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Attorneys for Plaintiffs and the Class

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF ORANGE – CIVIL COMPLEX CENTER**

YESENIA FIERRO and CHERISE MORRIS
EASTMAN, individually, and on behalf of
other members of the general public similarly
situated, and on behalf of the State of
California pursuant to the California Private
Attorneys General Act;

Plaintiffs,

vs.

5.11, INC., a California corporation; 5.11
TACTICAL, INC., an unknown business
entity; 5.11 TACTICAL, and unknown
business entity; and DOES 1 through 100,
inclusive,

Defendants.

Case No.: 30-2020-01171395-CU-OE-CXC

Honorable Layne H. Melzer
Department CX102

CLASS ACTION

**DECLARATION OF BRIAN J. ST. JOHN
IN SUPPORT OF PLAINTIFFS' MOTION
FOR FINAL APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT**

Date: April 11, 2025
Time: 1:30 p.m.
Department: CX102

Complaint Filed: November 20, 2020
FAC Filed: January 18, 2023
Trial Date: None Set

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1. I am an attorney duly licensed to practice law before all courts of the State of California and all United States District Courts in the State of California. I am a member of Lawyers *for* Justice, PC, attorneys of record for Yesenia Fierro (“Plaintiff Fierro”) and Cherise Morris Eastman (“Plaintiff Eastman”) (together, “Plaintiffs”) in the above-captioned consolidated case. The facts set forth in this declaration are within my personal knowledge or based on information and belief, and, if called as a witness, I could and would competently testify thereto.

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1 **WORK PERFORMED BY CLASS COUNSEL**

2 4. Several attorneys at Lawyers *for* Justice, PC have been actively engaged in litigating
3 the above-captioned action since prior to its commencement on November 20, 2020.

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

15 6. The Parties conducted significant formal and informal discovery and investigation into
16 the facts of the case, to assess the veracity, strength, and scope of the claims, and Class Counsel worked
17 on preparing the matter for class certification and trial, prior to reaching the Settlement. The Parties
18 exchanged information, documents, and data in the course of litigation and in connection with the
19 mediation and settlement negotiations. Class Counsel reviewed and analyzed information, data, and
20 documents obtained from Plaintiffs, Defendant, and other sources. The volume of data and documents
21 that Class Counsel reviewed and analyzed included and was not limited to: Plaintiffs' employment
22 records, a detailed sampling of Class Members' time and pay records, multiple iterations of
23 Defendant's Employee Handbook (also referred to as "Employee Field Rages"), company agreements
24 and acknowledgements (including but not limited to, multiple iterations of the Team Member
25 Arbitration Agreement, Drug and Alcohol Testing Policy Acknowledgement, Safety Manual
26 Acknowledgment, and 401k Summary Plan Acknowledgement, Receipt and Acknowledgement of
27 Employee Field Regs), new hire orientation and personnel checklists, Defendant's Code of Business
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1 Conduct and Ethics, job descriptions (Customer Service/Inside Sales Representative, Customer
2 Service Assistant, and Returns Clerk), forms (including, but not limited to, an exemplar California
3 Meal Period Waiver and Team Member Information form), performance appraisals, correspondence
4 and memos, and policies (including, but not limited to, Defendant's policies regarding Attendance,
5 Knife Use, Employee Uniform, Medical Release Authorization Drug and Alcohol Testing, Company
6 Whistleblower, and General Safety Rules), among other information and documents. Class Counsel
7 had the opportunity to interview Plaintiffs and other Class Members to gather information regarding
8 the facts and circumstances surrounding Plaintiffs' and putative class members' employment and to
9 identify potential witnesses. Class Counsel took the deposition of Defendant's Person Most
10 Knowledgeable and defended the deposition of Plaintiff Fierro. Class Counsel also developed
11 damages, violation, and penalties valuation models in connection with the mediation and settlement
12 negotiations, and met and conferred with Defendant's counsel on numerous occasions, e.g., to discuss
13 issues relating to the pleadings, case management, formal and informal discovery, motion practice,
14 and production of documents and data in the course of litigation and mediation and settlement
15 negotiations, and mediation and settlement negotiations. Other work that Class Counsel has performed
16 includes, and is not limited to, case strategy and analysis; drafting, reviewing, and revising the
17 pleadings, the mediation brief, and motion-related papers; claims assessment; preparing for and
18 attending court proceedings; and preparing for and participating in mediation and settlement
19 negotiations, among other tasks.

20 7. As outlined herein, the Parties have conducted significant investigation and formal and
21 informal discovery during the course of litigating the case, mediation, and extensive settlement
22 negotiations. Class Counsel analyzed a large volume of information, documents, and data obtained
23 from Plaintiffs, Defendant, and other sources that provided a critical understanding of the nature of
24 the work performed by the Class Members and PAGA Aggrieved Employees, as well as Defendant's
25 operations and employment policies, practices, and procedures. The information, documents, and data
26 were used in analyzing liability, damages, penalties, and other valuation issues in connection with all
27 phases of the litigation, and ultimately, in connection with the mediation and settlement negotiation
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1 process. Class Counsel also performed significant research regarding applicable law, which is
2 evolving as it relates to class certification, manageability, off-the-clock theory, meal and rest periods,
3 representative PAGA claims and penalties, wage-and-hour law and enforcement, Plaintiffs' claims
4 and allegations, and Defendant's defenses thereto, as well as facts discovered

5 8. After conducting significant investigation of the facts and law during the prosecution
6 of the case, counsel for the parties engaged in mediation and extensive settlement negotiations to try
7 to resolve the case. These efforts included participating in mediation conducted by Eve Wagner, Esq.,
8 a well-regarded mediator who is experienced in mediating complex labor and employment matter.
9 During all settlement discussions, the parties conducted their negotiations at arm's length in an
10 adversarial position. In the course of mediation and settlement negotiations, the parties discussed and
11 considered all aspects of the case, including the risks and delays of further litigation, the risks to the
12 parties of proceeding with class certification, and/or trial, the law relating to class certification, off-
13 the-clock theory, meal and rest periods, PAGA representative claims, and wage-and-hour
14 enforcement, as well as the evidence produced and analyzed, and the possibility of appeals, among
15 other things. Arriving at a settlement that was acceptable to the parties was not easy. After conducting
16 extensive investigations and settlement negotiations, and with the aid of the mediator's evaluation, the
17 parties have agreed to resolve the case given the legal issues relating to Plaintiffs' principal claims, as
18 well as the costs and risks to both sides that would attend further litigation, and the real possibility of
19 no recovery after years of litigation.

20 9. By way of the accompanying motion for final approval of the Settlement, Class
21 Counsel seek attorneys' fees in the amount of \$274,750.00, which is thirty-five percent (35%) of the
22 Gross Settlement Amount of \$785,000.00. Pursuant to the contingency-fee agreement entered into by
23 and between Plaintiffs and Lawyers *for* Justice, PC, Plaintiffs have agreed to a contingency fee of at
24 least forty-five percent (45%) of the recovery.

25 10. The attorneys' fees sought are commensurate with: (1) the risk that Class Counsel took
26 in commencing and/or pursuing the case; (2) the time, effort, and expense that Class Counsel dedicated
27 to the case; (3) the skill and determination that Class Counsel have shown; (4) the substantial results
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1 that Class Counsel have achieved throughout the litigation of the case; (5) the value of the settlement
2 that Class Counsel have achieved; and (6) the other case that Class Counsel have turned down in order
3 to devote their time and efforts to the case.

4 11. While not necessarily required to be demonstrated because the percentage fee is proper
5 for this settlement, Class Counsel have incurred many hours of work in connection with prosecuting
6 the cases, such that the award of attorneys' fees is also justified under a lodestar analysis. Attorneys
7 at Lawyers *for* Justice, PC have spent a total of **431.40** performing tasks and obtaining recovery in this
8 matter. Attached hereto as "**EXHIBIT A**" is an Attorney Task and Time Chart that sets forth in detail
9 the nature of the legal services provided by attorneys at Lawyers *for* Justice, PC, and the time incurred
10 in performing those services. The hours attributable to Lawyers *for* Justice, PC include work done by
11 several attorneys at Lawyers *for* Justice, PC. Additionally, separate from the hours of work referenced
12 herein and in the attached chart, Lawyers *for* Justice, PC had litigation support personnel actively
13 engaged in assisting with the prosecution of this matter.

14 12. The work performed in this particular matter, the background of Lawyers *for* Justice,
15 PC, as well as the individual backgrounds, training, and experience of the attorneys who worked on
16 this matter, in litigating complex wage-and-hour actions, and in particular, employment class action
17 and representative action cases, support a reasonable blended hourly rate of compensation of at least
18 \$850 per hour for work performed by Lawyers *for* Justice, PC. Lawyers *for* Justice, PC has been
19 awarded attorneys' fees, compensating the firm at the rate of at least \$850 per hour for legal services
20 performed, by courts granting approval of settlements in other wage-and-hour class action and
21 representative action cases: final approval of the class and representative action settlement in *David*
22 *Dugan v. TEC Equipment, Inc., et al.* (Los Angeles Superior Court Case No. 19STCV01591) was
23 granted on July 8, 2021, and the award of attorneys' fees involved compensation at the rate of \$936.47
24 per hour; final approval of the class and representative action settlement in *Larry Greenwood, et al. v.*
25 *Scan Health Plan* (Los Angeles Superior Court Case No. BC715157) was granted on April 20, 2021,
26 and the award of attorneys' fees involved compensation at the rate of \$919.57 per hour; and final
27 approval of the class and representative action settlement in *Seth Swan v. Pace Supply Corp.* (Sonoma
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1 County Superior Court Case No. SCV258764) was granted on February 6, 2019, and the award of
2 attorneys' fees involved compensation at the rate of \$855.96 per hour.

3 **EXPERIENCE AND ADEQUACY OF**

4 **LAWYERS *for* JUSTICE, PC**

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

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

14 15. Arby Aiwarzian is a Member and Shareholder of Lawyers *for Justice*, PC. He received
15 his Bachelor of Arts degree from University of California, Los Angeles and graduated magna cum
16 laude. He earned a Juris Doctor degree, cum laude, from Southwestern Law School. From
17 approximately May 2007 to approximately July 2007, he served as a Judicial Extern to the Honorable
18 Earl Johnson, Jr. of the California Court of Appeal for the Second Appellate District. From
19 approximately August 2008 to approximately December 2008, he served as a Judicial Extern to the
20 Honorable Kim McLane Wardlaw of the United State Court of Appeals for the Ninth Circuit. He was
21 admitted to practice law in California in 2010. He is admitted to practice before all courts of the State
22 of California and all United States District Courts in the State of California. He has worked on many
23 wage-and-hour class action and representative action cases, taking the lead in taking and defending
24 depositions, arguing motions, and attending mediations. He has played an integral role in preparing
25 matters for class certification, including and not limited to, successful certification of a class in *Upson*
26 *v. Sur La Table* (Los Angeles County Superior Court Case No. BC424012), *Montazemi v. Regus*
27 *Management* (Los Angeles County Superior Court Case No. BC478769), and *Abdulhaqq v. Urban*

1 *Outfitters* (Alameda County Superior Court Case No. RG13680477). Under his supervision, dozens
2 of class action or representative cases have resulted in settlements that have been granted court
3 approval, including and not limited to, those listed in paragraph 17 herein. He has handled over one
4 hundred and fifty (150) mediations and worked on over two hundred and fifty (250) class action or
5 representative action cases which have resulted in settlement.

6 16. Joanna Ghosh is a Senior Member of Lawyers *for* Justice, PC. She received a Bachelor
7 of Arts degree from California State University, Los Angeles in 2006, a Master of Science degree
8 from the London School of Economics in 2007, and a Juris Doctor degree from Georgetown University
9 Law Center in 2010. She is admitted to practice in California (since 2010) and in New York (since
10 2013) and is also admitted to practice in all U.S. District Courts in California, the U.S. Bankruptcy
11 Court for the Central District of California, and the U.S. Supreme Court. She has taken and defended
12 dozens of depositions and successfully handled motion practice in class action cases regarding
13 discovery (including and not limited to, regarding class contact information), class certification (both
14 contested class certification and stipulated class certification), arbitration agreements, coordination,
15 intervention. She has successfully handled briefing and oral argument on appeal and obtained notable
16 decisions regarding the Private Attorneys General Act and employer efforts to compel arbitration of
17 PAGA claims, e.g., *Roberto Betancourt v. Prudential Overall Supply* (Cal., May 24, 2017) 9
18 Cal.App.5th 439 (Cal. Ct. App., Mar. 7, 2017), cert. denied, cert. denied (U.S., Dec. 11, 2017) and *ZB,*
19 *N.A. v. Superior Court* (2019) 8 Cal.5th175. She also has extensive experience with class action and/or
20 representative action settlements. Under her, Edwin Aiwasian, and Arby Aiwasian's supervision, the
21 firm has handled the class certification and court approval process for hundreds of class action and/or
22 representative action matters that have successfully resolved. She is a member of the California
23 Employment Lawyers Association.

24 17. I am a Member of Lawyers *for* Justice, PC. I received my Bachelor's degree from the
25 University of California, San Diego in 2010 and earned my Juris Doctor degree from the University
26 of California, Berkeley, School of Law in 2013. I was admitted to practice law in California in 2015.
27 I am admitted to practice before all courts of the State of California and all federal district courts in
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1 the State of California. I have worked on many wage and hour class action and PAGA representative
2 matters, and my work has included, inter alia, researching and drafting pleadings, administrative notice
3 exhaustion, drafting, negotiating, and finalizing stipulations and settlement agreements, engaging in
4 motion practice, claims evaluation and analysis, and making court appearances. Prior to working at
5 *Lawyers for Justice, PC*, I spent several years working for a boutique employment and labor law firm
6 representing employers, and, in 2019 and 2020, I was employed as general counsel for a DMHC
7 licensed discount dental plan.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

21 m) LFJ represented the plaintiff in a PAGA representative action against a real
22 estate and property management company, on behalf of non-exempt employees. On November 4,
23 2016, the court granted approval of the PAGA representative action settlement. The Orange County
24 Superior Court Case Number is 30-2015-00775439-CU-OE-CXC.

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

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

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

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

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

23 s) LFJ, in association with co-counsel therein, represented the plaintiffs in a wage-
24 and-hour class and PAGA representative action against a lumber and hardware company on behalf of
25 non-exempt employees. On April 26, 2017, the court granted final approval of the class and PAGA
26 representative action settlement. The Orange County Superior Court Case Number is 30-2014-
27 00747750-CU-OE-CXC.

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

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

9 v) LFJ represented the plaintiffs in a wage-and-hour class and PAGA
10 representative action against a chocolate company on behalf of non-exempt employees. On July 19,
11 2017, the court granted final approval of the class and PAGA representative action settlement. The
12 Alameda County Superior Court Case Number is RG15764300.

13 w) LFJ represented the plaintiff in a PAGA representative action, against the parent
14 company of several restaurants, on behalf of hourly-paid, non-exempt employees. On October 18,
15 2017, the court granted approval of the PAGA representative action settlement. The Los Angeles
16 County Superior Court Case Number is BC569664.

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

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

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

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

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

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

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

20 ee) LFJ, in association with co-counsel therein, represents the plaintiff in a wage-
21 and-hour class action against a parking company on behalf of non-exempt employees. On September
22 3, 2019, the court granted the plaintiff's motion for class certification and certified a class. The Santa
23 Clara County Superior Court Case Number is 16CV292208 and the Judicial Council Coordination
24 Proceeding Number is 4886.

25 ff) LFJ, in association with co-counsel therein, represents the plaintiffs in a wage-
26 and-hour class and PAGA representative action against a bank on behalf of non-exempt employees.
27 On September 27, 2019, the court granted the plaintiffs' motion for class certification in part and
28

1 certified a class. The Alameda County Superior Court Case Number is RG15757606 and the Judicial
2 Council Coordination Proceeding Number is 4921.

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

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

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

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

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

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

13 mm) LFJ represented the plaintiff in a wage-and-hour class action against a
14 nutritional products manufacturer on behalf of non-exempt production line employees. On December
15 13, 2021, the court granted the plaintiff's motion for class certification in part and certified a class. On
16 January 16, 2024, the court granted final approval of the class and PAGA representative action
17 settlement. The Solano County Superior Court Case Number is FCS051001.

18 nn) LFJ represents the plaintiffs in a wage-and-hour class action against a
19 manufacturer and distributor of commercial dish and glass cleaning machines and supplies for the
20 restaurant and hospitality industries, on behalf of hourly-paid or non-exempt employees. On July 13,
21 2023, the court granted the plaintiffs' motion for class certification and certified a class. The Los
22 Angeles County Superior Court Case Number is BC707670.

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

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

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

9 19. To date, Class Counsel have borne all of the risks and costs of litigation and will not
10 receive any compensation until recovery is obtained in the case. Lawyers *for* Justice, PC seeks
11 reimbursement of **\$20,858.72** in litigation costs and expenses incurred in the case, as reflected in
12 **"EXHIBIT B"** attached hereto. These expenses were reasonable and necessary in the prosecution of
13 the cases and to obtain the Settlement

14 **CLASS REPRESENTATIVE SERVICE AWARDS TO PLAINTIFFS**

15 20. In recognition of their efforts and work serving as expended in the case and serving as
16 the Class Representatives, Plaintiffs seek Class Representative Service Awards in the amount of
17 \$5,000.00 to each Plaintiff, in the combined amount of \$10,000.00. The requested Class
18 Representative Service Awards are fair and appropriate. Plaintiffs spent a substantial amount of time
19 and effort in providing relevant documents, past employment records, and the facts and evidence
20 necessary to attempt to prove the allegations in the case. Plaintiffs were available whenever their
21 attorneys needed them and actively tried to obtain and provide information that would facilitate the
22 pursuit of the case. Accordingly, it is appropriate for Plaintiffs to each receive \$5,000.00 as a
23 reasonable Class Representative Service Award for their services performed in the matter.

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1 21. Class Counsel submits that the Settlement is fair, reasonable, and adequate, and is in
2 the best interest of the Class, PAGA Aggrieved Employees, and the State of California.

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

5 Executed this 28th day of March 2025, at Glendale, California.

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8 Brian J. St. John
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EXHIBIT A

YESENIA FIERRO V. 5.11, INC.
Orange County Superior Court Case No. 30-2020-01171395-CU-OE-CXC

ATTORNEY TASK AND TIME CHART

TASK	LAWYERS FOR JUSTICE, PC
Investigation and Research / Due Diligence	
Meet and Communicate with Plaintiff Yesenia Fierro (“Plaintiff Fierro”) During the Case	44.20
Meet and Communicate with Plaintiff Cherise Morris Eastman (“Plaintiff Eastman”) During the Case	31.60
Investigate, Communicate with, and/or Interview Putative Class Members, Aggrieved Employees, and/or Percipient Witnesses	18.50
Pleadings and Court Filings	
Research and Draft Plaintiff Fierro’s Class Action Complaint for Damages & Enforcement Under the Private Attorneys General Act, California Labor Code Section 2698, Et Seq. and Legal Research and Analysis of All Claims Involved (filed on November 20, 2020)	7.80
Review Court’s Notice of Case Reassignment (filed on December 10, 2020)	0.10
Review and Analyze Defendant 5.11, Inc.(“Defendant”) Answer to Class Action Complaint for Damages and Research Affirmative Defenses in Defendant’s Answer (served on January 7, 2021)	1.90
Review Court’s Minute Order Re: Case Management Conference (filed on April 23, 2021)	0.10
Draft Plaintiff Fierro’s Initial Case Management Conference Statement (filed on May 14, 2021)	1.10
Review and Analyze Defendant’s Status Conference Statement (served on May 18, 2021)	0.30
Review Court’s Minute Order Re: Case Management Conference (filed on May 28, 2021)	0.10
Draft Plaintiff Fierro’s Initial Case Management Conference Statement (filed on August 18, 2021)	0.90

Review and Analyze Defendant's Status Conference Statement (served on August 20, 2021)	0.30
Draft Plaintiff Fierro's Notice of Posting Jury Fees (filed on August 26, 2021)	0.20
Review Court's Minute Order Re: Case Management Conference (filed on August 30, 2021)	0.10
Review Court's Notice of Case Reassignment (filed on September 2, 2021)	0.10
Review Court's Notice of Hearing (filed on September 22, 2021)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Case Management Conference Statement (filed on October 28, 2021)	1.50
Review and Analyze Defendant's Notice of Intent to Appear by Telephone (served on November 1, 2021)	0.10
Review and Analyze Defendant's 511 Inc.'s Meet and Confer Statement (served on November 2, 2021)	0.50
Draft Plaintiff Fierro's Notice of Ruling (filed on November 4, 2021)	0.20
Draft Plaintiff Fierro's Informal Discovery Conference Statement (filed on November 29, 2021)	1.30
Review and Analyze Defendant's 511 Inc.'s Trial Brief (served on November 29, 2021)	0.50
Draft Plaintiff Fierro's Meet and Confer Statement (filed on December 2, 2021)	0.70
Meet and Confer with Defendant's Counsel, and Draft Stipulation and Protective Order – Confidential Designation Only (served on December 3, 2021)	1.70
Review Court's Minute Order Re: Chambers Work (filed on December 6, 2021)	0.10
Review Court's Minute Order Re: Chambers Work (filed on December 7, 2021)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Case Management Conference Statement (filed on December 10, 2021)	1.50
Review Court's Minute Order Re: Chambers Work (filed on December 13, 2021)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Case Management Conference Statement (filed on March 18, 2022)	1.40

Review Court's Minute Order Re: Status Conference (filed on March 25, 2022)	0.10
Review Court's Minute Order Re: Chambers Work (filed on March 29, 2022)	0.10
Draft Plaintiff Fierro's Notice of Ruling from March 25, 2022, Status Conference (filed on March 29, 2022)	0.20
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation to Complete Plaintiff's Continued Deposition (filed on April 27, 2022)	1.60
Meet and Confer with Defendant's Counsel, and Draft Joint Case Management Conference Statement (filed on September 13, 2022)	1.30
Review Courts Minute Order Re: Status Conference (filed on September 20, 2022)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation Regarding Class Certification Briefing Schedule (filed on October 5, 2022)	1.70
Review Court's Notice of Case Reassignment (filed on October 5, 2022)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation and [Proposed] Order to Continue Case Management Conference (filed on January 6, 2023)	1.20
Review Court's Order Granting Joint Stipulation and Order to Continue Case Management Conference (filed on January 9, 2023)	0.10
Research and Draft Plaintiff Fierro and Plaintiff Eastman's (together, "Plaintiffs") First Amended Class Action Complaint for Damages & Enforcement Under the Private Attorneys General Act, California Labor Code § 2698, Et Seq. (filed on January 18, 2023); Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation and [Proposed] Order Granting Plaintiff Leave to File [Proposed] First Amended Class Action Complaint for Damages and Enforcement Under the Private Attorneys General Act (filed on January 11, 2023)	3.10
Review Court's Order Granting Plaintiff Leave to File First Amended Class Action Complaint for Damages and Enforcement Under the Private Attorneys General Act (filed on January 17, 2023)	0.10
Draft Plaintiffs' Notice of Entry of Judgment or Order (filed on January 18, 2023)	0.10

Meet and Confer with Defendant's Counsel, and Draft Joint Status Conference Statement and Notice of Settlement (filed on March 14, 2023)	1.40
Review and Analyze Defendant's Answer to Plaintiffs' First Amended Class Action Complaint for Damages & Enforcement Under the Private Attorneys General Act (served on March 16, 2023)	1.0
Review Court's Minute Order Re: Chambers Work (filed on April 18, 2023)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Status Conference Statement and Notice of Settlement (filed on July 12, 2023)	1.10
Review Court's Minute Order Re: Chambers Work (filed on July 17, 2023)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation and [Proposed] Order to Continue Case Management Conference (filed on October 6, 2023)	1.20
Review Court's Order Granting to Continue Case Management Conference (filed on October 9, 2023)	0.10
Review Court's Minute Order Re: Chambers Work (filed on December 18, 2023)	0.10
Review Court's Minute Order Re: Status Conference (filed on January 5, 2024)	0.10
Review Court's Minute Order Re: Status Conference (filed on May 24, 2024)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Status Conference Statement (filed on August 16, 2024)	1.0
Review Court's Minute Order Re: Chambers Work (filed on August 16, 2024)	0.10
Review Court's Minute Order Re: Status Conference (filed on October 18, 2024)	0.10
Review Court's Minute Order Re: Status Conference (filed on November 1, 2024)	0.10
Review Courts Notice of Case Reassignment (filed on February 7, 2025)	0.10
Draft Plaintiffs' Notice of Change of Address or Other Contact Information (filed on February 26, 2025)	0.10
Appearances	

Prepare for and Remotely Attend Initial Status Conference (May 21, 2021)	1.10
Prepare for and Remotely Attend Case Management Conference (August 27, 2021)	0.80
Prepare for and Remotely Attend Hearing on Defendant's Motion to Compel Deposition Attendance and Status Conference (March 25, 2022)	2.90
Prepare for and Remotely Attend Hearing on the Status Conference (September 20, 2022)	0.80
Prepare for and Remotely Attend Hearing on Plaintiffs' Motion for Preliminary Approval of Class Action Settlement and Status Conference (May 24, 2024)	0.80
Prepare for and Remotely Attend Plaintiffs' Motion for Preliminary Approval of Class Action Settlement and Status Conference (October 18, 2024)	1.10
Discovery and Deposition	
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Fierro (served on July 22, 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 Fierro (served on December 21, 2020)	3.60
Draft Plaintiff Fierro's Form Interrogatories – General (Set One), Special Interrogatories (Set One and Two), and Requests for Production of Documents (Set One) to Defendant (served on January 19, 2021)	6.50
Draft Plaintiff Fierro's Notice of Deposition of Person Most Knowledgeable at Defendant 5.11, Inc. and Requests for Production of Documents (noticed for February 26, 2021; Organizational Structure) (served on January 19, 2021)	1.90
Draft Plaintiff Fierro's Notice of Deposition of Person Most Knowledgeable at Defendant 5.11, Inc. and Requests for Production of Documents (noticed for March 1, 2021; Job Duties) (served on January 19, 2021)	2.30
Review and Analyze Defendant 5.11, Inc.'s Objections to Plaintiff's Notice of Deposition of Person Most Knowledgeable and Request for Production of Documents (noticed for February 26, 2021) and Objections to	1.10

Plaintiff's Notice of Deposition of Person Most Knowledgeable and Request for Production of Documents (noticed for March 1, 2021) (served on April 16, 2021)	
Review and Analyze Defendant 5.11, Inc.'s Response to Plaintiff's Special Interrogatories, Set One, Response to Plaintiff's Special Interrogatories, Set Two, Response to Plaintiff's Form Interrogatories - General, Set One, and Response to Request for Production of Documents, Set One (served on April 16, 2021)	3.0
Review and Analyze Defendant's Notice of Deposition of Plaintiff Yesenia Fierro (noticed for July 21, 2021) (served on June 4, 2021)	0.20
Review and Analyze Defendant's Request for Production of Documents to Plaintiff, Set One (served on June 4, 2021)	1.0
Review and Analyze Defendant's Defendant 5.11, Inc.'s Supplemental Response to Plaintiff's Request for Production of Documents – Set One, Supplemental Response to Plaintiff's Special Interrogatories, Set One, Supplemental Response to Plaintiff's Special Interrogatories, Set Two; and Verifications to Defendant's Discovery Responses (Served on June 18, 2021)	3.40
Review and Analyze Defendant's Document Production (served on December 3, 2021)	3.20
Review and Analyze Defendant's First Amended Notice of Deposition of Plaintiff Yesenia Fierro (noticed for July 29, 2021) (served on July 2, 2021)	0.20
Draft Plaintiff's First Amended Notice of Deposition of Person Most Knowledgeable at Defendant 5.11, Inc. and Requests for Production of Documents (noticed for July 30, 2021; Organizational Structure) (served on July 20, 2021)	1.20
Draft Plaintiff's First Amended Notice of Deposition of Person Most Knowledgeable at Defendant 5.11, Inc. and Requests for Production of Documents (noticed for August 2, 2021; Job Duties) (served on July 20, 2021)	1.50
Draft Plaintiff Yesenia Fierro's Responses to Defendant 5.11, Inc.'s Requests for Production of Documents, Set One (served on July 23, 2021)	4.20
Review and Analyze Defendant 5.11, Inc.'s Objections to Plaintiff's First Amended Notice of Deposition of Person Most Knowledgeable and Request for Production of Documents (noticed for July 30, 2021) and	1.20

Objections to Plaintiff's First Amended Notice of Deposition of Person Most Knowledgeable and Request for Production of Documents (noticed for August 2, 2021) (filed on July 27, 2021)	
Review and Analyze Defendant's Supplemental Document Production (served on July 28, 2021)	1.40
Prepare for and Defend the Deposition of Plaintiff Fierro (July 29, 2021) and Review Deposition Transcript	11.50
Prepare for and take the Deposition of Person Most Knowledgeable Shannon Hill (July 30, 2021) and Review Deposition Transcript	9.20
Prepare for and take the Deposition of Person Most Knowledgeable Shannon Hill (August 2, 2021) and Review Deposition Transcript	10.0
Review Defendant 5.11, Inc.'s Verification to Defendant's Discovery Responses (served on August 24, 2021)	0.20
Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant 5.11, Inc. and Requests for Production of Documents (noticed for October 29, 2021) (served on September 21, 2021)	1.40
Review and Analyze Defendant 5.11, Inc.'s Objections to Plaintiff's First Amended Notice of Deposition of Person Most Knowledgeable and Request for Production of Documents (noticed for October 29, 2021) (served on October 22, 2021)	1.0
Draft Plaintiff Yesenia Fierro's Special Interrogatories (Set Three) to Defendant 5.11, Inc.; Plaintiff Yesenia Fierro's Requests for Production of Documents (Set Two) to Defendant 5.11, Inc. (served on November 8, 2021)	2.70
Review and Analyze Defendant 5.11, Inc.'s Further Supplemental Response to Plaintiff's from Interrogatories - General, Set One; Defendant 5.11, Inc.'s Further Supplemental Response to Plaintiff's Special Interrogatories, Set Two; Defendant 5.11, Inc.'s Further Supplemental Response to Plaintiff's Request for Production of Documents – Set One (served on November 11, 2021)	3.90
Review and Analyze Defendant's Supplemental Document Production (served on December 3, 2021)	0.80
Defendant 5.11, Inc.'s Objections and Responses to Plaintiff's Requests for Production of Documents (Set Two); Defendant 5.11, Inc.'s Objections and Responses to Plaintiff's Special Interrogatories (Set Three); Defendant 5.11, Inc.'s Objections and Responses to Plaintiff's Requests for Production of Documents (Set	2.50

Two); Defendant 5.11, Inc.’s Objections and Responses to Plaintiff’s Special Interrogatories (Set Three) (served on January 1, 2022)	
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Eastman (served on March 8, 2022)	1.90
Review and Analyze Defendant 5.11, Inc.’s Additional Further Supplemental Response to Plaintiff’s from Interrogatories - General, Set One, Additional Further Supplemental Response to Plaintiff’s Special Interrogatories, Set Two, and Additional Further Supplemental Response to Plaintiff’s Request for Production of Documents – Set One (served on March 18, 2022)	2.90
Review and Analyze Defendant’s Supplemental Document Production (served on March 18, 2022)	1.20
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Eastman (served on March 28, 2022)	2.10
Review and Analyze Defendant 5.11, Inc.’s Notice of Continued Deposition of Plaintiff Fierro (noticed for April 28, 2022) (served on April 20, 2022)	0.20
Review and Analyze Defendant 5.11, Inc.’s Amended Notice of Continued Deposition of Plaintiff (noticed for May 12, 2022) (served on May 3, 2022)	0.20
Review and Analyze Defendant 5.11, Inc.’s Second Amended Notice of Continued Deposition of Plaintiff (served on July 21, 2022)	0.20
Prepare for and Defend the Deposition of Plaintiff Fierro (July 29, 2022) and Review Deposition Transcript	6.50
Letters and Correspondence	
Draft Notice to California Labor and Workforce Development Agency Re: Claims of Plaintiff Yesenia Fierro, et al. for Penalties Under the Private Attorneys General Act, California Labor Code section 2698, <i>et seq.</i> (“PAGA”) (served on September 16, 2020)	4.70
Meet with, Draft Correspondence to, and Respond to Correspondence from, Defendant’s Counsel	18.50
Mediation/Settlement	

Review and Analyze Information, Data, and Documents Obtained from Plaintiffs, Defendant (served on January 24, 2023, to January 24, 2023), and Other Sources Prior to Mediation	35.50
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/Calculations (submitted on January 24, 2023)	28.0
Attend Mediation Session (January 31, 2023; Zoom Video Conference)	15.0
Draft, Review, Revise, Negotiate, and Finalize Memorandum of Understanding Following Mediation (fully executed on March 12, 2023)	2.50
Draft, Review, Revise, Negotiate, and Finalize Class Action and PAGA Settlement Agreement (fully executed on July 14, 2023) and Notice of Class Action and PAGA Settlement	19.0
Draft, Review, Revise, Negotiate, and Finalize First Amended Class Action and PAGA Settlement Agreement (fully executed on May 20, 2024) and Notice of Class Action and PAGA Settlement	6.50
Coordinate Settlement Administration with Settlement Administrator, Ongoing Monitoring of Settlement Administration, and Respond to Class Inquiries	5.50
Law and Motion	
Review and Analyze Defendant's 5.11, Inc.'s Notice of Motion and Motion to Compel Plaintiff Yesenia Fierro's Continued Deposition and Request for Sanctions; Memorandum of Points and Authorities In Support of Motion to Compel Plaintiff Yesenia Fierro's Continued Deposition and Request for Sanctions; Separate Statement in Support of Motion to Compel Plaintiff Yesenia Fierro's Continued Deposition and Request for Sanctions; Declaration of Andrew M. McNaught in Support of Defendant 5.11 Inc.'s Motion to Compel Plaintiff Yesenia Fierro's Continued Deposition and Request for Sanctions; [Proposed] Order Granting 5.11, Inc.'s Motion to Compel Plaintiff's Continued Deposition and Request for Sanctions (served on October 5, 2021)	2.10
Draft Plaintiff Fierro's Opposition to Defendant 5.11 Inc.'s Motion to Compel Plaintiff's Second Deposition and Request for Sanctions; Declaration of Charles T. Sweeny in Support of Plaintiff's Opposition to Defendant's Motion to Compel Plaintiff's Second Deposition and Request for Sanctions; Plaintiff Yesenia	8.50

Fierro's Opposition to Defendant 5.11 Inc.'s Separate Statement in Support of Motion to Compel Plaintiff's Second Deposition and Request for Sanctions (filed on October 25, 2021)	
Review and Analyze Defendant's 5.11, Inc.'s Reply in Support of Motion to Compel Plaintiff Yesenia Fierro's Continued Deposition and Request for Sanctions and Declaration of Timothy M. Hoppe in Support Thereof (served on October 29, 2021)	0.90
Review and Analyze Defendant's Notice of Order Granting Defendant's 5.11, Inc.'s Motion to Compel Plaintiff's Continued Deposition (served on April 6, 2022)	0.10
Draft Plaintiffs' Notice of Motion and Motion for Preliminary Approval of Class Action Settlement; Memorandum of Points and Authorities; Declaration of Brian J. St. John in Support of Plaintiffs' Motion for Preliminary Approval of Class Action Settlement; Declaration of Yesenia Fierro in Support of Plaintiffs' Motion for Preliminary Approval of Class Action; Declaration of Cherise Morris Eastman in Support of Plaintiffs' Motion for Preliminary Approval of Class Action Settlement; and [Proposed] Order Granting Preliminary Approval of Class Action Settlement (filed on September 14, 2023)	17.50
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation to Continue Hearing and Deadline to File Supplemental Briefing in Support of Plaintiffs' Motion for Preliminary Approval of Class Action Settlement; [Proposed] Order Thereon (filed on March 1, 2024)	1.20
Review Court's Order Granting Stipulation to Continue Hearing and Deadline to File Supplemental Briefing in Support of Plaintiffs' Motion for Preliminary Approval of Class Action Settlement (filed on March 5, 2024)	0.10
Draft Supplemental Declaration of Brian J. St. John in Support of Plaintiffs' Motion for Preliminary Approval of Class Action Settlement; [Revised Proposed] Order Granting Preliminary Approval of Class Action Settlement (filed on May 17, 2024)	5.70
Draft Plaintiffs' Further Supplemental Declaration of Brian J. St. John in Support of Plaintiffs' Motion for Preliminary Approval of Class Action Settlement (filed on May 20, 2024)	1.40
Review, Update, and Refile Plaintiffs' Supplemental Declaration of Brian J. St. John in Support of Plaintiffs' Motion for Preliminary Approval of Class Action Settlement; Further Supplemental Declaration of Brian J. St. John in Support of Plaintiffs' Motion for Preliminary Approval of Class Action Settlement;	1.0

[Revised Proposed] Order Granting Preliminary Approval of Class Action Settlement (filed on October 18, 2024)	
Review Court's Order Granting Preliminary Approval of Class Action and PAGA Settlement (filed on November 27, 2024)	0.10
Review and Analyze Settlement Administrator's Declaration Regarding Settlement Notice Administration; Research and Draft Plaintiffs' Motion for Final Approval of Class Action Settlement, Attorneys' Fees, Costs, and Class Representative Service Awards, Declaration of Brian J. St. John in Support Thereof, Declaration of Yesenia Fierro in Support Thereof, Declaration of Cherise Morris Eastman in Support Thereof, and [Proposed] Final Approval Order and Judgment (filed on March 28, 2025)	20.20
Total Hours:	431.40

EXHIBIT B

LAWYERS *for* JUSTICE, PC CASE COST DETAIL
Fierro, et al. vs. 5.11, Inc.

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
7/22/2020	U.S. Postmaster	Postage	\$7.00
9/16/2020	U.S. Postmaster	Postage	\$15.00
9/16/2020	Labor & Workforce Development Agency	PAGA Filing Fee	\$75.00
11/23/2020	One Legal	Attorney Service	\$59.56
11/23/2020	Orange County Superior Court	Complex Filing Fee	\$1,000.00
11/23/2020	Orange County Superior Court	Complaint Filing Fee	\$435.00
12/8/2020	Legal Document Server, Inc.	Attorney Service	\$110.00
1/12/2021	Legal Document Server, Inc.	Attorney Service	\$13.25
1/12/2021	Orange County Superior Court	Document Download Fee	\$7.50
1/19/2021	General Logistics Systems US, Inc.	Courier Service	\$25.80
5/14/2021	One Legal	Attorney Service	\$12.35
5/20/2021	CourtCall, LLC	Attorney Service	\$94.00
7/21/2021	General Logistics Systems US, Inc.	Courier Service	\$20.78
7/29/2021	TSG Reporting, Inc.	Court Reporter	\$1,407.15
7/30/2021	Esquire Deposition Solutions, LLC	Court Reporter	\$2,178.15
8/2/2021	Esquire Deposition Solutions, LLC	Court Reporter	\$2,517.40
8/18/2021	Legal Document Server, Inc.	Attorney Service	\$11.00
8/23/2021	Orange County Superior Court	Document Download Fee	\$7.50
8/26/2021	CourtCall, LLC	Attorney Service	\$94.00
8/26/2021	Legal Document Server, Inc.	Attorney Service	\$18.50
8/26/2021	Orange County Superior Court	Jury Fee	\$150.00
10/26/2021	One Legal	Attorney Service	\$14.67
11/2/2021	CourtCall, LLC	Attorney Service	\$94.00
11/4/2021	Legal Document Server, Inc.	Attorney Service	\$13.25
11/29/2021	Legal Document Server, Inc.	Attorney Service	\$13.25
11/30/2021	Simpluris, Inc.	Notice Mailing	\$379.50
12/2/2021	Legal Document Server, Inc.	Attorney Service	\$13.25
12/16/2021	Orange County Superior Court	Document Download Fee	\$7.50
12/31/2021	Simpluris, Inc.	Notice Mailing	\$128.00
2/2/2022	U.S. Postmaster	Postage	\$411.80
3/8/2022	U.S. Postmaster	Postage	\$7.38
3/29/2022	Legal Document Server, Inc.	Attorney Service	\$13.25
3/29/2022	Orange County Superior Court	Document Download Fee	\$7.50
4/8/2022	General Logistics Systems US, Inc.	Courier Service	\$24.77
4/19/2022	U.S. Postmaster	Postage	\$24.00
4/25/2022	Labor & Workforce Development Agency	PAGA Filing Fee	\$75.00
7/29/2022	TSG Reporting, Inc.	Court Reporter	\$745.40
9/22/2022	Legal Document Server, Inc.	Attorney Service	\$14.00
1/9/2023	General Logistics Systems US, Inc.	Courier Service	\$27.61

LAWYERS *for* JUSTICE, PC CASE COST DETAIL
Fierro, et al. vs. 5.11, Inc.

1/11/2023	Signature Resolution LLC	Mediation Fee	\$9,950.00
1/18/2023	One Legal	Attorney Service	\$15.78
1/18/2023	Legal Document Server, Inc.	Attorney Service	\$14.00
1/18/2023	Orange County Superior Court	Stipulation & Order Fee	\$20.00
1/20/2023	Legal Document Server, Inc.	Attorney Service	\$14.00
1/24/2023	FedEx Express	Courier Service	\$51.06
2/14/2023	Legal Document Server, Inc.	Attorney Service	\$14.00
2/16/2023	Legal Document Server, Inc.	Attorney Service	\$14.00
9/14/2023	Legal Document Server, Inc.	Attorney Service	\$14.20
9/15/2023	Legal Document Server, Inc.	Attorney Service	\$212.75
9/19/2023	Legal Document Server, Inc.	Attorney Service	\$4.17
9/19/2023	Orange County Superior Court	Motion Fee	\$60.00
12/21/2023	Orange County Superior Court	Document Download Fee	\$7.50
2/9/2024	Orange County Superior Court	Document Download Fee	\$7.50
3/1/2024	Legal Document Server, Inc.	Attorney Service	\$14.20
3/6/2024	Legal Document Server, Inc.	Attorney Service	\$1.39
3/6/2024	Orange County Superior Court	Stipulation & Order Fee	\$20.00
3/12/2024	Legal Document Server, Inc.	Attorney Service	\$14.20
5/17/2024	Legal Document Server, Inc.	Attorney Service	\$14.20
5/20/2024	Legal Document Server, Inc.	Attorney Service	\$14.20
5/21/2024	Legal Document Server, Inc.	Attorney Service	\$14.20
6/3/2024	Orange County Superior Court	Document Download Fee	\$7.50
6/14/2024	Legal Document Server, Inc.	Attorney Service	\$14.20
10/18/2024	Legal Document Server, Inc.	Attorney Service	\$14.20
10/28/2024	Orange County Superior Court	Document Download Fee	\$7.50
10/29/2024	Legal Document Server, Inc.	Attorney Service	\$14.20
12/2/2024	Legal Document Server, Inc.	Attorney Service	\$14.20
3/25/2025	Orange County Superior Court	Document Download Fee	\$22.50
Total:			<u>\$20,858.72</u>