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Attorneys for Plaintiffs and the Class

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

IGNACIO PEREZ, and LISZANDRA
PADILLA, individually, and on behalf of
other members of the general public
similarly situated; and KAREN RIOS,
individually, and on behalf of other
members of the general public similarly
situated, and on behalf of other aggrieved
employees pursuant to the California Private
Attorneys General Act,

Plaintiffs,

vs.

COMMUNICARE HEALTH CENTERS, a
California corporation; and DOES 1 through
100, inclusive,

Defendants.

Case No.: CV-2019-469

Honorable Timothy Fall
Department 11

CLASS ACTION

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

[Notice of Motion and Motion for Final
Approval of Class Action Settlement,
Attorneys' Fees and Litigation Costs, and
Enhancement Payments; Declarations of Class
Representatives (Ignacio Perez, Lizabeth
Padilla, and Karen Rios); Declaration of
Settlement Administrator (Jarrod Salinas); and
[Proposed] Final Approval Order and
Judgment filed concurrently herein]

Date: May 17, 2023
Time: 9:00 a.m.
Department: 11

Complaint Filed: March 7, 2019
FAC Filed: June 4, 2019
SAC Filed: September 5, 2019
TAC Filed: December 12, 2019
FAC Filed: June 28, 2022
Trial Date: None Set

DECLARATION OF EDWIN AIWAZIAN

I, Edwin Aiwazian, hereby declare as follows:

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

PRELIMINARY APPROVAL OF SETTLEMENT

2. On November 30, 2022, in Department 9 of the above-entitled Court, the Honorable Daniel M. Wolk preliminarily approved the Amended Joint Stipulation of Class Action and PAGA Settlement (“Settlement,” “Agreement,” or “Settlement Agreement”) entered into between Plaintiffs and Defendant Communicare Health Centers (“Defendant”), and conditionally certified the Class for settlement purposes. The Court preliminarily appointed Plaintiffs Ignacio Perez, Lizzandra Padilla, and Karen Rios as the representatives 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 Proposed Class Action Settlement (“Notice”) and Workweeks Dispute Form (“Notice Packet”), adopted the notice, opt-out, and objection procedures, and ordered their implementation. The Court appointed Phoenix Settlement Administrators (“Phoenix” or “Settlement Administrator”) to serve as the third-party settlement administrator and to handle the notice and settlement administration process.

3. As of the date of filing the accompanying Motion for Final Approval of Class Action Settlement, Attorneys’ Fees and Litigation Costs, and Enhancement Payments (“Motion for Final Approval”), no Class Members have objected to the Settlement or the request for Attorneys’ Fees and Litigation Costs, Enhancement Payments, Administration Costs, or allocation for the 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. I and several other attorneys at Lawyers *for* Justice, PC have been actively engaged in litigating the above-captioned action since prior to its commencement on March 7, 2019.

5. Before initiating the case, 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 Plaintiffs, 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, wage-and-hour law and enforcement, arbitration agreements, Plaintiffs' claims, and potential defenses. After conducting initial investigation, our firm determined that the claims of Plaintiffs 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 who worked for Defendant, who were not properly compensated for, *inter alia*, all hours worked, non-compliant meal and rest periods, and business expenses.

6. Class Counsel investigated the veracity, strength, and scope of the claims, and was preparing the matter for class certification and trial prior to reaching the Settlement. The parties conducted significant formal and informal discovery and investigation into the facts of the case, and formally and informally exchanged a large volume of documents, information, and data throughout the course of litigation and in connection with mediation and settlement negotiations. Class Counsel had the opportunity to interview and obtain information from Plaintiffs and other Class Members and reviewed and analyzed a large volume of information, documents, and data obtained from Plaintiffs, Defendant, and other sources. The information, documents, and data reviewed and analyzed by Class Counsel included, and was not limited to, employment records of Plaintiffs and other Class Members, a detailed sampling of Class Members' time and pay data, company policy acknowledgments (including acknowledgements of Defendant's Drug and Alcohol Policy and of Defendant's Domestic Violence/Abuse Reporting policy, and acknowledgement of receipt of Employee Handbook), job descriptions,

new hire information checklists, termination checklists, employee evaluations, Defendant's confidential financial information (including but not limited to operating budgets, financial statements, and balance sheets), Defendant's operations and employment practices (including multiple signed Arbitration Agreements and prior Settlement and Release Agreements with individual employees, along with check stubs evidencing payment under prior settlement agreements), among other information and documents. Class Counsel researched applicable law, developed liability, damages, and penalties valuation models in connection with mediation and settlement negotiations, and met and conferred with Defendant's counsel on numerous occasions, e.g., to discuss issues relating to the pleadings, discovery, and the production of information, documents, and data in the course of litigation as well as mediation and settlement negotiations. Class Counsel also drafted pleadings and the mediation brief, prepared for and attended court proceedings, prepared for and participated in mediation and settlement negotiations, among other tasks.

7. The parties have conducted significant formal and informal discovery and investigation during the course of litigating the case, and Class Counsel analyzed a large volume of information, documents, and data obtained from Plaintiffs, Defendant, and other sources. The information, documents, and data considered provided a critical understanding of the nature of the work performed by the Class Members, as well as Defendant's operations and employment policies, practices, and procedures, and were used in analyzing liability, damages, and penalties valuation issues in connection with all phases of the litigation, and ultimately in connection with the mediation and settlement negotiation process. Class Counsel also performed research regarding applicable law which is evolving as it relates to certification, off-the-clock theory, meal and rest periods, PAGA representative claims, arbitration agreements, wage-and-hour law and enforcement, Plaintiffs' claims and allegations and Defendant's defenses thereto, as well as facts discovered.

8. After conducting significant investigation of the facts and law during the prosecution of the case, counsel for the parties engaged in extensive settlement negotiations to try to resolve the entire matter. These efforts included participating in a formal, full-day

mediation conducted by Lynn S. Frank, Esq., a well-regarded mediator experienced in mediating complex labor and employment matters. During all settlement discussions, the parties conducted their negotiations at arm's length in an adversarial position. In the course of mediation and settlement negotiations, the parties exchanged information and data, and discussed all aspects of the case, including and not limited to, the risks and delays of further litigation, the risks to the parties of proceeding with class certification and trial, the law relating to off-the-clock theory, meal and rest periods, representative PAGA claims, arbitration agreements, and wage-and-hour law and enforcement, the evidence produced and analyzed, and the possibility of appeals, among other things. Arriving at a settlement that was acceptable to the parties was not easy. Defendant and its counsel felt strongly about Defendant's ability to prevail on the merits and to avoid class certification and representative adjudication, while Plaintiffs and Class Counsel believed that they would be able to obtain class certification and prevail at trial. With the aid of the mediator's evaluation, the parties ultimately agreed that the case was well-suited for settlement given the legal issues relating to Plaintiffs' principal claims, as well as the costs and risks to the parties that would attend further litigation. These 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.

9. By way of the accompanying Motion for Final Approval, Class Counsel seeks attorneys' fees in the amount of \$262,500.00, which is thirty-four percent (34%) of the Maximum Settlement Amount of \$767,500.00, as set forth in the Settlement Agreement and the Notice. Pursuant to the contingency-fee agreement entered into by and between Plaintiffs and Class Counsel, Plaintiffs have agreed to contingency fees of at least thirty-four percent (34%) of the recovery. The attorneys' fees sought are commensurate with: (1) the risk that Class Counsel took in commencing the case; (2) the time, effort, and expense that Class Counsel dedicated to the case; (3) the skill and determination that Class Counsel has shown; (4) the results that Class Counsel has achieved throughout the litigation; (5) the value of the settlement that Class Counsel

1 has achieved in the case; and (6) the other cases that Class Counsel has turned down in order to
2 devote its time and efforts to this matter.

3 10. I am aware that common and acceptable rates for contingency representation in
4 wage and hour class action litigation are in the range from 33.3% up to 50%.

5 11. While not necessarily required to be demonstrated because the percentage fee is
6 proper for this settlement, Class Counsel has incurred many hours of work in connection with
7 prosecuting the case such that the award of attorneys' fees is also justified under a simple
8 lodestar analysis. Attorneys at Lawyers for Justice, PC have spent a total of 566.30 hours
9 performing tasks and obtaining recovery in this matter. Attached hereto as "EXHIBIT A" is an
10 Attorney Task and Time Chart that sets forth in detail the nature of the legal services provided by
11 attorneys at Lawyers for Justice, PC and the time incurred in performing those services. These
12 hours include work done by myself and several other attorneys at the firm. Additionally, separate
13 from the hours referenced herein, Lawyers for Justice, PC had litigation support personnel
14 actively engaged in assisting with the prosecution of this matter.

15 12. The work performed in this particular case, the background of our firm, as well as
16 the individual backgrounds, training, and experience of the attorneys who worked on this case, in
17 litigating complex wage-and-hour actions, and in particular, employment class and representative
18 actions, support a reasonable blended hourly rate of compensation of at least \$600.00 for work
19 performed by Lawyers for Justice, PC. Lawyers for Justice, PC has been awarded attorneys' fees,
20 compensating the firm at the rate of at least \$600.00 per hour for legal services performed, by
21 courts granting final approval in other cases: final approval of the class and representative action
22 settlement in *David Dugan v. TEC Equipment, Inc., et al.* (Los Angeles Superior Court Case No.
23 19STCV01591) was granted on July 8, 2021, and the award of attorneys' fees involved an hourly
24 rate of \$936.47; final approval of the class and representative action settlement in *Larry*
25 *Greenwood, et al. v. Scan Health Plan* (Los Angeles Superior Court Case No. BC715157) was
26 granted on April 20, 2021, and the award of attorneys' fees involved an hourly rate of \$919.57;
27 final approval of the class action settlement in *Thereasa Carrozzella v. Basalite Concrete*
28 *Products, LLC* (Sacramento County Superior Court Case No. 34-2017-00220214-CU-OE-GDS)

was granted on February 21, 2020, and the award of attorneys' fees involved an hourly rate of \$766.05; final approval of the class and representative action settlement in *Alice Rutledge, et al. v. Healthport Technologies, LLC* (Alameda County Superior Court Case No. RG16835813) was granted on June 11, 2019, and the award of attorneys' fees involved an hourly rate of \$764.82; final approval of the class and representative action settlement in *Seth Swan v. Pace Supply Corp.* (Sonoma County Superior Court Case No. SCV258764) was granted on February 6, 2019, and the award of attorneys' fees involved an hourly rate of \$855.96; final approval of the class and representative action settlement in *Stanley Bland, et al. v. Telecare Corporation* (Alameda County Superior Court Case No. RG16811450) was granted on November 21, 2018, and the award of attorneys' fees involved an hourly rate of \$831.38; final approval of the class and representative action settlement in *Maryjo Ungerbuhler Anderson v. Boyett Petroleum* (Stanislaus County Superior Court Case No. 2020582) was granted on May 15, 2018, and the award of attorney's fees involved an hourly rate of \$780.77; and final approval of the class and representative action settlement in *Demetrius Camarillo v. Blue Diamond Growers* (Sacramento County Superior Court Case No. 34-2015-00175871) was granted on June 30, 2017, and the award of attorneys' fees involved an hourly rate of \$845.64.

ADEQUACY OF LAWYERS for JUSTICE, PC

EDUCATION

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

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JUDICIAL EXTERNSHIPS

14. From approximately September 2002 to approximately December 2002, I served as a Judicial Extern to the Honorable Kim McLane Wardlaw of the *United States Court of Appeals for the Ninth Circuit*. From approximately June 2002 to approximately August 2002, I served as a Judicial Extern to the Honorable Earl Johnson, Jr. of the *California Court of Appeal for the Second Appellate District*.

LITIGATION AND CLASS ACTION EXPERIENCE

15. In December of 2004, I obtained a license to practice law from the California State Bar. From approximately December 2004 to approximately August 2008, I was employed by *Girardi & Keese*.

16. At *Girardi & Keese*, my practice focused on class actions and other complex cases involving toxic torts and products liability. In addition, I gained substantial experience on cases involving insurance bad faith, premises liability, and medical negligence. While employed by *Girardi & Keese*, I argued approximately 100 motions, took or defended approximately 150 depositions, and prepared dozens of expert witnesses for deposition or trial.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

27 ll) LFJ, in association with co-counsel therein, represented the plaintiffs in a
28 wage-and-hour class action against manufacturer and supplier of power products and services on

1 behalf of non-exempt employees. On July 31, 2020, the court granted in part the plaintiffs'
2 motion for class certification and certified a class. On August 27, 2021, the court granted final
3 approval of the class action settlement. The San Diego County Superior Court Case Number is
4 37-2015-00025968-CU-OE-CTL.

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

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

10 19. To date, Class Counsel has borne all of the risks and costs of litigation and will
11 not receive any compensation until recovery is obtained in this case. Lawyers *for* Justice, PC
12 seeks reimbursement of \$17,361.86 in litigation costs and expenses incurred in this matter, as
13 reflected in "**EXHIBIT B**" attached hereto. These expenses were reasonable and necessary in the
14 prosecution of the case and to obtain the Settlement.

15 **ENHANCEMENT PAYMENTS TO PLAINTIFFS**

16 20. In recognition of their efforts and work serving as the Class Representatives, the
17 Settlement provides for Enhancement Payments in the amount of \$7,500.00 each to Plaintiffs
18 Ignacio Perez and Karen Rios, and \$2,500.00 to Plaintiff Lizzandra Padilla. The requested
19 Enhancement Payments are fair and appropriate. Plaintiffs spent a substantial amount of time and
20 effort in producing relevant documents and past employment records and provided the facts and
21 evidence necessary to attempt to prove the allegations. Plaintiffs were available whenever Class
22 Counsel needed them and actively tried to obtain information that would facilitate the pursuit of
23 the class and PAGA claims. Plaintiffs spent numerous hours speaking with Class Counsel about
24 their claims, describing their work experience with Defendant, and gathering and reviewing
25 documents. Accordingly, it is appropriate for Plaintiffs Ignacio Perez and Karen Rios to receive
26 \$7,500.00 each and Lizzandra Padilla to receive \$2,500.00 as reasonable Enhancement Payments
27 for their services on behalf of the Class and the State of California, in addition to their Individual
28 Settlement Payments.

21. I submit that the Settlement is fair, reasonable, and adequate. In addition, the Settlement is in the best interests of Plaintiffs, Class Members, 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 this 25th day of April 2023, at Glendale, California.



Edwin Aiwanian

EXHIBIT A

IGNACIO PEREZ, ET AL. V. COMMUNICARE HEALTH CENTERS
(YOLO COUNTY SUPERIOR COURT CASE NO. CV-2019-469) (“PEREZ ACTION”)

KAREN RIOS V. COMMUNICARE HEALTH CENTERS
(YOLO COUNTY SUPERIOR COURT CASE NO. CV2020-1659) (“RIOS ACTION”)

ATTORNEY TASK AND TIME CHART

TASK	LAWYERS FOR JUSTICE, PC
Investigation and Research / Due Diligence	
Pre-Lawsuit Investigation of the Key Facts with a Focus on Class Certification Elements, Including Adequacy, Typicality, Superiority, Commonality, and Manageability	7.90
Pre-Lawsuit Investigation of the Merits of Plaintiff Ignacio Perez’s (“Plaintiff Perez”) Claims and the Merits of the Claims of the Putative Class Members	8.10
Pre-Lawsuit Investigation of the Merits of Plaintiff Karen Rios’s (“Plaintiff Rios”) Private Attorneys General Act (“PAGA”) Claim on Behalf of the State of California with Respect to Aggrieved Employees	7.30
Pre-Lawsuit Investigation of Potential Damages and Penalties Exposure of Defendant Communicare Health Centers (“Defendant”) with Respect to Plaintiffs, Putative Class Members, and Aggrieved Employees	6.50
Legal Research and Analysis of Latest Decisions Regarding Off-the-Clock, Meal and Rest Breaks, IWC Wage Orders, PAGA, and Class Certification in California, Including all New and Relevant DLSE Materials	6.20

Investigation of Defendant, Its Licenses and Registrations, Its Business Relationships, and the Industry in which It Operates	2.90
Investigation of Defendant's Organizational and Corporate Structure, and Executive Reporting Structure as They Relate to the Employment and Management of the Putative Class Members and Aggrieved Employees	2.30
Investigation, Research and Analysis Regarding Defendant's Executives, Officers, and Leadership with a Focus on Involvement in Wage-and-Hour Issues and Litigation History Involving Wage-and-Hour Issues and Other Related Employment Issues, to Evaluate Willfulness and Uniformity	2.60
Analysis of Competitors in Various Relevant Geographic Areas within which Defendant Operates, and Comparing and Contrasting Defendant's Policies, Practices, and Procedures with the Policies, Practices, and Procedures of Defendant's Competitors	3.50
Research and Investigation Re: Location(s), Department(s), and/or Division(s) Owned, Managed, Serviced, and/or Operated by Defendant in California During the Class Period, Including Differences Between Them to Determine Whether Those Differences Will Cause Individual Issues to Predominate Over Common Issues	3.40
Comparative Analysis and Cross-Checking of All Available Job Postings and/or Job Reviews Regarding Work With Defendant in Order to Determine Any Variation and Identify Job Duties and Responsibilities That Would be Susceptible to Being Performed Off-the-Clock or During Meal or Rest Breaks	2.90
Research and Investigation Re: Workforce, Staffing Models, and Staffing Levels at Locations at Which Putative Class Members and Aggrieved Employees Worked Throughout California	2.90
Research and Investigation Re: Defendant's Written and Non-Written Policies, Practices, and Procedures Relating to Clinic Operations and Hours, Timekeeping, Patient Care, Rounding, Scheduling and Attendance, Auto-Deduction of Meals, Meal and Rest Breaks, On Premises Breaks, Overtime Compensation, Non-Discretionary Bonus/Incentive/Performance/Shift Differential Pay, Reporting Time Pay, Health and Safety, COVID-19 Protocols, Dress Code/Uniform, PPE, Equipment/Supplies, Use of	15.50

Personal Cell Phones, Use of Personal Vehicles (and Mileage/Gas), Reimbursement of Business-Related Expenses, and Arbitration Agreements	
Research and Investigation Re: Various Software Programs, Systems, and Other Technology Defendant Uses to Conduct Its Everyday Business, Including Timekeeping, Payroll, Patient Care and Management, Client Management, Resource Management, Communications, Information and Document Management, Safety, and Surveillance/Security Systems, with a Focus on What Documents (Both Paper and Electronic) Are Created in the Normal Course of Business Relating to Overtime Worked, Off-the-Clock Time Worked Pre/Post-Shift, and Time Worked During Meal Breaks	3.40
Research and Analysis of Potential Defenses Defendant May Raise, Including <i>De Minimis</i> Work, Non-Compensable Off-the-Clock Work, Waiver, <i>Pick-Up Stix</i> Agreements/Releases, Arbitration Agreements, and Compliant Policies	7.10
Research and Investigation Re: Post- <i>Duran</i> vs. <i>U.S. Bank</i> Trial Manageability Issues, including Research Regarding Which Experts to Retain and For What Purpose	4.10
Review and Investigation of Impact of COVID-19 Pandemic on Defendant, Its Operations, and Putative Class Members' and Aggrieved Employees' Work	5.20
Prepare a Discovery Strategy and Plan of Action, Including Topics of Inquiry Important to Certification, Liability, Damages, and Civil Penalties	2.90
Meet and Communicate with Plaintiff Ignacio Perez Throughout the Pendency of the Case	39.50
Meet and Communicate with Plaintiff Karen Rios Throughout the Pendency of the Case	37.50
Meet and Communicate with Plaintiff Lizarda Padilla ("Plaintiff Padilla") Throughout the Pendency of the Case	13.50
Investigate, Meet and Communicate with, and/or Interview Putative Class Members and Percipient Witnesses	9.50

Pleadings and Court Filings	
Draft Plaintiff Ignacio Perez Class Action Complaint for Damages and Legal Research and Analysis of All Claims Involved (filed on March 7, 2019) (Perez Action)	7.20
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation and [Proposed] Order Continuing Responsive Pleading Deadline 14 Days (submitted on May 8, 2019) (Perez Action)	0.80
Review Court's Order Re: Joint Stipulation Continuing Responsive Pleading Deadline 14 Days (filed on May 13, 2019) (Perez Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation and Order Continuing Responsive Pleading Deadline Additional 14 Days (submitted on May 23, 2019) (Perez Action)	0.70
Review Court's Order Re: Joint Stipulation Continuing Responsive Pleading Deadline Additional 14 Days (filed on May 28, 2019) (Perez Action)	0.10
Draft Plaintiff Perez's First Amended Class Action Complaint for Damages and Legal Research and Analysis of All Claims Involved (filed on June 4, 2019) (Perez Action)	4.50
Draft Plaintiff Perez's Case Management Statement (filed on June 14, 2019) (Perez Action)	0.90
Draft Plaintiff Perez's Notice of Posting Jury Fees (filed on June 21, 2019) (Perez Action)	0.10
Review Court's Case Management Minute Order (filed on July 1, 2019) (Perez Action)	0.10
Draft Notice Regarding July 1, 2019 Case Management Conference (filed on July 2, 2019) (Perez Action)	0.10
Review Defendant's Declaration of Alexander M. Medina in Response to Order to Show Cause Re Non-Appearance at Case Management Conference (served on July 3, 2019) (Perez Action)	0.10
Review Defendant's Case Management Statement (served on August 9, 2019) (Perez Action)	0.20

Draft Plaintiff Perez's Case Management Statement (filed on August 12, 2019) (Perez Action)	0.80
Review Court's Notice of Continuance (filed on August 20, 2019) (Perez Action)	0.10
Draft Plaintiff Perez's Second Amended Class Action Complaint for Damages and Legal Research and Analysis of All Claims Involved (filed on September 5, 2019) (Perez Action)	2.30
Review Court's Case Management Minute Order (filed on September 9, 2019) (Perez Action)	0.10
Review Defendant's Case Management Statement (served on November 1, 2019) (Perez Action)	0.20
Draft Plaintiff Perez's Case Management Statement (filed on November 4, 2019) (Perez Action)	0.70
Draft Plaintiff Perez's Third Amended Class Action Complaint for Damages and Legal Research and Analysis of All Claims Involved (filed on December 12, 2019) (Perez Action)	3.10
Draft Plaintiff Perez's Case Management Statement (filed on January 10, 2020) (Perez Action)	0.70
Review Defendant's Case Management Statement (served on January 10, 2020) (Perez Action)	0.20
Review and Analyze Defendant Communicare Health Centers' Answer to Plaintiff's Third Amended Complaint and Research Affirmative Defenses in Defendant's Answer (served on January 10, 2020) (Perez Action)	1.40
Review Court's Case Management Minute Order (filed on January 27, 2020) (Perez Action)	0.10
Draft Plaintiff Perez's Case Management Statement (filed on July 17, 2020) (Perez Action)	0.50
Review Defendant's Case Management Statement (served on July 17, 2020) (Perez Action)	0.10
Review Court's Case Management Minute Order (filed on August 3, 2020) (Perez Action)	0.10

Meet and Confer with Defendant's Counsel Regarding Joint Stipulation and Order to Continue Plaintiff Perez's Motions to Compel To Be Heard Concurrently with Defendant's Motion for Protective Order (submitted on October 8, 2020) (Perez Action)	0.40
Review Court's Order Granting Joint Stipulation and Order to Continue Plaintiff Perez's Motions to Compel To Be Heard Concurrently with Defendant's Motion for Protective Order (filed on October 9, 2020) (Perez Action)	0.10
Draft Plaintiff Perez's Case Management Statement (filed on November 20, 2020) (Perez Action)	0.50
Review Defendant's Case Management Statement (served on November 20, 2020) (Perez Action)	0.20
Draft Plaintiff Rios Complaint for Enforcement Under the Private Attorneys General Act, California Labor Code § 2698, Et Seq., and Legal Research and Analysis of All Allegations Involved (filed on December 7, 2020) (Rios Action)	6.50
Review Court's Case Management Minute Order (filed on December 7, 2020) (Perez Action)	0.10
Review Court's Notice of Case Management Conference (filed on December 8, 2020) (Rios Action)	0.10
Review Defendant's Notice of Unavailability (served on December 8, 2020) (Perez Action)	0.10
Review Defendant's Notice of Change of Address (served on January 5, 2021) (Perez Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Notice of Settlement (submitted on March 1, 2021) (Perez Action)	0.60
Meet and Confer with Defendant's Counsel, and Draft Joint Notice of Settlement and Case Management Conference Statement (submitted on March 1, 2021) (Rios Action)	0.20
Meet and Confer with Defendant's Counsel, and Draft Joint Case Management Statement (submitted on July 9, 2021) (Rios Action)	0.70

Review Court's Minute Order Re: Case Management Conference (filed on July 12, 2021) (Perez Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation to Consolidate CV-2019-469 and CV2020-1659 and Vacate All Trial-Related Dates and Deadlines; [Proposed] Order Thereon (submitted on December 2, 2021) (Perez Action)	1.20
Review Court's Order Re: Joint Stipulation to Consolidate CV-2019-469 and CV2020-1659 and Vacate All Trial-Related Dates and Deadlines (filed on December 8, 2021) (Perez Action)	0.10
Draft Plaintiffs' Fourth Amended Class Action Complaint for Damages & Enforcement Under the Private Attorneys General Act, California Labor Code § 2698 Et Seq., and Legal Research and Analysis of All Claims Involved (filed on June 28, 2022; Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation Granting Plaintiffs Leave to File Fourth Amended Complaint; [Proposed] Order Thereon (submitted on June 20, 2022) (Perez Action)	2.70
Review Court's Order Granting Plaintiffs Leave to File Fourth Amended Complaint (filed on June 27, 2022) (Perez Action)	0.10
Review and Analyze Defendant Communicare Health Centers' Answer to Plaintiffs' Fourth Amended Class and Representative Action Complaint and Research Affirmative Defenses in Defendant's Answer (served on August 3, 2022) (Perez Action)	1.10
Appearances	
Prepare for and Telephonically Attend Case Management Conference (July 1, 2019) (Perez Action)	1.40
Prepare for and Attend Demurrer (August 8, 2019) (Perez Action)	2.30
Prepare for and Telephonically Attend OSC Re: Dismissal (September 9, 2019) (Perez Action)	0.50

Prepare for and Telephonically Attend Demurrer/Motion to Strike (November 12, 2019) (Perez Action)	1.10
Prepare for and Telephonically Attend Further Case Management Conference (January 27, 2020) (Perez Action)	1.10
Prepare for and Telephonically Attend Case Management Conference (August 3, 2020) (Perez Action)	0.50
Prepare for and Telephonically Attend Motion to Compel and Motion for Protective Order Hearing (October 30, 2020) (Perez Action)	0.50
Prepared for and Telephonically Attend Case Management Conference (July 12, 2021) (Rios Action)	0.90
Prepare for and Telephonically Attend Hearing on Plaintiffs' Motion for Preliminary Approval of Class Action Settlement (November 30, 2022) (Perez Action)	2.10
Prepare for and Telephonically Attend Hearing on Plaintiffs' Motion for Final Approval of Class Action Settlement, Attorneys' Fees, Litigation Costs, and Enhancement Payments (May 17, 2023) (Anticipated)	1.50
Discovery and Deposition	
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Ignacio Perez (served on January 16, 2019) (Perez Action)	1.80
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Ignacio Perez (served on February 27, 2019) (Perez Action)	1.50
Draft Plaintiff Perez's Notice of Deposition of Person Most Knowledgeable at Defendant Communicare Health Centers and Requests for Production of Documents (noticed for July 11, 2019; Organizational Structure) (served on May 31, 2019) (Perez Action)	2.30

Draft Plaintiff Perez's Notice of Deposition of Person Most Knowledgeable at Defendant Communicare Health Centers and Requests for Production of Documents (noticed for July 12, 2019; Wage and Hour Practices) (served on May 31, 2019) (Perez Action)	2.70
Draft Plaintiff Perez's Form Interrogatories – General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), and Requests for Production of Documents (Set One) (served on May 31, 2019) (Perez Action)	4.20
Review Defendant Communicare Health Centers' Objections and Responses to Plaintiff Perez's Notice of Deposition of Person Most Knowledgeable and Requests for Production of Document (Organizational Structure) (served on July 2, 2019) (Perez Action)	1.50
Review Defendant Communicare Health Centers, Inc.'s Objections and Responses to Plaintiff Perez's Notice of Deposition of Person Most Knowledgeable and Requests for Production of Document (Wage and Hour Practices) (served on July 2, 2019) (Perez Action)	1.10
Review Defendant Communicare Health Centers, Inc.'s Objections and Responses to Plaintiff Perez's Form Interrogatories – General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), and Requests for Production of Documents (Set One) (served on July 2, 2019) (Perez Action)	3.80
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Lizandra Padilla (served on July 27, 2020) (Perez Action)	1.70
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Lizandra Padilla (served on September 1, 2020) (Perez Action)	3.60
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Karen Rios (served on September 8, 2020) (Rios Action)	1.80

Draft Plaintiff Perez's Form Interrogatories – General (Set Two), Requests for Admission (Set One), Special Interrogatories (Set Three), and Requests for Production of Documents (Set Two) (served on September 18, 2020) (Perez Action)	4.10
Draft Follow-up Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Karen Rios (served on October 27, 2020) (Rios Action)	1.10
Review Defendant Communicare Health Centers' Objections and Responses to Plaintiff Perez's Form Interrogatories – General (Set Two), Requests for Admission (Set One), Special Interrogatories (Set Three) and Requests for Production of Documents (Set Two) (served on December 11, 2020) (Perez Action)	2.40
Review and Analyze Documents Produced by Defendant [CCHC000001- CCHC000618] (served on December 11, 2020) (Perez Action)	7.40
Review and Analyze Documents Produced by Defendant [CCHC000619- CCHC001376] (served on December 16, 2020) (Perez Action)	9.10
Draft Follow-up Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Karen Rios (served on December 22, 2020) (Rios Action)	1.10
Review Defendant Communicare Health Centers, Inc.'s Supplemental Objections and Responses to Plaintiff Perez's Special Interrogatories (Set Two) and Requests for Production of Documents (Set One) (served on January 8, 2021) (Perez Action)	2.10
Review and Analyze Documents Produced by Defendant [CCHC001377- CCHC001376] (served on January 8, 2021) (Perez Action)	10.50
Letters and Correspondence	

Draft Notice to California Labor and Workforce Development Agency Re: Claims of Plaintiff Karen Rios for Penalties Under California Labor Code section 2698, <i>et seq.</i> (served on September 28, 2020) (Rios Action)	4.20
Meet with, Draft Correspondence to, and Respond to Correspondence from, Defendant's Counsel	21.50
Mediation/Settlement	
Review and Analyze Information, Data, and Documents Obtained from Plaintiff, Defendant (approximately 2,900+ pages), and Other Sources Prior to Mediation • Employee Handbooks and Employment and Operations, Policies, Practices, and Procedures Documents • Sampling of Employee Time Data • Sampling of Employee Pay Data • Work Schedules/Meal and Rest Periods • Pay Practices / Timecards / Overtime • Reimbursement for Expenses	34.50
Prepare for Mediation, Including Researching Settlement-Related Issues and Merits of Claims, Drafting the Mediation Brief, Compiling the Mediation Exhibits in Support of Mediation Brief, Performing Damages and Penalties Analysis and Calculations, and Reviewing Defendant's Mediation Brief (submitted on June 18, 2020 for June 23, 2020 Mediation)	25.50
Attend Mediation Session (June 23, 2020; Zoom Video Conference)	12.50
Investigate, Assess, and Analyze Documents Regarding Defendant's Financial Condition and Engage in Additional Settlement Negotiations Through Mediator (July 2020 - January 2021)	8.50
Draft, Review, Revise, Negotiate, and Finalize Memorandum of Understanding (fully executed on February 12, 2021)	2.60

Draft, Review, Revise, Negotiate, and Finalize Joint Stipulation of Class Action and PAGA Settlement (fully executed on August 31, 2021), Draft Notice of Proposed Class Action Settlement and Workweeks Dispute Form	18.50
Draft, Review, Revise, Negotiate, and Finalize Amended Joint Stipulation of Class Action and PAGA Settlement (fully executed on June 3, 2022)	2.50
Coordinate Settlement Administration with Settlement Administrator, Ongoing Monitoring of Settlement Administration Process, Respond to Inquiries, and Review Weekly Reports	5.60
Law and Motion	
Review Defendant's Memorandum of Points and Authorities in Support of Demurrer to Plaintiff's First Amended Complaint; Request for Judicial Notice in Support of Demurrer to Plaintiff's First Amended Complaint; Declaration of Alexander M. Medina in Support of Defendant's Demurrer to Plaintiff's First Amended Complaint; and [Proposed] Order Thereon (served on July 9, 2019) (Perez Action)	4.90
Draft Plaintiff Ignacio Perez's Opposition to Defendant Communicare Health Centers' Demurrer to Plaintiff's Complaint; Declaration of D. Elliot Gonzalez in Support of Plaintiff Ignacio Perez's Opposition to Defendant's Demurrer to Plaintiff's First Amended Complaint; and Plaintiff's Opposition to Defendant's Request for Judicial Notice (filed on July 26, 2019) (Perez Action)	10.30
Review Defendant Communicare Health Centers' Reply Brief in Support of Demurrer to Plaintiff Perez's First Amended Complaint and Supplemental Declaration of Alexander M. Medina in Support of Defendant's Reply to Demurrer to Plaintiff Perez's First Amended Complaint (filed on August 1, 2019) (Perez Action)	0.80
Review Court's Tentative Ruling Re Defendant's Demurrer (issued on August 7, 2019) (Perez Action)	0.10
Review Court's Minute Order Re: Defendant's Demurrer (filed on August 8, 2019) (Perez Action)	0.10
Review Defendant's Notice of Demurrer and Demurrer to Plaintiff's Second Amended Complaint; Defendant's Memorandum of Points and Authorities in Support of Demurrer to Plaintiff's Second	3.70

Amended Complaint; Declaration of Alexander M. Medina in Support of Defendant's Demurrer to Plaintiff's Second Amended Complaint; Appendix of Authorities in Support of Defendant's Demurrer to Plaintiff's Second Amended Complaint; [Proposed] Order Granting Defendant's Demurrer to Plaintiff's Second Amended Complaint (served on October 8, 2019) (Perez Action)	
Review Defendant's Notice of Motion and Motion to Strike Portions of Plaintiff's Second Amended Complaint; Memorandum of Points and Authorities; Declaration of Alexander M. Medina in Support of Defendant's Motion to Strike Portions of Plaintiff's Second Amended Complaint; Appendix of Authorities in Support of Defendant's Motion to Strike Portions of Plaintiff's Second Amended Complaint; [Proposed] Order Thereof (served on October 8, 2019) (Perez Action)	2.40
Draft Plaintiff Perez's Opposition to Defendant Communicare Health Centers Demurrer to Plaintiff's Second Amended Complaint; Appendix of Non-California Authorities in Support of Plaintiff's Opposition to Defendant's Demurrer and Motion to Strike Portions of Plaintiff's Second Amended Complaint; Opposition to Defendant Communicare Health Centers' Motion to Strike Portions of Plaintiff's Second Amended Complaint (filed on October 29, 2019) (Perez Action)	9.60
Review Defendant Communicare Health Centers' Reply Brief in Support of Demurrer to Plaintiff's Second Amended Complaint; Appendix of Authorities in Support of Defendant's Reply Brief in Support of Demurrer to Plaintiff's Second Amended Complaint (served on November 4, 2019) (Perez Action)	1.70
Review Defendant's Reply Brief in Support of Motion to Strike Portions of Plaintiff's Second Amended Complaint; Appendix in Support of Defendant's Reply Brief in Support of Motion to Strike Portions of Plaintiff's Second Amended Complaint (served on November 4, 2019) (Perez Action)	1.40
Review Court's Minute Order Re: Motion to Strike (filed on November 12, 2019) (Perez Action)	0.10
Review Court's Minute Order Re: Demurrer (filed November 12, 2019) (Perez Action)	0.10
Review Court's Order After Hearing Partially Granting Defendant's Demurrer to and Motion to Strike Plaintiff's Second Amended Complaint (filed on November 26, 2019) (Perez Action)	0.20
Review Defendant Communicare Health Centers' Memorandum of Points and Authorities in Support of Motion for Protective Order as to Plaintiff Perez's Written Discovery and Deposition Notices and/or	1.50

Motion to Sequence Discovery; Notice of Motion and Motion Thereof; Appendix of Exhibits in Support Thereof; Appendix of Non-California Authorities in Support Thereof; and [Proposed] Order Thereof (served on September 25, 2020) (Perez Action)	
Draft Plaintiff Perez's Notice of Motion and Motion to Compel Defendant Communicare Health Centers to Provide Further Responses to Plaintiff Perez's Requests for Production (Set One) and Request for Monetary Sanctions; Declaration of Daniel J. Kramer in Support Thereof; Rule 3.1345 Separate Statement in Support Thereof; and [Proposed] Order Thereof (filed on September 30, 2020) (Perez Action)	7.50
Draft Plaintiff Perez's Notice of Motion and Motion to Compel Defendant Communicare Health Centers, Inc., to Provide Further Responses to Plaintiff Perez's Special Interrogatories (Set One), and Request for Monetary Sanctions; Declaration of Daniel J. Kramer in Support Thereof; Rule 3.1345 Separate Statement in Support Thereof; and [Proposed] Order Thereof (September 30, 2020) (Perez Action)	7.30
Draft Plaintiff Perez's Notice of Motion and Motion to Compel Defendant Communicare Health Centers to Provide Further Responses to Plaintiff Perez's Special Interrogatories (Set Two) and Request for Monetary Sanctions; Declaration of Daniel J. Kramer in Support Thereof; Rule 3.1345 Separate Statement in Support Thereof; and [Proposed] Order Thereof (September 30, 2020) (Perez Action)	7.50
Review Defendant Communicare Health Centers' Opposition to Plaintiff Perez's Motion to Compel Defendant to Provide Further Responses to Plaintiff's Requests for Production of Documents, Set One and Defendant's Response to Plaintiff's Separate Statement in Support Thereof (served on October 19, 2020) (Perez Action)	2.10
Review Defendant Communicare Health Centers' Opposition to Plaintiff Perez's Motion to Compel Defendant to Provide Further Responses to Plaintiff's Special Interrogatories, Set One and Defendant's Response to Plaintiff's Separate Statement in Support Thereof (served on October 19, 2020) (Perez Action)	1.80
Review Defendant Communicare Health Centers' Opposition to Plaintiff Perez's Motion to Compel Defendant to Provide Further Responses to Plaintiff's Special Interrogatories, Set Two and Defendant's Response to Plaintiff's Separate Statement in Support Thereof (served on October 19, 2020) (Perez Action)	1.90

Review Defendant Communicare Health Centers' Appendix of Exhibits in Support of Defendant's Opposition to Plaintiff's Motions to Compel Further Responses to Requests for Production of Documents, Set One and Special Interrogatories, Sets One and Two and Appendix of Non-California of Defendant's Opposition to Plaintiff's Motions to Compel Further Responses to Requests for Production of Documents, Set One and Special Interrogatories, Sets One and Two (served on October 19, 2020) (Perez Action)	2.30
Draft Plaintiff Perez's Opposition to Defendant Communicare Health Centers' Motion for Protective Order as to Plaintiff's Written Discovery and Deposition Notices and/or Motion to Sequence Discovery and Declaration of Daniel J. Kramer in Support Thereof (filed on October 19, 2020) (Perez Action)	10.10
Review Defendant Communicare Health Centers' Reply Brief in Support of Motion for Protective Order as to Plaintiff Perez's Written Discovery and Deposition Notices and/or Motion to Sequence Discovery (served on October 23, 2020) (Perez Action)	0.90
Draft Plaintiff Perez's Reply in Support of Plaintiff Perez's Motion to Compel Further Responses to Requests for Production of Documents (Set One); Special Interrogatories (Set One); and Special Interrogatories (Set Two) (filed on October 23, 2020) (Perez Action)	6.10
Review Court's Tentative Ruling Re: Motion to Compel Further Responses and Motion for Protective Order (filed on October 30, 2020) (Perez Action)	0.20
Draft [Proposed] Order Regarding Defendant's Motion for Protective Order and Plaintiff Perez's Motions to Compel Further Responses to Discovery Requests and Request for Monetary Sanctions (filed on November 9, 2020) (Perez Action)	0.80
Review Court's Order Regarding Defendant's Motion for Protective Order and Plaintiff Perez's Motions to Compel Further Responses to Discovery Requests and Request for Monetary Sanctions (filed November 17, 2020) (Perez Action)	0.10
Research and Draft Plaintiffs' Notice of Motion and Motion for Preliminary Approval of Class Action Settlement; Memorandum of Points and Authorities, Declaration of Annabel Blanchard in Support Thereof, Declaration of Ignacio Perez in Support Thereof, Declaration of Karen Rios in Support Thereof,	16.50

Declaration of Lizandra Padilla in Support Thereof, and [Proposed] Order Thereon (filed on October 18, 2022) (Perez Action)	
Review Court's Tentative Ruling Re: Motion for Preliminary Approval (issued on November 29, 2022) (Perez Action)	0.10
Review Court's Minute Order Re: Motion for Final Approval (filed on November 30, 2022) (Perez Action)	0.10
Review Court's Order Granting Preliminary Approval of Class Action Settlement (filed on December 2, 2022) (Perez Action)	0.10
Review and Analyze Settlement Administrator's Declaration Regarding Settlement Notice Administration; and Research and Draft Plaintiffs' Motion for Final Approval of Class Action Settlement, Attorneys' Fees, Litigation Costs, and Enhancement Payments, and Declaration of Edwin Aiwarzian in Support Thereof, and [Proposed] Final Approval Order and Judgment (filed on April 25, 2023) (Perez Action)	17.50
Total Hours:	566.30

EXHIBIT B

LAWYERS for JUSTICE PC CASE COST DETAIL
Perez v. Communicare Healthcare Centers

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
2/12/2019	Golden State Overnight	Courier Service	19.08
3/7/2019	One Legal	Attorney Service	\$202.36
3/7/2019	Yolo County Superior Court	Complaint Filing Fee	\$435.00
3/7/2019	Yolo County Superior Court	Complex Filing Fee	\$1,000.00
3/25/2019	ProLegal	Attorney Service	\$179.70
5/6/2019	ProLegal	Attorney Service	144.95
5/31/2019	Golden State Overnight	Courier Service	\$26.12
6/4/2019	Legal Document Server, Inc.	Attorney Service	\$150.00
6/4/2019	U.S. Postmaster	Postage	1.75
6/14/2019	One Legal	Attorney Service	105.00
6/21/2019	Legal Document Server, Inc.	Attorney Service	155.25
6/21/2019	Yolo County Superior Court	Jury Fee	150.00
6/28/2019	CourtCall, LLC	Attorney Service	124.00
7/2/2019	Legal Document Server, Inc.	Attorney Service	150.00
7/26/2019	Golden State Overnight	Courier Service	25.95
7/29/2019	Legal Document Server, Inc.	Attorney Service	140.00
7/30/2019	Legal Document Server, Inc.	Attorney Service	150.00
8/2/2019	CourtCall, LLC	Attorney Service	94.00
8/7/2019	Daniel Kramer	Travel Reimbursement	36.21
8/8/2019	Daniel Kramer	Travel Reimbursement	813.71
9/5/2019	CourtCall, LLC	Attorney Service	94.00
9/5/2019	Golden State Overnight	Courier Service	17.00
10/29/2019	Golden State Overnight	Courier Service	19.08
10/29/2019	Legal Document Server, Inc.	Attorney Service	190.00
11/4/2019	Legal Document Server, Inc.	Attorney Service	150.00
11/8/2019	CourtCall, LLC	Attorney Service	124.00
12/12/2019	Legal Document Server, Inc.	Attorney Service	150.00
1/10/2020	Legal Document Server, Inc.	Attorney Service	150.00
6/10/2020	Lynn S. Frank	Mediation Fee	7,000.00
7/7/2020	General Logistics Systems US, Inc.	Courier Service	58.58
7/17/2020	Legal Document Server, Inc.	Attorney Service	\$150.00
7/27/2020	U.S. Postmaster	Postage	6.95
8/31/2020	Burkey Cox Evans & Bradford CPAs	Forensic Accounting	750.00
9/18/2020	General Logistics Systems US, Inc.	Courier Service	29.48
9/30/2020	Burkey Cox Evans & Bradford CPAs	Forensic Accounting	2,400.00
10/2/2020	Legal Document Server, Inc.	Attorney Service	\$27.39
10/2/2020	Yolo County Superior Court	Filing Fee	\$180.00
10/6/2020	Legal Document Server, Inc.	Attorney Service	\$16.14

LAWYERS for JUSTICE PC CASE COST DETAIL
Perez v. Communicare Healthcare Centers

10/19/2020	Legal Document Server, Inc.	Attorney Service	\$21.05
10/19/2020	Yolo County Superior Court	Filing Fee	\$60.00
10/20/2020	General Logistics Systems US, Inc.	Courier Service	\$20.13
10/21/2020	Legal Document Server, Inc.	Attorney Service	\$16.14
10/23/2020	General Logistics Systems US, Inc.	Courier Service	\$17.63
10/26/2020	Legal Document Server, Inc.	Attorney Service	\$16.14
10/30/2020	Esquire Deposition Solutions, LLC	Court Reporter	\$217.00
10/30/2020	Esquire Deposition Solutions, LLC	Court Reporter	\$490.00
11/9/2020	General Logistics Systems US, Inc.	Courier Service	\$27.07
11/12/2020	U.S. Postmaster	Postage	13.90
11/16/2020	Legal Document Server, Inc.	Attorney Service	\$16.14
11/20/2020	Legal Document Server, Inc.	Attorney Service	\$16.14
11/20/2020	General Logistics Systems US, Inc.	Courier Service	\$32.91
3/1/2021	Legal Document Server, Inc.	Attorney Service	\$16.14
12/8/2021	Legal Document Server, Inc.	Attorney Service	\$17.10
12/8/2021	Yolo County Superior Court	Filing Fee	\$20.00
12/15/2021	Legal Document Server, Inc.	Attorney Service	\$16.25
6/27/2022	Legal Document Server, Inc.	Attorney Service	\$17.60
6/27/2022	Yolo County Superior Court	Filing Fee	\$20.00
7/6/2022	Legal Document Server, Inc.	Attorney Service	\$17.00
1/11/2023	Legal Document Server, Inc.	Attorney Service	17.00
Total:			16,721.04

LAWYERS for JUSTICE PC CASE COST DETAIL
Rios v. Communicare Health (PAGA)

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