial investigation, our firm
8 determined that the claims of Plaintiff Albert Ebuén were well-suited for class-wide adjudication
9 owing to what appeared to be a common course of conduct affecting a similarly situated group of
10 current and former hourly-paid or non-exempt employees who worked for Defendant, who were
11 not properly compensated for, *inter alia*, all hours worked, and non-compliant meal and rest
12 periods.

13 6. Prior to reaching the Settlement, the parties used the pre-mediation time period to
14 investigate the veracity, strength, and scope of the claims, and were preparing for class
15 certification and trial. The parties conducted significant formal and informal discovery and
16 investigation into the facts of the case, and also informally exchanged information and data in
17 preparation for mediation. Class Counsel propounded multiple sets of written discovery requests
18 onto Defendant (specifically, Request for Production of Documents (Set One), Form
19 Interrogatories-General (Set One), and Special Interrogatories (Sets One and Two)); reviewed
20 Defendant's responses thereto. Class Counsel also served multiple notices of Defendant's
21 person(s) most knowledgeable witnesses accompanied with requests for production of
22 documents, and reviewed Defendant's objections and responses thereto. Class Counsel also
23 received class contact information from Defendant, and interviewed and obtained information
24 from Plaintiffs and other Class Members, including and not limited to the names of potential
25 witnesses, and reviewed and analyzed thousands of pages of documents and data obtained from
26 Defendant, Plaintiffs, and other sources. The documents and data reviewed and analyzed by
27 Class Counsel included, and were not limited to, employment records of Plaintiffs and other
28 Class Members, a detailed sampling of Class Members' time and pay data, class data, Meal and

1 Rest Period Policies, Meal Period Waiver, Second Meal Period Waiver, Meal & Rest Period
2 Policy (with Acknowledgment), Request for Manual Check, company policy acknowledgements
3 (including Acknowledgment of Receipt of Employee Handbook), and Defendant's operations
4 and employment practices, procedures, and policies, among other information, documents, and
5 data. Class Counsel researched applicable law, developed damages and penalties valuation
6 models in preparation for mediation, and met and conferred with Defendant's counsel on
7 numerous occasions, e.g., to discuss issues relating to the pleadings, informal conferences with
8 the Court, case management, discovery, and production of various documents and data prior to
9 mediation. Other work performed by Class Counsel included, and was not limited to, case
10 strategy and analysis; drafting, reviewing, and revising pleadings and mediation brief; preparing
11 and appearing for court proceedings; and preparing for and attending mediation and settlement
12 negotiations.

13 7. As outlined herein, the parties have conducted significant formal and informal
14 discovery and investigation during the course of litigating the case. Class Counsel analyzed
15 thousands of pages of documents and data obtained from Plaintiffs, Defendant and other sources.
16 These documents and data provided a critical understanding of the nature of the work performed
17 by the Class Members, as well as Defendant's operations and employment policies, practices,
18 and procedures, and were used in analyzing liability, damages, penalties, and valuation issues in
19 connection with all phases of the litigation, and ultimately with the mediation and settlement
20 negotiation process. Class Counsel also performed significant research into the law concerning
21 Defendant's defenses.

22 8. After conducting significant investigation of the facts and law during the
23 prosecution of the case, counsel for the parties engaged in extensive settlement negotiations to
24 try to resolve the entire matter. These efforts included participating in a formal, full-day
25 mediation conducted by Hon. Louis M. Meisinger (Ret.), a well-regarded mediator experienced
26 in mediating complex labor and employment matters. During all settlement discussions, the
27 parties conducted their negotiations at arm's length in an adversarial position. Prior to and
28 during mediation and settlement discussions, the parties exchanged class information and data,

1 and discussed all aspects of the case, including the risks and delays of further litigation, the risks
2 to the parties of proceeding with class certification and trial, the law relating to off-the-clock
3 theory, meal and rest periods, civil penalties and representative PAGA claims, and wage-and-
4 hour enforcement, the evidence produced and analyzed, and the possibility of appeals, among
5 other things. Arriving at a settlement that was acceptable to the parties was not easy. Defendant
6 contended that individualized questions of fact predominate over any common issues, and these
7 issues would pose challenges to certification and representative adjudication. Defendant and its
8 counsel felt very strongly about Defendant's ability to prevail on the merits and to obtain a denial
9 of class certification, while Plaintiffs and Class Counsel believed that class certification would be
10 obtained and that they would prevail at trial. With the aid of the mediator's evaluation, the
11 parties agreed that the case was well-suited for settlement given the legal issues relating to
12 Plaintiffs' principal claims, as well as the costs and risks to the parties that would attend further
13 litigation. These risks of further litigation include, and are not limited to, a determination that
14 the claims are unsuitable for class treatment and/or representative adjudication, failure to obtain
15 certification, class de-certification after certification of a class, allowing a jury to decide the
16 claims asserted in the case, and the real possibility of no recovery after years of litigation.

17 9. As set forth more fully in the accompanying Motion for Final Approval, Class
18 Counsel seeks attorneys' fees in the amount of \$800,000.00, which is forty percent (40%) of the
19 Gross Settlement Amount of \$2,000,000.00, as set forth in the Settlement Agreement and the
20 Class Notice. Pursuant to the contingency-fee agreement entered into by and between Plaintiffs
21 and Class Counsel, Plaintiffs have each agreed to contingency fees of at least forty percent (40%)
22 of the recovery. The attorneys' fees sought are commensurate with: (1) the risk that Class
23 Counsel took in commencing the case; (2) the time, effort, and expense that Class Counsel
24 dedicated to the case; (3) the skill and determination that Class Counsel has shown; (4) the
25 results that Class Counsel has achieved throughout the litigation; (5) the value of the settlement
26 that Class Counsel has achieved for the Class Members, the State of California, and PAGA
27 Employees; and (6) the other cases that Class Counsel has turned down in order to devote its
28 time and efforts to this matter.

1 10. I am aware that the common and acceptable rate for contingency representation in
2 wage and hour class action litigation is normally 40% before trial, with the range being from
3 33.3% up to 50%.

4 11. While not necessarily required to be demonstrated because the percentage fee
5 sought in this matter is proper, Class Counsel has incurred many hours of work in connection
6 with prosecuting the case such that the attorneys' fees requested is also justified under a lodestar
7 analysis. Class Counsel has spent a total of **671.10 hours** performing tasks and obtaining
8 recovery on behalf of Plaintiffs, Class Members, the State of California, and PAGA Employees.
9 For the reasons discussed in the accompanying motion, it is reasonable to apply a 1.71 multiplier
10 for the lodestar analysis. Attached hereto as "**EXHIBIT A**" is an Attorney Task and Time and
11 Chart that sets forth in detail the nature of the legal services provided by attorneys at Lawyers *for*
12 Justice, PC and the time incurred in performing those services. These hours include work done
13 by myself and several other attorneys at the firm. Additionally, Lawyers *for* Justice, PC had
14 litigation support personnel actively engaged in assisting with the prosecution of this matter.

15 12. The work performed in this particular matter, the background of our firm, as well
16 as the individual backgrounds, training, and experience of the attorneys who worked on this
17 matter, in litigating complex wage-and-hour matters, and in particular, employment class actions,
18 support a reasonable hourly rate of compensation at the rate of \$700 for work performed by
19 Class Counsel. Lawyers *for* Justice, PC has been awarded attorneys' fees, compensating the firm
20 at the rate of at least \$700 per hour for legal services performed, by courts granting final
21 approval in other cases: final approval of the class and representative action settlement in *David*
22 *Dugan v. TEC Equipment, Inc., et al.* (Los Angeles Superior Court Case No. 19STCV01591)
23 was granted on July 8, 2021, and the award of attorneys' fees involved an hourly rate of \$936.47;
24 final approval of the class and representative action settlement in *Larry Greenwood, et al. v.*
25 *Scan Health Plan* (Los Angeles Superior Court Case No. BC715157) was granted on April 20,
26 2021, and the award of attorneys' fees involved an hourly rate of \$919.57; *Thereasa Carrozzella*
27 *v. Basalite Concrete Products, LLC* (Sacramento County Superior Court Case No. 34-2017-
28 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 a higher 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 a higher 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 a higher 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 a higher hourly rate of \$845.64.

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*.

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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 fraud. Currently, we are the attorneys of record in over a dozen employment-related putative class actions in both state and federal courts in the State of California. Our firm has successfully litigated cases involving the executive, administrative, and other overtime exemptions to the State of California and federal overtime compensation requirements. During this relatively short time, in association with other law firms, we have recovered millions of dollars on behalf of thousands of individuals in California.

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

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

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

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

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

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

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

26 f) LFJ, in association with co-counsel therein, represented the plaintiff in a
27 wage-and-hour class and PAGA representative action against a national wholesale distributor of
28 plumbing and builder supplies, involving allegations of misclassification of multiple salaried

1 “manager” positions. On May 22, 2014, the court granted final approval of the class and PAGA
2 representative action settlement. The Sacramento County Superior Court Case Number is 34-
3 2012-00136285.

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

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

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

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

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

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

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

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

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

22 p) LFJ, on behalf of the plaintiff and respondent in a PAGA representative
23 action, successfully opposed in the trial court, and briefed and argued an appeal with respect to
24 the employer’s motion to compel arbitration, which resulted in a published opinion by the
25 California Court of Appeal in favor of employees. *Roberto Betancourt v. Prudential Overall*
26 *Supply* (Cal. App. 4th Dist., Mar. 7, 2017) 9 Cal.App.5th 439, review denied, cert. denied (U.S.
27 Supreme Court Docket No. 17-254). The Riverside County Superior Court Case Numbers are
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1 RIC1503952 and RICJCCP5046, and the Judicial Council Coordination Proceeding Number is
2 5046.

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

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

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

18 t) LFJ represented the plaintiff in a wage-and-hour class and PAGA
19 representative action against a property management company, on behalf of non-exempt
20 employees. On June 14, 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 BC586234.

23 u) LFJ represented the plaintiff in a wage-and-hour class and PAGA
24 representative action against a food company on behalf of non-exempt employees. On June 30,
25 2017, the court granted final approval of the class and PAGA representative action settlement.
26 The Sacramento County Superior Court Case Number is 34-2015-00175871.

27 v) LFJ represented the plaintiffs in a wage-and-hour class and PAGA
28 representative action against a chocolate company on behalf of non-exempt employees. On July

1 19, 2017, the court granted final approval of the class and PAGA representative action
2 settlement. The Alameda County Superior Court Case Number is RG15764300.

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

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

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

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

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

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

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

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

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

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

25 gg) LFJ, in association with co-counsel therein, represented the plaintiffs in a
26 wage-and-hour class and PAGA representative action against a national retailer of apparel and
27 fashion accessories, on behalf of non-exempt employees. On October 9, 2019, the court granted
28 the plaintiffs' motion for class certification in part and certified a class. On May 14, 2021, the

1 court granted final approval of the class and PAGA representative action settlement. The
2 Sacramento County Superior Court Case Number is 34-2015-00175330-CU-OE-GDS.

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

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

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

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

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1 ll) LFJ, in association with co-counsel therein, represents the plaintiffs in a
2 wage-and-hour class and PAGA representative action against a plastic packaging company on
3 behalf of non-exempt employees. On June 8, 2020, the court granted in part the plaintiffs’
4 motion for class certification and certified a class. On November 8, 2021, the court granted
5 approval of the partial settlement of the action. The San Bernardino County Superior Court Case
6 Number is CIVDS1507361.

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

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

16 oo) LFJ represents the plaintiff in a wage-and-hour class action against an
17 iconic lifestyle accessories brand and retailer on behalf of non-exempt employees. On March 15,
18 2022, the court granted the plaintiff’s motion for class certification in part and certified a class.
19 The San Francisco Superior Court Case Number is CGC-16-550794.

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

21 19. To date, Class Counsel has borne all the risks and costs of litigation and will not
22 receive any compensation until recovery is obtained in the above-captioned action. Lawyers *for*
23 Justice, PC has incurred **\$26,258.53** in litigation costs and expenses as reflected in “**EXHIBIT**
24 **B”** attached hereto. These expenses were reasonable and necessary in the prosecution of this
25 matter and to obtain the Settlement.

26 ///

27 ///

28 ///

ENHANCEMENT PAYMENTS TO PLAINTIFFS

20. In recognition of their efforts and work serving as the Class Representatives, the Settlement provides for Enhancement Payments in the amount of \$10,000.00 to Plaintiff Albert Ebuen and \$5,000.00 to Plaintiff Maricel J. Santa Ana to compensate Plaintiffs for the time and effort that they expended on behalf of the Class Members, the State of California, and PAGA Employees. The requested Enhancement Payments are fair and appropriate. Plaintiffs spent a substantial amount of time and effort in producing relevant documents and past employment records and provided the facts and evidence necessary to attempt to prove the allegations. Plaintiffs were available whenever Class Counsel needed them and actively tried to obtain information that would facilitate the pursuit of the class and PAGA claims. Plaintiffs spent numerous hours speaking with Class Counsel about their claims, describing their work experience with Defendant, and gathering and reviewing documents. Accordingly, it is appropriate for Plaintiffs to receive the requested Enhancement Payments, in addition to their Individual Settlement Payments and/or Individual PAGA Payments, for their services on behalf of the Class, the State of California, and PAGA Employees.

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

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

Executed this 27th day of May 2022, at Glendale, California.



Edwin Aiwarzian

EXHIBIT A

EBUEN, ET AL. V. RED RIBBON BASKESHOP. INC.
(LOS ANGELES COUNTY SUPERIOR COURT CASE NO. BC715064)

ATTORNEY TASK AND TIME CHART

TASK	LAWYERS FOR JUSTICE, PC
Investigation and Research / Due Diligence	
Pre-Lawsuit Investigation of the Key Facts with a Focus on Class Certification Elements, Including Adequacy, Typicality, Superiority, and Commonality	12.20
Pre-Lawsuit Investigation of the Merits of Plaintiff Albert Ebuén's Claims and the Merits of the Claims of the Putative Class Members	10.80
Pre-Lawsuit Investigation of Potential Damages Exposure of Defendant Red Ribbon Bakeshop, Inc. ("Defendant") with Respect to the Damages Sustained by Plaintiff Albert Ebuén and the Putative Class Members	9.30
Pre-Lawsuit Legal Research and Analysis of Latest Off-the-Clock, Meal and Rest Break, Civil Penalties, and Certification Decisions in California, Including all Relevant and New Enforcement Guidance and DLSE Materials	10.50
Investigation of Defendant, Defendant's Business Relationships, and the Industry in which Defendant Operates	5.60
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	4.40

Investigation of Defendant's Executives, Officers, and Leadership with a Focus on Involvement in Wage-and-Hour Issues and Establishing Willfulness and Uniformity	4.10
Analysis of Competitors in Various Relevant Geographic Areas within which Defendant Operates, and Comparing and Contrasting Defendant's Policies, Practices, and Procedures with the Policies, Practices, and Procedures of Defendant's Competitors	4.60
Research and Investigation Re: Location(s), Department(s), and/or Division(s) Owned, Managed, Serviced, and/or Operated by Defendant in California During the Class Period, Including Differences Between Location(s), Department(s), and/or Division(s) to Determine Whether Those Differences Will Cause Individual Issues to Predominate Over Common Issues	5.20
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	5.80
Comparative Analysis and Cross-Checking of All Available Job Reviews and Consumer Reviews for Defendant in Order to Determine Wage and Hour Issues, Variation, and Job Duties and Responsibilities Involving Performance of Work Off-the-Clock or During Meal or Rest Breaks	6.40
Research and Investigation Re: Workforce, Staffing Models, and Staffing Levels at Locations at which Putative Class Members Worked Throughout California	5.50
Research and Investigation Re: Defendant's Written and Unwritten Policies, Practices, and Procedures Relating to Reporting Time, Non-Discretionary Bonuses/Incentive/Shift Differential Pay, Regular Rate Calculations, Schedules, Timekeeping, Meal/Rest Breaks, Meal/Rest Premiums, Meal Period Waivers, On-Premises Breaks, Overtime Compensation, On-Call, Deliveries/Pickups, Donning and Doffing, Personal Cell Phone Use, PPE, Dress Code, Laundering Costs, Vehicle Maintenance, Reimbursement of Business-Related Expenses, and Wage and Hour Compliance	34.50
Research and Investigation Re: Various Software Programs, Systems, and Other Technologies Defendant Uses to Conduct Its Everyday Business, Including Timekeeping, Inventory, Sales, and CRM Systems, with	5.60

a Focus on What Documents (Both Paper and Electronic) Are Created in the Normal Course of Business Relating to Overtime Worked, Off-the-Clock Time Worked Pre/Post-Shift, and Time Worked During Meal Breaks	
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	8.90
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	7.80
Research and Analysis of Defendant's Litigation History Involving Wage-and-Hour Issues and Other Related Employment Issues in Court and/or Other Forums	4.10
Prepare a Discovery Strategy Plan of Action, Including Topics of Inquiry Important to Certification, Liability, and Damages/Civil Penalties	8.40
Research and Outline Contemplated Motion for Class Certification and Trial Plan	26.50
Meet and Communicate with Plaintiff Albert Ebuén Throughout the Pendency of the Case	47.20
Meet and Communicate with Plaintiff Maricel Santa Ana Throughout the Pendency of the Case	23.80
Meet and Communicate with Putative Class Members and Conduct Interviews	38.50
Pleadings and Court Filings	
Research and Draft Plaintiff Albert Ebuén's Class Action Complaint for Damages and Legal Research and Analysis of All Claims Involved (filed on July 26, 2018)	8.60
Review Court's Notice of Case Assignment (filed on July 26, 2018)	0.10

Review Court's Order Re: Newly Filed Class Action and Initial Status Conference Order (filed on August 13, 2018)	0.40
Meet and Confer with Defendant's Counsel, and Draft Joint Initial Status Conference Class Action Response Statement (submitted on October 26, 2018)	2.10
Review Court's Case Management Order (filed on November 9, 2018)	0.20
Review Court's Order Authorizing Electronic Service (filed on November 9, 2018)	0.10
Review Court's Order Re: Setting Pleading Telephonic Conference (filed on December 10, 2018)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Statement Re: Informal Telephonic Conference (submitted on December 13, 2018)	1.90
Review Court's Minute Order Re: Telephonic Conference (filed on December 18, 2018)	0.10
Review and Analyze Defendant's Answer to Class Action Complaint for Damages and Research Affirmative Defenses in Defendant's Answer (served on December 28, 2018)	3.40
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation and Protective Order – Confidential Designation Only (submitted on March 25, 2019)	2.30
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation to Continue Motion for Class Certification Deadline; [Proposed] Order (submitted on October 15, 2019)	1.30
Review Court's Order Granting Stipulation to Continue Motion for Class Certification Deadline (filed on October 21, 2019)	0.20
Draft CaseAnywhere Message Board Posting Re: Plaintiff Albert Albert Ebuen's Request for Informal Discovery Conference (submitted on November 27, 2019)	0.60

Review Defendant's CaseAnywhere Message Board Posting Re: Response to Plaintiff Albert Albert Ebuen's Request for Informal Discovery Conference (submitted on November 27, 2019)	0.20
Draft Plaintiff Albert Ebuen's Notice of Entry of Judgment or Order (filed on November 27, 2019)	0.30
Review Court's Minute Order Re: Setting Telephonic Conference (Discovery) (filed on December 3, 2019)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Notice of Class Action Settlement (submitted on December 9, 2019)	0.70
Draft CaseAnywhere Message Board Posting Re: Request to Take Telephonic Discovery Conf Off Calendar (submitted on December 10, 2019)	0.30
Review Court's CaseAnywhere Message Board Posting Re: Request to Take Telephonic Discovery Conference Off Calendar	0.10
Review Court's Notice Re: Continuance of Hearing and Order (filed on March 23, 2020)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Non-Appearance Case Review Statement and Stipulation to Vacate Motion for Class Certification- Related Dates and Deadlines; [Proposed] Order (submitted on April 1, 2020)	0.70
Meet and Confer with Defendant's Counsel, and Draft Joint Non-Appearance Case Review Statement (submitted on May 27, 2020)	0.60
Review Court's Minute Order Re: Non-Appearance Case Review Re: Filing the Motion for Class Certification (filed on May 29, 2020)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Non-Appearance Case Review Statement (submitted on September 25, 2020)	0.60

Review Court's Minute Order Re: Non-Appearance Case Review Re: Filing of Motion for Preliminary Approval (filed on September 25, 2020)	0.10
Draft Plaintiff Albert Ebuén's Class Action Complaint for Damages & Enforcement Under the Private Attorneys General Act, California Labor Code Section 2698, Et Seq and Legal Research and Analysis of All Claims Involved (filed on January 25, 2021)	4.90
Appearances	
Prepare for, Travel to/from, and Attend Initial Status Conference (November 9, 2018)	2.50
Prepare for and Telephonically Attend the Informal Pleadings Conference (December 18, 2018)	1.30
Prepare for Hearing on Plaintiffs' Motion for Preliminary Approval of Class Action Settlement	2.50
Prepare for, Travel to/from, and Attend Hearing on Plaintiffs' Motion for Final Approval of Class Action Settlement, Attorneys' Fees, Costs, and Enhancement Awards (March 8, 2022) (Anticipated)	2.50
Discovery and Deposition	
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Putative Class Member (served on April 20, 2018)	1.90
Draft Follow-Up Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Putative Class Member (served on May 23, 2018)	2.10
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Albert Ebuén (served on May 30, 2018)	1.90
Draft Final Follow-Up Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Putative Class Member (served on June 07, 2018)	2.10

Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Albert Ebuen (served on June 20, 2018)	0.80
Draft Plaintiff Albert Ebuen's Notice of Deposition of Person Most Knowledgeable at Defendant Red Ribbon Bakeshop, Inc and Requests for Production of Documents (January 14, 2019; Wage and Hour Practices) (served on December 5, 2018)	4.50
Draft Plaintiff Albert Ebuen's Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (January 15, 2019; Organizational Structure) (served on December 5, 2018)	3.50
Draft Plaintiff Albert Ebuen's Form Interrogatories-General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), and Requests for Production of Documents (Set One) to Defendant (served on December 5, 2018)	8.60
Review and Analyze Defendant's Responses to Plaintiff Albert Ebuen's Special Interrogatories (Set One) to Defendant (served on January 7, 2019)	1.30
Review and Analyze Defendant's Objection to Plaintiff Albert Ebuen's Notice of Deposition of Person Most Knowledgeable at Defendant Red Ribbon Bakeshop, Inc and Requests for Production of Documents (January 14, 2019; Wage and Hour Practices) (served on January 9, 2019)	3.10
Review and Analyze Defendant's Objection to Plaintiff Albert Ebuen's Notice of Deposition of Person Most Knowledgeable at Defendant Red Ribbon Bakeshop, Inc and Requests for Production of Documents (January 15, 2019; Organizational Structure) (served on January 9, 2019)	1.90
Draft <i>Belaire-West</i> Administration Notice and Opt-Out Postcard and Meet and Confer with Defendant's Counsel Regarding Production of Contact Information (sent January 17, 2019)	2.50

Review and Analyze Defendant's Responses to Plaintiff Albert Ebuen's Form Interrogatories-General (Set One), Special Interrogatories (Set Two), and Requests for Production of Documents (Set One) to Defendant (served on February 7, 2019)	7.40
Draft Plaintiff Albert Ebuen's Re-Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (November 14, 2019; Organizational Structure) (served on October 31, 2019)	3.10
Draft Plaintiff Albert Ebuen's Re-Notice of Deposition of Person Most Knowledgeable at Defendant Red Ribbon Bakeshop, Inc and Requests for Production of Documents (November 15, 2019; Wage and Hour Practices) (served on October 31, 2019)	3.40
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Putative Class Member (served on November 6, 2019)	1.90
Review and Analyze Defendant's Opposition to Plaintiff Albert Ebuen's Re- Notice of Deposition of Person Most Knowledgeable at Defendant Red Ribbon Bakeshop, Inc and Requests for Production of Documents (November 14, 2019; Organizational Structure) (served on November 7, 2019)	0.30
Review and Analyze Defendant's Opposition to Plaintiff Albert Ebuen's Re- Notice of Deposition of Person Most Knowledgeable at Defendant Red Ribbon Bakeshop, Inc and Requests for Production of Documents (November 15, 2019; Job Duties) (served on November 7, 2019)	0.30
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Putative Class Member (served on November 22, 2019)	1.90
Draft Plaintiff Albert Ebuen's Re-Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (December 19, 2019; Organizational Structure) (served on November 27, 2019)	2.20

Draft Plaintiff Albert Ebuen's Re-Notice of Deposition of Person Most Knowledgeable at Defendant Red Ribbon Bakeshop, Inc and Requests for Production of Documents (December 20, 2019; Wage and Hour Practices) (served on November 27, 2019)	2.40
Draft Follow-Up Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Putative Class Member (served on December 6, 2019)	2.10
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Maricel Santa Ana (served on December 10, 2019)	1.90
Review and Analyze Defendant's Opposition to Plaintiff Albert Ebuen's Re-Notice of Deposition of Person Most Knowledgeable at Defendant Red Ribbon Bakeshop, Inc and Requests for Production of Documents (December 19, 2019, and December 20, 2019) (served on December 11, 2019)	0.40
Draft Follow-Up Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Maricel Santa Ana (served on January 17, 2020)	2.10
Draft Final Follow-Up Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Putative Class Member (served on January 17, 2020)	2.20
Draft Follow-Up Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Putative Class Member (served on January 21, 2020)	2.10
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Maricel Santa Ana (served on May 22, 2020)	1.90
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Putative Class Member (served on June 15, 2020)	3.20
Review Contact List Produced by Defendant (received August 23, 2019)	1.10
Letters and Correspondence	

Draft Notice to California Labor and Workforce Development Agency Re: Claims of Plaintiff Maricel Santa Ana for Penalties Under California Labor Code section 2698, <i>et seq.</i> (served on July 15, 2020)	4.20
Meet with, Draft Correspondence to, and Respond to Correspondence from, Defendant's Counsel	40.50
Mediation/Settlement	
Review and Analyze Mediation Data and Documents Produced by Defendant (served on August 21, 2019, August 26, 2019, and August 28, 2019) • Employee Handbooks and Policies • Sampling of Employee Time Data • Sampling of Employee Wage Statements • Employee Contact Information	39.50
Prepare for Mediation, Including Researching Settlement-Related Issues and Merits of Claims, Drafting the Mediation Brief, Compiling the Mediation Exhibits in Support of Mediation Brief, Performing Meal Violation, Damages, and Penalties Analysis and Calculations, and Consulting with Expert(s) (submitted on August 30, 2019)	35.40
Travel to/from and Attend Mediation Session (September 3, 2019; Los Angeles, California)	10.50
Draft, Review, Revise, Negotiate, and Finalize Class Action and PAGA Settlement Agreement (executed on October 6, 2020) and Draft Exhibits	20.10
Draft, Review, Revise, Negotiate, and Finalize First Amended Class Action and PAGA Settlement Agreement (executed on February 26, 2021) and Draft Exhibits	6.90
Draft, Review, Revise, Negotiate, and Finalize the Second Amended Class Action and PAGA Settlement Agreement (executed on August 8, 2021) and Draft Exhibits	8.20

Draft, Review, Revise, Negotiate, and Finalize the Third Amended Class Action and PAGA Settlement Agreement (executed on September 23, 2021) and Draft Exhibits	2.60
Review Formatted and Translated Mailing Documents, Monitor Settlement Administration Process, and Review Administrator's Weekly Reports	8.50
Law and Motion	
Research and Draft Plaintiff Albert Ebuen's Notice of Motion and Motion for Preliminary Approval of Class Action Settlement, Declaration of Edwin Aiwazian in Support Thereof, Declaration of Albert Ebuen in Support Thereof, Declaration of Maricel J. Santa Ana in Support Thereof, and [Proposed] Order Thereon (filed on October 28, 2020)	25.60
Review Court's Order: Checklist for Preliminary Approval of Class Action Settlement (filed on January 21, 2021)	0.90
Meet and Confer with Defendant's Counsel, and Draft Joint Supplemental Brief in Support Plaintiffs' Motion for Preliminary Approval of Class Action Settlement and Supplemental Declaration of Edwin Aiwazian in Support Thereof (filed on March 23, 2021)	16.70
Review Court's Order: Checklist for Preliminary Approval of Class Action Settlement (filed on April 28, 2021)	0.80
Research and Draft Plaintiffs' Supplemental Brief in Support Plaintiff's Motion for Preliminary Approval of Class Action Settlement, Further Supplemental Declaration of Edwin Aiwazian in Support Thereof, Supplemental Declaration of Albert Ebuen in Support Thereof, Supplemental Declaration of Maricel J. Santa Ana in Support Thereof, and [Further Revised Proposed] Order Thereon (filed on August 11, 2021)	14.50
Review Court's Case Anywhere Message Board Posting Re: Hearing on Motion for Preliminary Approval of Settlement and Meet and Confer with Defendant's Counsel and Respond to Court (posting issued September 9, 2021; response sent September 9, 2021)	0.80

Review Court's Minute Order Re: Motion for Preliminary Approval of Class Action Settlement (filed on September 9, 2021)	0.10
Draft Declaration of Brian J. St. John in Support of Plaintiffs' Motion for Preliminary Approval of Class Action Settlement and [Further Revised Proposed] Order Thereon (filed on September 23, 2021)	4.70
Review Court's Further Revised Order Granting Preliminary Approval of Class Action Settlement (filed on December 17, 2021)	0.20
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation to Continue Final Approval Hearing and Related Dates and Deadlines and Proposed Order Thereon (filed on March 23, 2021)	1.10
Review and Analyze Settlement Administrator's Declaration Regarding Settlement Notice Administration; and Research and Draft Plaintiffs' Motion for Final Approval of Class Action Settlement, Attorneys' Fees, Costs, and Enhancement Awards, and Declaration of Edwin Aiwasian in Support Thereof, and [Proposed] Final Approval Order and Judgment (filed on February 4, 2022) (Anticipated)	26.50
Total Hours:	671.10

EXHIBIT B

LAWYERS for JUSTICE PC CASE COST DETAIL
Ebuen v. Red Ribbon Bakeshop, Inc.

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
7/26/2018	Los Angeles Superior Court	Filing Fee	435.00
7/26/2018	Los Angeles Superior Court	Jury Fee	150.00
7/26/2018	Los Angeles Superior Court	Complex Fee	1,000.00
7/26/2018	Pure Legal, Inc.	Attorney Service	202.05
8/1/2018	ProLegal	Attorney Service	131.85
8/23/2018	Pure Legal, Inc.	Attorney Service	196.80
10/9/2018	Pure Legal, Inc.	Attorney Service	195.60
10/26/2018	Pure Legal, Inc.	Attorney Service	197.10
11/9/2018	Cinela Aziz	Travel Reimbursement	27.72
2/6/2019	Case Anywhere, LLC	Attorney Service	152.40
3/18/2019	U.S. Postmaster	Postage	1.15
5/13/2019	Case Anywhere, LLC	Attorney Service	120.00
8/6/2019	Case Anywhere, LLC	Attorney Service	120.00
8/21/2019	Signature Resolution	Mediation Fee	9,450.00
9/3/2019	Arby Aiwarzian	Travel Reimbursement	287.90
9/3/2019	Robert A. Parris	Damages Consulting Expert	6,168.52
10/15/2019	Pure Legal, Inc.	Attorney Service	196.50
10/15/2019	Los Angeles Superior Court	Filing Fee	20.00
10/29/2019	U.S. Postmaster	Postage	711.70
10/30/2019	Pure Legal, Inc.	Notice Mailing	2,911.50
11/5/2019	Case Anywhere, LLC	Attorney Service	150.00
11/22/2019	U.S. Postmaster	Postage	6.85
11/27/2019	Pure Legal, Inc.	Attorney Service	197.40
11/27/2019	General Logistics Systems US, Inc.	Courier Service	13.63
12/10/2019	Legal Document Server, Inc.	Attorney Service	175.00
1/2/2020	U.S. Postmaster	Postage	7.00
1/17/2020	General Logistics Systems US, Inc.	Courier Service	19.04
2/6/2020	Case Anywhere, LLC	Attorney Service	132.00
3/2/2020	General Logistics Systems US, Inc.	Courier Service	18.96
3/7/2020	FedEx Express	Courier Service	33.21
4/13/2020	Legal Document Server, Inc.	Attorney Service	145.70
4/13/2020	Los Angeles Superior Court	Filing Fee	20.00
5/5/2020	Case Anywhere, LLC	Attorney Service	132.00
5/27/2020	Legal Document Server, Inc.	Attorney Service	90.00
6/16/2020	Labor & Workforce Development Agency	Filing Fee	75.00
6/19/2020	Legal Document Server, Inc.	Attorney Service	90.00
8/6/2020	Case Anywhere, LLC	Attorney Service	126.00
8/6/2020	Case Anywhere, LLC	Attorney Service	126.00
9/25/2020	Legal Document Server, Inc.	Attorney Service	145.00
10/28/2020	Legal Document Server, Inc.	Attorney Service	226.10

LAWYERS for JUSTICE PC CASE COST DETAIL
Ebuen v. Red Ribbon Bakeshop, Inc.

10/28/2020	Los Angeles Superior Court	Filing Fee	60.00
11/8/2020	Case Anywhere, LLC	Attorney Service	162.00
1/25/2021	Legal Document Server, Inc.	Attorney Service	65.00
2/3/2021	Case Anywhere, LLC	Attorney Service	126.00
2/4/2021	Legal Document Server, Inc.	Attorney Service	130.00
3/23/2021	Legal Document Server, Inc.	Attorney Service	250.50
5/4/2021	Case Anywhere, LLC	Attorney Service	144.00
8/2/2021	Case Anywhere, LLC	Attorney Service	120.00
8/11/2021	Legal Document Server, Inc.	Attorney Service	239.00
11/8/2021	Case Anywhere, LLC	Attorney Service	174.00
12/14/2021	Legal Document Server, Inc.	Attorney Service	15.20
12/20/2021	Legal Document Server, Inc.	Attorney Service	15.20
2/1/2022	Legal Document Server, Inc.	Attorney Service	16.15
2/2/2022	Case Anywhere, LLC	Attorney Service	126.00
2/14/2022	Los Angeles Superior Court	Document Download Fee	5.00
12/20/2022	Los Angeles Superior Court	Document Download Fee	5.80
Total:			26,258.53