

Arby Aiwarzian (SBN 269827)
Joanna Ghosh (SBN 272479)
Vartan Madoyan (SBN 279015)
LAWYERS for JUSTICE, PC
450 North Brand Blvd, Suite 900
Glendale, California 91203
Tel: (818) 265-1020 / Fax: (818) 265-1021

Attorneys for Plaintiff and the Class

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

CYNTHIA BARRAGAN, individually, and
on behalf of other members of the general
public similarly situated, and on behalf of
other aggrieved employees pursuant to the
California Private Attorneys General Act;

Plaintiff,

vs.

TIBURCIO VASQUEZ HEALTH
CENTER, INC., a California corporation;
and DOES 1 through 100, inclusive,

Defendants.

Reservation ID: A-20078693-001

Case No.: RG20078693

Honorable Michael Markman
Department 23

**DECLARATION OF VARTAN MADOYAN
IN SUPPORT OF PLAINTIFF'S MOTION
FOR FINAL APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT,
ATTORNEYS' FEES AND COSTS, AND
CLASS REPRESENTATIVE SERVICE
PAYMENT**

Date: May 29, 2025
Time: 10:00 a.m.
Department: 23

Complaint Filed: October 20, 2020
FAC Filed: June 29, 2021
SAC Filed: September 10,
2021

Trial Date: None Set

DECLARATION OF VARTAN MADOYAN

I, Vartan Madoyan, 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 Cynthia Barragan (“Plaintiff”) and the Class. The facts set forth in this declaration are within my personal knowledge or based on information and belief, and, if called as a witness, I could and would competently testify as follows.

PRELIMINARY APPROVAL OF SETTLEMENT

2. On December 12, 2024, the above-entitled Court entered the order granting and preliminarily approving the Class Action and PAGA Settlement and Release and Addendum to Class Action and PAGA Settlement Agreement and Release (collectively, “Settlement,” “Agreement,” or “Settlement Agreement”) entered into between Plaintiff and Defendant, and conditionally certified the Class for settlement purposes. The Court preliminarily appointed Plaintiff as representative of the Class (“Class Representative”). The Court also preliminarily appointed and designated Lawyers *for* Justice, PC as counsel for the Class (“Class Counsel”). The Court approved and ordered the mailing of the Notice of Class Action Settlement (“Notice”), and adopted the notice, opt-out, and objection procedures, and ordered their implementation. The Court appointed Simpluris, Inc. (“Simpluris” or “Settlement Administrator”) to serve as Settlement Administrator for handling the notice and settlement administration process.

3. As of the date of filing the accompanying Motion for Final Approval of Class Action and PAGA Settlement, Attorneys’ Fees and Costs, and Class Representative Service Payment (“Motion for Final Approval”), no Class Members have objected to the Settlement in any manner, including as to the request for Attorneys’ Fees and Costs, Class Representative Service Payment, Settlement Administration Costs, or allocation for penalties under the Private Attorneys General Act of 2004, California Labor Code section 2698, *et seq.* (“PAGA”).

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WORK PERFORMED BY CLASS COUNSEL

4. Several attorneys at Lawyers *for* Justice, PC have been actively engaged in litigating this matter action since the inception of Plaintiff's lawsuit.

5. Lawyers *for* Justice, PC fully and actively participated in the litigation of the Action, including and not limited to, preparing the pleadings, case strategy, undertaking investigation, performing legal research, engaging in numerous, highly contested dispositive motion practice, and conducting claims evaluation and analysis. Ultimately, Class Counsel's efforts and Plaintiff's efforts have been successful in reaching the Settlement.

6. Before initiating the Action, Lawyers *for* Justice, PC investigated and researched the facts and circumstances underlying the pertinent factual and legal issues and applicable law. This required thorough discussions and interviews between attorneys at our firm and Plaintiff, and research into the various legal issues involved in the case, namely, the current state of the law as it applied to certification, off-the-clock theory, meal and rest periods, reimbursement of business-related expenses, wage-and-hour enforcement, representative PAGA claims, Plaintiff's claims and allegations, and potential defenses. After conducting initial investigation, Lawyers *for* Justice, PC determined that the claims were well-suited for class-wide and representative adjudication owing to what appeared to be a common course of conduct affecting a similarly situated group of current and former hourly-paid or non-exempt employees of Defendant in California, who were not properly compensated for, *inter alia*, all hours worked, non-compliant meal and rest periods, and unreimbursed business expenses.

7. Collectively, Class Counsel investigated the veracity, strength, and scope of the claims and were preparing the Action for class certification and trial prior to reaching the Settlement. Class Counsel conducted significant formal and informal discovery and investigation into the facts of the case, exchanging a volume of information, documents, and data in the course of litigation, mediation, and settlement negotiations. Class Counsel reviewed and analyzed a large volume of pages of information, documents, and data obtained from Plaintiff, Defendant, and other sources. The documents and data reviewed and analyzed by Class Counsel included, and were not limited to, not limited to a detailed sampling of Class Members' timekeeping and

1 payroll data, as well as relevant employment policies and practices, to determine the potential
2 value and strength of the claims. The available information enabled Class Counsel to assess and
3 value the class and PAGA claims and prepare violation, damages, and penalties analyses and
4 models. Accordingly, the Parties have conducted adequate investigation and discovery to be
5 sufficiently informed of the nature and extent of the Class and PAGA claims, and to enable both
6 sides to fully evaluate the Settlement for its fairness, adequacy, and reasonableness. The Parties
7 have agreed that the matter is well-suited for settlement given the legal issues relating to
8 Plaintiff's principal claims, as well as the costs and risks to both sides that would attend further
9 litigation. The Settlement takes into account the strengths and weaknesses of each side's position
10 and the uncertainty of how the case might have concluded at certification, trial, and/or appeals, in
11 connection with the mediation and settlement negotiations. Other work performed by Class
12 Counsel included, and was not limited to, case strategy and analysis; drafting, reviewing, and
13 revising pleadings, motion-related papers, and mediation briefs; preparing and appearing for
14 court proceedings; and preparing for and attending private mediation sessions and engaging in
15 extensive settlement negotiations, among other tasks. Further, Class Counsel was successful in
16 the continued prosecution and resolution of Plaintiff's class action and PAGA claims despite
17 numerous demurrers and/or motions to strike filed by Defendant, which Plaintiff strongly
18 opposed.

19 8. As outlined herein, the parties have conducted significant formal and informal
20 discovery and investigation in the Action. Class Counsel analyzed a volume of information,
21 documents, and data obtained from Plaintiff, Defendant, or other sources. The information,
22 documents, and data provided a critical understanding of the nature of the work performed by the
23 Class Members and Aggrieved Employees, as well as Defendant's operations and employment
24 policies, practices, and procedures, and were used in analyzing liability, damages, and valuation
25 issues in connection with all phases of litigation, and ultimately with the mediation and
26 settlement negotiation process. Class Counsel also performed significant research into the
27 applicable law, which is evolving as it relates class certification, off-the-clock theory, meal and
28 rest periods, representative PAGA actions, wage-and-hour enforcement, Plaintiff's claims and

1 allegations, and Defendant's defenses thereto, as well as facts discovered. Accordingly,
2 sufficient investigation and review of information have taken place in order for the parties to be
3 adequately informed of the nature and extent of the claims, and to enable all parties to fully
4 evaluate the Settlement for its fairness, adequacy, and reasonableness.

5 9. The Parties engaged in extensive settlement negotiations to try to resolve the
6 Action. These efforts included participating in a formal, full-day mediation with respected and
7 experienced mediator Francis J. Ortman, wherein the case did not resolve but the Parties
8 continued to engage in further settlement negotiations, exchanged information on Defendant's
9 financial condition, and ultimately resolved the case with the continued assistance of the
10 mediator via a mediator's proposal. During all settlement discussions, the parties conducted
11 their negotiations at arm's length in an adversarial position. In the course of mediation and
12 settlement discussions, the Parties exchanged information, documents, and data, and discussed
13 various aspects of the case, including and not limited to, the risks and delays of further litigation,
14 the risks to the Parties of proceeding with class certification and/or representative adjudication,
15 the law relating to class certification, off-the-clock theory, meal and rest periods, representative
16 PAGA actions, and wage-and-hour law and enforcement, as well as the evidence produced and
17 analyzed, and the possibility of appeals, among other things. Arriving at a settlement that was
18 acceptable to the Parties was not easy. Defendant contended that individualized questions of fact
19 predominate over any common issues, and these issues would pose challenges to class
20 certification and representative adjudication (and ultimately issues of proof at any trial).
21 Defendant and its counsel felt strongly about Defendant's ability to avoid class certification and
22 prevail on the merits, while Plaintiff and Class Counsel believed that they would be able to
23 obtain class certification and prevail at trial. After conducting extensive investigations, formal
24 and informal discovery, exchange of information, discussions of financial condition, and
25 settlement negotiations, and with the aid of the mediator's evaluation, the Parties have agreed
26 that the matter is well-suited for settlement given the legal issues relating to Plaintiff's principal
27 claims, as well as the costs and risks to both sides that would attend further litigation. These
28 risks of further litigation include, and are not limited to, a determination that the claims are

unsuitable for class treatment and/or representative adjudication, class de-certification after certification of a class, allowing a jury to decide the claims asserted in the case, and the real possibility of no monetary recovery after years of litigation.

10. Plaintiff moves for an award of attorneys' fees to Class Counsel in the amount of \$516,666.67 which is one-third of the Gross Settlement Amount of \$1,550,000.00.

11. The attorneys' fees sought are commensurate with: (1) the risk that Class Counsel took in commencing and/or pursuing the Action; (2) the time, effort, and expense that Class Counsel dedicated to the Action; (3) the skill and determination that Class Counsel have shown; (4) the substantial results that Class Counsel have achieved throughout the litigation of the Action; (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 Action.

12. While not necessarily required to be demonstrated because the percentage fee from the common fund is proper for this settlement, Class Counsel has incurred many hours of work in connection with prosecuting the Action 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 413.50 hours performing tasks and obtaining recovery in the Action. Based on a reasonable blended rate of \$850 per hour, the lodestar for my office totals at least \$351,475.00. 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 Lawyers *for* Justice, PC. The hours attributable to Lawyers *for* Justice, PC include work done by several other attorneys at the firm and myself. Additionally, separate from the hours of work referenced herein and in the attached chart, Lawyers *for* Justice, PC had litigation support personnel actively engaged in assisting with the prosecution of this matter.

13. 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 Action, 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 at least \$850 per hour 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 \$850 per hour for legal services performed, by courts granting approval of settlements in other wage-and-hour class action and/or representative action 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 compensation at the rate of \$936.47 per hour; 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 compensation at the rate of \$919.57 per hour; 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 compensation at the rate of \$855.96 per hour.

**EXPERIENCE AND ADEQUACY OF
LAWYERS for JUSTICE, PC**

14. For over a decade, 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, Lawyers for Justice, PC is attorney of record in tens of dozens of employment-related putative class actions in both state and federal courts in the State of California. Lawyers for Justice, PC is comprised of attorneys who focus on litigating complex wage-and-hour class and Private Attorneys General Act ("PAGA") representative actions. The firm has successfully litigated cases involving nearly every aspect of California wage and hour law, including payment of overtime and minimum wages, provision of meal and rest breaks and/or premiums wages for same, timely payment of wages, provision of compliant wage statements, reimbursement of business expenses, executive, administrative, and other overtime exemptions to the State of California and federal overtime compensation requirements, PAGA claims, and sister statutes under federal law. Lawyers for Justice, PC has recovered (sometimes in association with other law firms) millions of dollars on behalf of thousands of individuals in California.

1 15. Edwin Aiwazian is a Managing Member and Shareholder of Lawyers *for* Justice,
2 PC. He received his Bachelor of Arts degree from Pepperdine University in April of 1999 and
3 earned a Juris Doctor degree from Pepperdine University School of Law in May of 2004. He has
4 extensive formal training in dispute resolution and negotiation from the Straus Institute for
5 Dispute Resolution as part of its Masters in Dispute Resolution degree program. In addition, he
6 has previously served as a pro bono mediator for the Los Angeles County Superior Court. In
7 October of 2000, he obtained a Litigation Paralegal Certificate from the UCLA Extension
8 Program. During the summer of 2000, he studied Legal Writing at Harvard University. From
9 approximately September 2002 to approximately December 2002, he served as a Judicial Extern
10 to the Honorable Kim McLane Wardlaw of the United States Court of Appeals for the Ninth
11 Circuit. From approximately June 2002 to approximately August 2002, he served as a Judicial
12 Extern to the Honorable Earl Johnson, Jr. of the California Court of Appeal for the Second
13 Appellate District. In December of 2004, he obtained a license to practice law from the
14 California State Bar. Since in or around October of 2008, through his work at Lawyers *for*
15 Justice, PC, he has almost exclusively focused on the prosecution of consumer and employment
16 class actions. While employed by Lawyers *for* Justice PC, he has argued over one hundred (100)
17 motions, taken or defended over one hundred fifty (150) depositions, prepared dozens of expert
18 witnesses for deposition or trial, and attended over one hundred seventy-five (175) mediations.
19 Together with other attorneys at the firm, and in some cases in conjunction with co-counsel, he
20 has successfully litigated cases involving the executive, administrative, and other overtime
21 exemptions to the State of California and federal overtime compensation requirements. Under
22 his supervision, Lawyers *for* Justice, PC has successfully obtained class certification by
23 contested motion practice in approximately fifteen (15) cases in the last decade and litigated over
24 1,000 class action or representative action cases.

25 16. Arby Aiwazian is a Member and Shareholder of Lawyers *for* Justice, PC. He
26 received his Bachelor of Arts degree from University of California, Los Angeles and graduated
27 magna cum laude. He earned a Juris Doctor degree, cum laude, from Southwestern Law School.
28 From approximately May 2007 to approximately July 2007, he served as a Judicial Extern to the

Honorable Earl Johnson, Jr. of the California Court of Appeal for the Second Appellate District. From approximately August 2008 to approximately December 2008, he served as a Judicial Extern to the Honorable Kim McLane Wardlaw of the United State Court of Appeals for the Ninth Circuit. He was admitted to practice law in California in 2010. He is admitted to practice before all courts of the State of California and all United States District Courts in the State of California. He has worked on many wage-and-hour class action and representative action cases, taking the lead in taking and defending depositions, arguing motions, and attending mediations. He has played an integral role in preparing matters for class certification, including and not limited to, successful certification of a class in *Upson v. Sur La Table* (Los Angeles County Superior Court Case No. BC424012), *Montazemi v. Regus Management* (Los Angeles County Superior Court Case No. BC478769), and *Abdulhaqq v. Urban Outfitters* (Alameda County Superior Court Case No. RG13680477). Under his supervision, dozens of class action or representative cases have resulted in settlements that have been granted court approval, including and not limited to, those listed in paragraph 19 herein. He has handled over one hundred and fifty (150) mediations and worked on over two hundred and fifty (250) class action or representative action cases which have resulted in settlement.

17. Joanna Ghosh is a Managing Member of Lawyers for Justice, PC. She received a Bachelor of Arts degree from California State University, Los Angeles in 2006, a Master of Science degree from the London School of Economics in 2007, and a Juris Doctor degree from Georgetown University Law Center in 2010. She is admitted to practice in California (since 2010) and in New York (since 2013), and is admitted to practice in all U.S. District Courts in California, the U.S. Bankruptcy Court for the Central District of California, and the U.S. Supreme Court. She has taken and defended dozens of depositions and successfully handled motion practice in class action cases regarding discovery (including and not limited to, regarding class contact information), class certification (both contested class certification and stipulated class certification), arbitration agreements, coordination, and intervention. She has successfully handled briefing and oral argument on appeal and obtained notable decisions regarding the Private Attorneys General Act and employer efforts to compel arbitration, e.g., *Betancourt v.*

1 *Prudential Overall Supply*, 9 Cal.App.5th 439 (Cal. Ct. App., Mar. 7, 2017), cert. denied (Cal.,
2 May 24, 2017), cert. denied (U.S., Dec. 11, 2017) and *ZB, N.A. v. Superior Court*, 8 Cal.5th175
3 (2019). She has significant experience with class actions, including and not limited to working
4 on cases to obtain class certification through contested motion practice and working on cases in
5 the post-certification stage (e.g., post-certification discovery, appeal, statistical sampling and
6 pilot study, and trial preparation in conjunction with co-counsel in a case involving a certified
7 class consisting of approximately 2,600 individuals). She also has extensive experience with
8 class action and/or representative action settlements, and has handled this process in over three
9 hundred (300) cases. Under Edwin Aiwazian, Arby Aiwazian, and her supervision, Lawyers *for*
10 Justice, PC has handled the class certification and court approval process for hundreds of class
11 action and/or representative action matters that have successfully resolved. She is a member of
12 the California Employment Lawyers Association and, on several occasions, has been a speaker
13 regarding topics in wage and hour law at the organization's continuing legal education events.

14 18. I am a Member of Lawyers *for* Justice, PC. I received my Bachelor of Arts
15 degree in Economics from the University of California, San Diego in 2007, and a Juris Doctor
16 degree from Loyola Law School in 2011, graduating with Cum Laude and Order of the Coif
17 honors. I am admitted to practice before all courts in the State of California and all U.S. District
18 Courts in California. I externed for the Honorable Victoria S. Kaufman of the United States
19 Bankruptcy Court, Central District of California, from June 2009 to August 2009. I externed for
20 the Honorable Gary A. Feess of the United States District Court, Central District of California,
21 from January 2010 to May 2010. From 2011 through and including the present, my practice
22 consisted almost exclusively of complex wage and hour class action and PAGA action matters in
23 California. From October 2011 to June 2013, I was an Associate at Littler Mendelson's Century
24 City, California office, working for one of the largest employer-side labor and employment law
25 firms in the United States. From July 2013 to March 2014, I was an Associate at Sheppard,
26 Mullin, Richter & Hampton's Century City, California office. From March 2014 to July 2023, I
27 worked as an Associate and then as Counsel at Baker Hostetler LLP's Los Angeles office. From
28 August 2023 to the present, I have been a Member of Lawyers *for* Justice, PC. I have taken and

defended dozens of depositions and has successfully handled motion practice in class action and PAGA cases regarding discovery (including and not limited to motions regarding class contact information), class certification (both contested class certification and stipulated class certification), dispositive motions, arbitration agreements, coordination, and intervention. I have successfully handled a complex wage and hour class action and PAGA case through a trial verdict in the matter of *Estrada v. Royalty Carpet Mills*, Orange County Superior Court, Case No. 30-2013-00692890. I also successfully handled briefing on appeal regarding employer efforts to compel arbitration. *TitleMax of Cal. v. Pena*, California Court of Appeals for the Fifth District, Case No. F084706 (Cal. Ct. App. March 28, 2023) (unpublished decision). Further, I have extensive experience with settlements of class actions and PAGA actions and have handled and supervised this process in over 100 cases.

**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 its 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

1 granted final approval of the class action settlement. The Los Angeles County Superior Court
2 Case Number is BC430918.

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

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

13 f) LFJ, in association with co-counsel therein, represented the plaintiff in a
14 wage-and-hour class and PAGA representative action against a national wholesale distributor of
15 plumbing and builder supplies, involving allegations of misclassification of multiple salaried
16 “manager” positions. On May 22, 2014, the court granted final approval of the class and PAGA
17 representative action settlement. The Sacramento County Superior Court Case Number is 34-
18 2012-00136285.

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

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

1 non-exempt employees. On November 18, 2016, the court granted final approval of the class and
2 PAGA representative action settlement. The San Francisco County Superior Court Case Number
3 is CJC-13-004839 and the Judicial Council Coordination Proceeding Number is 4839.

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

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

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

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

26 s) LFJ, in association with co-counsel therein, represented the plaintiffs in a
27 wage-and-hour class and PAGA representative action against a lumber and hardware company
28 on behalf of non-exempt employees. On April 26, 2017, the court granted final approval of the

1 class and PAGA representative action settlement. The Orange County Superior Court Case
2 Number is 30-2014-00747750-CU-OE-CXC.

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

8 u) LFJ represented the plaintiff in a wage-and-hour class and PAGA
9 representative action against a food company on behalf of non-exempt employees. On June 30,
10 2017, the court granted final approval of the class and PAGA representative action settlement.
11 The Sacramento County Superior Court Case Number is 34-2015-00175871.

12 v) LFJ represented the plaintiffs in a wage-and-hour class and PAGA
13 representative action against a chocolate company on behalf of non-exempt employees. On July
14 19, 2017, the court granted final approval of the class and PAGA representative action
15 settlement. The Alameda County Superior Court Case Number is RG15764300.

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

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

25 y) LFJ, in association with co-counsel therein, represented the plaintiffs in a
26 wage-and-hour class and PAGA representative action against a bank on behalf of non-exempt
27 employees. On December 11, 2017, the court granted final approval of the class and PAGA
28

1 representative action settlement. The Los Angeles County Superior Court Case Number is
2 BC569646.

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

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

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

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

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

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

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

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

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

22 ii) LFJ, in association with co-counsel therein, on behalf of the plaintiff and
23 respondent in a PAGA representative action, successfully opposed in the trial court, and briefed
24 and argued an appeal with respect to the employer's motion to compel arbitration, resulting in a
25 notable decision from the California Supreme Court clarifying the law regarding PAGA claims,
26 *ZB, N.A. v. Superior Court* (2019) 8 Cal.5th 175. On February 21, 2020, the court granted
27 approval of the PAGA representative action settlement. The San Diego County Superior Court
28 Case Number is 34-2016-00005578-CU-OE-CTL.

1 jj) LFJ, in association with co-counsel therein, represented the plaintiff in a
2 wage-and-hour class and PAGA representative action against a large national drug testing
3 laboratory on behalf of non-exempt employees. On February 21, 2020, the court granted the
4 plaintiff's motion for class certification and certified a class. On October 28, 2022, the court
5 granted final approval of the class and PAGA representative action settlement. The San Diego
6 County Superior Court Case Number is 37-2018-00019611-CU-OE-CTL.

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

13 ll) LFJ, in association with co-counsel therein, represented the plaintiffs in a
14 wage-and-hour class action against manufacturer and supplier of power products and services on
15 behalf of non-exempt employees. On July 31, 2020, the court granted in part the plaintiffs'
16 motion for class certification and certified a class. On August 27, 2021, the court granted final
17 approval of the class action settlement. The San Diego County Superior Court Case Number is
18 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 nn) LFJ represents the plaintiffs in a wage-and-hour class action against a
24 manufacturer and distributor of commercial dish and glass cleaning machines and supplies for
25 the restaurant and hospitality industries, on behalf of hourly-paid or non-exempt employees. On
26 July 13, 2023, the court granted the plaintiffs' motion for class certification and certified a class.
27 The Los Angeles County Superior Court Case Number is BC707670.
28

**LITIGATION COSTS AND EXPENSES INCURRED BY
LAWYERS FOR JUSTICE, PC**

20. To date, Class Counsel have borne all the risks and costs of litigation and will not receive any compensation until recovery is obtained in the Action. Lawyers *for* Justice, PC seeks reimbursement of **\$16,632.73** in litigation costs and expenses incurred in the Action, as reflected in **“EXHIBIT B”** attached hereto. These expenses were reasonable and necessary in the prosecution of the Action and to obtain the Settlement.

CLASS REPRESENTATIVE SERVICE PAYMENT TO PLAINTIFF

21. In recognition of her efforts and work serving as the Class Representative, the Settlement provides for a Class Representative Service Payment in the amount of \$10,000.00 to Plaintiff Barragan. The requested Class Representative Service Payment is fair and appropriate. Plaintiff spent a substantial amount of time and effort to produce relevant documents and information and provided facts and evidence to support the prosecution of the claims. Plaintiff was available whenever Class Counsel needed her and actively tried to obtain and provide information that would facilitate the pursuit of the case. Plaintiff spent numerous hours speaking with Class Counsel about her claims, describing her work experiences with Defendant, and gathering and reviewing documents. Plaintiff also agreed to a general release in exchange for the class representative service payment, which no other Class Member has had to provide in connection with this Settlement. Accordingly, it is appropriate for Plaintiff to receive \$10,000.00 as a reasonable Class Representative Service Payment for her services in the case, in addition to her individual settlement payment.

22. I submit that the Settlement is fair, reasonable, and adequate. In addition, the Settlement is in the best interest of Plaintiff, Class Members, Aggrieved Employees, and the State of California.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed May 6, 2025, at Glendale, California.

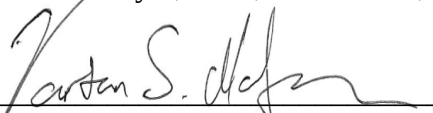

Vartan Madoyan

EXHIBIT A

CYNTHIA BARRAGAN V. TIBURCIO VASQUEZ HEALTH CENTER, INC.
Alameda County Superior Court, Case No. 19STCV24268

ATTORNEY TASK AND TIME CHART

TASK	LAWYERS <i>for</i> JUSTICE, PC
Investigation and Research / Due Diligence	
Meet and Communicate with Plaintiff Cynthia Barragan (“Plaintiff”) During the Case	41.50
Investigate, Communicate with, and/or Interview Putative Class Members, Aggrieved Employees, and/or Percipient Witnesses	11.50
Pleadings and Court Filings	
Investigate the Merits of Plaintiff’s Claims, Conduct Legal Research and Analysis Regarding the Claims, and Draft Plaintiff’s Complaint for Damages and Enforcement Under the Private Attorneys General Act, California Labor Code § 2698, Et. Seq. (filed on October 20, 2020)	9.50
Review Court’s Notice of Hearing (filed on November 12, 2020)	0.10
Review Court’s Minutes and Order Re: Complex Determination Hearing (filed on December 15, 2020)	0.10
Review Tiburcio Vasquez Health Center, Inc.’s (“Defendant”) Statement in Advance of January 19, 2021 Case Management Conference (served on January 11, 2021)	0.20
Draft Plaintiff’s Case Management Statement in Advance of January 19, 2021 Case Management Conference (filed January 13, 2021)	0.70

Review Court's Minutes and Order Re: Case Management and Re: Complex Determination (filed on January 19, 2021)	0.30
Review and Analyze Court's Notice of Assignment of Judge for All Purposes (filed on January 25, 2021)	0.20
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation and Order to Extend Time for Defendant to Respond to Plaintiff's Complaint (filed on February 4, 2021)	0.90
Review Court's Order Granting Stipulation to Extend Time for Defendant to Respond to Plaintiff's Complaint (filed on February 5, 2021)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation and Order to Further Extend Time for Defendant to Respond to Plaintiff's Complaint (filed on February 16, 2021)	0.60
Review Court's Order Granting Stipulation to Extend Time for Defendant to Respond to Plaintiff's Complaint (filed on February 23, 2021)	0.10
Draft Plaintiff's Notice of Posting Jury Fees (filed on April 16, 2021)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Statement for May 25, 2021 Case Management Conference (filed on May 17, 2021)	0.90
Review Court's Tentative Ruling Re: Case Management Conference (issued on May 21, 2021)	0.10
Review Court's Minutes and Order re: Case Management Conference (filed on May 25, 2021)	0.10
Draft Plaintiff's First Amended Class Action Complaint for Damages and Enforcement Under the Private Attorneys General Act, California Labor Code § 2698, Et. Seq. (filed on June 29, 2021)	2.50
Review Court's Tentative Ruling Re: Case Management Conference (issued on July 6, 2021)	0.10

Meet and Confer with Defendant's Counsel, and Draft Joint Statement for July 13, 2021 Case Management Conference (filed on July 6, 2021)	0.90
Review Court's Minutes and Order Re: Case Management Conference (filed on July 13, 2021)	0.10
Review Defendant's Notice of Change of Firm Name and Electronic Service Address (served on July 14, 2021)	0.10
Research and Draft Plaintiff's Second Amended Class Action Complaint for Damages and Enforcement Under the Private Attorneys General Act, California Labor Code § 2698, Et. Seq. (filed on September 10, 2021), and Meet and Confer with Defendant's Counsel and Draft Joint Stipulation and [Proposed] Order Regarding Filing of Plaintiff's Second Amended Complaint and Defendant's Response Thereto (filed on August 26, 2021)	6.50
Meet and Confer with Defendant's Counsel, and Draft Joint Statement for September 9, 2021 Case Management Conference (filed on August 30, 2021)	0.90
Review Court's Order Granting Stipulation Regarding Filing of Plaintiff's Second Amended Complaint (filed on August 31, 2021)	0.10
Review Defendant's Notice of Entry of Judgment or Order Re: Order Granting Stipulation Regarding Filing of Plaintiff's Second Amended Complaint and Defendant's Response Thereto (filed on September 1, 2021)	0.10
Review Court's Minutes and Order re: Case Management Conference (filed on September 7, 2021)	0.10
Review and Analyze Defendant's Answer to Plaintiff's Second Amended Complaint (served on October 12, 2021), and Research Affirmative Defenses in Defendant's Answer	1.90
Meet and Confer with Defendant's Counsel, and Draft Joint Statement for October 26, 2021 Case Management Conference (filed on October 25, 2021)	0.90

Review Court's Tentative Ruling and Minutes Re: Case Management Conference (issued/filed on October 26, 2021)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Statement for January 11, 2022 Case Management Conference (filed on January 4, 2022)	0.80
Review Court's Tentative Ruling Re: Case Management Conference (issued on January 7, 2022)	0.10
Review Court's Minutes and Order Re: Case Management Conference (filed on January 11, 2022)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Statement for April 5, 2022 Case Management Conference (filed on March 30, 2022)	0.80
Review Court's Tentative Ruling, Minutes, and Order Re: Case Management Conference (issued/filed April 5, 2022)	0.10
Review Defendant's Notice of Change of Firm Address (served on April 13, 2022)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Statement for April 5, 2022 Case Management Conference (filed on June 6, 2022)	0.90
Review Court's Tentative Ruling Re: Case Management Conference (issued June 6, 2022)	0.10
Review Court's Minutes and Order Re: Case Management Conference (issued June 7, 2022)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Statement for August 16, 2022 Case Management Conference (filed on August 9, 2022)	0.90
Review Court's Tentative Ruling Re: Case Management Conference (issued August 15, 2022)	0.10
Review Court's Minutes and Order Re: Case Management Conference (issued August 16, 2022)	0.10

Review Defendant's Notice of Unavailability (served on August 18, 2022)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Statement for October 18, 2022 Case Management Conference (filed on October 5, 2022)	0.80
Review Court's Tentative Ruling Re: Case Management Conference (issued October 14, 2022)	0.10
Review Court's Minutes and Order Re: Case Management Conference (issued October 18, 2022)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Statement for December 20, 2022 Case Management Conference (filed on December 13, 2022)	0.80
Review Court's Tentative Ruling Re: Case Management Conference (issued December 19, 2022)	0.10
Review Court's Minutes and Order Re: Case Management Conference (issued December 20, 2022)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation to Continue Case Management Conference (filed on January 6, 2023)	0.80
Review Court's Order Granting Stipulation to Continue Case Management Conference (filed on January 10, 2023)	0.10
Draft Plaintiff's Notice of Entry of Judgment or Order Re: Order Granting Stipulation to Continue Case Management Conference (filed on January 11, 2023)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Statement for September 12, 2023 Case Management Conference (filed on August 28, 2023)	0.80
Review Court's Tentative Ruling Re: Case Management Conference (issued September 5, 2023)	0.10
Review Defendant's Substitution of Attorney — Civil (served on September 6, 2023)	0.10

Review Court's Minutes and Order Re: Case Management Conference (issued September 12, 2023)	0.10
Draft Plaintiff's Case Management Statement (filed November 6, 2023)	0.90
Review Defendant's Case Management Statement (filed November 7, 2023)	0.20
Review Court's Tentative Ruling Re: Case Management Conference (issued November 8, 2023)	0.10
Review Court's Minutes and Order Re: Case Management Conference (issued November 14, 2023)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Notice of Settlement (filed on November 17, 2023)	0.30
Meet and Confer with Defendant's Counsel, and Draft Joint Status Conference Statement (filed on December 11, 2023)	0.50
Review Court's Tentative Ruling Re: Case Management Conference (issued December 14, 2023)	0.10
Review Court's Minutes and Order Re: Case Management Conference (issued December 19, 2023)	0.10
Review Court's Notice of Case Reassignment (filed on April 4, 2024)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Status Conference Statement and Request to Continue Status Conference (filed on April 8, 2024)	0.50
Review Court's Order Re: Case Management Conference (filed on April 15, 2024)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Status Conference Statement (filed on July 25, 2024)	0.50
Review Court's Order Re: Case Management Conference (filed on August 2, 2024)	0.10

Draft Plaintiff's Notice of Change of Address or Other Contact Information (filed on February 4, 2025)	0.10
Appearances	
Prepare for and Remotely Attend Hearing on Defendant's Demurrer and Motion to Strike (May 18, 2021)	5.40
Discovery and Deposition	
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff (served on August 11, 2020)	1.90
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff (served on September 23, 2020)	4.30
Draft Plaintiff's Form Interrogatories – General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), and Requests for Production of Documents (Set One) to Defendant (served on January 12, 2021)	4.50
Draft Plaintiff's Notice of Deposition of Defendant's Person Most Knowledgeable at Defendant Tiburcio Vasquez Health Center, Inc. and Requests for Production of Documents (Organizational Structure; noticed for February 18, 2021) (served on January 12, 2021)	1.40
Draft Plaintiff's Notice of Deposition of Defendant's Person Most Knowledgeable at Defendant Tiburcio Vasquez Health Center, Inc. and Requests for Production of Documents (Wage and Hour Practices; noticed for February 19, 2021) (served on January 12, 2021)	1.60
Review Defendant's Objections to Plaintiff's Notice of Deposition of Defendant's Person Most Knowledgeable on February 18, 2021 and Requests for Production of Documents (Organizational Structure) (served on February 11, 2021)	1.10

Review Defendant's Objections to Plaintiff's Notice of Deposition of Defendant's Person Most Knowledgeable on February 19, 2021 and Requests for Production of Documents (Wage and Hour Practices) (served on February 11, 2021)	1.80
Draft Plaintiff's Form Interrogatories – General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), Requests for Admission (Set One), and Requests for Production (Set One) to Defendant (served on September 27, 2023)	3.80
Draft Plaintiff's Notice of Deposition of Defendant's Person Most Knowledgeable and Request for Production of Documents (Organizational Structure, Job Duties, Wage and Hour Policies and Practices; noticed for November 2, 2023) (served on September 27, 2023)	2.50
Review Defendant's Objection to Plaintiff's Notice of Deposition of Defendant's Person Most Knowledgeable and Requests for Production of Documents (Organizational Structure, Job Duties, Wage and Hour Policies and Practices) (served on October 26, 2023)	1.90
Draft, Review, and/or Revise Contemplated <i>Belaire-West</i> Administration Notice and Opt-Out Postcard	0.50
Letters and Correspondence	
Draft Notice to California Labor and Workforce Development Agency Re: Claim of Plaintiff under the Private Attorneys General Act (served on August 11, 2020)	4.80
Draft Correspondence to, Meet and Confer with, and Respond to Correspondence from, Defendant's Counsel	28.50
Mediation/Settlement	
Review and Analyze Information, Data, and Documents Obtained from Plaintiff, Defendant, and Other Sources Prior to Mediation	83.50

Prepare for Mediation, Including Researching Settlement and Merits-Related Issues, Drafting the Mediation Brief, Compiling the Mediation Exhibits in Support of Plaintiff's Mediation Brief, and Performing Damages and Penalties Analysis and Calculations (submitted on July 21, 2023)	41.50
Attend Mediation Session and Conduct Research Regarding Financial Difficulty Issue (July 28, 2023; via Video Conference)	13.50
Review and Analyze Defendant's Production of Financial Documents and Other Information, and Engage in Additional Settlement-Related Discussions and Negotiations Following Unsuccessful Mediation (August 2023 – November 2023)	17.50
Review and Analyze Mediator's Proposal (accepted November 8, 2023)	2.50
Draft, Review, Revise, and Negotiate Memorandum of Understanding	1.90
Draft, Review, Revise, Negotiate, and Finalize Class Action and PAGA Settlement Agreement and Class Notice (executed on May 29, 2024), and Draft Notice of Class Action Settlement and Hearing Date for Final Court Approval	15.10
Draft, Review, Revise, Negotiate, and Finalize Addendum to Class Action and PAGA Settlement Agreement and Release (executed on October 23, 2024)	0.60
Coordinate Settlement Administration with Settlement Administrator, Ongoing Monitoring of Settlement Administration, and Respond to Class Inquiries	7.50
Law and Motion	
Review Defendant's Declaration of Jean M. Sedlak in Support of Defendant's Good Faith Attempt to Meet and Confer Regarding Demurrer and Motion to Strike Plaintiff's Complaint (served on March 4, 2021)	1.10

Review and Analyze Defendant's Notice of Motion and Motion to Strike Plaintiff's Complaint, Notice of Demurrer and Demurrer to Plaintiff's Complaint, Declaration of Jean M. Sedlak in Support Thereof, Declaration of Gabriela Valdez in Support Thereof, Request for Judicial Notice in Support Thereof, and [Proposed] Order Sustaining Defendant's Demurrer to Plaintiff's Complaint (served on April 5, 2021)	3.80
Research, Draft, Review, and/or Revise Plaintiff's Omnibus Opposition to Defendant's Demurrer to Her Complaint and Motion to Strike (filed May 5, 2021)	18.50
Review and Analyze Defendant's Reply in Support of Defendant's Motion to Strike Plaintiff's Complaint, Reply in Support of Defendant's Demurrer to Plaintiff's Complaint, and Request for Judicial Notice in Support Thereof (served on May 11, 2021)	2.60
Review Court's Tentative Ruling Re: Demurrer and Motion to Strike Plaintiff's Complaint (issued on May 17, 2021)	0.80
Review Court's Minutes Re: Demurrer and Motion to Strike Plaintiff's Complaint (filed on May 18, 2021)	0.10
Review Court's Order Re: Demurrer to Complaint (filed on May 24, 2021)	0.60
Review and Analyze Defendant's Declaration of Jean M. Sedlak in Support of Defendant's Good Faith Attempt to Meet and Confer Regarding Demurrer and Motion to Strike Plaintiff's First Amended Complaint (served on July 29, 2021)	1.10
Research and Draft Plaintiff's Motion for Preliminary Approval of Class Action Settlement; Memorandum of Points and Authorities, Declaration of Vartan Madoyan in Support Thereof, Declaration of Cynthia Barragan in Support Thereof, and [Proposed] Order Granting Preliminary Approval of Class Action Settlement (filed on August 5, 2024)	17.50
Review Court's Minutes and Order Re: Hearing on Motion for Preliminary Approval of Class Action Settlement (filed on September 17, 2024)	0.50

Research and Draft Plaintiff's Supplemental Declaration of Vartan Madoyan in Support of Plaintiff's Motion for Preliminary Approval of Class Action Settlement, and Amended [Proposed] Order Granting Plaintiff's Motion for Preliminary Approval of Class Action Settlement (filed on October 24, 2024)	6.50
Review Court's Tentative Ruling Re: Hearing on Motion for Preliminary Approval of Class Action Settlement and Case Management Conference (issued on October 30, 2024)	0.40
Review Court's Minutes and Order Re: Hearing on Motion for Preliminary Approval of Class Action Settlement and Case Management Conference (filed on October 31, 2021)	0.30
Review Court's Amended Order Granting Plaintiff's Motion for Preliminary Approval of Class Action Settlement (filed on December 12, 2024)	0.10
Draft Plaintiff's Notice of Entry of Judgment or Order Re: Amended Order Granting Plaintiff's Motion for Preliminary Approval of Class Action Settlement (filed on January 28, 2025)	0.10
Review Declaration of Settlement Administrator, and Research and Draft Plaintiff's Motion for Final Approval of Class Action Settlement, Attorneys' Fees, Costs, and Class Representative Service Payment, Declaration of Vartan Madoyan in Support Thereof, and [Proposed] Final Approval Order and Judgment (filed on May 6, 2025)	18.50
Total Hours:	413.50

EXHIBIT B

LAWYERS *for* JUSTICE, PC CASE COST DETAIL
Barragan vs. Tiburcio Vasquez Health Center, Inc. (CLASS and PAGA)

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
8/11/2020	U.S. Postmaster	Postage	\$15.00
8/11/2020	Labor & Workforce Development Agency	PAGA Filing Fee	\$75.00
10/20/2020	Legal Document Server, Inc.	Attorney Service	\$200.23
10/20/2020	Alameda Superior Court	Complex Filing Fee	\$1,000.00
10/20/2020	Alameda Superior Court	Complaint Filing Fee	\$435.00
1/12/2021	FedEx Express	Courier Service	\$34.43
1/13/2021	Legal Document Server, Inc.	Attorney Service	\$195.00
1/19/2021	Legal Document Server, Inc.	Attorney Service	\$195.00
2/2/2021	Legal Document Server, Inc.	Attorney Service	\$35.00
2/2/2021	Legal Document Server, Inc.	Attorney Service	\$80.00
4/21/2021	Legal Document Server, Inc.	Attorney Service	\$135.25
4/21/2021	Alameda Superior Court	Jury Fee	\$150.00
5/5/2021	Legal Document Server, Inc.	Attorney Service	\$65.00
5/13/2021	Legal Document Server, Inc.	Attorney Service	\$130.00
6/29/2021	Legal Document Server, Inc.	Attorney Service	\$150.00
9/10/2021	One Legal	Attorney Service	\$126.11
10/26/2021	One Legal	Attorney Service	\$20.54
1/5/2022	Legal Document Server, Inc.	Attorney Service	\$17.95
4/1/2022	Legal Document Server, Inc.	Attorney Service	\$17.95
6/6/2022	Legal Document Server, Inc.	Attorney Service	\$17.95
12/13/2022	Legal Document Server, Inc.	Attorney Service	\$18.70
1/9/2023	Legal Document Server, Inc.	Attorney Service	\$20.05
1/9/2023	Alameda Superior Court	Stipulation & Order Fee	\$20.00
1/11/2023	Legal Document Server, Inc.	Attorney Service	\$18.70
5/9/2023	Ortman Mediation	Mediation Fee	\$13,000.00
11/7/2023	Legal Document Server, Inc.	Attorney Service	\$18.90
11/17/2023	Legal Document Server, Inc.	Attorney Service	\$18.90
12/13/2023	Legal Document Server, Inc.	Attorney Service	\$18.90
4/9/2024	Legal Document Server, Inc.	Attorney Service	\$18.90
4/12/2024	Legal Document Server, Inc.	Attorney Service	\$18.90
4/30/2024	Alameda Superior Court	Attorney Service	\$3.00
8/7/2024	Legal Document Server, Inc.	Attorney Service	\$195.00
8/8/2024	Legal Document Server, Inc.	Attorney Service	\$23.07
8/8/2024	Alameda Superior Court	Motion Fee	\$60.00
10/25/2024	Legal Document Server, Inc.	Attorney Service	\$20.45
11/19/2024	Alameda Superior Court	Document Download Fee	\$8.00
1/29/2025	Legal Document Server, Inc.	Attorney Service	\$34.40
2/5/2025	Legal Document Server, Inc.	Attorney Service	\$21.45
Total:			\$16,632.73