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SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN BERNARDINO

EVELYN MARTINEZ and SANDY
ACOSTA, as individuals and on behalf of all
others similarly situated, and as private
attorneys general,

Plaintiffs,

vs.

CITY OF HOPE NATIONAL MEDICAL
CENTER, a California corporation; CITY OF
HOPE, a California corporation; CITY OF
HOPE MEDICAL FOUNDATION, a
California corporation; and DOES 1 through
50, inclusive,

Defendants.

Case No.: CIVDS2015729

Honorable David S. Cohn
Department S26

CLASS ACTION

**DECLARATION OF EDWIN AIWAZIAN
IN SUPPORT OF PLAINTIFFS' MOTION
FOR FINAL APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT**

Date: December 5, 2022
Time: 10:00 a.m.
Department: S26

Complaint filed: August 4, 2020
FAC Filed: September 28, 2021
SAC Filed: April 7, 2021
Trial Date: None Set

DECLARATION OF EDWIN AIWAZIAN

I, Edwin Aiwazian, hereby declare as follows:

1. I am an attorney licensed to practice law in the State of California. I am a member of Lawyers *for* Justice, PC, attorneys of record for Plaintiff Sandy Acosta (“Plaintiff Acosta”) and the Settlement Class in the above-captioned action. The facts set forth in this declaration are within my personal knowledge or based on information and belief, and, if called as a witness, I could and would competently testify as follows.

PRELIMINARY APPROVAL OF SETTLEMENT

2. On June 21, 2022, in Department S26 of the above-entitled Court, the Honorable David S. Cohn preliminarily approved the Stipulation of Class Action and PAGA Settlement (“Settlement,” “Agreement,” or “Settlement Agreement”) entered into between Plaintiffs Sandy Acosta and Evelyn Martinez (together, “Plaintiffs”) and Defendants City of Hope, City of Hope National Medical Center, and City of Hope Medical Foundation (collectively, “Defendants”), and conditionally certified the Settlement Class for settlement purposes. The Court preliminarily appointed Plaintiffs Sandy Acosta and Evelyn Martinez to represent the Settlement Class (together, “Class Representatives”). The Court also preliminarily appointed and designated Edwin Aiwazian, Arby Aiwazian, and Joanna Ghosh of Lawyers *for* Justice, PC, and Larry W. Lee and Simon L. Yang of Diversity Law Group, P.C. to represent the Settlement Class (together, Lawyers *for* Justice, PC and Diversity Law Group, P.C. 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 Simpluris, Inc. (“Simpluris” 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 the Settlement, no Settlement Class Members have objected to the Class Settlement or the contemplated request for Attorneys’ Fees and Costs, Class Representative Service Awards, Settlement Administration Costs, or allocation for the penalties under the Private Attorneys

General Act of 2004, California Labor Code section 2698, *et seq.* (“PAGA”).

SUMMARY OF WORK PERFORMED

4. I have been actively engaged in this litigation from the inception of Plaintiff Acosta’s putative class action case entitled *Sandy Acosta v. City of Hope, et al.*, Los Angeles County Superior Court Case No. 21STCV04440 (“Acosta Class Lawsuit”), which was filed on February 4, 2021, as have several other attorneys and staff members at our firm. Lawyers for Justice, PC has fully and actively participated in the litigation process throughout the pendency of the Acosta Class Lawsuit, as well as the pendency of Plaintiff Acosta’s Private Attorneys General Act case entitled *Sandy Acosta v. City of Hope Medical Foundation, et al.*, Los Angeles County Superior Court Case No. 21BBCV00284 (“Acosta PAGA Lawsuit”), which was filed on March 22, 2021.

5. Lawyers for Justice, PC joined forces with other plaintiff’s counsel, Diversity Law Group P.C., that commenced the above-captioned earlier filed case, entitled *Evelyn Martinez v. City of Hope National Medical Center*, San Bernardino County Case No. CIVDS2015729 (“Martinez Lawsuit”). On April 7, 2022, as part of the Settlement, a Second Amended Class and Representative Action Complaint was filed in the *Martinez* Lawsuit, which added Plaintiff Acosta as a named plaintiff and included the claims alleged in the Acosta Class Lawsuit and Acosta PAGA Lawsuit.

6. Since joining forces with other plaintiff’s counsel in the *Martinez* Lawsuit, our work with Diversity Law Group, P.C. has been a coordinated and combined effort. Ultimately, Class Counsel’s efforts and the efforts of Plaintiffs have been successful in reaching the Settlement.

7. Before initiating the Acosta Class Lawsuit and Acosta PAGA Lawsuit, Lawyers for Justice, PC conducted extensive investigation and research into the facts and circumstances underlying the pertinent factual and legal issues and applicable law. This required thorough discussions and interviews between attorneys at our firm and Plaintiff Acosta, and research into the various legal issues involved in the Acosta Class Lawsuit and Acosta PAGA Lawsuit, namely, the current state of the law as it applied to certification, off-the-clock theory, meal and

rest periods, wage-and-hour enforcement, Private Attorney General Act (PAGA) claims, Plaintiff Acosta's claims, and potential defenses. After conducting initial investigation, our firm determined that Plaintiff Acosta's claims were well-suited for class action treatment and representative adjudication owing to what appeared to be a common course of conduct affecting a similarly situated group of non-exempt employees who worked for Defendants within the State of California, who were not properly compensated for, *inter alia*, all hours worked, non-compliant meal and rest periods, and business expenses.

8. Lawyers for Justice, PC investigated the veracity, strength, and scope of the claims in the *Acosta* Class Lawsuit and *Acosta* PAGA Lawsuit, and was also preparing for class certification and trial, prior to reaching the Settlement. This matter has involved ongoing investigations, extensive research into legal and factual issues, formal and informal discovery, and mediation. In the *Acosta* Class Lawsuit, Lawyers for Justice, PC propounded multiple sets of written discovery requests on Defendants, served multiple notices of deposition of Defendants' Person(s) Most Knowledgeable accompanied with requests for production of documents, reviewed Defendants' responses and objections to the notices of deposition of their Person(s) Most Knowledgeable and written discovery requests, reviewed Defendants' written discovery requests and notices of deposition served on Plaintiff Acosta, worked with Plaintiff Acosta to prepare responses and objections to Defendants' notices of deposition and written discovery requests, and prepared for and defended the deposition of Plaintiff Acosta. Additionally, Lawyers for Justice, PC took the deposition of George Vukazich, Executive Director of Employee and Labor Relations of City of Hope National Medical Center. Lawyers for Justice, PC interviewed Plaintiff Acosta and other Settlement Class Members to gather facts and to identify potential witnesses. Counsel for the parties also met and conferred on numerous occasions, e.g., to discuss issues relating to the pleadings, discovery, motion practice, and the production of information, documents, and data in the course of litigation and in connection with mediations and settlement negotiations. Other work that Lawyer for Justice, PC performed included, and was not limited to, case strategy and analysis; drafting, reviewing, and revising the pleadings and motion-related papers (including and not limited to, proposed intervenors' motions

1 for leave to intervene and *ex parte* applications filed in the *Acosta* Class Lawsuit and the
2 *Martinez* Lawsuit), drafting the mediation brief; preparing for and attended court proceedings,
3 mediation, and settlement negotiations, among other tasks. Lawyers for Justice, PC also invested
4 time researching and investigating the applicable law, which is constantly evolving as it relates
5 to off-the-clock theory, meal and rest periods and premiums, regular rate, arbitration agreements,
6 pre-emption, PAGA representative actions, and wage-and-hour enforcement, Plaintiff Acosta's
7 claims and damages, and Defendants' defenses thereto, as well as facts discovered.

8 9. As outlined herein, Plaintiff Acosta conducted significant investigation and
9 formal and informal discovery during the course of litigating the *Acosta* Class Lawsuit and
10 *Acosta* PAGA Lawsuit. Lawyers for Justice, PC analyzed thousands of pages of documents and
11 data obtained from Plaintiff Acosta, Defendants, and other sources. These documents and data
12 provided a critical understanding of the nature of the work performed by Settlement Class
13 Members and PAGA Aggrieved Employees, as well as Defendants' operations and employment
14 policies, practices, and procedures, and were used in analyzing liability, penalties, damages, and
15 valuation issues in connection with all phases of the litigation, and ultimately, in connection with
16 the mediation and settlement negotiation process. Accordingly, sufficient investigation and
17 review of information has taken place in order for the parties to be sufficiently informed of the
18 nature and extent of the class and PAGA claims, and to enable all parties to fully evaluate the
19 Settlement for its fairness, adequacy, and reasonableness.

20 10. Plaintiff Martinez and Defendant City of Hope National Medical Center mediated
21 in July 2021 with Jeffrey A. Ross, Esq., a well-respect mediator experienced in mediating
22 complex labor and employment matters, but they were not successful in reaching a resolution.
23 After conducting significant investigation of the facts and law during the prosecution of the
24 cases, and upon Class Counsel joining forces, counsel for the parties engaged in additional
25 extensive settlement negotiations to try to resolve the cases. These efforts included, preparing
26 for and participating in a private mediation session on December 23, 2021, conducted by Paul
27 Grossman, Esq., another well-respected mediator experienced in mediating complex labor and
28 employment matters. Prior to and during the mediation and settlement discussions, the parties

1 exchanged extensive information, data, and documents and engaged in an extensive discussion
2 regarding their evaluations of the cases and various aspects of the cases, including but not limited
3 to, the risks and delays of further litigation, the risks to the parties of proceeding with class
4 certification and representative adjudication, the law relating to off-the-clock theory, meal and
5 rest periods and premiums, regular rate, arbitration agreements, pre-emption, PAGA
6 representative actions, and wage-and-hour enforcement, as well as the evidence produced and
7 analyzed, and the possibility of appeals, among other things. During all settlement discussions,
8 the parties conducted their negotiations at arm's length in an adversarial position. Arriving at a
9 settlement that was acceptable to the parties was not easy. Defendants contended that
10 individualized questions of fact predominate over any common issues, and these issues would
11 pose challenges to certification and representative adjudication. Defendant also raised its
12 collective bargaining agreements, arbitration agreements, and meal waiver agreements, which
13 were and could continue to be subjects of extensive litigation, and the outcome of which could
14 also pose significant challenges to adjudication of the claims in state court, class certification,
15 and trial, as key considerations. Defendants and their counsel felt very strongly about
16 Defendants' ability to prevail on the merits and to obtain a denial of class certification, while
17 Plaintiffs and Class Counsel believed that class certification would be obtained and that they
18 would prevail at trial. After conducting investigations, formal and informal discovery, and
19 exchange of information, extensive settlement negotiations, and with the aid of the mediator Paul
20 Grossman's evaluations, the parties agreed that the cases were well-suited for settlement given
21 the legal issues relating to the class and PAGA claims, as well as the costs and risks to the parties
22 that would attend further litigation. These risks of further litigation include, and are not limited
23 to, a determination that the claims are unsuitable for class treatment and/or representative
24 adjudication, class de-certification after certification of a class, a determination that the PAGA
25 claims are unmanageable, allowing a jury to decide the claims asserted in the cases, and the real
26 possibility of no recovery after years of litigation.

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11. Pursuant to the Escalator Clause in Paragraph 5(d) of the Settlement Agreement, Defendants provided Plaintiffs a declaration prior to the June 21, 2022 hearing on Plaintiffs' Motion for Preliminary Approval of Class Action and PAGA Settlement, confirming that the total number of pay periods from July 23, 2016 to December 22, 2021 was 354,684, excluding pay periods covered by the class action settlement in *Jordan A. Seper v. City of Hope National Medical Center*, Los Angeles Superior Court Case No. BC630925. As such, it was determined that the Escalator Clause in the Settlement Agreement was not triggered and the Gross Settlement Amount continues to be \$5,500,000.00.

12. As set forth more fully in the accompanying motion for final approval of the Settlement, Class Counsel seek attorneys' fees in the total amount of \$1,925,000.00, which is thirty-five percent (35%) of the Gross Settlement Amount of \$5,500,000.00, as set forth in the Settlement Agreement and the Class Notice. The attorneys' fees that are sought are commensurate with: (1) the risk that Class Counsel took in commencing the cases; (2) the time, effort, and expense that Class Counsel dedicated to the cases; (3) the skill and determination that Class Counsel have shown; (4) the results that Class Counsel have achieved throughout the litigation of the cases; (5) the value of the settlement that Class Counsel have achieved; and (6) the other cases that Class Counsel have turned down in order to devote their time and efforts to the cases.

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

14. While not necessarily required to be demonstrated because the percentage fee is proper for this settlement, Class Counsel have incurred many hours of work in connection with prosecuting the cases such that the award of attorneys' fees is also justified under a lodestar analysis. Attorneys at Lawyers for Justice, PC have spent a total of **1,136.30 hours** performing tasks and obtaining recovery in this matter. 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, separate from the hours referenced herein.

15. 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 cases, and in particular, employment class actions and representative actions, support a reasonable blended hourly rate of compensation at the rate of \$775 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 \$775 per hour for legal services performed, by courts granting approval of settlements 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 *Maryjo Ungerbuhler Anderson v. Boyett Petroleum* (Stanislaus County Superior Court Case No. 2020582) was granted on May 15, 2018, and the award of attorney's fees involved an hourly rate of \$780.77; and final approval of the class and representative action settlement in *Demetrius Camarillo v. Blue Diamond Growers* (Sacramento County Superior Court Case No. 34-2015-00175871) was granted on June 30, 2017, and the award of attorneys' fees involved an hourly rate of \$845.64.

ADEQUACY OF LAWYERS *for* JUSTICE, PC

EDUCATION

16. 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

17. 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

18. 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*.

19. 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.

20. Since its inception, in or around October of 2008, *Lawyers for Justice, PC* has almost exclusively focused on the prosecution of consumer and employment class actions, involving wage-and-hour claims, race discrimination, unfair business practices or consumer

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

11 u) LFJ represented the plaintiff in a wage-and-hour class and PAGA
12 representative action against a food company on behalf of non-exempt employees. On June 30,
13 2017, the court granted final approval of the class and PAGA representative action settlement.
14 The Sacramento County Superior Court Case Number is 34-2015-00175871.

15 v) LFJ represented the plaintiffs in a wage-and-hour class and PAGA
16 representative action against a chocolate company on behalf of non-exempt employees. On July
17 19, 2017, the court granted final approval of the class and PAGA representative action
18 settlement. The Alameda County Superior Court Case Number is RG15764300.

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

23 x) LFJ represented the plaintiffs in a wage-and-hour class and PAGA
24 representative action against a manufacturer of plastic containers on behalf of non-exempt
25 employees. On October 31, 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 BC577233.

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1 y) LFJ, in association with co-counsel therein, represented the plaintiffs in a
2 wage-and-hour class and PAGA representative action against a bank on behalf of non-exempt
3 employees. On December 11, 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 BC569646.

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

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

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

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

26 dd) LFJ, in association with co-counsel therein, represented the plaintiff in a
27 PAGA representative action against a global provider of products and services to the energy
28 industry, on behalf of hourly-paid and non-exempt employees. On November 19, 2018, the court

1 granted approval of the PAGA representative action settlement. The Kern County Superior
2 Court Case Number is S-1500-CV-280215-SDC.

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

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

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

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

26 ii) LFJ, in association with co-counsel therein, represents the plaintiff in a
27 wage-and-hour class and PAGA representative action against a medical equipment supplier on
28 behalf of non-exempt employees. On February 13, 2020, the court granted the plaintiff's motion

1 for class certification and certified a class. The San Bernardino County Superior Court Case
2 Number is CIVDS1505744.

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

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

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

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

23 **LITIGATION COSTS AND EXPENSES INCURRED BY**

24 **LAWYERS FOR JUSTICE, PC**

25 22. To date, Class Counsel have borne all the risks and costs of litigation and will not
26 receive any compensation until recovery is obtained in the cases. Lawyers for Justice, PC seeks
27 reimbursement of **\$30,393.37** in litigation costs and expenses as reflected in **"EXHIBIT B"**
28 attached hereto. These expenses were reasonable and necessary in the prosecution of the cases

1 and to obtain the Settlement.

2 **CLASS REPRESENTATIVE SERVICE AWARDS TO PLAINTIFFS**

3 23. In recognition of their efforts and work in the cases and serving as the Class
4 Representatives, the Settlement provides for Class Representative Service Awards in the amount
5 of \$15,000.00 each to Plaintiffs Sandy Acosta and Evelyn Martinez. The service awards are to
6 be paid out of the Gross Settlement Amount subject to approval by the Court. The requested
7 service awards are fair and appropriate. Plaintiff Acosta spent considerable time and effort to
8 produce relevant documents and past employment records and to provide the facts and evidence
9 necessary to facilitate the prosecution of the class and PAGA claims. For example, Plaintiff
10 Acosta provided objections, responses, supplemental responses, and documents responsive to
11 Defendants' discovery requests, and prepared for and attended a full-day deposition. Plaintiff
12 Acosta was available whenever Lawyer *for* Justice, PC needed her and actively tried to obtain
13 and provide information that would facilitate the pursuit of the class and PAGA claims.
14 Accordingly, it is fair and appropriate for Plaintiffs to each receive a Class Representative
15 Service Award, in addition to their Individual Settlement Payments and Individual PAGA
16 Payments, for their services on behalf of the Settlement Class, State of California, and PAGA
17 Aggrieved Employees.

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

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

23 Executed this 8th day of November 2022, at Glendale, California.

24
25 

26 Edwin Aiwasian
27
28

EXHIBIT A

ACOSTA V. CITY OF HOPE, ET AL. (“ACOSTA CLASS LAWSUIT”)
(LOS ANGELES COUNTY SUPERIOR COURT CASE NO. 21STCV04440)
ACOSTA V. CITY OF HOPE MEDICAL FOUNDATION, ET AL. (“ACOSTA PAGA LAWSUIT”)
(LOS ANGELES COUNTY SUPERIOR COURT CASE NO. 21BBCV00284)
MARTINEZ, ET AL. V. CITY OF HOPE NATIONAL MEDICAL CENTER (“MARTINEZ LAWSUIT”)
(SAN BERNARDINO COUNTY SUPERIOR COURT CASE NO. CIVDS2015729)

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	11.40
Pre-Lawsuit Investigation of the Merits of Plaintiff Sandy Acosta’s (“Plaintiff Acosta”) Claims and the Merits of the Claims of the Putative Class Members and State of California	13.20
Pre-Lawsuit Investigation of Potential Damages and Penalties Exposure of Defendants City of Hope, City of Hope Medical Foundation, and City of Hope National Medical Center (collectively, “Defendants”) with Respect to Plaintiff Acosta and the Putative Class Members	10.70
Legal Research & Analysis of Latest Decisions Regarding Off-the-Clock, Meal and Rest Breaks, Premiums, Regular Rate, Wage Statements, Certification, and Arbitration Agreements in California, including all New and Relevant DLSE Materials	9.50
Investigation of Defendants, Defendants’ Business Relationships, and the Industry in which Defendants Operate	5.10

Investigation of Defendants' Organizational and Corporate Structure, and Executive Reporting Structure as They Relate to the Employment and Management of the Putative Class Members and Aggrieved Employees	5.40
Investigation of Defendants' Executives, Officers, and Leadership with a Focus on Involvement in Wage-and-Hour Issues and Establishing Willfulness and Uniformity	5.10
Analysis of Competitors within Various Relevant Geographic Areas within which Defendants Operate, and Comparing and Contrasting Defendants' Policies, Practices, and Procedures with the Policies, Practices, and Procedures of Defendants' Competitors	7.30
Research and Investigation Re: Facilitie(s), Location(s), Department(s), and/or Division(s) Owned, Managed, Operated, and/or Serviced by Defendants in California During the Class Period, Including and Not Limited to Hospital Facilities, Outpatient Care Centers, Blood Drive Services, Radiation Oncology Facilities, and Administrative Locations, and Analyzing Differences Between Them to Determine Whether Those Differences Will Cause Individual Issues to Predominate Over Common Issues	11.20
Comparative Analysis and Cross-Checking of Job Postings, Job Reviews, and Consumer/Patient Review Regarding Defendants in Order to Determine Any Variation and Identify Job Duties and Responsibilities That Would be Susceptible to Being Performed Off-the-Clock or During Meal or Rest Breaks	12.40
Research and Investigation Re: Workforce, Staffing Models, and Staffing Levels at Locations at Which Putative Class Members and Aggrieved Employees Work Throughout California	8.60
Research and Investigation Re: Defendants' Written and Unwritten Policies, Practices, and Procedures Relating to First Responders, Patient Care, Emergencies, COVID-19 Screenings, Reporting Time, Timekeeping, Rounding, Schedules, Meal/Rest Breaks, On-Premises Breaks, Meal/Rest Premiums, Meal Period Waivers, Non-Discretionary Bonus/Incentive/Performance/Shift Differential Pay (e.g., Gifts Cards, Rewards Program, Institution Bonus Program, and Other Bonus Programs), Regular Rate Calculation, Overtime Compensation, Health and Safety Procedures, Uniforms, PPE, Equipment and Supplies, Donning and Doffing, Traveling Between Locations, Use of Personal Vehicle, Mileage, Use of Personal Cell Phones and Computing Devices, Reimbursement of Business-Related Expenses, Recordkeeping,	35.60

Wage Statements, Inspection and Copying of Employment Records, Arbitration Agreements, Union Collective Bargaining Agreements, and Arbitration/Grievance Procedures	
Research and Investigation Re: Software Programs and Other Technology Defendants Use to Conduct Their Everyday Business, Including Timekeeping, Patient Care, Communications, Information Management, Resource Management, and Health and Safety 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	6.90
Research and Analysis of Potential Defenses Defendants May Raise, Including <i>De Minimis</i> Work, Non-Compensable Off-the-Clock Work, Waiver, Pre-Emption, Exemption, and Compliant Policies	11.30
Research and Investigation Re: Post- <i>Duran vs. U.S. Bank</i> Trial Manageability Issues, including Research Regarding Which Experts to Retain and For What Purpose	5.40
Research and Analysis of Defendants' Litigation History Involving Wage-and-Hour Issues and Other Related Employment Issues	4.50
Research and Analysis of Impact of COVID-19 on Defendants' Locations, Operations, and Employment Practices, and on Putative Class Members' and Aggrieved Employees' Work	15.90
Prepare a Discovery Strategy and Plan of Action, including Topics of Inquiry Important to Certification, Liability, Damages, and Penalties	6.80
Meet and Communicate with Plaintiff Sandy Acosta throughout the Pendency of the Cases	57.50
Meet, Communicate with, and Interview Putative Class Members, Aggrieved Employees, and Percipient Witnesses	32.40
Research, Analyze, Plan, Outline, and Draft Briefing of Certification Issues and Theories in Anticipation of Moving to Certify Class	54.50

Review and Analyze Pleadings in, and Research Regarding, the Case <i>Seper v. City of Hope National Medical Center</i> , Los Angeles Superior Court, Case No. BC630925, and Review and Analyze Class Action Settlement Agreement and Orders and Judgment Regarding Class Action Settlement	7.50
Review and Analyze Pleadings in, and Research Regarding, the Case <i>Martinez v. City of Hope National Medical Center</i> , San Bernardino Superior Court, Case No. CIVDS2015729 (i.e., Martinez Lawsuit)	8.50
Review and Analyze Pleadings in, and Research Regarding, the Case <i>Bonilla v. City of Hope</i> , Los Angeles Superior Court, Case No. 20STCV27678 (“Bonilla Case”)	8.10
Review and Analyze Pleadings in, and Research Regarding, the Case <i>Payan, et al. v. City of Hope, et al.</i> , Los Angeles Superior Court, Case No. 21STCV46242 (“Payan Case”)	5.60
Pleadings and Court Filings	
Draft Plaintiff Acosta’s Class Action Complaint for Damages and Legal Research and Analysis of All Claims Involved (filed on February 4, 2021) (Acosta Class Lawsuit)	8.10
Review Court’s Notice of Case Assignment (filed on February 4, 2021) (Acosta Class Lawsuit)	0.10
Review Court’s Minute Order and Initial Status Conference Order (filed on March 10, 2021) (Acosta Class Lawsuit)	0.20
Draft Plaintiff Acosta’s Complaint for Enforcement Under the Private Attorneys General Act, California Labor Code § 2698, Et Seq. and Legal Research and Analysis of All Allegations Involved (filed on March 22, 2021) (Acosta PAGA Lawsuit)	7.50
Review Court’s Notice of Case Assignment (filed on March 22, 2021) (Acosta PAGA Lawsuit)	0.10
Review Court’s Notice of Case Management Conference and Order to Show Cause Hearing (filed on March 23, 2021) (Acosta PAGA Lawsuit)	0.20

Draft Plaintiff Acosta's Notice of Posting Jury Fees (filed on April 13, 2021) (Acosta Class Lawsuit)	0.20
Meet and Confer with Defendants' Counsel, and Draft Joint Initial Status Conference Statement (filed on April 16, 2021) (Acosta Class Lawsuit)	1.80
Review Defendants' Notice of Appearance and Notice of Related Case (served on April 22, 2021) (Acosta Class Lawsuit)	0.50
Review Defendants' Notice of Related Case (served on April 22, 2021) (Acosta PAGA Lawsuit)	0.40
Review Court's Minute Order and Order Authorizing Electronic Service (filed on April 23, 2021) (Acosta Class Lawsuit)	0.20
Draft Plaintiff Acosta's Notice of Ruling (filed on April 27, 2021) (Acosta Class Lawsuit)	0.60
Review Defendants' Declaration of Jennifer Parkhurst in Support of Defendant City of Hope National Medical Center's Request that Plaintiff Voluntarily Dismiss City of Hope and City of Hope Medical Foundation Because They Are Not Proper Defendants (served on May 4, 2021) (Acosta Class Lawsuit)	0.70
Review and Analyze Defendants City of Hope and City of Hope Medical Foundation's Answer to Plaintiff Acosta's Complaint, and Research Affirmative Defenses in Answer (served on May 12, 2021) (Acosta PAGA Lawsuit)	2.60
Review and Analyze Defendant City of Hope National Medical Center's Answer to Plaintiff Acosta's Complaint and Research Affirmative Defenses in Answer (served on May 21, 2021) (Acosta Class Lawsuit)	3.10
Review Court's Minute Order (filed on May 21, 2021) (Acosta Class Lawsuit)	0.10
Review Court's Minute Order (filed on May 21, 2021) (Acosta PAGA Lawsuit)	0.10

Meet and Confer with Defendants' Counsel, and Draft Joint Case Management Conference Statement (filed on June 7, 2021) (Acosta Class Lawsuit)	1.60
Review Court's Minute Order (filed on June 14, 2021) (Acosta Class Lawsuit)	0.10
Review and Analyze Defendant City of Hope National Medical Center's Amended Answer to Plaintiff Acosta's Complaint and Research Affirmative Defenses in Answer (served on June 18, 2021) (Acosta Class Lawsuit)	3.40
Draft Plaintiff Acosta's Notice of Ruling (filed on June 21, 2021) (Acosta Class Lawsuit)	0.50
Meet and Confer with Defendants' Counsel, and Draft Joint Case Management Conference Statement (filed on July 13, 2021) (Acosta Class Lawsuit)	1.70
Review Court's Minute Order (filed on July 20, 2021) (Acosta Class Lawsuit)	0.10
Review Defendants' Notice of Unavailability of Counsel (served on July 22, 2021) (Acosta Class Lawsuit)	0.10
Review Defendants' Notice of Unavailability of Counsel (served on July 22, 2021) (Acosta PAGA Lawsuit)	0.10
Draft Plaintiff Acosta's Notice of Ruling (filed on July 28, 2021) (Acosta Class Lawsuit)	0.50
Review Defendants' Amended Declaration of Jennifer Parkhurst in Support of Defendant City of Hope National Medical Center's Request That Plaintiff Voluntarily Dismiss City of Hope and City Of Hope Medical Foundation Because They Are Not Proper Defendants (served on July 30, 2021) (Acosta Class Lawsuit)	0.70
Draft Plaintiff Acosta's Case Management Statement (filed on July 30, 2021) (Acosta PAGA Lawsuit)	0.90
Meet and Confer with Defendants' Counsel, and Draft Joint Informal Discovery Conference Report (filed on August 10, 2021) (Acosta Class Lawsuit)	2.10

Review Court's Minute Order (filed on August 17, 2021) (Acosta Class Lawsuit)	0.10
Draft Plaintiff Acosta's Notice of Ruling (filed on August 26, 2021) (Acosta Class Lawsuit)	0.50
Review Defendants' Objections to Plaintiff Acosta's Notice of Ruling (served on August 30, 2021) (Acosta Class Lawsuit)	0.20
Draft Plaintiff Acosta's Notice of Related Case (filed on September 3, 2021) (Acosta Class Lawsuit)	0.40
Draft Plaintiff Acosta's Notice of Related Case (filed on September 3, 2021) (Acosta PAGA Lawsuit)	0.30
Review Court's Minute Order (filed on September 13, 2021) (Acosta Class Lawsuit)	0.10
Review and Analyze Defendants City of Hope and City of Hope Medical Foundation's Answer to Plaintiff Acosta's Complaint and Research Affirmative Defenses in Answer (served on September 16, 2021) (Acosta Class Lawsuit)	3.90
Review Court's Notice of Case Reassignment and Order for Plaintiff to Give Notice (filed on September 16, 2021) (Acosta PAGA Lawsuit)	0.10
Meet and Confer with Defendants' Counsel, and Draft CaseAnywhere Message Board Posting Re: Deadlines for Production of Sampling and Belaire West Notice (posted September 1, 2021) (Acosta Class Lawsuit)	1.10
Meet and Confer with Defendants' Counsel, and Draft CaseAnywhere Message Board Posting Re: Request to Continue All Class Certification-Rated Deadlines and Hearing (posted November 10, 2021) (Acosta Class Lawsuit)	0.90
Meet and Confer with Defendants' Counsel, and Draft Joint Stipulation to Continue All Class Certification-Rated Deadlines and Hearing; [Proposed] Order (submitted on November 10, 2021) (Acosta Class Lawsuit)	1.30

Review Court's Order Granting Joint Stipulation to Continue All Class Certification-Rated Deadlines and Hearing (filed on November 12, 2021) (Acosta Class Lawsuit)	0.10
Review Court's Minute Order (filed on November 22, 2021) (Acosta Class Lawsuit)	0.10
Review Non-Party Conrad Bonilla's Notice of Related Case (served on December 2, 2021) (Acosta Class Lawsuit)	0.20
Review Non-Party Conrad Bonilla's Notice of Related Case (served on December 2, 2021) (Acosta PAGA Lawsuit)	0.20
Review Defendants' Notice of Unavailability of Counsel (served on December 14, 2021) (Acosta Class Lawsuit)	0.10
Review Defendants' Notice of Unavailability of Counsel (served on December 14, 2021) (Acosta PAGA Lawsuit)	0.10
Meet and Confer with Defendants' Counsel, and Draft CaseAnywhere Message Board Posting Re: Request to Continue All Class Certification-Related Deadlines and All Deadlines and Hearings Related to Intervenor's Motion for Leave to Intervene (posted December 28, 2021) (Acosta Class Lawsuit)	0.70
Review Court's CaseAnywhere Message Board Posting Re: Request to Continue All Class Certification-Related Deadlines and All Deadlines and Hearings Related to Intervenor's Motion for Leave to Intervene (posted December 29, 2021) (Acosta Class Lawsuit)	0.10
Meet and Confer with Defendants' Counsel, and Draft Joint Stipulation to Continue All Class Certification-Related Deadlines and All Deadlines and Hearings Related to Intervenor's Motion for Leave to Intervene; [Proposed] Order (submitted on December 29, 2021) (Acosta Class Lawsuit)	1.80

Review Court's Order Granting Joint Stipulation to Continue All Class Certification-Rated Deadlines and All Deadlines and Hearings Related to Intervenor's Motion for Leave to Intervene (filed on January 3, 2022) (Acosta Class Lawsuit)	0.10
Meet and Confer with Defendants' Counsel, and Draft CaseAnywhere Message Board Posting Re: Request to Continue All Class Certification-Rated Deadlines and All Deadlines and Hearings Related to Intervenor's Motion for Leave to Intervene (posted on January 4, 2022) (Acosta Class Lawsuit)	0.60
Review Court's CaseAnywhere Message Board Posting Re: Request to Continue All Class Certification-Rated Deadlines and All Deadlines and Hearings Related to Intervenor's Motion for Leave to Intervene (posted on January 4, 2022) (Acosta Class Lawsuit)	0.10
Meet and Confer with Defendants' Counsel, and Draft Joint Stipulation to Continue All Class Certification-Rated Deadlines and All Deadlines and Hearings Related to Intervenor's Motion for Leave to Intervene; [Proposed] Order (submitted on January 4, 2022) (Acosta Class Lawsuit)	1.50
Review Court's Order Granting Joint Stipulation to Continue All Class Certification-Rated Deadlines and All Deadline and Hearings Related to Intervenor's Motion for Leave to Intervene (filed on January 6, 2022) (Acosta Class Lawsuit)	0.10
Review Non-Party Conrad Bonilla's Notice of Related Case (served on January 7, 2022) (Acosta Class Lawsuit)	0.20
Review Non-Party Conrad Bonilla's Notice of Related Case (served on January 7, 2022) (Acosta PAGA Lawsuit)	0.20
Review Court's Minute Order (filed on January 7, 2022) (Acosta Class Lawsuit)	0.10
Review Court's Status Conference Order (filed on January 11, 2022) (Acosta Class Lawsuit)	0.30

Review Court's Status Conference Order and Minute Order (filed on January 11, 2022) (Acosta PAGA Lawsuit)	0.50
Review Non-Party Conrad Bonilla's Notice of Court Order Re Relating Cases (served on January 18, 2022) (Acosta Class Lawsuit)	0.40
Review Non-Party Conrad Bonilla's Notice of Court Order Re Relating Cases (served on January 18, 2022) (Acosta PAGA Lawsuit)	0.20
Meet and Confer with Defendants' Counsel, and Draft Notice of Settlement (filed on February 7, 2022) (Acosta Class Lawsuit)	0.80
Meet and Confer with Defendants' Counsel, and Draft Notice of Settlement (filed on February 7, 2022) (Acosta PAGA Lawsuit)	0.50
Meet and Confer with Defendants' Counsel, and Draft Joint Initial Status Conference Statement (filed on February 23, 2022) (Acosta Class Lawsuit)	1.50
Meet and Confer with Defendants' Counsel, and Draft Joint Initial Status Conference Statement (filed on February 23, 2022) (Acosta PAGA Lawsuit)	0.80
Review Court's Minute Order (filed on March 3, 2022) (Acosta Class Lawsuit)	0.10
Review Court's Minute Order (filed on March 3, 2022) (Acosta PAGA Lawsuit)	0.10
Review Court's CaseAnywhere Message Board Posting Re: Change of Department Handling the Case (posted on March 16, 2022) (Acosta Class Lawsuit)	0.10
Meet and Confer with Defendants' Counsel, and Draft Stipulation to Stay Proceedings and Set Status Conference Re: Status of Settlement Approval in San Bernardino Superior Court; [Proposed] Order (submitted on April 7, 2022) (Acosta Class Lawsuit)	1.50

Meet and Confer with Plaintiff Evelyn Martinez's ("Plaintiff Martinez") Counsel, and Research and Draft Plaintiff Martinez and Plaintiff Acosta's (together, "Plaintiffs") Second Amended Class and Representative Action Complaint (submitted on April 7, 2022) (Martinez Lawsuit)	4.80
Review Court's Order Granting Stipulation to Stay Proceedings and Set Status Conference Re: Status of Settlement Approval in San Bernardino Superior Court (filed on April 12, 2022) (Acosta Class Lawsuit)	0.10
Review Non-Party Conrad Bonilla's Notice of Related Case (served on April 18, 2022) (Martinez Lawsuit)	0.40
Draft Plaintiff Acosta's Notice of Stay, Status Conference, and Continuance of Motion to Intervene (filed on April 25, 2022) (Acosta Class Lawsuit)	0.60
Meet and Confer with Defendants' Counsel, and Draft Joint Status Conference Statement (filed on May 17, 2022) (Acosta PAGA Lawsuit)	1.30
Review Court's Minute Order (filed on May 24, 2022) (Acosta PAGA Lawsuit)	0.10
Meet and Confer with Defendants' Counsel, and Draft Joint Status Conference Statement (filed on July 19, 2022) (Acosta Class Lawsuit)	1.20
Meet and Confer with Defendants' Counsel, and Draft Joint Status Conference Statement (filed on July 19, 2022) (Acosta PAGA Lawsuit)	0.90
Review Court's Minute Order (filed on July 26, 2022) (Acosta Class Lawsuit)	0.10
Review Court's Minute Order (filed on July 26, 2022) (Acosta PAGA Lawsuit)	0.10
Review Defendants' Notice of Ruling (served on July 26, 2022) (Acosta Class Lawsuit)	0.30
Review Defendant City of Hope's Notice of Ruling (served on July 26, 2022) (Payan Case)	0.10

Appearances	
Prepare for and Telephonically Attend Initial Status Conference (April 23, 2021) (Acosta Class Lawsuit)	3.10
Prepare for and Telephonically Attend Further Status Conference (June 14, 2021) (Acosta Class Lawsuit)	2.30
Prepare for and Telephonically Attend Further Status Conference (July 20, 2021) (Acosta Class Lawsuit)	1.50
Prepare for and Telephonically Attend Hearing on Motion to Stay PAGA Action (July 30, 2021) (Acosta PAGA Lawsuit)	2.50
Prepare for and Telephonically Attend Informal Discovery Conference (August 17, 2021) (Acosta Class Lawsuit)	4.50
Prepare for and Telephonically Attend Hearing on <i>Ex Parte</i> Application (October 28, 2021) (Acosta Class Lawsuit)	1.30
Prepare for and Telephonically Attend Initial Status Conference (March 3, 2022) (Acosta Class Lawsuit and Acosta PAGA Lawsuit)	2.20
Prepare for, Travel to/from, and Attempted to Attend Hearing on Motion for Leave to Intervene (April 8, 2022) (Acosta Class Lawsuit)	4.50
Prepare for and Telephonically Attend Hearing on <i>Ex Parte</i> Application (May 4, 2022) (Martinez Lawsuit)	1.50
Prepare for and Telephonically Attend Status Conference (May 24, 2022) (Acosta PAGA Lawsuit)	0.50
Prepare for and Telephonically Attend Hearing on Plaintiffs' Motion for Preliminary Approval of Class Action and PAGA Settlement (June 21, 2022) (Martinez Lawsuit)	1.80
Prepare for and Telephonically Attend Hearing on Motion for Leave to Intervene (July 6, 2022) (Martinez Lawsuit)	3.50

Prepare for and Telephonically Attend Hearing on Proposed Intervenor Pedro Payan, Pedro Nava, and Daniel Chavez's Motion for Leave to Intervene into Acosta Class Action (July 19, 2022) (Acosta Class Lawsuit)	2.10
Prepare for and Telephonically Attend Status Conference (July 26, 2022) (Acosta Class Lawsuit and Acosta PAGA Lawsuit)	0.50
Prepare for and Attend Hearing on Plaintiff's Motion for Final Approval of Class Action and PAGA Settlement (December 5, 2022) (Anticipated) (Martinez Lawsuit)	2.50
Discovery and Deposition	
Draft Letter to Defendants Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Sandy Acosta (served on November 18, 2020)	1.90
Review and Analyze Documents Produced by Defendants in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Sandy Acosta (served on December 10, 2020)	7.50
Draft Plaintiff Acosta's Form Interrogatories - General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), and Requests for Production of Documents (Set One) to Defendant City of Hope National Medical Center (served on April 30, 2021) (Acosta Class Lawsuit)	7.50
Draft Plaintiff Acosta's Notice of Deposition of Person Most Knowledgeable at Defendant City of Hope National Medical Center and Requests for Production of Documents (noticed for June 1, 2021; Organizational Structure) (served on April 30, 2021) (Acosta Class Lawsuit)	3.80
Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant City of Hope National Medical Center and Requests for Production of Documents (noticed for June 2, 2021; Wage and Hour Practices) (served on April 30, 2021) (Acosta Class Lawsuit)	4.50

Review and Analyze Defendant City of Hope National Medical Center's Request for Production of Documents (Set One) to Plaintiff (served on April 30, 2021) (Acosta Class Lawsuit)	1.50
Review and Analyze Defendant City of Hope National Medical Center's Notice of Taking Deposition of Plaintiff Acosta and Request for Production (noticed for July 15, 2021) (served on April 30, 2021) (Acosta Class Lawsuit)	1.50
Review and Analyze Defendant City of Hope Medical Center's Objections to Plaintiff Acosta's Notice of Deposition of Person Most Knowledgeable at Defendant City of Hope National Medical Center and Requests for Production of Documents (June 1, 2021; Organizational Structure) (served on May 27, 2021) (Acosta Class Lawsuit)	1.60
Review and Analyze Defendant City of Hope Medical Center's Objections and Responses to Plaintiff Acosta's Notice of Deposition of Person Most Knowledgeable at Defendant City of Hope National Medical Center and Requests for Production of Documents (June 2, 2021; Wage and Hour Practices) (served on May 27, 2021) (Acosta Class Lawsuit)	3.20
Draft Plaintiff Acosta's Responses to Defendant City of Hope National Medical Center's Request for Production of Documents (Set One) (served on May 28, 2021) (Acosta Class Lawsuit)	15.90
Draft Plaintiff Acosta's Objections to Defendant City of Hope National Medical Center's Notice of Taking Deposition of Plaintiff Sandy Acosta and Requests for Production of Documents (July 15, 2021) (served on May 28, 2021) (Acosta Class Lawsuit)	0.80
Draft Letter to Defendants Re: Request for Personnel File, Pay Stubs, and Time Records for Putative Class Member (served on June 12, 2021)	1.90
Draft Plaintiff Acosta's Supplemental Responses to Defendant City of Hope National Medical Center's Request for Production of Documents (Set One) (served on July 21, 2021) (Acosta Class Lawsuit)	5.50
Review and Analyze Defendant City of Hope National Medical Center's Objections and Responses to Plaintiff Acosta's Form Interrogatories - General (Set One), Special Interrogatories (Set One), Special	6.70

Interrogatories (Set Two), and Requests for Production of Documents (Set One) (served July 23, 2021) (Acosta Class Lawsuit)	
Review and Analyze Documents Produced by Defendants [COH000001-001490] (served on August 10, 2021)	12.90
Draft Plaintiff Acosta's Form Interrogatories - General (Set Two), Special Interrogatories (Set Three), Requests for Production of Documents (Set Two), Requests for Production of Documents (Set Three), and Requests for Admissions (Set One) to Defendant City of Hope National Medical Center (served on August 27, 2021) (Acosta Class Lawsuit)	8.10
Draft Plaintiff Acosta's Requests for Production of Documents (Set One) to Defendant City of Hope (served on August 27, 2021) (Acosta Class Lawsuit)	3.30
Draft Plaintiff Acosta's Requests for Production of Documents (Set One) to Defendant City of Hope Medical Foundation (served on August 27, 2021) (Acosta Class Lawsuit)	2.30
Draft Plaintiff Acosta's Notice of Deposition of Person Most Knowledgeable at Defendant City of Hope National Medical Center and Requests for Production of Documents (noticed for September 29, 2021; Organizational Structure) (served on August 27, 2021) (Acosta Class Lawsuit)	4.50
Draft Plaintiff Acosta's Notice of Deposition of Person Most Knowledgeable at Defendant City of Hope National Medical Center and Requests for Production of Documents (noticed for September 29, 2021; Wage and Hour Practices) (served on August 27, 2021) (Acosta Class Lawsuit)	3.50
Draft Plaintiff Acosta's Notice of Deposition of Person Most Knowledgeable at Defendant City of Hope and Requests for Production of Documents (noticed for September 29, 2021; Organizational Structure) (served on August 27, 2021) (Acosta Class Lawsuit)	3.50
Draft Plaintiff Acosta's Notice of Deposition of Person Most Knowledgeable at Defendant City of Hope Medical Foundation and Requests for Production of Documents (noticed for September 29, 2021; Organizational Structure) (served on August 27, 2021) (Acosta Class Lawsuit)	2.50

Review and Analyze Defendant City of Hope National Medical Center's Form Interrogatories - General (Set One) and Requests for Admissions (Set One) to Plaintiff Acosta (served on September 1, 2021) (Acosta Class Lawsuit)	1.10
Draft <i>Belaire-West</i> Notice Paperwork, Monitor Notice Administration Process, Review Third-Party Administrator's Reports, and Review Non-Opt Out Contact List (served on September 21, 2021)	8.50
Review and Analyze Defendant City of Hope National Medical Center's Objections to Plaintiff Acosta's Notice of Deposition of Person Most Knowledgeable at Defendant City of Hope National Medical Center and Requests for Production of Documents (September 29, 2021; Organizational Structure) (served on September 23, 2021) (Acosta Class Lawsuit)	3.40
Review and Analyze Defendant City of Hope National Medical Center's Objections and Responses to Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant City of Hope National Medical Center and Requests for Production of Documents (September 29, 2021; Wage and Hour Practices) (served on September 23, 2021) (Acosta Class Lawsuit)	3.10
Review and Analyze Defendant City of Hope's Objections to Plaintiff Acosta's Notice of Deposition of Person Most Knowledgeable at Defendant City of Hope and Requests for Production of Documents (September 29, 2021; Organizational Structure) (served on September 23, 2021) (Acosta Class Lawsuit)	3.20
Review and Analyze Defendant City of Hope Medical Foundation's Objections to Plaintiff Acosta's Notice of Deposition of Person Most Knowledgeable at Defendant City of Hope Medical Foundation and Requests for Production of Documents (September 29, 2021; Organizational Structure) (served on September 23, 2021) (Acosta Class Lawsuit)	2.80
Review and Analyze Defendant City of Hope National Medical Center's Amended Notice of Taking Deposition of Plaintiff Acosta (noticed for October 2, 2021 and October 3, 2021) (served on September 23, 2021) (Acosta Class Lawsuit)	0.50

Draft Plaintiff Acosta's Objections and Responses to Defendant City of Hope National Medical Center's Amended Notice of Taking Deposition of Plaintiff Acosta (October 2, 2021 and October 3, 2021) (served on September 28, 2021) (Acosta Class Lawsuit)	7.80
Prepare for and Take the Deposition of Defendants' Person Most Knowledgeable George Vukazich (September 29, 2021; Zoom Video Conference) and Review Deposition Transcript	14.50
Review and Analyze Documents Produced by Defendants [COH0001491-001496] (served on September 29, 2021)	0.50
Draft Plaintiff Acosta's Responses to Defendant City of Hope National Medical Center's Form Interrogatories - General (Set One) and Requests for Admission (Set One) (served on October 1, 2021) (Acosta Class Lawsuit)	4.80
Review and Analyze Defendant City of Hope National Medical Center's Objections to Plaintiff's Form Interrogatories - General (Set Two), Special Interrogatories (Set Three), Requests for Production of Documents (Set Two), Requests for Production of Documents (Set Three), and Requests for Admission (Set One) (served on October 5, 2021) (Acosta Class Lawsuit)	7.40
Review and Analyze Defendant City of Hope's Objections to Plaintiff Acosta's Requests for Production of Documents (Set One) (served on October 5, 2021) (Acosta Class Lawsuit)	3.20
Review and Analyze Defendant City of Hope Medical Foundation's Objections to Plaintiff Acosta's Requests for Production of Documents (Set One) (served on October 5, 2021) (Acosta Class Lawsuit)	3.60
Review and Analyze Defendant City of Hope National Medical Center's Second Amended Notice of Taking Deposition of Plaintiff Acosta (noticed for October 11, 2021) (served on October 7, 2021) (Acosta Class Lawsuit)	0.50
Prepare for Defend the Deposition of Plaintiff Acosta (October 11, 2021; Zoom Video Conference) and Review Deposition Transcript	13.10

Review and Analyze Documents Produced by Defendants (approximately 280,000 pages) (served on October 19, 2021)	89.50
Review Defendant City of Hope National Medical Center's Notice to Consumer or Employee and Objection and Deposition Subpoena for Production of Business Records (Aerotek, Inc.) (served on October 21, 2021) (Acosta Class Lawsuit)	0.60
Review Defendant City of Hope National Medical Center's Notice to Consumer or Employee and Objection and Deposition Subpoena for Production of Business Records (Emanate Health) (served on October 21, 2021) (Acosta Class Lawsuit)	0.60
Review Defendant City of Hope National Medical Center's Notice to Consumer or Employee and Objection and Deposition Subpoena for Production of Business Records (Kaiser Permanente) (served on October 21, 2021) (Acosta Class Lawsuit)	0.60
Review Defendant City of Hope Nation Medical Center's Notice to Consumer or Employee and Objection and Deposition Subpoena for Production of Business Records (The Lawton Group) (served on October 21, 2021) (Acosta Class Lawsuit)	0.60
Draft Letter to Defendants Re: Request for Personnel File, Pay Stubs, and Time Records for Putative Class Member (served on October 25, 2021)	1.90
Review and Analyze Defendant City of Hope National Medical Center's Objections and Responses to Plaintiff Acosta's Form Interrogatories - General (Set Two), Special Interrogatories (Set Three), Requests for Production of Documents (Set Three), and Requests for Admissions (Set One) (served on October 26, 2021) (Acosta Class Lawsuit)	6.90
Review and Analyze Defendant City of Hope National Medical Center's Amended Objections and Responses to Plaintiff Acosta's Special Interrogatories (Set One) and Special Interrogatories (Set Two) (served on November 1, 2021) (Acosta Class Lawsuit)	3.90

Draft Letter to Defendants Re: Request for Personnel File, Pay Stubs, and Time Records for Putative Class Member (served on November 11, 2021)	1.90
Draft Letter to Defendants Re: Request for Personnel File, Pay Stubs, and Time Records for Putative Class Member (served on November 11, 2021)	1.90
Draft Letter to Defendants Re: Request for Personnel File, Pay Stubs, and Time Records for Putative Class Member (served on November 12, 2021)	1.90
Draft Letter to Defendants Re: Request for Personnel File, Pay Stubs, and Time Records for Putative Class Member (served on November 12, 2021)	1.90
Draft Letter to Defendants Re: Request for Personnel File, Pay Stubs, and Time Records for Putative Class Member (served on November 12, 2021)	1.90
Draft Letter to Defendants Re: Request for Personnel File, Pay Stubs, and Time Records for Putative Class Member (served on November 12, 2021)	1.90
Draft Letter to Defendants Re: Request for Personnel File, Pay Stubs, and Time Records for Putative Class Member (served on November 12, 2021)	1.90
Draft Letter to Defendants Re: Request for Personnel File, Pay Stubs, and Time Records for Putative Class Member (served on November 18, 2021)	1.90
Draft Letter to Defendants Re: Request for Personnel File, Pay Stubs, and Time Records for Putative Class Member (served on November 19, 2021)	1.90
Draft Letter to Defendants Re: Request for Personnel File, Pay Stubs, and Time Records for Putative Class Member (served on November 19, 2021)	1.90
Draft Letter to Defendants Re: Request for Personnel File, Pay Stubs, and Time Records for Putative Class Member (served on November 19, 2021)	1.90

Draft Letter to Defendants Re: Request for Personnel File, Pay Stubs, and Time Records for Putative Class Member (served on November 23, 2021)	1.90
Draft Letter to Defendants Re: Request for Personnel File, Pay Stubs, and Time Records for Putative Class Member (served on November 23, 2021)	1.90
Draft Letter to Defendants Re: Request for Personnel File, Pay Stubs, and Time Records for Putative Class Member (served on November 23, 2021)	1.90
Draft Letter to Defendants Re: Request for Personnel File, Pay Stubs, and Time Records for Putative Class Member (served on November 23, 2021)	1.90
Draft Letter to Defendants Re: Request for Personnel File, Pay Stubs, and Time Records for Putative Class Member (served on November 23, 2021)	1.90
Draft Letter to Defendants Re: Request for Personnel File, Pay Stubs, and Time Records for Putative Class Member (served on November 24, 2021)	1.90
Draft Letter to Defendants Re: Request for Personnel File, Pay Stubs, and Time Records for Putative Class Member (served on December 2, 2021)	1.90
Draft Letter to Defendants Re: Request for Personnel File, Pay Stubs, and Time Records for Putative Class Member (served on December 8, 2021)	1.90
Draft Letter to Defendants Re: Request for Personnel File, Pay Stubs, and Time Records for Putative Class Member (served on December 28, 2021)	1.90
Draft Letter to Defendants Re: Request for Personnel File, Pay Stubs, and Time Records for Putative Class Member (served on December 28, 2021)	1.90
Draft Letter to Defendants Re: Request for Personnel File, Pay Stubs, and Time Records for Putative Class Member (served on January 31, 2022)	1.90

Draft Letter to Defendants Re: Request for Personnel File, Pay Stubs, and Time Records for Putative Class Member (served on January 31, 2022)	1.90
Letters and Correspondence	
Research and Draft Notice to California Labor and Workforce Development Agency Re: Claims of Plaintiff Sandy Acosta for Penalties Under California Labor Code section 2698, <i>et seq.</i> (“PAGA”) (served on January 14, 2021)	4.50
Meet and Confer with, Draft Correspondence to, and Respond to Correspondence from, Defendants’ Counsel	30.60
Meet and Confer with, Draft Correspondence to, and Respond to Correspondence from, Plaintiff Martinez and Proposed Intervenor’s Counsel	13.50
Mediation/Settlement	
Review and Analyze Pre-Mediation Data and Documents Produced by Defendants, Including, and Not Limited To: • Operations and Employment Policies, Rules, and Internal Memorandum • Class Data Points • Sampling of Employee Time Data • Sampling of Employee Pay Data • Collective Bargaining Agreements • COVID-19 Screening-Related Paperwork	69.40
Prepare for Mediation, Including Researching Settlement-Related Issues and Merits of Claims, Drafting the Mediation Brief, Compiling the Mediation Exhibits in Support of Mediation Brief, and Performing Damages and Penalties Analysis and Calculations (submitted on December 17, 2021)	40.10
Telephonically Attend Mediation Session (December 23, 2021; Zoom Video Conference)	18.50

Draft, Review, Revise, Negotiate, and Finalize Memorandum of Agreement (fully executed on February 2, 2022)	3.50
Review, Revise, Negotiate, and Finalize Stipulation of Class Action and PAGA Settlement and Notice of Class Action Settlement (fully executed on April 7, 2022)	10.10
Meet and Confer with Settlement Administrator and Defendants' Counsel Regarding, and Monitor, Settlement Administration Process, and Respond to Inquiries (mailing on August 4, 2022)	7.50
Law and Motion	
Review and Analyze Defendants' Notice of Motion and Motion to Stay PAGA Action, Memorandum of Points and Authorities in Support Thereof, Declaration of Elizabeth A. Brown in Support Thereof, and [Proposed] Order (served on July 6, 2021) (Acosta PAGA Lawsuit)	4.10
Draft Plaintiff Acosta's Opposition to Defendant's Motion to Stay PAGA Action (filed on July 19, 2021) (Acosta PAGA Lawsuit)	12.70
Review and Analyze Defendants' Reply Memorandum of Points and Authorities in Support of Motion to Stay PAGA Action (served on July 23, 2021) (Acosta PAGA Lawsuit)	3.20
Review Court's Minute Order and Order re: Motion to Stay PAGA Action (filed on July 30, 2021) (Acosta PAGA Lawsuit)	0.50
Review Defendants City of Hope and City of Hope Medical Foundation's Notice of Ruling Regarding Motion to Stay PAGA Action (served on August 4, 2021) (Acosta PAGA Lawsuit)	0.20
Review and Analyze Proposed Intervenor Evelyn Martinez's <i>Ex Parte</i> Application for Leave to Intervene, Declaration of Larry W. Lee in Support Thereof, and [Proposed] Order (served on October 25, 2021) (Acosta Class Lawsuit)	3.10
Review and Analyze Defendants' Opposition to Intervenor Evelyn Martinez's <i>Ex Parte</i> Application for Leave to Intervene and Request for Sanctions, Declaration of Elizabeth A. Brown in Support Thereof,	3.30

Defendants' Objection to Larry W. Lee in Support of Intervenor Evelyn Martinez's <i>Ex Parte</i> Application for Leave to Intervene Dated October 22, 2021, and [Proposed] Order (served on October 27, 2021) (Acosta Class Lawsuit)	
Review Proposed Intervenor Evelyn Martinez's Notice of Ruling (served on October 28, 2021) (Acosta Class Lawsuit)	0.10
Review Court's Minute Order Re: Hearing on <i>Ex Parte</i> Application for Leave to Intervene (filed on October 28, 2021) (Acosta Class Lawsuit)	0.10
Review and Analyze Defendants' Opposition to Intervenor Evelyn Martinez's Motion for Leave to Intervene, Declaration of Elizabeth A. Brown in Support Thereof, and [Proposed] Order (served on December 1, 2021) (Acosta Class Lawsuit)	3.20
Review and Analyze Proposed Intervenor Conrad Bonilla's Notion of Motion and Motion for Leave to Intervene, Memorandum of Points and Authorities in Support Thereof, Declaration of William M. Turner in Support Thereof, Complaint in Intervention, and [Proposed] Order (served on March 9, 2022) (Acosta Class Lawsuit)	3.40
Review and Analyze Proposed Intervenor Conrad Bonilla's <i>Ex Parte</i> Application to Advance Hearing Date for Proposed Intervenor Conrad Bonilla's Motion for Leave to Intervene, Declaration of William M. Turner, and [Proposed] Order (served on March 14, 2022) (Acosta Class Lawsuit)	1.50
Review and Analyze Defendants' Opposition to <i>Ex Parte</i> Application of Conrad Bonilla for an Order Advancing Hearing Date of Motion for Leave to Intervene, Declaration of Elizabeth A. Brown in Support Thereof, Evidentiary Objections to the Declaration of William M. Turner, [Proposed] Order Granting Evidentiary Objections to the Declaration of William M. Turner, and [Proposed] Order Denying <i>Ex Parte</i> Application (served on March 15, 2022) (Acosta Class Lawsuit)	2.60
Draft Plaintiff Acosta's Opposition to <i>Ex Parte</i> Application to Advance the Hearing Date of Motion for Leave to Intervene (filed on March 15, 2022) (Acosta Class Lawsuit)	6.80

Review Court's Minute Order and Order Granting Proposed Intervenor Conrad Bonilla's <i>Ex Parte</i> Application to Advance Hearing Date for Proposed Intervenor Conrad Bonilla's Motion for Leave to Intervene (filed on March 16, 2021) (Acosta Class Lawsuit)	0.20
Review Proposed Intervenor Conrad Bonilla's Notice of Ruling Granting <i>Ex Parte</i> Application to Advance Hearing Date for Proposed Intervenor Conrad Bonilla's Motion for Leave to Intervene (served on March 17, 2022) (Acosta Class Lawsuit)	0.30
Review and Analyze Defendants' Opposition to Intervenor Conrad Bonilla's Motion for Leave to Intervene, Declaration of Elizabeth A. Brown in Support Thereof, Evidentiary Objections to the Declaration of William M. Turner, [Proposed] Order Granting Evidentiary Objections to the Declaration of William M. Turner, and [Proposed] Order Denying Motion for Leave to Intervene (served on March 25, 2022) (Acosta Class Lawsuit)	3.80
Draft Plaintiff Acosta's Opposition to Proposed Intervenor Conrad Bonilla's Motion for Leave to Intervene, Declaration of Edwin Aiwanian in Support Thereof, and [Proposed] Order Denying Proposed Intervenor Conrad Bonilla's Motion for Leave to Intervene (filed on March 25, 2022) (Acosta Class Lawsuit)	17.50
Review and Analyze Proposed Intervenor Pedro Payan, Pedro Nava, and Daniel Chavez' Notice of Motion and Motion for Leave to Intervene into the Acosta Class Action; Memorandum of Points and Authorities in Support of Motion for Leave to Intervene and Declaration of Bradley C. Gage, and [Proposed] Order (served on March 31, 2022) (Acosta Class Lawsuit)	3.10
Review and Analyze Proposed Intervenor Conrad Bonilla's Reply Re Defendants' Opposition to Motion for Leave to Intervene and Proposed Intervenor Conrad Bonilla's Reply Re Acosta's Opposition to Motion for Leave to Intervene (served on April 1, 2022) (Acosta Class Lawsuit)	2.50
Review and Analyze Proposed Intervenor Pedro Payan, Pedro Nava, and Daniel Chavez <i>Ex Parte</i> Application to Advance Hearing Date for Proposed Intervenor Pedro Payan, Pedro Nava, and Daniel	1.30

Chavez Motion for Leave to Intervene, Declaration of Bradley C. Gage, Esq., and [Proposed] Order (served on April 4, 2022) (Acosta Class Lawsuit)	
Review and Analyze Defendants' Opposition to <i>Ex Parte</i> Application of Pedro Payan, Pedro Nava and Daniel Chavez for an Order Advancing Hearing Date of Motion for Leave to Intervene, Declaration of Elizabeth in Support Thereof, and Evidentiary Objections to Declaration of Bradley C. Gage (served on April 5, 2022) (Acosta Class Lawsuit)	2.10
Draft Plaintiff Acosta's Opposition to Payan Plaintiffs' <i>Ex Parte</i> Application to Advance the Hearing Date of Motion for Leave to Intervene and Amended Proofs of Service (filed on April 5, 2022) (Acosta Class Lawsuit)	8.90
Review Court's Minute Order Re: <i>Ex Parte</i> Application to Advance Hearing Date on Proposed Intervenor's Motion to Intervene (filed on April 6, 2022)	0.10
Review Court's Minute Order Re: Hearing on Motion for Leave to Intervene (filed on April 8, 2022)	0.10
Research, Draft, Review, and/or Revise Plaintiffs' Notice of Motion and Motion for Preliminary Approval of Class Action and PAGA Settlement, Declaration of Edwin Aiwazian in Support Thereof, Declaration of Larry W. Lee in Support Thereof, Declaration of Simon L. Yang in Support Thereof, Declaration of Evelyn Martinez In Support Thereof, Declaration of Sandy Acosta in Support Thereof, and [Proposed] Order Thereon (filed on April 8, 2022) (Martinez Lawsuit)	5.10
Review and Analyze Proposed Intervenors Pedro Payan, Pedro Nava, and Daniel Chavez' Notice of Motion and Motion for Leave to Intervene into the Evelyn Martinez Class Action; Memorandum of Points and Authorities in Support of Motion for Leave to Intervene in the Evelyn Martinez Class Action and Declaration of Bradley C. Gage, and [Proposed] Order (served on April 13, 2022) (Martinez Lawsuit)	3.60
Review and Analyze Proposed Intervenor Conrad Bonilla's Notion of Motion and Motion for Leave to Intervene, Memorandum of Points and Authorities in Support Thereof, Declaration of William M. Turner in Support Thereof, Complaint in Intervention, and [Proposed] Order (served on April 22, 2022) (Martinez Lawsuit)	2.90

Review and Analyze Proposed Intervenor Conrad Bonilla's <i>Ex Parte</i> Application to Advance Hearing Date for Proposed Intervenor Conrad Bonilla's Motion for Leave to Intervene, Declaration of William M. Turner, and [Proposed] Order (served on May 2, 2022) (Martinez Lawsuit)	1.50
Review, Revise, and/or Draft Plaintiffs' Opposition to <i>Ex Parte</i> Application to Advance Hearing Date for Proposed Intervenor Conrad Bonilla's Motion for Leave to Intervene, Declaration of Joanna Ghosh in Support Thereof, Declaration of Simon L. Yang in Support Thereof (served on May 3, 2022) (Martinez Lawsuit)	2.10
Review and Analyze Defendants' Opposition to Proposed Intervenor Conrad Bonilla's <i>Ex Parte</i> Application to Advance Hearing Date for Motion for Leave to Intervene, and Evidentiary Objections to Declaration of William M. Turner (served on May 3, 2022) (Martinez Lawsuit)	1.40
Review Proposed Intervenor Conrad Bonilla's Notice of Ruling Re: <i>Ex Parte</i> Application to Advance Hearing Date for Proposed Intervenor Conrad Bonilla's Motion for Leave to Intervene (served on May 5, 2022) (Martinez Lawsuit)	0.20
Review Defendants' Declaration of Margie Martin and Analyze Whether Escalator Clause Has Been Triggered (served on June 14, 2022) (Martinez Lawsuit)	0.50
Review Court's Order Granting Motion for Preliminary Approval of Class Action and PAGA Settlement (filed on June 21, 2022) (Martinez Lawsuit)	0.20
Review, Revise, and/or Draft Plaintiffs' Consolidated Opposition to Motions for Leave to Intervene Filed by Proposed Intervenor Conrad Bonilla, Pedro Payan, Pedro Nava, and Daniel Chavez and Declaration of Larry W. Lee in Support Thereof (filed on June 22, 2022) (Martinez Lawsuit)	1.60
Review and Analyze Defendants' Opposition to Proposed Intervenor Conrad Bonilla's Motion for Leave to Intervene, Evidentiary Objections to Declaration of William M. Turner, and [Proposed] Order Denying Proposed Intervenor Conrad Bonilla's Motion for Leave to Intervene (served on June 22, 2022) (Martinez Lawsuit)	1.50

Review and Analyze Defendants' Opposition to Proposed Intervenors Pedro Payan, Pedro Navan, and Daniel Chavez's Motion for Leave to Intervene, Declaration of Elizabeth A. Brown in Support Thereof, Evidentiary Objections to Declaration of William M. Turner, and [Proposed] Order Denying Proposed Intervenors Pedro Payan, Pedro Nava and Daniel Chavez' Motion for Leave to Intervene (served on June 22, 2022) (Martinez Lawsuit)	1.90
Draft Plaintiffs' Notice of Entry of Judgment or Order (filed on June 22, 2022) (Martinez Lawsuit)	0.20
Review and Analyze Proposed Intervenors Pedro Payan, Pedro Nava and Daniel Chavez' Memorandum of Points and Authorities in Reply to Defendants' Opposition to Motion for Leave to Intervene; Declaration of David G. Torres-Siegrist, Esq. (served on June 27, 2022) (Martinez Lawsuit)	1.20
Review and Analyze Proposed Intervenor Conrad Bonilla's Omnibus Reply in Support of Motion for Leave to Intervene; Declaration of William M. Turner, Esq., Objections to Declaration of Larry W. Lee, and Objections to Declaration of Lisa Brown (served on June 28, 2022) (Martinez Lawsuit)	1.40
Review and Analyze Defendants' Notice of New Authority in Support of Opposition to Motions for Leave to Intervene Filed by Proposed Intervenors Conrad Bonilla, Pedro Payan and Daniel Chavez (served on July 1, 2022) (Martinez Lawsuit)	0.90
Review and Analyze Proposed Intervenor Conrad Bonilla's Opposition to Defendants' Notice of New Authority (served on July 1, 2022) (Martinez Lawsuit)	0.20
Review Court's Minute Orders Re: Motions to Intervene (Martinez Lawsuit)	0.30
Review and Analyze Defendant City of Hope's Opposition to Proposed Intervenors Pedro Payan, Pedro Nava, and Daniel Chavez's Motion for Leave to Intervene into the Acosta Class Action, Request for Judicial Notice in Support Thereof, [Proposed] Order Granting Request for Judicial Notice, and [Proposed] Order Denying Motion (served on July 6, 2022) (Acosta Class Lawsuit)	3.40

Draft Plaintiff Acosta's Opposition to Proposed Intervenors Pedro Payan, Pedro Nava, and Daniel Chavez's Motion for Leave to Intervene, Declaration of Joanna Ghosh in Support Thereof, and [Proposed] Order (filed on July 6, 2022) (Acosta Class Lawsuit)	17.80
Review and Analyze Court's Minute Orders Re: Hearing and Ruling on Proposed Intervenor Conrad Bonilla's Motion for Leave to Intervene (filed July 6, 2022) (Martinez Lawsuit)	0.20
Review and Analyze Court's Minute Orders Re: Hearing and Ruling on Proposed Intervenors Pedro Payan, Pedro Nava, and Daniel Chavez's Motion for Leave to Intervene (filed July 6, 2022) (Martinez Lawsuit)	0.20
Review and Analyze Proposed Intervenor Conrad Bonilla's Notice of Errata to His Proposed Complaint in Intervention (served on July 12, 2022) (Acosta Class Lawsuit)	0.50
Review and Analyze Proposed Intervenors Pedro Payan, Pedro Nava, and Daniel Chavez's Memorandum of Points and Authorities in Reply to Defendants' Opposition to Motion for Leave to Intervene; Declaration of David G. Torres-Siegrist, Esq. (served on July 12, 2022) (Acosta Class Lawsuit)	1.90
Review and Analyze Defendants' Supplemental Opposition to Intervenor Conrad Bonilla's Motion for Leave to Intervene, Request for Judicial Notice in Support Thereof, and [Proposed] Order Granting Request for Judicial Notice (served on July 13, 2022) (Acosta Class Lawsuit)	0.90
Review and Analyze Proposed Intervenor Conrad Bonilla's Objection to Defendants' Supplemental Opposition to Proposed Intervenor Conrad Bonilla's Motion for Leave to Intervene (served on July 14, 2022) (Acosta Class Lawsuit)	0.30
Review Court's Minute Order Re: Hearing on Motion for Leave to Intervene (filed on July 19, 2022) (Acosta Class Lawsuit)	0.10
Review Proposed Intervenor Conrad Bonilla's Notice of Withdrawal of Plaintiff Conrad Bonilla's Motion to Intervene in Acosta Action (served on July 19, 2022) (Bonilla Case)	0.20

Review Proposed Intervenor Conrad Bonilla's Notice of Withdrawal of Plaintiff Conrad Bonilla's Motion to Intervene (served on July 20, 2022) (Acosta Class Lawsuit)	0.10
Review and Analyze Settlement Administrator's Declaration Regarding Settlement Notice Administration; and Research, Review, Revise, and/or Draft Plaintiffs' Motion for Final Approval of Class Action and PAGA Settlement, Declaration of Edwin Aiwasian in Support Thereof, Declaration of Larry W. Lee in Support Thereof, Declaration of Simon L. Yang in Support Thereof, Declaration of Evelyn Martinez in Support Thereof, Declaration of Sandy Acosta in Support Thereof, and [Proposed] Final Approval Order and Judgment (filed on November 8, 2022) (Martinez Lawsuit)	5.90
Total Hours:	1,136.30

EXHIBIT B

LAWYERS for JUSTICE PC CASE COST DETAIL
Acosta v. City of Hope, et al.

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
11/18/2020	US Postmaster	Postage	6.95
2/4/2021	Legal Document Server, Inc.	Attorney Service	180.23
2/4/2021	Los Angeles Superior Court	Court Filing Fee	435.00
2/4/2021	Los Angeles Superior Court	Complex Court Filing Fee	1,000.00
3/16/2021	Legal Document Server, Inc.	Attorney Service	330.00
3/18/2021	Legal Document Server, Inc.	Attorney Service	205.00
3/30/2021	Legal Document Server, Inc.	Attorney Service	175.00
4/7/2021	Legal Document Server, Inc.	Attorney Service	15.20
4/8/2021	Legal Document Server, Inc.	Attorney Service	205.00
4/13/2021	Legal Document Server, Inc.	Attorney Service	210.25
4/13/2021	Los Angeles Superior Court	Jury Fee	150.00
4/16/2021	Legal Document Server, Inc.	Attorney Service	205.00
4/27/2021	Legal Document Server, Inc.	Attorney Service	205.00
5/3/2021	General Logistics Systems US, Inc.	Courier Service	20.62
5/19/2021	FedEx Express	Courier Service	23.20
6/7/2021	Legal Document Server, Inc.	Attorney Service	95.00
6/9/2021	Legal Document Server, Inc.	Attorney Service	110.00
6/19/2021	Los Angeles Superior Court	Remote Hearing Fee	15.00
6/21/2021	Legal Document Server, Inc.	Attorney Service	65.00
6/22/2021	Legal Document Server, Inc.	Attorney Service	110.00
7/1/2021	Case Anywhere, LLC	Attorney Service	160.80
7/13/2021	Legal Document Server, Inc.	Attorney Service	175.00
7/25/2021	Los Angeles Superior Court	Remote Hearing Fee	15.00
7/28/2021	Legal Document Server, Inc.	Attorney Service	175.00
8/4/2021	Los Angeles Superior Court	Remote Hearing Fee	15.00
8/10/2021	Legal Document Server, Inc.	Attorney Service	175.00
8/17/2021	Coalition Court Reporters	Court Reporter	550.00
8/22/2021	Los Angeles Superior Court	Remote Hearing Fee	30.00
8/26/2021	General Logistics Systems US, Inc.	Courier Service	25.00
8/26/2021	Legal Document Server, Inc.	Attorney Service	175.00
9/1/2021	General Logistics Systems US, Inc.	Courier Service	20.95
9/3/2021	Legal Document Server, Inc.	Attorney Service	175.00
9/27/2021	One Legal	Attorney Service	55.80
9/29/2021	Esquire Deposition Solutions, LLC	Videography Service	1,087.50
9/29/2021	Esquire Deposition Solutions, LLC	Court Reporter	2,448.10
9/30/2021	Simpluris, Inc.	Notice Mailing	2,800.00
10/1/2021	Case Anywhere, LLC	Attorney Service	360.00
10/2/2021	Biehl CSR, Inc.	Court Reporter	3,215.10
10/11/2021	Biehl CSR, Inc.	Court Reporter	1,805.30
10/25/2021	Los Angeles Superior Court	Court Filing Fee	60.00

LAWYERS for JUSTICE PC CASE COST DETAIL
Acosta v. City of Hope, et al.

10/25/2021	One Legal	Attorney Service	18.45
11/1/2021	US Postmaster	Postage	3,043.84
11/9/2021	General Logistics Systems US, Inc.	Courier Service	15.20
11/10/2021	Legal Document Server, Inc.	Attorney Service	16.05
11/10/2021	Los Angeles Superior Court	Filing Fee	20.00
11/12/2021	Legal Document Server, Inc.	Attorney Service	95.00
11/18/2021	FedEx Express	Courier Service	24.34
11/30/2021	Paul Hastings LLP	Mediation Fee	7,500.00
12/29/2021	Legal Document Server, Inc.	Attorney Service	111.15
12/29/2021	Los Angeles Superior Court	Court Filing Fee	20.00
1/4/2022	Case Anywhere, LLC	Attorney Service	150.00
1/4/2022	Case Anywhere, LLC	Attorney Service	150.00
1/5/2022	Legal Document Server, Inc.	Attorney Service	16.15
1/5/2022	Los Angeles Superior Court	Court Filing Fee	20.00
1/6/2022	Legal Document Server, Inc.	Attorney Service	95.00
1/19/2022	Los Angeles Superior Court	Document Download Fee	14.40
2/23/2022	Legal Document Server, Inc.	Attorney Service	15.20
3/15/2022	Legal Document Server, Inc.	Attorney Service	15.20
3/28/2022	Legal Document Server, Inc.	Attorney Service	15.20
3/31/2022	Los Angeles Superior Court	Document Download Fee	2.00
4/5/2022	Legal Document Server, Inc.	Attorney Service	15.20
4/5/2022	Legal Document Server, Inc.	Attorney Service	115.00
4/5/2022	Legal Document Server, Inc.	Attorney Service	15.20
4/7/2022	Case Anywhere, LLC	Attorney Service	162.00
4/22/2022	Los Angeles Superior Court	Document Download Fee	5.40
4/26/2022	Legal Document Server, Inc.	Attorney Service	15.20
6/21/2022	Legal Document Server, Inc.	Attorney Service	125.00
6/22/2022	Court Call	Attorney Service	94.00
7/5/2022	Case Anywhere, LLC	Attorney Service	28.00
7/6/2022	Legal Document Server, Inc.	Attorney Service	15.95
7/6/2022	Legal Document Server, Inc.	Attorney Service	15.95
7/7/2022	Court Call	Attorney Service	94.00
7/20/2022	Legal Document Server, Inc.	Attorney Service	15.95
10/4/2022	Case Anywhere, LLC	Attorney Service	42.00
Total:			29,401.03

LAWYERS for JUSTICE PC CASE COST DETAIL
Acosta v. City of Hope Medical Foundation (PAGA)

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
10/27/2020	US Postmaster	Postage	6.95
11/18/2020	US Postmaster	Postage	6.95
1/15/2021	Labor & Workforce Development Agency	Filing Fee	75.00
3/23/2021	Legal Document Server, Inc.	Attorney Service	30.43
3/23/2021	Los Angeles Superior Court	Filing Fee	435.00
4/7/2021	Legal Document Server, Inc.	Attorney Service	15.20
4/12/2021	Legal Document Server, Inc.	Attorney Service	220.00
4/30/2021	Los Angeles Superior Court	Remote Hearing	15.00
5/13/2021	Legal Document Server, Inc.	Attorney Service	15.20
7/20/2021	Legal Document Server, Inc.	Attorney Service	15.20
7/30/2021	Legal Document Server, Inc.	Attorney Service	15.20
9/3/2021	Legal Document Server, Inc.	Attorney Service	15.20
9/21/2021	One Legal	Attorney Service	16.68
9/24/2021	One Legal	Attorney Service	16.68
12/17/2021	San Bernardino Superior Court	Document Download Fee	6.50
12/22/2021	Los Angeles Superior Court	Document Download Fee	25.60
1/21/2022	Legal Document Server, Inc.	Attorney Service	15.20
2/23/2022	Legal Document Server, Inc.	Attorney Service	15.20
5/17/2022	Legal Document Server, Inc.	Attorney Service	15.20
7/20/2022	Legal Document Server, Inc.	Attorney Service	15.95
			992.34