

Edwin Aiwazian (SBN 232943)
Arby Aiwazian (SBN 269827)
Joanna Ghosh (SBN 272479)
LAWYERS for JUSTICE, PC
410 West Arden Avenue, Suite 203
Glendale, California 91203
Tel: (818) 265-1020 / Fax: (818) 265-1021

Attorneys for Plaintiffs and the Class

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

ABRAHAM MARIN, individually, and on
behalf of other members of the general
public similarly situated; SHEREE WILLIS,
individually, and on behalf of other
members of the general public similarly
situated and on behalf of other aggrieved
employees pursuant to the California Private
Attorneys General Act;

Plaintiffs,

vs.

WORD & BROWN COMPANIES, an
unknown business entity; and DOES 1
through 100, inclusive,

Defendants.

Case No.: 30-2019-01055348-CU-OE-CXC

Honorable Peter J. Wilson
Department CX102

CLASS ACTION

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

[Notice of Motion and Motion for Final
Approval of Class Action Settlement,
Attorneys' Fees, Costs, and Incentive Awards;
Declarations of Class Representatives
(Abraham Marin and Sheree Willis);
Declaration of Settlement Administrator
(Christina Fowler); and [Proposed] Final
Approval Order and Judgment filed
concurrently herein]

Date: September 15, 2022
Time: 2:00 p.m.
Department: CX102

Complaint Filed: March 6, 2019
FAC Filed: January 13, 2021
Trial Date: None Set

DECLARATION OF EDWIN AIWAZIAN

I, Edwin Aiwazian, hereby declare as follows:

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

PRELIMINARY APPROVAL OF SETTLEMENT

2. On March 28, 2022, in Department CX102 of the above-entitled Court, the Honorable Peter J. Wilson preliminarily approved the First Amended Joint Stipulation for Class Action and PAGA Settlement (“Settlement,” “Agreement,” or “Settlement Agreement”) entered into between Plaintiffs and Defendant Word & Brown Insurance Administrators, Inc. (“Defendant”), and conditionally certified the Class for settlement purposes. The Court preliminarily appointed Plaintiffs Abraham Marin and Sheree Willis to represent the Class (together, “Class Representatives”). The Court also preliminarily appointed and designated Lawyers *for* Justice, PC as counsel for the Class (“Class Counsel”). The Court approved and ordered the mailing of the Notice of Class Action Settlement (“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, no Class Members have objected to the Settlement or the request for Attorneys’ Fees and Costs, Incentive 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”).

WORK PERFORMED BY CLASS COUNSEL

4. I have been actively engaged in litigating this matter since prior to the commencement of the above-captioned action on March 6, 2019, as have several other attorneys and members in our firm.

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

13 6. Prior to reaching the Settlement, the parties investigated the veracity, strength,
14 and scope of the claims, and were preparing for class certification and trial. The parties
15 conducted significant formal and informal discovery and investigation into the facts of the case,
16 and also informally exchanged a large volume of information and data in preparation for
17 mediation. Class Counsel served multiple sets of written discovery requests in various forms
18 (specifically, Requests for Production of Documents (Set One & Two), Special Interrogatories
19 (Sets One, Two & Three), and Form Interrogatories-General (Set One)) and numerous notices of
20 depositions person(s) most knowledgeable along with requests for production of documents.
21 Class Counsel also interviewed and obtained information from Plaintiffs, Defendant, and other
22 sources, including and not limited to the names of potential witnesses, and reviewed and
23 analyzed thousands of pages of documents and data obtained from Plaintiffs, Defendant, and
24 other sources. The documents and data reviewed and analyzed by Class Counsel included, and
25 were not limited to, employment records of Plaintiffs and other Class Members, Class Members'
26 time and pay data, multiple iterations of Defendant's Employee Handbook, company policy
27 acknowledgements (including, but not limited to, Acknowledgement of Employee Handbook),
28 internal memoranda, job descriptions, new hire orientation checklists, Defendant's operations

1 and employment practices, procedures, and policies (including, but not limited to, Defendant's
2 Meal and Rest Periods policy, Timekeeping Requirements, and Expense Reimbursement policy),
3 among other documents and data. Class Counsel researched applicable law, developed violation,
4 damages, and penalties valuation models in preparation for mediation, and met and conferred
5 with Defendant's counsel on numerous occasions, e.g., to discuss issues relating to the pleadings,
6 case management, discovery, and production of various documents and data prior to mediation.
7 Other work performed by Class Counsel included, and was not limited to, case strategy and
8 analysis; drafting, reviewing, and revising pleadings, the mediation brief, and settlement
9 approval motion papers; preparing and appearing for court proceedings; and preparing for and
10 engaging in mediation and settlement negotiations, among other tasks.

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

20 8. After conducting significant investigation of the facts and law during the
21 prosecution of the case, counsel for the parties engaged in extensive settlement negotiations to
22 try to resolve the entire matter. These efforts included preparing for mediation to take place but
23 then having it re-scheduled due to the COVID-19 pandemic, and preparing again for mediation
24 and ultimately participating in a formal, full-day mediation conducted by Hon. Louis Meisinger
25 (ret.), a well-regarded mediator experienced in mediating complex labor and employment
26 matters. During all settlement discussions, the parties conducted their negotiations at arm's
27 length in an adversarial position. Prior to and during mediation and settlement discussions, the
28 parties exchanged extensive information and data, and discussed all aspects of the case,

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

17 9. As set forth more fully in the accompanying Motion for Final Approval, Class
18 Counsel seeks attorneys' fees in the amount of \$770,000.00, which is thirty-five percent (35%)
19 of the Total Settlement Amount of \$2,200,000.00, as set forth in the Settlement Agreement and
20 the Notice of Class Action Settlement. Pursuant to the contingency-fee agreement entered into
21 by and between Plaintiffs and Class Counsel, Plaintiffs have each agreed to contingency fees of
22 at least thirty-five percent (35%) of the recovery.

23 10. The attorneys' fees sought are commensurate with: (1) the risk that Class Counsel
24 took in commencing the case; (2) the time, effort, and expense that Class Counsel dedicated to
25 the case; (3) the skill and determination that Class Counsel has shown; (4) the results that Class
26 Counsel has achieved throughout the litigation; (5) the value of the settlement that Class Counsel
27 has achieved; and (6) the other cases that Class Counsel has turned down in order to devote its
28 time and efforts to this matter.

11. 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%.

12. While not necessarily required to be demonstrated because the contingent fee is proper for this settlement, Class Counsel has incurred many hours of work in connection with prosecuting the case such that the award of attorneys' fees is also justified under a lodestar analysis with a multiplier of 1.51. Attorneys at Lawyers for Justice, PC have spent a total of 707.00 hours performing tasks and obtaining recovery in the case. 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 Class Counsel and the time incurred in performing those services. These hours include work done by myself and several other attorneys at the firm. Lawyers for Justice, PC also had litigation support personnel actively engaged in assisting with the prosecution of this matter.

13. The work performed in this particular case, the background of our firm, as well as the individual backgrounds, training, and experience of the attorneys who worked on this case, in litigating complex wage-and-hour matters, and in particular, employment class actions, support a reasonable hourly rate of compensation at the rate of \$725 for work performed by Class Counsel. Lawyers for Justice, PC has been awarded attorneys' fees, compensating the firm at the rate of at least \$725 per hour for legal services performed, by courts granting approval of wage-and-hour settlements in other cases: final approval of the class and representative action settlement in *David Dugan v. TEC Equipment, Inc., et al.* (Los Angeles Superior Court Case No. 19STCV01591) was granted on July 8, 2021, and the award of attorneys' fees involved an hourly rate of \$936.47; final approval of the class and representative action settlement in *Larry Greenwood, et al. v. Scan Health Plan* (Los Angeles Superior Court Case No. BC715157) was granted on April 20, 2021, and the award of attorneys' fees involved an hourly rate of \$919.57; final approval of the class action settlement in *Thereasa Carrozzella v. Basalite Concrete Products, LLC* (Sacramento County Superior Court Case No. 34-2017-00220214-CU-OE-GDS) was granted on February 21, 2020, and the award of attorneys' fees involved an hourly rate of

1 \$766.05; final approval of the class and representative action settlement in *Alice Rutledge, et al.*
2 *v. Healthport Technologies, LLC* (Alameda County Superior Court Case No. RG16835813) was
3 granted on June 11, 2019, and the award of attorneys' fees involved an hourly rate of \$764.82;
4 final approval of the class and representative action settlement in *Seth Swan v. Pace Supply*
5 *Corp.* (Sonoma County Superior Court Case No. SCV258764) was granted on February 6, 2019,
6 and the award of attorneys' fees involved an hourly rate of \$855.96; final approval of the class
7 and representative action settlement in *Stanley Bland, et al. v. Telecare Corporation* (Alameda
8 County Superior Court Case No. RG16811450) was granted on November 21, 2018, and the
9 award of attorneys' fees involved an hourly rate of \$831.38; final approval of the class and
10 representative action settlement in *Maryjo Ungerbuhler Anderson v. Boyett Petroleum*
11 (Stanislaus County Superior Court Case No. 2020582) was granted on May 15, 2018, and the
12 award of attorney's fees involved an hourly rate of \$780.77; and final approval of the class and
13 representative action settlement in *Demetrius Camarillo v. Blue Diamond Growers* (Sacramento
14 County Superior Court Case No. 34-2015-00175871) was granted on June 30, 2017, and the
15 award of attorneys' fees involved an hourly rate of \$845.64.

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

17 **EDUCATION**

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

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JUDICIAL EXTERNSHIPS

15. 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

16. 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*.

17. 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.

18. Since its inception, in or around October of 2008, *Lawyers for Justice, PC* has almost exclusively focused on the prosecution of consumer and employment class actions, involving wage-and-hour claims, race discrimination, unfair business practices or consumer fraud. Currently, we are the attorneys of record in over a dozen employment-related putative class actions in both state and federal courts in the State of California. Our firm has successfully litigated cases involving the executive, administrative, and other overtime exemptions to the State of California and federal overtime compensation requirements. During this relatively short time, in association with other law firms, we have recovered millions of dollars on behalf of thousands of individuals in California.

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

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

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

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

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

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

e) LFJ, in association with co-counsel therein, represented the plaintiff in a wage-and-hour class and PAGA representative action against a bank, involving allegations of misclassification of the “Assistant Branch Manager” position. On August 27, 2013, the court granted final approval of the class and PAGA representative action settlement. The Kern County

Superior Court Case Number is S-1500-CV-273194-LHB.

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

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

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

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

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

Council Coordination Proceeding Number is 4794.

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

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

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

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

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

p) LFJ, on behalf of the plaintiff and respondent in a PAGA representative action, successfully opposed in the trial court, and briefed and argued an appeal with respect to the employer’s motion to compel arbitration, which resulted in a published opinion by the California Court of Appeal in favor of employees. *Roberto Betancourt v. Prudential Overall*

1 *Supply* (Cal. App. 4th Dist., Mar. 7, 2017) 9 Cal.App.5th 439, review denied, cert. denied (U.S.
2 Supreme Court Docket No. 17-254). The Riverside County Superior Court Case Numbers are
3 RIC1503952 and RICJCCP5046, and the Judicial Council Coordination Proceeding Number is
4 5046.

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

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

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

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

25 u) LFJ represented the plaintiff in a wage-and-hour class and PAGA
26 representative action against a food company on behalf of non-exempt employees. On June 30,
27 2017, the court granted final approval of the class and PAGA representative action settlement.
28 The Sacramento County Superior Court Case Number is 34-2015-00175871.

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

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

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

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

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

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

Number is BC498401.

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

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

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

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

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

gg) LFJ, in association with co-counsel therein, represented the plaintiffs in a wage-and-hour class and PAGA representative action against a national retailer of apparel and fashion accessories, on behalf of non-exempt employees. On October 9, 2019, the court granted

1 the plaintiffs' motion for class certification in part and certified a class. On May 14, 2021, the
2 court granted final approval of the class and PAGA representative action settlement. The
3 Sacramento County Superior Court Case Number is 34-2015-00175330-CU-OE-GDS.

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

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

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

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

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

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

10 nn) LFJ represents the plaintiff in a wage-and-hour class action against an
11 iconic lifestyle accessories brand and retailer on behalf of non-exempt employees. On March 15,
12 2022, the court granted the plaintiff's motion for class certification in part and certified a class.
13 The San Francisco Superior Court Case Number is CGC-16-550794.

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

15 20. To date, Class Counsel has borne all the risks and costs of litigation and will not
16 receive any compensation until recovery is obtained in the above-captioned action. Lawyers *for*
17 Justice, PC has incurred \$23,059.66 in litigation costs and expenses as reflected in **“EXHIBIT**
18 **B”** attached hereto. These expenses were reasonable and necessary in the prosecution of this
19 case and to obtain the Settlement.

20 **INCENTIVE AWARDS TO PLAINTIFFS**

21 21. In recognition of their efforts and work serving as the Class Representatives, the
22 Settlement provides for Incentive Awards in the amount of \$5,000.00 each to Plaintiffs Abraham
23 Marin and Sheree Willis, to compensate Plaintiffs for the time and effort that they expended in
24 the case. The requested incentive payments are fair and appropriate. Plaintiffs spent a
25 substantial amount of time and effort in producing relevant documents and information and
26 provided the facts and evidence necessary to attempt to prove the allegations. Plaintiffs spent
27 numerous hours speaking with Class Counsel about their claims, describing their work
28 experiences with Defendant, and gathering and reviewing documents. Plaintiffs were available

1 whenever Class Counsel needed them and actively tried to obtain and provide information to
2 support the pursuit of class and PAGA claims. Accordingly, it is appropriate for Plaintiffs to
3 each receive \$5,000.00, as reasonable incentive payments, in addition to their individual
4 settlement payments as Class Members and Aggrieved Employees, for their services on behalf of
5 the Class, State of California, and Aggrieved Employees.

6 22. I submit that the Settlement is fair, reasonable, and adequate. In addition, the
7 Settlement is in the best interests of Plaintiffs, other Class Members, the State of California, and
8 Aggrieved Employees.

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

11 Executed this 23rd day of August 2022, at Glendale, California.

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14 Edwin Aiwanian
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EXHIBIT A

MARIN V. WORD & BROWN COMPANIES.
(ORANGE COUNTY SUPERIOR COURT CASE NO. 30-2019-01055348-CU-OE-CXC)
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	13.50
Pre-Lawsuit Investigation of the Merits of Plaintiff Abraham Marin’s Claims and the Merits of the Claims of the Putative Class Members	11.40
Pre-Lawsuit Investigation of Potential Damages and Penalties Exposure of Defendant Word & Brown Companies. (“Defendant”) with Respect to Plaintiff Abraham Marin and the Putative Class Members	12.60
Legal Research and Analysis of Latest Off-the-Clock, Meal and Rest Break, Representative PAGA, and Certification Decisions in California, Including all New and Relevant DLSE Materials	9.30
Investigation of Defendant, Defendant’s Business Relationships, and the Industry in which Defendant Operates	8.30
Investigation of Defendant’s Organizational and Corporate Structure, and Executive Reporting Structure as They Relate to the Employment and Management of the Putative Class Members	7.90
Investigation of Defendant’s Executives, Officers, and Leadership with a Focus on Involvement in Wage-and-Hour Issues and Establishing Willfulness and Uniformity	6.10
Analysis of Competitors in Various Relevant Geographic Areas within which Defendant Operates, and Comparing and Contrasting Defendant’s Policies, Practices, and Procedures with the Policies, Practices, and Procedures of Defendant’s Competitors	5.60

Research and Investigation Re: Location(s), Division(s), and/or Department(s) Owned, Managed, Serviced, and/or Operated by Defendant in California During the Class Period, Including Differences Between the Various Location(s), Division(s), and/or Department(s) to Determine Whether Those Differences Will Cause Individual Issues to Predominate Over Common Issues	7.80
Comparative Analysis and Cross-Checking of All Available Job Postings, Job Reviews, and Consumer Reviews Regarding Defendant in Order to Determine Any Variation and Identify Job Duties and Responsibilities That Would be Susceptible to Being Performed Off-the-Clock or During Meal or Rest Breaks	8.50
Research and Investigation Re: Workforce, Staffing Models, and Staffing Levels at Locations at which Putative Class Members Worked Throughout California	9.20
Research and Investigation Re: Defendant's Written and Unwritten Policies, Practices, and Procedures Relating to Bonuses/Incentive/Shift Differential Pay, Timekeeping, Regular Rate Calculations, Scheduling, Meal/Rest Breaks, Meal/Rest Premiums, On-Premises Breaks, Overtime Compensation, Dress Code, Personal Cell Phone Usage, and Reimbursement of Business-Related Expenses	45.60
Research and Investigation Re: Various Software Programs, Systems, and Other Technology Defendant Uses to Conduct Its Everyday Business, Including CRM, Project Management, Timekeeping, Attendance, VPN, and Badge/Secured Entry Systems, with a Focus on What Documents (Both Paper and Electronic) Are Created in the Normal Course of Business Relating to Overtime Worked, Off-the-Clock Time Worked Pre/Post-Shift, and Time Worked During Meal Breaks	7.50
Research and Analysis of Potential Defenses Defendant May Raise, Including <i>De Minimis</i> Work, Non-Compensable Off-the-Clock Work, Waiver, and Compliant Policies	8.50
Research and Investigation Re: Post- <i>Duran</i> vs. <i>U.S. Bank</i> Trial Manageability Issues, including Research Regarding Which Experts to Retain and For What Purpose	7.20

Research and Analysis of Defendant's Past and Recent History Involving Wage-and-Hour Issues and Other Related Employment Issues and Complaints in Court and/or Other Forums (e.g., Administrative Agencies)	5.40
Prepare a Discovery Strategy and Plan of Action, Including Topics of Inquiry Important to Certification, Liability, and Damages/Civil Penalties	8.90
Outline Class Certification Issues and Preliminarily Brief Anticipated Class Certification Motion	33.50
Research and Investigation of Impact of COVID-19 Pandemic on Defendant, Its Operations, and Putative Class Members' Work	7.90
Meet and Communicate with Plaintiff Abraham Marin Throughout the Pendency of the Case	29.50
Meet and Communicate with Plaintiff Sheree Willis Throughout the Pendency of the Case	25.80
Meet and Communicate with Putative Class Members	22.60
Pleadings and Court Filings	
Research and Draft Plaintiff Abraham Marin's Class Action Complaint for Damages and Legal Research and Analysis of All Claims Involved (filed on March 6, 2019)	8.50
Review Court's Notice of Case Assignment (filed on March 6, 2019)	0.10
Review Court's Minute Order Re: Complex Designation (filed on April 9, 2019)	0.20
Draft Plaintiff Abraham Marin's Notice of Posting Jury Fees (filed on April 18, 2019)	0.20
Review and Analyze Defendant's Answer to Class Action Complaint for Damages and Research Affirmative Defenses in Defendant's Answer (served on May 3, 2019)	2.50

Meet and Confer with Defendant's Counsel, and Draft Joint Status Conference Statement (submitted on May 20, 2019)	1.90
Review Court's Minute Order Re: Status Conference (filed on May 31, 2019)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation to Continue Status Conference; and [Proposed] Order (submitted on September 17, 2019)	1.80
Review Court's Order Granting Stipulation to Continue Status Conference (filed on September 18, 2019)	0.20
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation to Continue Status Conference; and [Proposed] Order (submitted on December 30, 2019)	1.70
Review Court's Order Granting Stipulation to Continue Status Conference (filed on January 6, 2020)	0.20
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation and [Proposed] Protective Order Re: Confidential Information and Documents (submitted on March 4, 2020)	2.40
Review Court's Order Re: Confidential Information and Documents (filed on March 4, 2020)	0.20
Review Court's Notice of Continuance Re: Status Conference (filed on May 14, 2020)	0.20
Meet and Confer with Defendant's Counsel, and Draft Joint Status Conference Statement (submitted on July 20, 2020)	2.20
Draft Plaintiff Abraham Marin's Notice Regarding July 24, 2020 Status Conference (filed on July 24, 2020)	0.30
Review Court's Minute Order Re: Status Conference (filed on July 24, 2020)	0.20
Meet and Confer with Defendant's Counsel, and Draft Joint Notice of Tentative Class Action Settlement (submitted on August 26, 2020)	0.70

Review Court's Minute Order Re: Joint Notice of Tentative Class Action Settlement (filed on August 27, 2020)	0.20
Meet and Confer with Defendant's Counsel, and Draft Joint Status Conference Statement (submitted on December 7, 2020)	1.20
Review Court's Minute Order Re: Status Conference (filed on December 10, 2020)	0.20
Research and Draft Plaintiffs' Class Action Complaint for Damages & Enforcement Under the Private Attorneys General Act, California Labor Code Section 2698, Et Seq. and Legal Research and Analysis of All Claims Involved (filed on January 13, 2021); Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation Granting Plaintiff Leave to File First Amended Complaint; [Proposed] Order (submitted on December 14, 2020)	5.90
Review Court's Order Granting Plaintiff Leave to File First Amended Complaint (filed on December 14, 2020)	0.20
Review Defendant's Answer to Plaintiffs' First Amended Complaint (served on January 15, 2021)	2.10
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation to Continue Status Conference Hearing; [Proposed] Order (submitted on February 10, 2021)	0.80
Review Court's Order Continuing Status Conference (filed on February 11, 2021)	0.20
Meet and Confer with Defendant's Counsel, and Draft Joint Status Conference Statement (submitted on May 14, 2021)	0.80
Review Court's Minute Order Re: Status Conference (filed on May 17, 2021)	0.20
Review Court's Minute Order Re: Status Conference (filed on July 7, 2021)	0.10
Review Court's Minute Order Re: Status Conference (filed on August 27, 2021)	0.20

Review Court's Minute Order Re: Status Conference (filed on September 10, 2021)	0.10
Appearances	
Prepare for, Travel to/from, and Attend Initial Status Conference (May 24, 2019)	2.10
Prepare for and Telephonically Attend Status Conference (July 24, 2020)	1.10
Prepare for and Telephonically Attend Status Conference (July 2, 2021)	0.70
Prepare for and Telephonically Attend Hearing on Plaintiffs' Motion for Preliminary Approval of Class Action Settlement (March 24, 2022)	1.20
Prepare for and Telephonically Attend Hearing on Plaintiffs' Motion for Final Approval of Class Action Settlement, Attorneys' Fees, Costs, and Incentive Awards (September 15, 2022) (Anticipated)	2.50
Discovery and Deposition	
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Abraham Marin (served on November 6, 2018)	2.10
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Putative Class Member (served on November 6, 2018)	1.80
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Putative Class Member (served on November 6, 2018)	1.80
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Abraham Marin (served on November 29, 2018)	7.50
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Putative Class Member (served on November 29, 2018)	8.50

Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Putative Class Member (served on April 2, 2019)	2.10
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Putative Class Member (served on April 11, 2019)	0.50
Draft Plaintiff Abraham Marin's Form Interrogatories – General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), Special Interrogatories (Set Three), Requests for Production of Documents (Set One), and Requests for Production of Documents (Set Two) to Defendant (served on May 28, 2019)	9.10
Draft Plaintiff Abraham Marin's Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (July 8, 2019; Organizational Structure, Document Retention/Destruction, Locations, and Staffing Levels) (served on May 28, 2019)	5.60
Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (July 9, 2019; Wage and Hour Practices) (served on May 28, 2019)	6.80
Draft Plaintiff Abraham Marin's Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (July 10, 2019; Affirmative Defenses) (served on May 28, 2019)	6.50
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Putative Class Member (served on August 7, 2020)	1.80
Letters and Correspondence	
Draft Notice to California Labor and Workforce Development Agency Re: Claims of Plaintiff Sheree Willis for Penalties Under California Labor Code section 2698, <i>et seq.</i> (served on August 26, 2020)	4.50
Meet with, Draft Correspondence to, and Respond to Correspondence from, Defendant's Counsel	28.70
Mediation/Settlement	

Review and Analyze Mediation Data and Documents Produced by Defendant (approximately 20,633 pages) (served on March 9, 2020) • Employee Handbooks and Policies • Employee Timecard Data • Employee Payroll Earnings	63.20
Review and Analyze Additional Mediation Data and Documents Produced by Defendant (approximately 33,470 pages) (served on July 20, 2020) • Updated Employee Timecard Data • Updated Employee Payroll Earnings	54.70
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 Violation, Damages, and Penalties Analysis/Calculations (submitted on July 17, 2020)	33.50
Attend Mediation Session (July 22, 2020; Zoom Video Conference)	10.80
Draft, Review, Revise, Negotiate, and Finalize Class Action/Representative Action Memorandum of Understanding (executed December 11, 2020)	4.50
Draft, Review, Revise, Negotiate, and Finalize Class Action and PAGA Settlement Agreement (executed on May 4, 2021) and Draft Exhibits	25.80
Draft, Review, Revise, Negotiate, and Finalize First Amended Class Action and PAGA Settlement Agreement (executed on January 28, 2022) and Draft Exhibits	6.80
Monitor Settlement Administration Process and Review Administrator's Weekly Reports	7.50
Law and Motion	
Research and Draft Plaintiffs' Notice of Motion and Motion for Preliminary Approval of Class Action Settlement, Declaration of Edwin Aiwasian in Support Thereof, Declaration of Abraham Marin in Support	23.80

Thereof, Declaration of Sheree Williams in Support Thereof, and [Proposed] Order Thereon (filed on September 8, 2021)	
Review Court's Minute Order Re: Motion for Preliminary Approval (filed on October 28, 2021)	0.60
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation to Continue Deadline and Hearing Date for Supplemental Briefing in Support of Plaintiffs' Motion for Preliminary Approval; [Proposed] Order Thereon (submitted on November 22, 2021)	0.80
Review Court's Order Continuing Deadline and Hearing Date for Supplemental Briefing in Support of Plaintiffs' Motion for Preliminary Approval (filed on November 29, 2021)	0.20
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation to Continue Deadline and Hearing Date for Supplemental Briefing of Plaintiffs' Motion for Preliminary Approval (submitted on December 30, 2021)	0.30
Review Court's Order Re: Stipulation to Continue Deadline and Hearing Date for Supplemental Briefing of Plaintiffs' Motion for Preliminary Approval (filed on January 3, 2022)	0.10
Draft Plaintiffs' Supplemental Brief in Support of Motion for Preliminary Approval of Class Action Settlement; Memorandum of Points and Authorities, Supplemental Declaration of Edwin Aiwazian in Support Thereof, and [Revised Proposed] Order Thereon (filed on February 1, 2022)	9.40
Review Court's Minute Order Re: Motion for Preliminary Approval (filed on February 3, 2022)	0.10
Review Court's Minute Order Re: Motion for Preliminary Approval (filed on February 24, 2022)	0.10
Draft Plaintiffs' Further Supplemental Brief in Support of Motion for Preliminary Approval of Class Action Settlement; Memorandum of Points and Authorities, Further Supplemental Declaration of Edwin Aiwazian in Support Thereof, and [Revised Proposed] Order Thereon (filed on March 10, 2022)	7.80
Review Court's Minute Order Re: Motion for Preliminary Approval (filed on March 24, 2022)	0.10

Draft [Revised Proposed] Order Granting Preliminary Approval of Class Action Settlement and Proposed Order (Cover Sheet) (filed on March 25, 2022)	0.80
Review Court's Order Granting Preliminary Approval of Class Action Settlement (filed on March 28, 2022)	0.20
Review and Analyze Settlement Administrator's Declaration Regarding Settlement Notice Administration; and Research and Draft Plaintiffs' Motion for Final Approval of Class Action Settlement, Attorneys' Fees, Costs, and Incentive Awards, and Declaration of Edwin Aiwasian in Support Thereof, and [Proposed] Final Approval Order and Judgment (filed on August 23, 2022) (Anticipated)	22.60
Total Hours:	707.00

EXHIBIT B

LAWYERS for JUSTICE PC CASE COST DETAIL

Marin v. Word and Brown Companies, Inc.

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
11/6/2018	U.S. Postmaster	Postage	13.40
3/7/2019	One Legal	Attorney Service	59.56
3/7/2019	Orange County Superior Court	Filing Fee	435.00
3/7/2019	Orange County Superior Court	Complex Fee	1,000.00
4/1/2019	ProLegal	Attorney Service	76.28
4/18/2019	One Legal	Attorney Service	17.15
4/18/2019	Orange County Superior Court	Jury Fee	150.00
4/19/2019	One Legal	Attorney Service	12.20
5/7/2019	ProLegal	Attorney Service	28.65
5/20/2019	One Legal	Attorney Service	12.20
5/20/2019	General Logistics Systems US, Inc.	Courier Service	13.63
5/24/2019	Malalai Anbari	Travel Reimbursement	53.00
5/28/2019	General Logistics Systems US, Inc.	Courier Service	13.63
1/2/2020	CourtCall, LLC	Attorney Service	94.00
1/3/2020	Legal Document Server, Inc.	Attorney Service	12.25
1/6/2020	Legal Document Server, Inc.	Attorney Service	12.95
1/6/2020	Orange County Superior Court	Filing Fee	20.00
1/9/2020	Legal Document Server, Inc.	Attorney Service	12.25
3/4/2020	Signature Resolution LLC	Mediation Fee	10,450.00
7/20/2020	General Logistics Systems US, Inc.	Courier Service	13.93
7/20/2020	Legal Document Server, Inc.	Attorney Service	13.25
7/21/2020	CourtCall, LLC	Attorney Service	94.00
7/22/2020	Andre Sherman Consulting, LLC	Damages Consulting Expert	9,450.00
7/24/2020	General Logistics Systems US, Inc.	Courier Service	11.93
7/24/2020	Legal Document Server, Inc.	Attorney Service	13.25
8/26/2020	Labor & Workforce Development Agency	Filing Fee	75.00
8/27/2020	Legal Document Server, Inc.	Attorney Service	13.25
12/7/2020	Legal Document Server, Inc.	Attorney Service	13.25
12/14/2020	Legal Document Server, Inc.	Attorney Service	13.95
12/14/2020	Orange County Superior Court	Filing Fee	20.00
1/13/2021	Orange County Superior Court	Document Download Fee	9.46
1/14/2021	Legal Document Server, Inc.	Attorney Service	13.25
2/10/2021	Legal Document Server, Inc.	Attorney Service	13.25
2/16/2021	Legal Document Server, Inc.	Attorney Service	0.70
2/16/2021	Orange County Superior Court	Filing Fee	20.00
5/14/2021	Legal Document Server, Inc.	Attorney Service	13.25
5/17/2021	CourtCall, LLC	Attorney Service	94.00
6/28/2021	CourtCall, LLC	Attorney Service	94.00
9/8/2021	Legal Document Server, Inc.	Attorney Service	13.25
9/13/2021	Legal Document Server, Inc.	Attorney Service	5.10

LAWYERS for JUSTICE PC CASE COST DETAIL
Marin v. Word and Brown Companies, Inc.

9/13/2021	Orange County Superior Court	Filing Fee	120.00
9/13/2021	Orange County Superior Court	Document Download Fee	7.50
10/25/2021	CourtCall, LLC	Attorney Service	94.00
10/29/2021	Orange County Superior Court	Document Download Fee	7.50
11/2/2021	One Legal	Attorney Service	14.67
11/22/2021	Legal Document Server, Inc.	Attorney Service	13.25
11/29/2021	Legal Document Server, Inc.	Attorney Service	0.85
11/29/2021	Orange County Superior Court	Filing Fee	20.00
12/30/2021	Legal Document Server, Inc.	Attorney Service	13.25
1/3/2022	Legal Document Server, Inc.	Attorney Service	0.95
1/3/2022	Orange County Superior Court	Filing Fee	20.00
2/1/2022	CourtCall, LLC	Attorney Service	94.00
2/1/2022	Legal Document Server, Inc.	Attorney Service	13.25
2/25/2022	Orange County Superior Court	Document Download Fee	15.00
3/10/2022	Legal Document Server, Inc.	Attorney Service	13.25
3/23/2022	CourtCall, LLC	Attorney Service	94.00
3/25/2022	Legal Document Server, Inc.	Attorney Service	13.25
3/31/2022	Orange County Superior Court	Document Download Fee	10.72
Total:			23,059.66