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SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES – SPRING STREET COURTHOUSE

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

Plaintiff,

vs.

CAINE & WEINER COMPANY, INC., a
California corporation; and DOES 1 through
100, inclusive,

Defendants.

Case No.: 20STCV36086

Honorable Carolyn B. Kuhl
Department SSC-12

CLASS ACTION

**DECLARATION OF EDWIN AIWAZIAN
IN SUPPORT OF PLAINTIFF’S MOTION
FOR FINAL APPROVAL OF CLASS
ACTION SETTLEMENT, ATTORNEYS’
FEES, COSTS, AND ENHANCEMENT
PAYMENT**

[Notice of Motion and Motion for Final
Approval of Class Action Settlement,
Attorneys’ Fees, Costs, and Enhancement
Payment; Declaration of Class Representative
(Laijayna Casey); Declaration of Settlement
Administrator (Taylor Mitzner); and [Proposed]
Final Approval Order and Judgment filed
concurrently herein]

Date: March 7, 2023
Time: 10:30 a.m.
Department: SSC-12

Complaint Filed: September 22, 2020
FAC Filed: April 27, 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 Plaintiff Laijayna Casey (“Plaintiff”) and the Class. The facts set forth in this declaration are within my personal knowledge or based on information and belief, and, if called as a witness, I could and would competently testify as follows.

PRELIMINARY APPROVAL OF SETTLEMENT

2. On September 12, 2022, in Department SSC-12 of the above-entitled Court, the Honorable Carolyn B. Kuhl preliminarily approved the Joint Stipulation of Class Action and PAGA Settlement and Release (“Settlement,” “Agreement,” or “Settlement Agreement,”) entered into between Plaintiff and Defendant Caine & Weiner Company, Inc., (“Defendant”), and conditionally certified the Class for settlement purposes. The Court preliminarily appointed Plaintiff Laijayna Casey to represent the Class (“Class Representative”). The Court also preliminarily appointed and designated Lawyers *for* Justice, PC as counsel for the Class (“Class Counsel”). The Court approved and ordered the mailing of the Notice of Class Action Settlement (“Class Notice”), adopted the notice, opt-out, and objection procedures, and ordered their implementation. The Court appointed Phoenix Class Action Administration Solutions (“Phoenix” or “Settlement Administrator”) to serve as the third-party settlement administrator and handle the notice and settlement administration process.

3. As of the date of filing the accompanying Motion for Final Approval of Class Action Settlement, Attorneys’ Fees, Costs, and Enhancement Payment (“Motion for Final Approval”), no Class Members have objected to the Class Settlement or the contemplated request for Attorneys’ Fees and Costs, Enhancement Payment, Settlement 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 putative class action (“Action”) since prior to its commencement on September 22, 2020, as well as Plaintiff’s separate representative action under the Private Attorneys General Act (“PAGA”), entitled *Laijayna Casey v. Caine & Weiner Company, Inc.*, Los Angeles Superior Court Case No. 20VECV01380 (“Casey PAGA Action”), since prior to its commencement on November 23, 2020. On April 27, 2022, to implement the settlement, the claims asserted in both cases were effectively consolidated into the operative complaint in the Action, by the filing of the First Amended Class Action Complaint for Damages and Enforcement Under the Private Attorneys General Act, California Labor Code § 2698, Et Seq. on April 27, 2022. The Casey PAGA Action, which was pending in Department U of the Los Angeles Superior Court, Van Nuys Courthouse-East, was dismissed without prejudice on June 24, 2022.

5. Before initiating the cases, Lawyers for Justice, PC investigated and researched the facts and circumstances underlying the pertinent factual and legal issues and applicable law. This required thorough discussions and interviews between attorneys at our firm and Plaintiff and research into the various legal issues involved in the cases, namely, the current state of the law as it applied to certification, off-the-clock theory, meal and rest periods, representative PAGA claims, wage-and-hour enforcement and penalties, Plaintiff’s claims and allegations, and potential defenses. After conducting initial investigation, our firm determined that the claims of Plaintiff 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 in California, 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 informal discovery and investigation into the facts of the cases, and

1 informally exchanged a large volume of information, documents, and data throughout the course
2 of the litigation and in connection with mediation and settlement negotiations. Class Counsel
3 also interviewed and obtained information from Plaintiff and other Class Members and reviewed
4 and analyzed a large volume of information, data, and documents obtained from Plaintiff,
5 Defendant, and other sources. The information, documents, and data reviewed and analyzed by
6 Class Counsel included and were not limited to: Plaintiff's employment records, a detailed
7 sampling of Class Members' time and pay data, redacted class list, meal premium payment
8 details, multiple iterations of Defendant's Employee Handbook, company policy
9 acknowledgements (e.g., Handbook Acknowledgement, At-Will Acknowledgement,
10 Discrimination, Harassment, Bullying and Retaliation Acknowledgement, Duty-Free Meal and
11 Rest Period Acknowledgement, Communications Acknowledgment, National Labor Relations
12 Act Acknowledgment, and Internet/Company Property Acknowledgment), internal memoranda,
13 job descriptions, and Defendant's operations and employment practices, procedures, and policies
14 documents (including but not limited to Employment-At-Will Statement, Policy Against
15 Harassment, Authorization for Background Checks, Employee Non-Disclosure Agreement,
16 Software Code of Ethics, Defendant's ID Badge Policy, Company Dress Code Reminder
17 memoranda, California Confidential Information Agreement, and Confidentiality and Invention
18 Assignment Agreement), among other information and documents. Class Counsel researched
19 applicable law, developed liability, damages, and penalties valuation models in preparation for
20 mediation and settlement negotiations, and met and conferred with Defendant's counsel on
21 numerous occasions, e.g., to discuss issues relating to the pleadings, case management, and
22 production of information, documents, and data in the course of litigation and in connection with
23 mediation and settlement negotiations. Other work performed by Class Counsel included, and
24 was not limited to, case strategy and analysis; drafting, reviewing, and revising the pleadings and
25 the mediation brief; and preparing for and attended court proceedings and mediation and
26 settlement negotiations, among other tasks.

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1 7. As outlined herein, the parties have conducted significant investigation and
2 informal discovery during the course of litigating the cases and mediation and settlement
3 negotiations. Class Counsel analyzed a large volume information, documents, and data obtained
4 from Plaintiff, Defendant, and other sources. These documents and data provided a critical
5 understanding of the nature of the work performed by the Class Members, as well as Defendant's
6 operations and employment policies, practices, and procedures, and were used in analyzing
7 liability, damages, penalties, and valuation issues in connection with all phases of the litigation,
8 and ultimately, in connection with the mediation and settlement negotiation process. Class
9 Counsel also performed significant research into the applicable law, which is evolving as it
10 relates to certification, off-the-clock theory, meal and rest periods, PAGA claims and penalties,
11 wage-and-hour enforcement, Plaintiff's claims and damages, and Defendant's defenses thereto,
12 as well as facts discovered.

13 8. After conducting significant investigation of the facts and law during the
14 prosecution of the cases, counsel for the parties engaged in extensive settlement negotiations to
15 try to resolve the cases. These efforts included participating in a formal mediation conducted by
16 Paul Grossman, Esq., a well-regarded mediator experienced in mediating complex labor and
17 employment matters. During all settlement discussions, the parties conducted their negotiations
18 at arm's length in an adversarial position. Prior to, during, and after the mediation, and in the
19 course of settlement discussions, the parties exchanged information and data, and discussed all
20 aspects of the cases, including the risks and delays of further litigation, the risks to the parties of
21 proceeding with class certification and trial, the law relating to certification, off-the-clock theory,
22 meal and rest periods, representative PAGA claims, and wage-and-hour enforcement, the
23 evidence produced and analyzed, and the possibility of appeals, among other things. Arriving at
24 a settlement that was acceptable to the parties was not easy. Defendant contended that
25 individualized questions of fact predominate over any common issues, and these issues would
26 pose challenges to class certification and representative adjudication. Defendant and its counsel
27 felt very strongly about Defendant's ability to prevail on the merits and obtain a denial of class
28 certification, while Plaintiff and Class Counsel believed that they would be able to obtain class

1 certification and prevail at trial. After conducting investigations, informal discovery and
2 exchange of information, and extensive settlement negotiations, with the aid of the mediator's
3 evaluation, the parties ultimately agreed that the cases were well-suited for settlement given the
4 legal issues relating to Plaintiff's principal claims, as well as the costs and risks to the parties that
5 would attend further litigation. These risks of further litigation include, and are not limited to, a
6 determination that the claims are unsuitable for class treatment and/or representative
7 adjudication, class de-certification after certification of a class, allowing a jury to decide the
8 claims asserted in the cases, and the real possibility of no monetary recovery after years of
9 litigation.

10 9. Pursuant to the Escalator Clause in Paragraph 37 of the Settlement Agreement, if
11 the actual number of Workweeks for the time period of September 22, 2016 to October 27, 2021
12 exceeds twenty-three thousand three hundred fifty-four (23,354) by more than 10%, the Total
13 Settlement Amount will be increased proportionally. The Settlement Administrator's declaration
14 confirms that the total number of Workweeks during this period was twenty-five thousand nine
15 hundred sixty-four (25,964), which exceeds the threshold by 11.07%. As such, it was
16 determined that the Escalator Clause in the Settlement Agreement was triggered, and the Total
17 Settlement Amount has increased from \$900,000.00 to \$909,630.12 (and Class Members were
18 provided notice of this increased Total Settlement Amount by way of the Class Notice that was
19 distributed to them).

20 10. As set forth more fully in the accompanying Motion for Final Approval, Class
21 Counsel seeks attorneys' fees in the amount of \$318,370.54, which is thirty-five percent (35%)
22 of the increased Total Settlement Amount of \$909,630.12, as set forth in the Settlement
23 Agreement and the Class Notice. Pursuant to the contingency-fee agreement entered into by and
24 between Plaintiff and Class Counsel, Plaintiff has agreed to a contingency fee of at least thirty-
25 five percent (35%) of the recovery. The attorneys' fees sought are commensurate with: (1) the
26 risk that Class Counsel took in commencing the cases; (2) the time, effort, and expense that Class
27 Counsel dedicated to the cases; (3) the skill and determination that Class Counsel has shown; (4)
28 the results that Class Counsel has achieved throughout the litigation; (5) the value of the

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

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

5 12. 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 cases 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 **440 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 Lawyers for Justice, PC. Also,
13 separate from the hours referenced herein, Lawyers for Justice, PC had litigation support
14 personnel actively engaged in assisting with the prosecution of this matter.

15 13. The work performed in this particular matter, the background of our firm, as well
16 as the individual backgrounds, training, and experience of the attorneys who worked on this
17 matter, in litigating complex wage-and-hour actions, and in particular, employment class and
18 representative actions, support a reasonable blended hourly rate of compensation of at least \$750
19 per hour for work performed by Lawyers for Justice, PC. Lawyers for Justice, PC has been
20 awarded attorneys' fees, compensating the firm at the rate of at least \$750 per hour for legal
21 services performed, by courts granting approval of wage-and-hour settlements in other cases:
22 final approval of the class and representative action settlement in *David Dugan v. TEC*
23 *Equipment, Inc., et al.* (Los Angeles Superior Court Case No. 19STCV01591) was granted on
24 July 8, 2021, and the award of attorneys' fees involved an hourly rate of \$936.47; final approval
25 of the class and representative action settlement in *Larry Greenwood, et al. v. Scan Health Plan*
26 (Los Angeles Superior Court Case No. BC715157) was granted on April 20, 2021, and the award
27 of attorneys' fees involved an hourly rate of \$919.57; final approval of the class action settlement
28 in *Thereasa Carrozzella v. Basalite Concrete Products, LLC* (Sacramento County Superior Court

Case No. 34-2017-00220214-CU-OE-GDS) was granted on February 21, 2020, and the award of attorneys' fees involved an hourly rate of \$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

14. 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

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

LITIGATION AND CLASS ACTION EXPERIENCE

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

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

18. Since its inception, in or around October of 2008, *Lawyers for Justice, PC* has almost exclusively focused on the prosecution of consumer and employment class actions, involving wage-and-hour claims, race discrimination, unfair business practices or consumer fraud. Currently, *Lawyers for Justice, PC* is the attorney of record in well 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 recovered millions of dollars on behalf of thousands of individuals in California.

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

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

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

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

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

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

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

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

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

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

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

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

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

Council Coordination Proceeding Number is 4794.

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

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

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

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

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

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

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

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

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

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

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

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

1 v) LFJ represented the plaintiffs in a wage-and-hour class and PAGA
2 representative action against a chocolate company on behalf of non-exempt employees. On July
3 19, 2017, the court granted final approval of the class and PAGA representative action
4 settlement. The Alameda County Superior Court Case Number is RG15764300.

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

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

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

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

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

1 BC498401.

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

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

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

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

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

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

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

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

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

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

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

///

1 ll) LFJ, in association with co-counsel therein, represented the plaintiffs in a
2 wage-and-hour class action against manufacturer and supplier of power products and services on
3 behalf of non-exempt employees. On July 31, 2020, the court granted in part the plaintiffs'
4 motion for class certification and certified a class. On August 27, 2021, the court granted final
5 approval of the class action settlement. The San Diego County Superior Court Case Number is
6 37-2015-00025968-CU-OE-CTL.

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

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

12 20. To date, Class Counsel has borne all of the risks and costs of litigation and will
13 not receive any compensation until recovery is obtained in this matter. Lawyers *for* Justice, PC
14 seeks reimbursement of **\$18,177.60** in litigation costs and expenses incurred in this matter, as
15 reflected in "**EXHIBIT B**" attached hereto. These expenses were reasonable and necessary in
16 the prosecution of the cases and to obtain the Settlement.

17 **ENHANCEMENT PAYMENT TO PLAINTIFF**

18 21. In recognition of her efforts and work serving as the Class Representative, the
19 Settlement provides for an Enhancement Payment in the amount of \$7,500.00 to Plaintiff
20 Laijayna Casey. The requested Enhancement Payment is fair and appropriate. Plaintiff spent a
21 substantial amount of time and effort in producing relevant documents and information and
22 provided the facts and evidence necessary to attempt to prove the allegations. Plaintiff was
23 available whenever Class Counsel needed her and actively tried to obtain information that would
24 facilitate the pursuit of the class and PAGA claims. Plaintiff spent numerous hours speaking
25 with Class Counsel about her claims, describing her work experience with Defendant, and
26 gathering and reviewing documents. Accordingly, it is appropriate for Plaintiff Laijayna Casey
27 to receive \$7,500.00 as a reasonable Enhancement Payment, for her services on behalf of the
28 Class Members, State of California, and PAGA Members, in addition to her Individual

1 Settlement Payment and Individual PAGA Payment.

2 22. I submit that the Settlement is fair, reasonable, and adequate. In addition, the
3 Settlement is in the best interests of Plaintiff, other Class Members, the State of California, and
4 PAGA Members.

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

7 Executed this 9th day of February 2023, at Glendale, California.

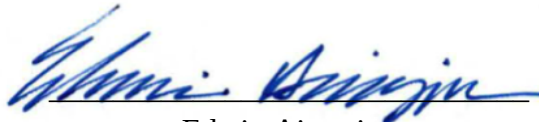
8 
9 Edwin Aiwarzian

EXHIBIT A

CASEY VS. CAINE & WEINER COMPANY INC.
(LOS ANGELES SUPERIOR COURT CASE NO. 20STCV36086)
CASEY VS. CAINE & WEINER COMPANY INC.
(LOS ANGELES SUPERIOR COURT CASE NO. 20VECV01380) (“CASEY PAGA 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, and Commonality	11.50
Pre-Lawsuit Investigation of the Merits of Plaintiff Laijayna Casey’s (“Plaintiff”) Claims and the Merits of the Claims of the Putative Class Members	9.10
Pre-Lawsuit Investigation of Potential Damages Exposure of Defendant Caine & Weiner Company Inc. (“Defendant”) with Respect to Plaintiff and the Putative Class Members	10.30
Pre-Lawsuit Investigation of the Key Facts with a Focus on the Merits of the Private Attorneys General Act (“PAGA”) Claim on Behalf of the State of California With Respect to Plaintiff and the PAGA Members	8.50
Pre-Lawsuit Investigation of Potential Civil Penalties Exposure of Defendant with Respect to Plaintiff and the Aggrieved Employees	9.70
Legal Research and Analysis of Latest Off-the-Clock, Meal and Rest Break Law, PAGA, and Certification Decisions in California, Including all New and Relevant DLSE Materials	7.50

Investigation of Defendant, Defendant's Business Relationships and Affiliations, Customers and Clients, Contracts (including, e.g., Government Contracts), and the Industry in which Defendant Operates	4.90
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	2.30
Investigation of Defendant's Executives, Officers, and Leadership with a Focus on Involvement in Wage-and-Hour Issues and Establishing Willfulness and Uniformity	2.50
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	3.90
Research and Investigation Re: Location(s), Division(s) and/or Department(s) Owned, Managed, Serviced, and/or Operated by Defendant in California During the Class Period, Including Differences Between Them to Determine Whether Those Differences Will Cause Individual Issues to Predominate Over Common Issues	4.30
Comparative Analysis and Cross-Checking of All Available Job Postings and Reviews Regarding Defendant in Order to Determine Any Variation and Identify Job Duties and Responsibilities That Would be Susceptible to Being Performed Off-the-Clock or During Meal or Rest Breaks	5.10
Research and Investigation Re: Workforce, Staffing Models, and Staffing Levels at Location(s) at Which Putative Class Members Worked Throughout California	4.60
Research and Investigation Re: Defendant's Policies, Practices, and Procedures Relating to Timekeeping, Scheduling, Opening and Closing Procedures, Mandatory Meetings, Productivity Quotas, Meal/Rest Breaks, On-Premises Breaks, Meal Period Waivers, Meal/Rest Premiums, Overtime Compensation, Commission/Bonus/Incentive/Performance/Shift Differential Pay, Parking, Dress Code, Use of Personal Cell Phone, PPE/Supplies/Equipment, Reimbursement of Business-Related Expenses, Employee Hotline	23.50

Research and Investigation Re: Software Programs and Other Technology Defendant Uses to Conduct Its Everyday Business, Including Timekeeping, Document and Information Management, Customer/Client Relations Management, Call Center/Routing, and 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	3.90
Research and Analysis of Potential Defenses Defendant May Raise, Including <i>De Minimis</i> Work, Non-Compensable Off-the-Clock Work, Waiver, and Compliant Policies	8.10
Research and Investigation Re: Post- <i>Duran vs. U.S. Bank</i> Trial Manageability Issues, including Research Regarding Which Experts to Retain and For What Purpose	5.40
Research and Analysis of Defendant's Litigation History Involving Wage-and-Hour Issues and Other Related Employment Issues	2.20
Prepare and Outline a Discovery Strategy and Plan of Action, Including Topics of Inquiry Important to Certification, Liability, Damages, and Civil Penalties	5.90
Research and Investigation of Impact of COVID-19 Pandemic on Defendant, its Operations, and Putative Class Members' Work	7.50
Meet and Communicate with Plaintiff Laijayna Casey Throughout the Pendency of the Case	42.50
Investigate, Meet and Communicate with, and/or Interview Putative Class Members and Percipient Witnesses	16.50
Pleadings and Court Filings	
Draft Plaintiff's Class Action Complaint for Damages and Legal Research Analysis of All Claims Involved (filed on September 22, 2020)	7.50
Review Court's Notice of Case Assignment (filed on September 22, 2020)	0.10

Review Court's Minute Order Re: Newly Filed Class Action (filed on September 24, 2020)	0.20
Draft Plaintiff's Notice of Posting Jury Fees (filed on October 21, 2020)	0.10
Review Defendant's Notice of Appearance (served on October 26, 2020)	0.10
Draft Plaintiff's Complaint for Enforcement Under the Private Attorneys General Act, California Labor Code § 2698, Et Seq. and Legal Research and Analysis of All Claims Involved (filed on November 23, 2020) (<i>Casey</i> PAGA Action)	6.50
Review Court's Notice of Case Assignment (filed on November 23, 2020) (<i>Casey</i> PAGA Action)	0.10
Review Court's Notice of Case Management Conference (filed on November 23, 2020) (<i>Casey</i> PAGA Action)	0.10
Review and Analyze Defendant's Initial Status Conference Response Statement (served on December 30, 2020)	0.50
Meet and Confer with Defendant's Counsel, and Draft Joint Case Management Conference Report (filed on December 31, 2020)	1.50
Draft [Proposed] Order Authorizing Electronic Service (submitted on January 5, 2021)	0.10
Review Court's Minute Order Re: Initial Status Conference and Order Authorizing Electronic Service (Case Anywhere) (filed on January 8, 2021)	0.20
Review Court's Notice of Case Reassignment and Order for Plaintiff to Give Notice (filed on January 27, 2021) (<i>Casey</i> PAGA Action)	0.10
Draft Plaintiff's Notice of Posting Jury Fees (filed on February 11, 2021) (<i>Casey</i> PAGA Action)	0.10

Meet and Confer with Defendant's Counsel and Draft Joint Case Management Conference Report (filed on April 7, 2021)	0.50
Meet and Confer with Defendant's Counsel and Draft Joint Stipulation to Continue Case Management Conference; and [Proposed] Order (served on May 10, 2021) (<i>Casey</i> PAGA Action)	0.80
Meet and Confer with Defendant's Counsel and Draft Joint Stipulation and Order to Continue Initial Status Conference (submitted on May 13, 2021)	0.70
Draft Plaintiff's Notice of Entry of Judgment or Order (filed on May 18, 2021)	0.10
Review Court's Order Granting Parties' Joint Stipulation to Continue Case Management Conference (filed on November 23, 2020) (<i>Casey</i> PAGA Action)	0.10
Review and Analyze Defendant Caine & Weiner Company, Inc.'s Answer to Complaint for Enforcement under the Private Attorneys General Act, California Labor Code § 2698 <i>Et Seq.</i> (served on June 3, 2021) (<i>Casey</i> PAGA Action)	2.10
Meet and Confer with Defendant's Counsel and Draft Joint Status Conference Statement and Notice of Settlement (filed on November 15, 2021)	0.70
Meet and Confer with Defendant's Counsel and Draft Joint Status Conference Statement and Notice of Settlement (filed on November 15, 2021) (<i>Casey</i> PAGA Action)	0.70
Draft Notice Regarding November 30, 2021 Case Management Conference (filed on December 8, 2021) (<i>Casey</i> PAGA Action)	0.20
Review Court's Notice of Case Reassignment and Order for Plaintiff to Give Notice (filed on December, 17, 2021) (<i>Casey</i> PAGA Action)	0.10
Meet and Confer with Defendant's Counsel and Draft Joint Response to Order to Show Cause Regarding Dismissal (Settlement) (filed on March 21, 2022) (<i>Casey</i> PAGA Action)	0.60

Review Court's Minute Order Re: Non-Appearance Case Review Re: Filing of the Motion for Preliminary Approval (filed on April 1, 2022)	0.10
Meet and Confer with Defendant's Counsel and Draft Joint Status Report (filed on April 11, 2022)	0.60
Draft Plaintiff's First Amended Class Action Complaint for Damages and Enforcement under the Private Attorneys General Act, California Labor Code § 2698 <i>Et Seq.</i> (filed on April 27, 2022); and Meet and Confer with Defendant's Counsel and Draft Joint Stipulation and Order Granting Plaintiff Leave to File First Amended Complaint (submitted on April 22, 2022)	5.70
Meet and Confer with Defendant's Counsel and Draft Joint Status Report (filed on April 27, 2022)	0.50
Review Court's Minute Order Re: Status Conference (filed on May 4, 2022)	0.10
Review and Analyze Defendant Caine & Weiner Company, Inc.'s Answer to Unverified First Amended Class Action Complaint for Damages and Enforcement under the Private Attorneys General Act, California Labor Code § 2698 <i>Et Seq.</i> (served on June 1, 2022)	1.20
Meet and Confer with Defendant's Counsel and Draft Joint Response to Order to Show Cause Regarding Dismissal (Settlement) (filed on June 21, 2022) (<i>Casey</i> PAGA Action)	0.60
Review Court's Minute Order Re: Hearing on Motion for Preliminary Approval of Settlement (filed on July 12, 2022)	0.10
Draft Plaintiff's Notice of Entry of Judgment or Order (filed on September 13, 2022)	0.10
Appearances	
Prepare for and Telephonically Attend Case Initial Status Conference (January 8, 2021)	1.10
Prepare for and Telephonically Attend Case Management Conference (November 30, 2021) (<i>Casey</i> PAGA Action)	1.20

Prepare for and Telephonically Attend Order to Show Cause Regarding Dismissal (March 25, 2022) (<i>Casey</i> PAGA Action)	0.50
Prepare for and Telephonically Attend Status Conference (May 4, 2022)	0.40
Prepare for and Telephonically Attend Order to Show Cause Regarding Dismissal (June 24, 2022) (<i>Casey</i> PAGA Action)	0.50
Prepare for and Telephonically Attend Hearing on Plaintiff's Motion for Preliminary Approval of Class Action Settlement (July 12, 2022)	1.50
Prepare for and Telephonically Attend Hearing on Plaintiff's Motion for Final Approval of Class Action Settlement, Attorneys' Fees, Costs, and Enhancement Payment (March 7, 2023) (Anticipated)	1.50
Discovery and Deposition	
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Laijayna Casey (served on June 29, 2020)	1.90
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Laijayna Casey (served on July 23, 2020)	3.90
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Putative Class Member (served on November 24, 2021)	1.90
Letters and Correspondence	
Draft Notice to California Labor and Workforce Development Agency Re: Claims of Plaintiff Laijayna Casey for Penalties Under California Labor Code section 2698, <i>et seq.</i> (served on September 18, 2020)	4.10
Meet with, Draft Correspondence to, and Respond to Correspondence from, Defendant's Counsel	22.50

Mediation/Settlement	
Review and Analyze Information, Data, and Documents Obtained from Plaintiff, Defendant, and Other Sources Prior to Mediation (served on September 27, 2021) • Employee Handbooks and Employment and Operations Policies, Practices, and Procedures Documents • Sampling of Employee Time and Pay Data • Redacted Class List • Meal Premium Payment Details	63.50
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, and Performing Damages and Penalties Analysis and Calculations (submitted on October 20, 2021)	20.50
Remotely Attend Mediation Session (October 27, 2021; Zoom Video Conference)	16.50
Review and Analyze Mediator's Proposal (issued on November 1, 2021)	0.90
Review and Analyze Mediator's Revised Proposal (issued on November 2, 2021)	0.80
Draft, Review, Revise, Negotiate, and Finalize Joint Stipulation of Class Action and PAGA Settlement and Release (fully executed on May 26, 2022) and Exhibits Thereto	17.10
Review and Monitor Settlement Administration Process and Weekly Reports	6.50

Law and Motion	
Research and Draft Plaintiff's Notice of Motion and Motion for Preliminary Approval of Class Action Settlement, Declaration of Yasmin Hosseini in Support Thereof, Declaration of Laijayna Casey in Support Thereof, and [Proposed] Order Thereon (filed on May 31, 2022)	17.60
Research and Draft Supplemental Declaration of Yasmin Hosseini in Support of Plaintiff's Motion for Preliminary Approval of Class Action Settlement and [Revised Proposed] Order Thereon (filed on July 25, 2022)	3.50
Review Court's Order Granting Motion for Preliminary Approval of Class Action Settlement filed by Laijayna Casey (filed on September 12, 2022)	0.10
Review and Analyze Settlement Administrator's Declaration Regarding Settlement Notice Administration; and Research and Draft Plaintiff's Motion for Final Approval of Class Action Settlement, Attorneys' Fee and Costs, and Enhancement Payment, and Declaration of Edwin Aiwasian in Support Thereof, and [Proposed] Final Approval Order and Judgment (filed on February 9, 2023) (Anticipated)	19.50
Total Hours:	440.00

EXHIBIT B

LAWYERS for JUSTICE PC CASE COST DETAIL
Casey v. Caine Weiner Company

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
9/22/2020	Legal Document Server, Inc.	Attorney Service	160.23
9/22/2020	Los Angeles Superior Court	Complex Filing Fee	1,000.00
9/22/2020	Los Angeles Superior Court	Court Filing Fee	435.00
9/29/2020	Legal Document Server, Inc.	Attorney Service	110.00
10/6/2020	Legal Document Server, Inc.	Attorney Service	60.00
10/21/2020	Legal Document Server, Inc.	Attorney Service	80.25
10/21/2020	Los Angeles Superior Court	Jury Fee	150.00
11/3/2020	Legal Document Server, Inc.	Attorney Service	145.00
12/24/2020	Legal Document Server, Inc.	Attorney Service	110.00
12/24/2020	Legal Document Server, Inc.	Attorney Service	65.00
12/31/2020	Legal Document Server, Inc.	Attorney Service	175.00
1/12/2021	Los Angeles Superior Court	Document Download Fee	5.80
3/2/2021	Case Anywhere LLC	Attorney Service	94.80
4/8/2021	Legal Document Server, Inc.	Attorney Service	205.00
5/11/2021	Legal Document Server, Inc.	Attorney Service	205.70
5/11/2021	Los Angeles Superior Court	Filing Fee	20.00
5/18/2021	Legal Document Server, Inc.	Attorney Service	65.00
5/18/2021	Legal Document Server, Inc.	Attorney Service	110.00
6/3/2021	Case Anywhere LLC	Attorney Service	138.00
9/1/2021	Case Anywhere LLC	Attorney Service	120.00
9/30/2021	FedEx Express	Courier Service	33.94
10/21/2021	Paul Hastings LLP	Mediation Fee	12,500.00
11/15/2021	Legal Document Server, Inc.	Attorney Service	15.20
11/16/2021	Legal Document Server, Inc.	Attorney Service	95.00
12/6/2021	Case Anywhere LLC	Attorney Service	126.00
3/2/2022	Case Anywhere LLC	Attorney Service	120.00
4/20/2022	Legal Document Server, Inc.	Attorney Service	16.55
4/20/2022	Los Angeles Superior Court	Filing Fee	20.00
4/28/2022	Legal Document Server, Inc.	Attorney Service	15.20
4/28/2022	Legal Document Server, Inc.	Attorney Service	15.20
5/31/2022	Legal Document Server, Inc.	Attorney Service	19.25
5/31/2022	Los Angeles Superior Court	Filing Fee	60.00
6/1/2022	Legal Document Server, Inc.	Attorney Service	175.00
6/6/2022	Case Anywhere LLC	Attorney Service	174.00
7/26/2022	Legal Document Server, Inc.	Attorney Service	15.95
9/14/2022	Legal Document Server, Inc.	Attorney Service	15.95
12/5/2022	Case Anywhere LLC	Attorney Service	126.00
Total:			16,998.02

LAWYERS for JUSTICE PC CASE COST DETAIL
Casey v. Caine and Weiner Company (PAGA)

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
6/29/2020	U.S. Postmaster	Postage	7.00
9/18/2020	Labor & Workforce Development Agency	Filing Fee	75.00
9/18/2020	U.S. Postmaster	Postage	0.70
11/23/2020	Legal Document Server, Inc.	Attorney Service	30.43
11/23/2020	Los Angeles Superior Court	Court Filing Fee	435.00
2/11/2021	Legal Document Server, Inc.	Attorney Service	20.45
2/11/2021	Los Angeles Superior Court	Jury Fee	150.00
3/2/2021	Legal Document Server, Inc.	Attorney Service	11.00
3/2/2021	Case Anywhere LLC	Attorney Service	94.80
3/4/2021	Legal Document Server, Inc.	Attorney Service	15.20
6/3/2021	Case Anywhere LLC	Attorney Service	138.00
11/15/2021	Legal Document Server, Inc.	Attorney Service	15.20
11/16/2021	Legal Document Server, Inc.	Attorney Service	115.00
12/9/2021	Legal Document Server, Inc.	Attorney Service	15.20
3/22/2022	Legal Document Server, Inc.	Attorney Service	15.20
3/30/2022	Legal Document Server, Inc.	Attorney Service	15.20
4/20/2022	Legal Document Server, Inc.	Attorney Service	11.00
6/21/2022	Legal Document Server, Inc.	Attorney Service	15.20
Total:			1,179.58