

Arby Aiwazian (SBN 269827)
Elizabeth Parker-Fawley (SBN 301592)
Ryan Slinger (SBN 351297)
LAWYERS for JUSTICE, PC
450 North Brand Blvd., Suite 900
Glendale, California 91203
Tel: (818) 265-1020 / Fax: (818) 265-1021

Attorneys for Plaintiff and the Class

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

SANDEEP PUREWAL, 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.

ACC SENIOR SERVICES, an unknown
business entity; ASIAN COMMUNITY
CENTER OF SACRAMENTO VALLEY,
INC., an unknown business entity; and
DOES 1 through 100, inclusive,

Defendants.

Case No. 34-2020-00285518

Honorable Jill H. Talley
Department 23

CLASS ACTION

**DECLARATION OF ELIZABETH
PARKER-FAWLEY IN SUPPORT OF
PLAINTIFF'S MOTION FOR FINAL
APPROVAL OF CLASS ACTION AND
PAGA SETTLEMENT**

Date: May 9, 2025
Time: 9:00 a.m.
Department: 23

Complaint Filed: September 22, 2020
FAC Filed: November 20, 2020
Trial Date: None Set

DECLARATION OF ELIZABETH PARKER-FAWLEY

I, Elizabeth Parker-Fawley, 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 Sandeep Purewal (“Plaintiff”) and the Class in the above-captioned matter. 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.

2. Undersigned counsel has reviewed the Court’s new checklist for approval of class action settlements that was published on or about August 9, 2024 on the Court’s website. This declaration is intended to provide information that is required by Section 2 of the checklist regarding Motions for Final Approval of Settlements, while the other moving and supporting papers for the motion are intended to provide the information required by other sections of the checklist. Undersigned counsel believes that the contents of this declaration should, to the best of undersigned counsel’s knowledge, contain the information that is required by Section 2 of the checklist.

PRELIMINARY APPROVAL OF SETTLEMENT

3. On August 20, 2024, the Honorable Jilly H. Talley entered an order preliminarily approving the Joint Stipulation of Class Action and PAGA Settlement (“Agreement,” “Settlement,” or “Settlement Agreement”) entered into between Plaintiff and Defendants ACC Senior Services and Asian Community Center of Sacramento Valley, Inc. (together, “Defendants”) (collectively with Plaintiff, the “Parties”), and conditionally certified the Class for settlement purposes. The Court preliminarily appointed Plaintiff as the representative of the Class (“Class Representative”). The Court also preliminarily appointed and designated Lawyers *for* Justice, PC as counsel for the Class (“Class Counsel”). The Court approved and ordered the mailing of the Court Approved Notice of Class Action Settlement (“Class Notice”), adopted the notice, opt-out, and objection procedures, and ordered their implementation. The Court appointed Phoenix Settlement Administrators (“Settlement Administrator”) to serve as the third-party settlement administrator and handle the notice and settlement administration process.

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

WORK PERFORMED BY CLASS COUNSEL

5. Several attorneys at Lawyers *for* Justice, PC have been actively performing work in this matter since prior to the commencement of Plaintiff’s putative class action (i.e., the above-captioned action) on September 22, 2020.

6. Before initiating this matter, 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 Lawyers *for* Justice, PC and Plaintiff and research into the various legal issues involved in this matter, namely, the current state of the law as it applied to class certification, off-the-clock theory, regular rate, meal and rest periods, PAGA representative claims, wage-and-hour law and enforcement, Plaintiff’s claims and allegations, and Defendants’ defenses. After conducting an initial investigation, Lawyers *for* Justice, PC 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 individuals who are or were employed by Defendants as hourly-paid or non-exempt employees in the State of California at any time from November 22, 2016 through August 20, 2024, who were not properly compensated for, *inter alia*, all hours worked, non-compliant meal and rest periods, and business expenses.

7. Class Counsel conducted significant litigation and formal and informal discovery and investigation into the facts of the case, to assess the veracity, strength, and scope of the claims, and were preparing the case for class certification and trial prior to reaching the Settlement. The Parties exchanged a large volume of information, documents, and data throughout the course of the litigation and in connection with the mediation and settlement negotiations. Class Counsel had the opportunity to interview and obtain information from Plaintiff, and reviewed and analyzed a

1 large volume of information, data, and documents obtained from Plaintiff, Defendants, and other
2 sources. Class Counsel propounded multiple sets of written discovery on both Defendants
3 (including, but not limited to Special Interrogatories (Set One and Two), Form Interrogatories—
4 General (Set One), and Requests for Production of Documents (Sets One)) and reviewed and
5 analyzed Defendants' responses and objections thereto. Additionally, Plaintiff noticed the
6 depositions of Defendants' persons most knowledgeable regarding Defendants' organizational
7 structure and job descriptions. The volume of information, documents, and data that Class Counsel
8 reviewed and analyzed included and was not limited to: Plaintiff's employment records, a random
9 sampling of Class Members' time data and wage records, Defendants' Employee Handbooks and
10 Employee Roster, Defendants' operations and employment practices, forms, procedures, and
11 policies, and Defendant's confidential financial records. Class Counsel also developed liability,
12 damages, violation, and penalties valuation models in the course of litigation and in connection
13 with the mediation and settlement negotiations and met and conferred with Defendants' counsel
14 on numerous occasions, e.g., to discuss issues relating to the pleadings, case management,
15 discovery and the production of information, documents, and data in the course of litigation and
16 in connection with mediation and settlement negotiations, and settlement. Other work performed
17 by Class Counsel included, and was not limited to, case strategy and analysis; researching,
18 drafting, reviewing, and/or revising the pleadings, motion-related papers, the mediation brief, and
19 settlement documents; and preparing for and attending court proceedings, mediation, and
20 settlement negotiations, among other tasks.

21 8. As outlined herein, the Parties have conducted significant investigation and formal
22 and informal discovery during the course of litigating the cases, mediation and extensive
23 settlement negotiations. Class Counsel analyzed a large volume of information, documents, and
24 data obtained from Plaintiff, Defendants, and other sources. The information, documents, and data
25 provided a critical understanding of the nature of the work performed by the Class Members, as
26 well as Defendants' operations and employment policies, practices, and procedures, and were used
27 in analyzing liability, damages, penalties, and other valuation issues in connection with all phases
28 of the litigation, and ultimately, in connection with the mediation and settlement negotiation

process. Class Counsel also performed significant research into the applicable law, which is evolving as it relates to class certification, PAGA representative actions, off-the-clock theory, regular rate, meal and rest periods, wage-and-hour law and enforcement, Plaintiff's claims and allegations, and Defendants' defenses thereto, as well as facts discovered.

9. After conducting significant investigation of the facts and law during the prosecution of the cases, and formal and informal discovery, counsel for the Parties engaged in extensive settlement negotiations to try to resolve the cases. These efforts included participating in a formal mediation session conducted on September 19, 2021, by the Hon. Raul A. Ramirez (Ret.), a well-regarded mediator experienced in handling complex labor and employment matters. During all settlement discussions, the Parties conducted their negotiations at arm's length in an adversarial position. In the course of mediation and settlement discussions, the Parties exchanged information, documents, and data, and discussed various aspects of the case, including and not limited to, the risks and delays of further litigation; the risks and expenses to the Parties of proceeding with class certification and trial; the law relating to off-the-clock theory, regular rate, meal and rest periods, wage-and-hour law and enforcement, and PAGA representative claims; the evidence produced and analyzed; and the possibility of appeals, among other things. Arriving at a settlement that was acceptable to the Parties was not easy. Defendants contended that individualized questions of fact predominate over any common issues, and these issues would pose challenges to class certification and representative adjudication. Defendants and their counsel felt strongly about Defendants' ability to avoid class certification and prevail on the merits, while Plaintiff and Class Counsel believed that they would be able to obtain class certification and prevail at trial. With the aid of the mediator's evaluation, the Parties ultimately agreed that the cases were well-suited for settlement given the legal issues relating to Plaintiff's principal claims, as well as the costs and risks to the Parties that would attend further litigation. These risks of further litigation include, and are not limited to, a determination that the claims are unsuitable for class treatment and/or representative adjudication, class de-certification after certification of a class, allowing a jury to decide the claims asserted in the case, and the real possibility of no monetary recovery after years of litigation.

10. By way of the accompanying Motion for Final Approval, Class Counsel seeks attorneys' fees in the amount of \$805,000.00, which is 35% of the Total Settlement Amount of \$2,300,000.00. Pursuant to the contingency-fee agreement entered into by and between Plaintiff and Class Counsel, Plaintiff has agreed to a contingency fee of at least 35% of the recovery.

11. The attorneys' fees sought are commensurate with: (1) the risk that Class Counsel took in commencing the cases; (2) the time, effort, and expense that Class Counsel dedicated to the cases; (3) the skill and determination that Class Counsel has shown; (4) the results that Class Counsel has achieved throughout the litigation; (5) the value of the settlement that Class Counsel has achieved in the cases; and (6) the other cases that Class Counsel has turned down in order to devote their time and efforts to this matter.

12. While not necessarily required to be demonstrated because the percentage fee is proper for this settlement, Class Counsel has incurred many hours of work in connection with prosecuting the cases such that the award of attorneys' fees is also justified under a lodestar analysis with a modest multiplier of 3.03. Attorneys at Lawyers for Justice, PC have spent a total of **318.80 hours** performing tasks and obtaining recovery in this matter. Attached hereto as **"EXHIBIT A"** is an Attorney Task and Time Chart that sets forth in detail the nature of the legal services provided by attorneys at Lawyers for Justice, PC and the time incurred by them in performing those services. These hours include work done by several attorneys at Lawyers for Justice, PC. Also, separate from the hours referenced herein and in the chart, Lawyers for Justice, PC had litigation support personnel actively engaged in assisting with the prosecution of this matter.

13. The attorneys identified below have worked on this case, and they have performed their work in this matter exclusively on a contingency basis.

Attorneys	Titles	Bar Nos.	Years Admitted & Practicing in CA	Rate	Total Hours	Lodestar
Edwin Aiwarzian	Managing Attorney & Shareholder	232943	2004 (20 years)	\$1,495	40.80	\$60,996.00

Arby Aiwazian	Shareholder	269827	2010 (14 years)	\$1,295	6.00	\$7,770.00
Joanna Ghosh	Managing Attorney	272479 (CA); 518149 (NY)	2010 (CA); 2013 (NY) (14 years)	\$1,295	5.50	\$7,122.50
Melissa A. LeBlanc-Mansell	Senior Attorney	283080 (CA); 59808 (WA); 230652 (OR)	2012 (CA); 2022 (WA); 2023 (OR) (12 years)	\$850	10.00	\$8,500.00
Elizabeth Parker-Fawley	Senior Attorney	301592	2014 (10 years)	\$850	11.50	\$9,775.00
Ryan Slinger	Attorney	351297	2023 (1 year)	\$575	62.10	\$35,707.50
Hagit Goltzer	Senior Attorney	324276	2018 (6 years)	\$850	0.50	\$425.00
Talar DerOhannessian	Senior Attorney	311687	2016 (8 years)	\$850	29.20	\$24,820.00
Kenyon Harbison	Attorney (formerly)	260416	2008 (16 years)	\$725	7.60	\$5,510.00
Centrina Jackson	Attorney (formerly)	249641	2007 (17 years)	\$725	61.70	\$44,732.50
Andrew Kim	Attorney (formerly)	329478	2019 (5 years)	\$725	0.90	\$652.50
Won Christina Chang	Attorney (formerly)	317168	2008 (16 years)	\$725	21.20	\$15,370.00
Annabel Blanchard	Attorney (formerly)	258135	2008 (16 years)	\$725	18.60	\$13,485.00
Tiffany Hyun	Attorney (formerly)	311743	2016 (8 years)	\$725	43.20	\$31,320.00
Total:					318.80	\$266,186.00

14. Each of the attorneys identified above performed their work in this matter exclusively on a contingency basis. Plaintiff has not been billed for, and has not paid for, any of the work performed in the instant action to date by attorneys at Lawyers for Justice, PC (i.e., Plaintiff has not been billed for or paid the hourly rates of the various attorneys who performed work in the instant action). Lawyers for Justice, PC will receive compensation for the work performed by attorneys at the firm thus far, if attorneys' fees are awarded by the Court as a part of the Settlement.

15. The billing rates for each of the attorneys listed above, who worked on this matter,

are reasonable, usual, and commensurate with the individual backgrounds, training, and experience of the attorneys, in litigating complex wage-and-hour actions, and in particular, employment class actions and representative actions. These rates are the reasonable and usual hourly rates for the referenced attorneys' services in wage and hour class action cases handled by Lawyers *for* Justice, PC, and are commensurate with rates charged in the community by other plaintiffs-side and defense-side attorneys in this practice area. Lawyers *for* Justice, PC almost exclusively handles the prosecution of plaintiffs' side cases. To the best of undersigned counsel's knowledge, Lawyers *for* Justice, PC has not billed nor required any of its clients, who are usually workers who do not have the financial means to pay a retainer or otherwise fund the prosecution or litigation of their wage-and-hour cases against their current or former employers, to pay the firm out of pocket for the legal work performed by attorneys at the firm (and thus, has not billed any clients using any hourly rates).

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

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

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

21 18. Arby Aiwazian is a Member and Shareholder of Lawyers *for* Justice, PC. He
22 received his Bachelor of Arts degree from University of California, Los Angeles and graduated
23 magna cum laude. He earned a Juris Doctor degree, cum laude, from Southwestern Law School.
24 From approximately May 2007 to approximately July 2007, he served as a Judicial Extern to the
25 Honorable Earl Johnson, Jr. of the California Court of Appeal for the Second Appellate District.
26 From approximately August 2008 to approximately December 2008, he served as a Judicial Extern
27 to the Honorable Kim McLane Wardlaw of the United State Court of Appeals for the Ninth Circuit.
28 He was admitted to practice law in California in 2010. He is admitted to practice before all courts

of the State of California and all United States District Courts in the State of California. He has worked on many wage-and-hour class action and representative action cases, taking the lead in taking and defending depositions, arguing motions, and attending mediations. He has played an integral role in preparing matters for class certification, including and not limited to, successful certification of a class in *Upson v. Sur La Table* (Los Angeles County Superior Court Case No. BC424012), *Montazemi v. Regus Management* (Los Angeles County Superior Court Case No. BC478769), and *Abdulhaqq v. Urban Outfitters* (Alameda County Superior Court Case No. RG13680477). Under his supervision, dozens of class action or representative cases have resulted in settlements that have been granted court approval. He has handled over one hundred and fifty (150) mediations and worked on over two hundred and fifty (250) class action or representative action cases which have resulted in settlement.

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

1 preparation in conjunction with co-counsel in a case involving a certified class consisting of
2 approximately 2,600 individuals). She also has extensive experience with class action and/or
3 representative action settlements, and she has handled this process in over three hundred (300)
4 cases. Under her, Edwin Aiwasian and Arby Aiwasian, Lawyers *for* Justice, PC has handled the
5 class certification and court approval process for hundreds of class action and/or representative
6 action matters that have successfully resolved. She is a member of the California Employment
7 Lawyers Association and, on several occasions, she has been a speaker regarding topics in wage
8 and hour law at the organization's continuing legal education events.

9 20. I am the Senior Director of Litigation at Lawyers for Justice, PC. I earned my
10 Bachelor of Arts in History at Chapman University in 2011 and my Juris Doctor from the UCLA
11 School of Law in 2014. In December 2014, I obtained a license to practice law from the California
12 State Bar. I am admitted to practice in all courts in the State of California, as well as the Central,
13 Southern, Northern, and Eastern District Courts of California and the Ninth Circuit Court of
14 Appeal. Since December 2014, I have worked at Lawyers for Justice, PC, and my practice has
15 almost exclusively focused on the prosecution of employment class actions and representative
16 actions, handling cases in all stages of litigation from initial pleadings to assisting with class action
17 trial matters, attending mediations, and preparing class action settlements. I oversee approximately
18 between 15 and 25 attorneys working on hundreds of employment class actions and representative
19 actions. In addition, I review and advise attorneys on work product and practices, provide training,
20 and supervise cases from their inception to final accounting. I am a member of the California
21 Lawyers Association Labor & Employment Group and the California Employment Lawyers
22 Association.

23 **LITIGATION COSTS AND EXPENSES INCURRED BY**

24 **LAWYERS *FOR* JUSTICE, PC**

25 21. To date, Class Counsel has borne all of the risks and costs of litigation and will not
26 receive any compensation until recovery is obtained in this matter. Lawyers *for* Justice, PC seeks
27 reimbursement of **\$9,733.17** in litigation costs and expenses incurred in this matter, as reflected in
28 **"EXHIBIT B"** attached hereto. These expenses were reasonable and necessary in the prosecution

of this matter and to obtain the Settlement.

ENHANCEMENT PAYMENT TO PLAINTIFF

22. In recognition of her efforts and work serving as the Class Representative, the Settlement Agreement provides for an Enhancement Payment in the amount of \$10,000.00. The requested Enhancement Payment is fair and appropriate. Plaintiff spent a substantial amount of time and effort to produce relevant documents and information and provided facts and evidence to support the prosecution of the claims. Plaintiff was available whenever Class Counsel needed her and actively tried to obtain and provide information that would facilitate the pursuit of the case. Plaintiff spent numerous hours speaking with Class Counsel about her claims and describing her work experiences with Defendants. Accordingly, it is appropriate for Plaintiff to receive \$10,000.00 as an Enhancement Payment for her services in the cases, in addition to her individual settlement payments.

23. I submit that the Settlement is fair, reasonable, and adequate, and is in the best interests of Plaintiff, Class Members, PAGA Employees, and the State of California.

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

Executed this 17th day of April 2025, at Glendale, California.



Elizabeth Parker-Fawley

EXHIBIT A

SANDEEP PUREWAL V. ACC SENIOR SERVICES, ET AL.
Sacramento Superior Court Case No. 34-2020-00285518-CU-OE-GDS

ATTORNEY TASK AND TIME CHART

TASK	LAWYERS <i>for</i> JUSTICE, PC
Investigation and Research / Due Diligence	
Meet and Communicate with Plaintiff Sandeep Purewal (“Plaintiff”) during the Case	45.00
Pleadings and Court Filings	
Investigate the Merits of Plaintiff’s Claims, Legal Research and Analysis of All Claims Involved, Draft Plaintiff’s Class Action Complaint for Damages (filed on September 22, 2020)	7.50
Review Court’s Notice and Order of Complex Case Determination (filed on October 5, 2020)	0.10
Review Defendant ACC Senior Services’ Consent to Electronic Service and Notice of Electronic Serve Address (served on November 9, 2020)	0.10
Review Court’s Notice of Case Management Conference and Complex Case Management Procedures (filed on November 12, 2020)	0.10
Draft Plaintiff’s Notice of Posting Jury Fees (filed on November 18, 2020)	0.10
Investigate the Merits of Plaintiff’s Claims, Legal Research and Analysis of All Claims Involved, Draft Plaintiff’s First Amended Class Action Complaint for Damages & Enforcement Under the Private Attorneys General Act, California Labor Code § 2698 Et Seq. (filed on November 20, 2020)	4.50

Review and Analyze Defendants ACC Senior Services and Asian Community Center of Sacramento Valley, Inc.'s Answer to Plaintiff's First Amended Complaint (served on January 8, 2021), and Research Affirmative Defenses in Defendants' Answer	2.20
Meet and Confer with Defendants' Counsel, and Draft Joint Case Management Conference Statement (filed on March 5, 2021)	1.50
Review Defendant's Demand for Jury and Notice of Deposit of Jury Fees (served on March 9, 2021)	0.10
Review Court's Order Continuing Case Management Conference (filed on March 9, 2021)	0.10
Meet and Confer with Defendants' Counsel, and Draft Joint Case Management Conference Statement and Request for Continuance (filed on July 23, 2021)	0.50
Review Court's Order Continuing Case Management Conference (filed on July 30, 2021)	0.10
Meet and Confer with Defendants' Counsel, and Draft Joint Stipulation to Continue Case Management Conference; and [Proposed] Order (submitted on November 5, 2021)	1.20
Review Court's Order to Continue Case Management Conference (filed on November 8, 2021)	0.10
Review Court's Minute Order re: Case Management Conference Hearing (filed on November 8, 2021)	0.10
Draft Notice of Entry of Judgment or Order (filed on November 15, 2021)	0.10
Review Court's Minute Order Re: Notice of Re-Assignment of Complex Civil Case Judge and Department (filed on November 15, 2021)	0.30
Meet and Confer with Defendants' Counsel, and Draft Joint Stipulation to Continue Case Management Conference; [Proposed] Order (submitted on February 14, 2022)	0.30
Review Court's Tentative Ruling Re: Case Management Conference (published on February 24, 2022)	0.10

Review Court's Minute Order re: Case Management Conference (filed on February 25, 2022)	0.10
Meet and Confer with Defendants' Counsel, and Draft Joint Case Management Conference Statement and Notice of Settlement (filed on March 28, 2022)	0.70
Review Court's Tentative Ruling Re: Case Management Conference (published on April 19, 2022)	0.10
Review Court's Minute Order Case Management Conference (filed on April 22, 2022)	0.10
Meet and Confer with Defendants' Counsel, and Draft Joint Case Management Statement (filed on August 11, 2022)	0.50
Draft Notice of Remote Appearance (filed on August 17, 2022)	0.10
Review Court's Minute Order Re: Notice of Reassignment (filed on March 27, 2024)	0.10
Draft Notice of Entry of Judgment or Order (filed on February 7, 2025)	0.10
Appearances	
Prepare for, Travel to/from, and Attend Hearing on Plaintiff's Motion for Final Approval of Class Action and PAGA Settlement, Attorneys' Fees and Costs, and Enhancement Payment (May 9, 2025)	0.50
Discovery and Deposition	
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Sandeep Purewal (served on June 19, 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 Sandeep Purewal (served on July 8, 2020)	2.40

Draft Plaintiff's Form Interrogatories – General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), and Requests for Production of Documents (Set One) to Defendant ACC Senior Services (served on November 25, 2020)	6.10
Draft Plaintiff's Form Interrogatories – General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), and Requests for Production of Documents (Set One) to Defendant Asian Community Center of Sacramento Valley, Inc. (served on November 25, 2020)	6.10
Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant ACC Senior Services and Requests for Production of Documents (Organizational Structure; noticed for December 28, 2020) (served on November 25, 2020)	1.10
Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant ACC Senior Services and Requests for Production of Documents (Job Duties; noticed for December 29, 2020) (served on November 25, 2020)	1.30
Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant Asian Community Center of Sacramento Valley, Inc., and Requests for Production of Documents (Organizational Structure; noticed for December 30, 2020) (served on November 25, 2020)	1.10
Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant Asian Community Center of Sacramento Valley, Inc., and Requests for Production of Documents (Job Duties; noticed for December 31, 2020) (served on November 25, 2020)	1.30
Review and Analyze Defendant Asian Community Center of Sacramento Valley, Inc., Responses to Plaintiff's Form Interrogatories – General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), and Requests for Production of Documents (Set One) (served on April 27, 2021)	4.70
Review and Analyze Defendant Asian Community Center of Sacramento Valley, Inc. DBA ACC Senior Services, Responses to Plaintiff's Form Interrogatories – General (Set One), Special Interrogatories (Set	2.50

One), Special Interrogatories (Set Two), and Requests for Production of Documents (Set One) (served on April 27, 2021)	
Letters and Correspondence	
Draft Notice of California Labor and Workforce Development Agency re: Claims of Plaintiff under the Private Attorneys General Act (served on September 15, 2020)	4.50
Draft Correspondence to, and Respond to Correspondence from, Defense Counsel	22.10
Mediation/Settlement	
Review and Analyze Information, Data, and Documents Obtained from Plaintiff, Defendants, and Other Sources Prior to Mediation	63.40
Prepare for Mediation, Including Researching Settlement Related Issues and Merits of Claims, Drafting the Mediation Brief, and Compiling the Mediation Exhibits in Support of Plaintiff's Mediation Brief, and Performing Damages Analysis/Calculations (submitted on September 21, 2021)	26.80
Attend Mediation Session (September 29, 2021; via Zoom Video Conference)	16.00
Review, Revise, Negotiate, and Finalize Memorandum of Understanding – Class Action Settlement (fully executed March 25, 2022)	8.50
Review, Revise, Negotiate, and Finalize Joint Stipulation of Class Action and PAGA Settlement (executed on February 20, 2024), and Draft Notice of Class Action Settlement	23.50
Coordinate Settlement Administration with Settlement Administrator, Ongoing Monitoring of Settlement Administration, and Respond to Class Inquiries	6.80
Law and Motion	

Research and Draft Plaintiff's Notice of Motion and Motion for Preliminary Approval of Class Action and PAGA Settlement, Declaration of Ryan Slinger in Support Thereof, Declaration of Plaintiff in Support Thereof, and [Proposed] Order Granting Preliminary Approval of Class Action and PAGA Settlement (filed on May 21, 2024)	20.50
Review Court's Tentative Ruling Re: Hearing on Motion for Preliminary Approval of Settlement (published on July 18, 2024)	0.10
Review Court's Minute Order Re: Hearing on Motion for Preliminary Approval of Settlement (filed on July 19, 2024)	0.10
Draft Declaration of Elizabeth Parker-Fawley in Support of Plaintiff's Motion for Preliminary Approval of Class Action and PAGA Settlement (filed on August 1, 2024)	4.50
Review Court's Tentative Ruling Re: Hearing on Motion for Preliminary Approval of Settlement (published on August 15, 2024)	0.10
Review Court's Minute Order Re: Hearing on Motion for Preliminary Approval of Settlement (filed on August 16, 2024)	0.10
Review Court's Order Granting Plaintiff's Motion for Preliminary Approval of Class Action and PAGA Settlement (filed on August 20, 2024)	0.10
Meet and Confer with Defendants' Counsel, and Draft Joint Stipulation Regarding Settlement and Final Approval Hearing; [Proposed] Order (submitted on January 23, 2025)	1.20
Review Court's Order to Continue Final Approval Hearing (filed on February 6, 2025)	0.10
Research and Draft Plaintiff's Motion for Final Approval of Class Action and PAGA Settlement, Attorneys' Fees and Costs, and Enhancement Payment, Declaration of Elizabeth Parker-Fawley in Support	25.50

Thereof, and [Proposed] Final Approval Order and Judgment; and Review Declaration of Settlement Administrator in Support Thereof (filed on April 17, 2025)	
Total Hours:	318.80

EXHIBIT B

LAWYERS *for* JUSTICE, PC CASE COST DETAIL
Purewal vs. ACC Senior Services

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
6/19/2020	U.S. Postmaster	Postage	\$7.00
9/15/2020	Labor & Workforce Development Agency	PAGA Filing Fee	\$75.00
9/22/2020	Legal Document Server, Inc.	Attorney Service	\$180.23
9/22/2020	Sacramento Superior Court	Complex Filing Fee	\$1,000.00
9/22/2020	Sacramento Superior Court	Complaint Filing Fee	\$435.00
11/5/2020	Legal Document Server, Inc.	Attorney Service	\$110.00
11/5/2020	Legal Document Server, Inc.	Attorney Service	\$110.00
11/13/2020	Legal Document Server, Inc.	Attorney Service	\$120.00
11/18/2020	Legal Document Server, Inc.	Attorney Service	\$195.00
11/20/2020	Legal Document Server, Inc.	Attorney Service	\$150.00
3/4/2021	Legal Document Server, Inc.	Attorney Service	\$65.25
3/4/2021	Sacramento Superior Court	Jury Fee	\$150.00
3/5/2021	Legal Document Server, Inc.	Attorney Service	\$110.00
3/18/2021	Legal Document Server, Inc.	Attorney Service	\$110.00
7/23/2021	Legal Document Server, Inc.	Attorney Service	\$110.00
8/20/2021	ADR Services, Inc.	Mediation Fee	\$3,275.00
9/23/2021	FedEx Express	Courier Service	\$62.08
9/30/2021	Burkey Cox Evans & Bradford CPAs	Forensic Accounting	\$1,000.00
11/8/2021	Legal Document Server, Inc.	Attorney Service	\$110.85
11/8/2021	Sacramento Superior Court	Stipulation & Order Fee	\$20.00
11/15/2021	Legal Document Server, Inc.	Attorney Service	\$110.00
11/19/2021	General Logistics Systems US, Inc.	Courier Service	\$21.59
1/4/2022	ADR Services, Inc.	Supplemental Mediator's Fee	\$1,375.00
2/14/2022	Legal Document Server, Inc.	Attorney Service	\$175.95
2/14/2022	Sacramento Superior Court	Stipulation & Order Fee	\$20.00
3/28/2022	Legal Document Server, Inc.	Attorney Service	\$120.00
8/11/2022	Legal Document Server, Inc.	Attorney Service	\$125.00
8/17/2022	Legal Document Server, Inc.	Attorney Service	\$105.00
5/22/2024	Legal Document Server, Inc.	Attorney Service	\$210.32
5/22/2024	Sacramento Superior Court	Motion Fee	\$60.00
8/2/2024	Legal Document Server, Inc.	Attorney Service	\$14.90
Total:			<u>\$9,733.17</u>