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

JASON ADAMS, RAUL ALVARADO,
EMMA SARWAR, SERGIO
RODRIGUEZ, and SHENITA TATUM, as
private attorneys general and as an
individual on behalf of all others similarly
situated,

Plaintiffs,

vs.

SCHOLLE IPN PACKAGING, INC., a
Nevada corporation; SCHOLLE
PACKAGING, INC., a Nevada corporation
and DOES 1 through 50, inclusive,

Defendants.

Case No.: 20CV-02350

Honorable Brian L. McCabe
Department 8

CLASS ACTION

**DECLARATION OF JOANNA GHOSH IN
SUPPORT OF PLAINTIFFS' MOTION
FOR PRELIMINARY APPROVAL OF
CLASS ACTION AND PAGA
SETTLEMENT**

Date: January 9, 2025
Time: 8:15 a.m.
Department: 8

Complaint Filed: August 17, 2020
FAC Filed: August 30, 2024
Trial Date: None Set

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Attorneys for Plaintiffs Jason Adams and Shenita Tatum

DECLARATION OF JOANNA GHOSH

I, Joanna Ghosh, 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 Raul Alvarado (“Plaintiff Alvarado”), Emma Sarwar (“Plaintiff Sarwar”), and Sergio Rodriguez (“Plaintiff Rodriguez”) (collectively, “Plaintiffs”) in the action entitled *Raul Alvarado, et al. v. Scholle IPN Packaging, Inc., et al.*, Superior Court of California for the County of Merced, Case No. 19CV-04613 (“*Alvarado* Action”), which is being resolved along with the following lawsuits and/or claims asserted in the following lawsuits: the above-captioned action *Jason Adams v. Scholle IPN Packaging, Inc., et al.*, Superior Court of California for the County of Merced, Case No. 20CV-023500 (“*Adams* Action”), and the now dismissed action of *Shenita Tatum v. Scholle IPN Packaging Inc.*, Superior Court of California for the County of Merced, Case No. 23CV-03082 (“*Tatum* Action”) (collectively, the *Alvarado* Action, *Adams* Action, and *Tatum* Action are referred to as the “Actions”). 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 thereto.

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

2. 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 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. Lawyers *for* Justice, PC has successfully litigated cases involving the executive, administrative, and other overtime exemptions to the State of California and federal overtime compensation requirements. Lawyers *for* Justice, PC, sometimes in association with other law firms, has recovered millions of dollars on behalf of thousands in California.

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

4. Arby Aiwazian is a Member and Shareholder of Lawyers *for* Justice, PC. He received his Bachelor of Arts degree from University of California, Los Angeles, and graduated magna cum laude. He earned a Juris Doctor degree, cum laude, from Southwestern Law School. 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.

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

14 5. I, Joanna Ghosh, am a Managing Member of Lawyers for Justice, PC. I received a
15 Bachelor of Arts degree from California State University, Los Angeles in 2006, a Master of
16 Science degree from the London School of Economics in 2007, and a Juris Doctor degree from
17 Georgetown University Law Center in 2010. I am admitted to practice in California (since 2010)
18 and in New York (since 2013) and I am admitted to practice in all U.S. District Courts in
19 California, the U.S. Bankruptcy Court for the Central District of California, and the U.S. Supreme
20 Court. I have taken and defended dozens of depositions and successfully handled motion practice
21 in class action cases regarding discovery (including and not limited to, regarding class contact
22 information), class certification (both contested class certification and stipulated class
23 certification), arbitration agreements, coordination, and intervention. I have successfully handled
24 briefing and oral argument on appeal and obtained notable decisions regarding Private Attorneys
25 General Act claims and employer efforts to compel arbitration of such claims, e.g., *Betancourt v.*
26 *Prudential Overall Supply*, 9 Cal.App.5th 439 (Cal. Ct. App., Mar. 7, 2017), cert. denied (Cal.,
27 May 24, 2017), cert. denied (U.S., Dec. 11, 2017) and *ZB, N.A. v. Superior Court*, 8 Cal.5th175
28 (2019). I have significant experience with class actions, including and not limited to working on

1 cases to obtain class certification through contested motion practice and working on cases in the
2 post-certification stage (e.g., post-certification discovery, appeal, statistical sampling and
3 pilot study, and trial preparation in conjunction with co-counsel in a case involving a certified
4 class consisting of approximately 2,600 individuals). I also have extensive experience with class
5 action and/or representative action settlements, and I have handled this process in over five
6 hundred (500) cases. Under Edwin Aiwasian, Arby Aiwasian, and my supervision, Lawyers *for*
7 Justice, PC has handled the class certification and court approval process for hundreds of class
8 action and/or representative action matters that have successfully resolved. I am a member of the
9 California Employment Lawyers Association and, on several occasions, have been a speaker
10 regarding topics in wage and hour law at the organization's continuing legal education events.

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

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

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

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

25 c) LFJ, in association with co-counsel therein, represented the plaintiffs in a
26 wage-and-hour class action against a national property management company involving
27 allegations of misclassification of the "Property Manager" position. On May 23, 2012, the court
28 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.

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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.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

19 hh) LFJ, in association with co-counsel therein, represented the plaintiff in a
20 wage-and-hour class and PAGA representative action against a medical equipment supplier on
21 behalf of non-exempt employees. On February 13, 2020, the court granted the plaintiff's motion
22 for class certification and certified a class. On November 2, 2023, the court granted final approval
23 of the class and PAGA representative action settlement. The San Bernardino County Superior
24 Court Case Number is CIVDS1505744.

25 ii) LFJ, in association with co-counsel therein, on behalf of the plaintiff and
26 respondent in a PAGA representative action, successfully opposed in the trial court, and briefed
27 and argued an appeal with respect to the employer's motion to compel arbitration, resulting in a
28 notable decision from the California Supreme Court clarifying the law regarding PAGA claims,

1 *ZB, N.A. v. Superior Court* (2019) 8 Cal.5th 175. On February 21, 2020, the court granted approval
2 of the PAGA representative action settlement. The San Diego County Superior Court Case
3 Number is 37-2016-00005578-CU-OE-CTL.

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

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

16 ll) LFJ, in association with co-counsel therein, represented the plaintiffs in a
17 wage-and-hour class and PAGA representative action against a plastic packaging company on
18 behalf of non-exempt employees. On June 8, 2020, the court granted in part the plaintiffs' motion
19 for class certification and certified a class. On November 8, 2021, the court granted approval of
20 the partial settlement of the action. On April 22, 2024, the court granted approval of the PAGA
21 settlement and entered an order dismissing the action. The San Bernardino County Superior Court
22 Case Number is CIVDS1507361.

23 mm) LFJ, in association with co-counsel therein, represented the plaintiffs in a
24 wage-and-hour class action against manufacturer and supplier of power products and services on
25 behalf of non-exempt employees. On July 31, 2020, the court granted in part the plaintiffs' motion
26 for class certification and certified a class. On August 27, 2021, the court granted final approval
27 of the class action settlement. The San Diego County Superior Court Case Number is 37-2015-
28 00025968-CU-OE-CTL.

1 nn) LFJ represented the plaintiff in a wage-and-hour class action against a
2 nutritional products manufacturer on behalf of non-exempt production line employees. On
3 December 13, 2021, the court granted the plaintiff's motion for class certification in part and
4 certified a class. On January 16, 2024, the court granted final approval of the class and PAGA
5 representative action settlement. The Solano County Superior Court Case Number is FCS051001.

6 oo) LFJ represents the plaintiffs in a wage-and-hour class action against a
7 manufacturer and distributor of commercial dish and glass cleaning machines and supplies for the
8 restaurant and hospitality industries, on behalf of hourly-paid or non-exempt employees. On July
9 13, 2023, the court granted the plaintiffs' motion for class certification and certified a class. The
10 Los Angeles County Superior Court Case Number is BC707670.

11 pp) LFJ represents the plaintiffs in a wage-and-hour class action against a chain
12 of restaurants on behalf of non-exempt employees. On July 22, 2024, the court granted in part the
13 plaintiffs' motion for class certification and certified a class. The San Francisco Superior Court
14 Case Number is CGC-20-582809.

15 SUMMARY OF WORK PERFORMED

16 7. Several attorneys at Lawyers for Justice, PC have worked on the *Alvarado* Action
17 that was commenced on October 24, 2019, on behalf of Plaintiff Alvarado, Plaintiff Sarwar, and
18 Plaintiff Rodriguez, since its inception.

19 8. Lawyers for Justice, PC has worked closely with LippSmith LLP in the pursuit of
20 the *Alvarado* Action since they were associated in as co-counsel, and our work with them has been
21 a coordinated and combined effort. Lawyers for Justice, PC and LippSmith LLP eventually
22 teamed up and joined forces with other plaintiffs' counsel Diversity Law Group, P.C. and Polaris
23 Law Group, who are counsel for Plaintiffs Jason Adams ("Plaintiff Adams") and Shenita Tatum
24 ("Plaintiff Tatum") in the above-captioned action and the now dismissed lawsuit *Tatum* Action.
25 Together, Lawyers for Justice, PC, Diversity Law Group, P.C., Polaris Law Group, and LippSmith
26 LLP are referred to as "Class Counsel." Together, Plaintiffs Jason Adams, Raul Alvarado, Emma
27 Sarwar, Sergio Rodriguez, and Shenita Tatum are referred to as "Plaintiffs."

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1 9. Ultimately, the efforts of Plaintiffs and Class Counsel have resulted in a settlement
2 recovery. On or about November 12, 2024, Plaintiffs and Defendants SIG Packaging LLC
3 (formerly known as Scholle IPN Packaging, Inc. and Scholle Packaging, Inc.), Scholle IPN
4 Packaging, Inc., and Scholle Packaging, Inc. (collectively, “Defendants”) (together, Plaintiffs and
5 Defendants are referred to as “Parties”) executed the Joint Stipulation of Class Action and PAGA
6 Settlement, agreeing to the terms of a class action and PAGA settlement of the Actions.

7 10. Collectively, Class Counsel investigated the veracity, strength, and scope of the
8 claims, and worked on preparing the cases for class certification and trial, prior to reaching the
9 settlement. This matter involved extensive and ongoing investigations and research into legal and
10 factual issues, and formal and informal discovery. Class Counsel obtained information from
11 Plaintiffs and percipient witnesses, reviewed and analyzed a volume of information, documents,
12 and data obtained from Plaintiffs, Defendants, and other sources, researched applicable law, and
13 undertook analyses and calculations of the value of claims, damages, and penalties exposure.
14 Class Counsel also met and conferred with Defendants’ counsel on numerous occasions, e.g., to
15 discuss issues relating to the pleadings, case management, formal and informal discovery,
16 production of information, documents, and data in the course of litigation and mediation and
17 settlement negotiations, and the mediation and settlement negotiations. Other work that Class
18 Counsel has performed and/or will perform include, *inter alia*, case strategy and analysis; drafting,
19 reviewing, and revising the pleadings, motion-related papers, and settlement-related papers; case
20 management; claims assessment and evaluation; and preparing for and attending court proceedings
21 and the mediation and settlement negotiations.

22 11. As outlined herein, the Parties have conducted significant investigations and
23 discovery during the course of litigating this matter. Class Counsel analyzed a volume of
24 information, documents, and data obtained from Plaintiffs, Defendants, and other sources. This
25 information, documents, and data provided a critical understanding of the nature of the work
26 performed by class members and aggrieved employees, as well as Defendants’ operations and
27 employment policies, practices, and procedures, and were used in analyzing liability, damages,
28 and penalties valuation issues in connection with all phases of the litigation, and ultimately, in

1 connection with the mediation and settlement negotiation process. Accordingly, sufficient
2 investigation and review of information has taken place in order for the Parties to be sufficiently
3 informed of the nature and extent of the claims, and to enable all parties to fully evaluate the
4 settlement for its fairness, adequacy, and reasonableness.

5 12. After conducting significant investigation of the facts and law during the prosecution
6 of the cases, counsel for the Parties engaged in mediation and extensive settlement negotiations to
7 try to resolve the cases. During all settlement discussions, the Parties conducted their negotiations
8 at arm's length in an adversarial position. In the course of the mediation and settlement
9 negotiations, the Parties discussed all aspects of the cases, including the risks and delays of further
10 litigation proceedings, class certification, and/or trial, the law relating to, *inter alia*, class
11 certification, off-the-clock theory, meal and rest periods, rounding, regular rate, sick pay, PAGA
12 representative claims, and wage-and-hour enforcement, as well as the evidence produced and
13 analyzed, and the possibility of appeals, among other things. Arriving at a settlement that was
14 acceptable to the Parties was not easy. After conducting extensive investigations, formal and
15 informal discovery, and settlement negotiations, and with the aid of the mediator's evaluations,
16 the Parties ultimately agreed to resolve the cases given the legal issues relating to Plaintiffs'
17 principal claims, as well as the costs and risks to both sides that would attend further litigation,
18 and the real possibility of no recovery after years of litigation.

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1 13. The settlement provides for Class Representative Awards in amounts of up to
2 \$10,000.00 each for Plaintiffs. The contemplated service awards are fair and appropriate in light
3 of Plaintiffs' broader general release of claims and Civil Code section 1542 waiver, as well as their
4 time and effort expended to pursue the cases. Plaintiffs were available whenever Class Counsel
5 needed them, actively tried to obtain and provide information, and spent a substantial amount of
6 time and effort providing the facts and evidence necessary to facilitate prosecution of the cases.
7 Accordingly, it is appropriate and just for Plaintiffs to each receive a reasonable service award, in
8 addition to their individual settlement payments under the settlement.

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 on this 10th day of December 2024 at Glendale, California.

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Joanna Ghosh