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Attorneys for Plaintiff and the Class

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

KRYSTAL CAMINA, individually, and on
behalf of other members of the general public
similarly situated;

Plaintiff,

vs.

WOK IN THE PARK LLC, a California
limited liability company; CAFETERIA
15L, an unknown business entity; and
DOES 1 through 100, inclusive,

Defendants.

Lead Case No. 34-2020-00283344-CU-OE-
GDS

Consolidated with Case No. 34-2020-
00289018

Honorable Lauri A. Damrell
Department 22

**DECLARATION OF YASMIN HOSSEINI
IN SUPPORT OF PLAINTIFF'S MOTION
FOR IFNAL APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT**

Date: March 14, 2025
Time: 9:00 a.m.
Department: 22

KRYSTAL CAMINA, individually, and on
behalf of other aggrieved employees pursuant
to the California Private Attorneys General
Act;

Plaintiff,

vs.

WOK IN THE PARK LLC, a California
limited liability company; CAFETERIA 15L,
an unknown business entity; and DOES 1
through 100, inclusive,

Defendants.

Class Complaint Filed: August 12, 2020
PAGA Complaint filed: November 17, 2020
Trial Date: None Set

DECLARATION OF YASMIN HOSSEINI

I, Yasmin Hosseini, 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 Krystal Camina (“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 2, 2024, the Honorable Lauri A. Damrell entered an order preliminarily approving the Class and Representative Action Settlement Agreement and Release (“Agreement,” “Settlement,” or “Settlement Agreement”) entered into between Plaintiff and Defendants Wok in the Park, LLC and Cafeteria 15L (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 Simpluris, Inc. (“Settlement Administrator”) to serve as the third-party settlement administrator and handle the notice and settlement administration process.

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

6 **WORK PERFORMED BY CLASS COUNSEL**

7 5. Several attorneys at Lawyers *for* Justice, PC have been actively performing work
8 in this matter since prior to the commencement of Plaintiff’s putative class action (i.e., the above-
9 captioned action) on August 12, 2020.

10 6. Before initiating this matter, Lawyers *for* Justice, PC investigated and researched
11 the facts and circumstances underlying the pertinent factual and legal issues and applicable law.
12 This required thorough discussions and interviews between attorneys at Lawyers *for* Justice, PC
13 and Plaintiff and research into the various legal issues involved in this matter, namely, the current
14 state of the law as it applied to class certification, off-the-clock theory, regular rate, meal and rest
15 periods, PAGA representative claims, wage-and-hour law and enforcement, Plaintiff’s claims and
16 allegations, and Defendants’ defenses. After conducting an initial investigation, Lawyers *for*
17 Justice, PC determined that the claims of Plaintiff were well-suited for class-wide and
18 representative adjudication, owing to what appeared to be a common course of conduct affecting
19 a similarly situated group of individuals who are or were employed by Defendants as hourly non-
20 exempt employees in California from August 12, 2016 through April 22, 2022, who were not
21 properly compensated for, *inter alia*, all hours worked, non-compliant meal and rest periods, and
22 business expenses.

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

large volume of information, data, and documents obtained from Plaintiff, Defendants, and other sources. Class Counsel propounded multiple sets of written discovery on both Defendants (including, but not limited to Special Interrogatories (Set One, Two and Three), Form Interrogatories—General (Set One), and Requests for Production of Documents (Sets One and Two)) and reviewed and analyzed Defendants’ responses and objections thereto. Additionally, Plaintiff noticed the depositions of Defendants’ persons most knowledgeable regarding organizational structure, document retention, and wage and hour practices topics, and Class Counsel conducted a deposition of Phallon Miller, Defendants’ General Manager, on November 3, 2023. Plaintiff also responded to multiple sets of discovery requests propounded on her by Defendants (specifically, Form Interrogatories-Employment (Set One), Form Interrogatories-General (Set One), Requests for Admission (Set One), Requests for Production of Documents (Set One), and Special Interrogatories (Set One)) and prepared for and attended a full-day deposition on December 15, 2021. The volume of information, documents, and data that Class Counsel reviewed and analyzed included and was not limited to: Plaintiff’s employment records, 100% of available time and pay records for the entire class (which pertained to the period January 1, 2017 to December 15, 2021), Defendants’ job descriptions, Defendants’ Employee Handbook, and Defendants’ other operations and employment practices, forms, procedures, and policies. Class Counsel also developed liability, damages, violation, and penalties valuation models in the course of litigation and in connection with the mediation and settlement negotiations and met and conferred with Defendants’ counsel on numerous occasions, e.g., to discuss issues relating to the pleadings, case management, discovery and the production of information, documents, and data in the course of litigation and in connection with mediation and settlement negotiations, and settlement. Other work performed by Class Counsel included, and was not limited to, case strategy and analysis; researching, drafting, reviewing, and/or revising the pleadings, motion-related papers, the mediation brief, and settlement documents; and preparing for and attending court proceedings, mediation, and settlement negotiations, among other tasks.

8. As outlined herein, the Parties have conducted significant investigation and formal and informal discovery during the course of litigating the cases, mediation and extensive

1 settlement negotiations. Class Counsel analyzed a large volume of information, documents, and
2 data obtained from Plaintiff, Defendants, and other sources. The information, documents, and data
3 provided a critical understanding of the nature of the work performed by the Class Members, as
4 well as Defendants' operations and employment policies, practices, and procedures, and were used
5 in analyzing liability, damages, penalties, and other valuation issues in connection with all phases
6 of the litigation, and ultimately, in connection with the mediation and settlement negotiation
7 process. Class Counsel also performed significant research into the applicable law, which is
8 evolving as it relates to class certification, PAGA representative actions, off-the-clock theory,
9 regular rate, meal and rest periods, wage-and-hour law and enforcement, Plaintiff's claims and
10 allegations, and Defendants' defenses thereto, as well as facts discovered.

11 9. After conducting significant investigation of the facts and law during the
12 prosecution of the cases, and formal and informal discovery, counsel for the Parties engaged in
13 extensive settlement negotiations to try to resolve the cases. These efforts included participating
14 in a formal mediation session conducted on February 17, 2022, by Lynn S. Frank, Esq., a well-
15 regarded mediator experienced in handling complex labor and employment matters. During all
16 settlement discussions, the Parties conducted their negotiations at arm's length in an adversarial
17 position. In the course of mediation and settlement discussions, the Parties exchanged information,
18 documents, and data, and discussed various aspects of the case, including and not limited to, the
19 risks and delays of further litigation; the risks and expenses to the Parties of proceeding with class
20 certification and trial; the law relating to off-the-clock theory, regular rate, meal and rest periods,
21 wage-and-hour law and enforcement, and PAGA representative claims; the evidence produced and
22 analyzed; and the possibility of appeals, among other things. Arriving at a settlement that was
23 acceptable to the Parties was not easy. Defendants contended that individualized questions of fact
24 predominate over any common issues, and these issues would pose challenges to class certification
25 and representative adjudication. Defendants and their counsel felt strongly about Defendants'
26 ability to avoid class certification and prevail on the merits, while Plaintiff and Class Counsel
27 believed that they would be able to obtain class certification and prevail at trial. With the aid of
28 the mediator's evaluation, the Parties ultimately agreed that the cases were well-suited for

1 settlement given the legal issues relating to Plaintiff's principal claims, as well as the costs and
2 risks to the Parties that would attend further litigation. These risks of further litigation include, and
3 are not limited to, a determination that the claims are unsuitable for class treatment and/or
4 representative adjudication, class de-certification after certification of a class, allowing a jury to
5 decide the claims asserted in the case, and the real possibility of no monetary recovery after years
6 of litigation.

7 10. By way of the accompanying Motion for Final Approval, Class Counsel seeks
8 attorneys' fees in the amount of \$252,000.00, which is 35% of the Settlement Sum of \$720,000.00.
9 Pursuant to the contingency-fee agreement entered into by and between Plaintiff and Class
10 Counsel, Plaintiff has agreed to a contingency fee of at least 35% of the recovery.

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

17 12. While not necessarily required to be demonstrated because the percentage fee is
18 proper for this settlement, Class Counsel has incurred many hours of work in connection with
19 prosecuting the cases such that the award of attorneys' fees is also justified under a lodestar
20 analysis. Attorneys at Lawyers for Justice, PC have spent a total of **381.30 hours** performing tasks
21 and obtaining recovery in this matter. Attached hereto as "**EXHIBIT A**" is an Attorney Task and
22 Time Chart that sets forth in detail the nature of the legal services provided by attorneys at Lawyers
23 for Justice, PC and the time incurred by them in performing those services. These hours include
24 work done by several attorneys at Lawyers for Justice, PC. Also, separate from the hours
25 referenced herein and in the chart, Lawyers for Justice, PC had litigation support personnel actively
26 engaged in assisting with the prosecution of this matter.

27 13. The attorneys identified below have worked on this case, and they have performed
28 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	77.60	\$116,012.00
Arby Aiwarzian	Shareholder	269827	2010 (14 years)	\$1,295	3.50	\$4,532.50
Joanna Ghosh	Managing Attorney	272479 (CA); 518149 (NY)	2010 (CA); 2013 (NY) (14 years)	\$1,295	13.00	\$16,835.00
Vartan Madoyan	Senior Attorney	279015	2011 (13 years)	\$850	8.20	\$6,970.00
Melissa A. LeBlanc- Mansell	Senior Attorney	283080 (CA); 59808 (WA); 230652 (OR)	2012 (CA); 2022 (WA); 2023 (OR) (12 years)	\$850	1.00	\$850.00
Elizabeth Parker- Fawley	Senior Attorney	301592	2014 (10 years)	\$850	1.90	\$1,615.00
Brian St. John	Senior Attorney	304112	2015 (9 years)	\$850	0.50	\$425.00
Yasmin Hosseini	Senior Attorney	326399	2019 (5 years)	\$850	12.00	\$10,200.00
Ryan Slinger	Attorney	351297	2023 (1 year)	\$575	27.00	\$15,525.00
Charles T. Sweeny	Attorney (formerly)	325167	2019 (5 years)	\$725	135.10	\$97,947.50
Harry Erganyan	Attorney (formerly)	333091	2021 (3 years)	\$725	43.90	\$31,827.50
Annabel Blanchard	Attorney (formerly)	258135	2008 (16 years)	\$725	31.60	\$22,910.00
Jeremy Stern	Attorney (formerly)	351412	2023 (1 year)	\$575	21.50	\$12,362.50
Janardana Burns	Attorney (formerly)	337696	2021 (3 years)	\$575	4.50	\$2,587.50
Total:					381.30	\$340,599.50

14. Each of the attorneys identified above performed their work in this matter exclusively on a contingency basis. Plaintiffs have not been billed for, and have not paid for, any of the work performed in the instant action to date by attorneys at Lawyers for Justice, PC (i.e., Plaintiffs have 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 undersign 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 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

1 recovered (sometimes in association with other law firms) millions of dollars on behalf of
2 thousands of individuals in California.

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

23 18. Arby Aiwazian is a Member and Shareholder of Lawyers *for* Justice, PC. He
24 received his Bachelor of Arts degree from University of California, Los Angeles and graduated
25 magna cum laude. He earned a Juris Doctor degree, cum laude, from Southwestern Law School.
26 From approximately May 2007 to approximately July 2007, he served as a Judicial Extern to the
27 Honorable Earl Johnson, Jr. of the California Court of Appeal for the Second Appellate District.
28 From approximately August 2008 to approximately December 2008, he served as a Judicial Extern

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

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

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

11 20. I am a Member of Lawyers for Justice, PC. I received my Bachelor of Arts degree
12 from University of California, Santa Barbara in 2013 and earned my Juris Doctor degree from
13 Pepperdine University School of Law in 2017. I was admitted to practice law in California in 2019.
14 I am admitted to practice before all courts of the State of California and all federal district courts
15 in the State of California. I have worked on many wage and hour class action and PAGA
16 representative matters, and my work has included, *inter alia*, researching and drafting pleadings,
17 administrative notice exhaustion, drafting, negotiating, and finalizing stipulations and settlement
18 agreements, engaging in motion practice, claims evaluation and analysis, and making court
19 appearances. Prior to working at Lawyers for Justice, PC, I represented filmmakers and talent,
20 negotiating and structuring various types of agreements on their behalf. I am a member of the
21 California Employment Lawyers Association, Beverly Hills Bar Association, and Iranian
22 American Bar 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 **\$18,093.59** in litigation costs and expenses incurred in this matter, as reflected
28 in "EXHIBIT B" attached hereto. These expenses were reasonable and necessary in the

prosecution of this matter and to obtain the Settlement.

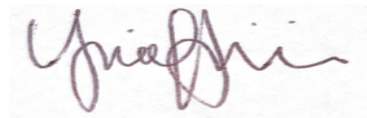
ENHANCEMENT AWARD TO PLAINTIFF

22. In recognition of her efforts and work serving as the Class Representative, the Settlement Agreement provides for an Enhancement Award in the amount of \$10,000.00. The requested Enhancement Award 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. Additionally, Plaintiff spent numerous hours preparing for and providing testimony at her deposition as well as reviewing Defendants' discovery requests, locating documents, and providing documents and information in connection with the responses. Accordingly, it is appropriate for Plaintiff to receive \$10,000.00 as an Enhancement Award 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 Group Members, and the State of California.

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

Executed this 20th day of February 2025, at Glendale, California.



Yasmin Hosseini

EXHIBIT A

CAMINA V. WOK IN THE PARK LLC, CAFETERIA 15L (“Class Action”)
Sacramento Superior Court Case No. 34-2020-00283344-CU-OE-GDS

CAMINA V. WOK IN THE PARK LLC, CAFETERIA 15L (“PAGA Action”)
Sacramento Superior Court Case No. 34-2020-00289018-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 Krystal Camina (“Plaintiff”) during the Case	35.00
Investigate, Communicate with, and/or Interview Putative Class Members, PAGA Group Members and Percipient Witnesses	8.50
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 August 12, 2020) (Class Action)	7.50
Review and Analyze Defendants Wok in the Park and CAFETERIA 15L’s (together, “Defendants”) Answer to Plaintiff’s Class Action Complaint for Damages (served on October 22, 2020), and Research Affirmative Defenses in Defendants’ Answer (Class Action)	2.20
Investigate the Merits of Plaintiff’s Claims, Legal Research and Analysis of All Claims Involved, Draft Plaintiff’s Complaint for Enforcement Under the Private Attorneys General Act, California Labor Code Section 2698, Et Seq. (filed on November 17, 2020) (PAGA Action)	4.50

Review Court's Order re: Delay in Scheduling Initial Case Management Conference (filed on November 17, 2020) (PAGA Action)	0.10
Review Court's Notice of Case Assignment and Case Management Conference (filed on November 24, 2020) (PAGA Action)	0.10
Review Defendants' Notice of Substitution of Attorney (served on January 22, 2021) (Class Action)	0.10
Review and Analyze Defendants' Memorandum of Points and Authorities in Support of Demurrer to Plaintiff's Complaint, Defendants' Notice and Statement of Demurrer to Plaintiff's Complaint, Defendants' Request For Judicial Notice in Support of Demurrer to Plaintiff's Complaint, Declaration of Gregory L. Blueford in Support of Demurrer to Plaintiff's Complaint and [Proposed] Order Re: Defendants' Demurrer to Plaintiff's Complaint (served on February 3, 2021) (PAGA Action)	3.10
Draft Plaintiff's Opposition to Defendants' Demurrer to Plaintiff's Complaint (filed May 19, 2021) (PAGA Action)	3.20
Review and Analyze Defendants' Reply Brief in Support of Demurrer to Plaintiff's Complaint (filed on May 24, 2021) (PAGA Action)	0.80
Review Court's Tentative Ruling re: Hearing on Demurrer (filed June 2, 2021) (PAGA Action)	0.10
Review Court's Minute Order re: Hearing on Demurrer (filed June 3, 2021) (PAGA Action)	0.10
Review and Analyze Defendants' Answer and Affirmative Defenses to Plaintiff's Complaint for Enforcement Under the Private Attorneys General Act, California Labor Code 2698, Et Seq. (filed on June 23, 2021), and Research Affirmative Defenses in Defendants' Answer (PAGA Action)	2.50
Review Court's Minute Order re: Case Management Conference (filed September 27, 2021) (PAGA Action)	0.10
Review Defendants' Case Management Statement (filed on November 4, 2021) (PAGA Action)	0.10

Draft Plaintiff's Case Management Statement (filed on November 4, 2021) (Class Action)	0.50
Review Court's Tentative Ruling re: Case Management Conference (filed November 8, 2021) (PAGA Action)	0.10
Review Court's Minute Order re: Complex Case Management Conference (filed November 19, 2021) (PAGA Action)	0.10
Meet and Confer with Defendants' Counsel and Draft Joint Notice of Settlement (filed on March 2, 2022) (Class Action)	1.10
Meet and Confer with Defendants' Counsel and Draft Joint Notice of Settlement (filed on March 2, 2022) (PAGA Action)	1.10
Review Court's Notice of Complex Determination (filed March 22, 2022) (Class Action)	0.10
Review Court's Notice of Complex Determination (filed March 22, 2022) (PAGA Action)	0.10
Review Court's Notice of Case Management Conference and Orders re: Complex Case Management Procedures (filed on May 20, 2022) (Class Action)	0.10
Review Court's Notice of Case Management Conference and Orders re: Complex Case Management Procedures (filed on May 20, 2022) (PAGA Action)	0.10
Meet and Confer with Defendant's Counsel and Draft Joint Case Management Conference Statement – Continuance Requested (filed on November 23, 2022) (Class Action)	1.20
Meet and Confer with Defendant's Counsel and Draft Joint Case Management Conference Statement – Continuance Requested (filed on November 23, 2022) (PAGA Action)	1.20
Review Court's Tentative Ruling re: Complex Case Management Conference (filed December 7, 2022) (PAGA Action)	0.10

Review Court's Minute Order re: Complex Case Management Conference (filed December 8, 2022) (PAGA Action)	0.10
Review Court's Tentative Ruling re: Complex Case Management Conference (filed December 7, 2022) (Class Action)	0.10
Review Court's Minute Order re: Complex Case Management Conference (filed December 8, 2022) (Class Action)	0.10
Meet and Confer with Defendant's Counsel and Draft Joint Case Management Conference Statement (filed on March 1, 2023) (Class Action)	1.20
Meet and Confer with Defendant's Counsel and Draft Joint Case Management Conference Statement (filed on March 1, 2023) (PAGA Action)	1.20
Review Court's Tentative Ruling re: Complex Case Management Conference (filed March 8, 2023) (Class Action)	0.10
Review Court's Minute Order re: Complex Case Management Conference (filed March 9, 2023) (Class Action)	0.10
Review Court's Tentative Ruling re: Complex Case Management Conference (filed March 8, 2023) (PAGA Action)	0.10
Review Court's Minute Order re: Complex Case Management Conference (filed March 9, 2023) (PAGA Action)	0.10
Review Defendants' Notice of Posting Complex Fees (served on May 19, 2023) (Class Action)	0.10
Review Defendants' Notice of Posting Complex Fees (served on May 19, 2023) (PAGA Action)	0.10

Meet and Confer with Defendants' Counsel and Draft Joint Case Management Conference Statement (filed on May 30, 2023) (Class Action)	1.20
Meet and Confer with Defendants' Counsel and Draft Joint Case Management Conference Statement (filed on May 30, 2023) (PAGA Action)	1.20
Review Court's Tentative Ruling re: Complex Case Management Conference (filed June 6, 2023) (Class Action)	0.10
Review Court's Tentative Ruling re: Complex Case Management Conference (filed June 6, 2023) (PAGA Action)	0.10
Review Court's Minute Order re: Complex Case Management Conference (filed June 8, 2023) (Class Action)	0.10
Review Court's Minute Order re: Complex Case Management Conference (filed June 8, 2023) (PAGA Action)	0.10
Meet and Confer with Defendants' Counsel and Draft Joint Case Management Conference Statement (filed on August 9, 2023) (Class Action)	1.40
Meet and Confer with Defendants' Counsel and Draft Joint Case Management Conference Statement (filed on August 9, 2023) (PAGA Action)	1.40
Review Court's Tentative Ruling re: Complex Case Management Conference (filed August 22, 2023) (Class Action)	0.10
Review Court's Tentative Ruling re: Complex Case Management Conference (filed August 22, 2023) (PAGA Action)	0.10
Review Court's Minute Order re: Complex Case Management Conference (filed August 24, 2023) (Class Action)	0.10

Review Court's Minute Order re: Complex Case Management Conference (filed August 24, 2023) (PAGA Action)	0.10
Meet and Confer with Defendants' Counsel and Draft Joint Case Management Conference Statement (filed on October 11, 2023) (Class Action)	1.20
Meet and Confer with Defendants' Counsel and Draft Joint Case Management Conference Statement (filed on October 11, 2023) (PAGA Action)	1.20
Review Court's Tentative Ruling re: Complex Case Management Conference (filed October 24, 2023) (Class Action)	0.10
Review Court's Tentative Ruling re: Complex Case Management Conference (filed October 24, 2023) (PAGA Action)	0.10
Review Court's Minute Order re: Complex Case Management Conference (filed October 26, 2023) (Class Action)	0.10
Review Court's Minute Order re: Complex Case Management Conference (filed October 26, 2023) (PAGA Action)	0.10
Meet and Confer with Defendants' Counsel and Draft Joint Case Management Conference Statement (filed on December 21, 2023) (Class Action)	1.40
Meet and Confer with Defendants' Counsel and Draft Joint Case Management Conference Statement (filed on December 21, 2023) (PAGA Action)	1.40
Review Court's Tentative Ruling re: Complex Case Management Conference (filed January 2, 2024) (Class Action)	0.10
Review Court's Tentative Ruling re: Complex Case Management Conference (filed January 2, 2024) (PAGA Action)	0.10

Review Court's Minute Order re: Complex Case Management Conference (filed January 4, 2024) (Class Action)	0.10
Review Court's Minute Order re: Complex Case Management Conference (filed January 4, 2024) (PAGA Action)	0.10
Review Court's Notice of Department Relocation (filed on January 5, 2024) (Class Action)	0.10
Review Court's Notice of Department Relocation (filed on January 5, 2024) (PAGA Action)	0.10
Meet and Confer with Defendants' Counsel and Draft Joint Stipulation to Consolidate Case Numbers 34-2020-00283344 and 34-2020-00289018; [Proposed] Order Thereon (filed on February 1, 2024) (Class Action)	1.60
Review Court's Minute Order re: Consolidation of Case Numbers (filed on February 8, 2024) (Class Action)	0.10
Review Court's Minute Order re: Consolidation of Case Numbers (filed on February 8, 2024) (PAGA Action)	0.10
Review Court's Order re: Consolidation Case Numbers (filed on February 8, 2024) (Class Action)	0.10
Review Court's Tentative Ruling re: Case Management Conference (filed on March 28, 2024) (Class Action)	0.10
Review Court's Minute Order re: Case Management Conference (filed on March 29, 2024) (Class Action)	0.10
Meet and Confer with Defendants' Counsel and Draft Joint Case Management Conference Statement (filed on May 23, 2024) (Class Action)	1.20
Review Court's Tentative Ruling re: Case Management Conference (filed on June 6, 2024) (Class Action)	0.10

Meet and Confer with Defendants' Counsel and Draft Joint Case Management Conference Statement (filed on July 18, 2024) (Class Action)	1.40
Review Court's Tentative Ruling re: Case Management Conference (filed on August 1, 2024) (Class Action)	0.10
Appearances	
Prepare for and Telephonically Attend Hearing on Demurrer (June 2, 2021) (PAGA Action)	3.20
Prepare for and Telephonically Attend Case Management Conference (November 19, 2021) (PAGA Action)	0.50
Prepare for and Telephonically Attend Hearing on Case Management Conference (January 4, 2024) (Class Action) (PAGA Action)	1.00
Prepare for and Telephonically Attend Case Management Conference & Hearing on Motion for Preliminary Approval (March 29, 2024) (Class Action)	2.00
Discovery and Deposition	
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Krystal Camina (served on April 27, 2020)	1.90
Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant Wok in the Park LLC and Requests for Production of Documents (Organizational Structure; December 18, 2020) (served on November 13, 2020) (Class Action)	1.30
Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant Cafeteria 15L and Requests for Production of Documents (Job Duties; December 17, 2020) (served on November 13, 2020) (Class Action)	1.50

Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant Wok in the Park LLC and Requests for Production of Documents (Job Duties; December 17, 2020) (served on November 13, 2020) (Class Action)	1.50
Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant Cafeteria 15L and Requests for Production of Documents (Organizational Structure; December 18, 2020) (served on November 13, 2020) (Class Action)	1.30
Draft Plaintiff's Form Interrogatories—General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), Special Interrogatories (Set Three), Requests for Production of Documents (Set One), Requests for Production of Documents (Set Two) to Defendant Cafeteria 15L (served on November 13, 2020) (Class Action)	8.20
Draft Plaintiff's Form Interrogatories—General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), Special Interrogatories (Set Three), Requests for Production of Documents (Set One), Requests for Production of Documents (Set Two) to Defendant Wok in the Park (served on November 13, 2020) (Class Action)	7.20
Review and Analyze Defendants' Form Interrogatories – Employment Law (Set One), Form Interrogatories – General (Set One), Request For Admission (Set One), Special Interrogatories (Set One), Requests for Production of Documents (Set One) and Declaration of Alexandra Asterlin, Esq., In Support of Additional Discovery (served on December 15, 2020) (Class Action)	3.40
Draft Plaintiff Krystal Camina's Responses to Defendants' Form Interrogatories – Employment Law (Set One), Form Interrogatories – General (Set One), Request For Admission (Set One), Special Interrogatories (Set One) and Requests for Production of Documents (Set One) (served on March 9, 2021) (Class Action)	6.20
Review and Analyze Defendant Cafeteria 15L's Responses to Plaintiff's Form Interrogatories—General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), Special Interrogatories (Set Three), Requests for Production of Documents (Set One), Requests for Production of Documents (Set Two) (served on March 12, 2021) (Class Action)	5.10

Review and Analyze Defendant Wok in the Park's Responses to Plaintiff's Form Interrogatories—General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), Special Interrogatories (Set Three), Requests for Production of Documents (Set One), Requests for Production of Documents (Set Two) (served on March 12, 2021) (Class Action)	5.10
Draft Plaintiff's Notice of Videotaped Deposition of Person Most Knowledgeable at Defendant Cafeteria 15L (filed on September 20, 2021) (Class Action)	1.30
Draft Plaintiff's Notice of Videotaped Deposition of Person Most Knowledgeable at Defendant Wok in the Park LLC (filed on September 20, 2021) (Class Action)	1.30
Review Defendants' Objection to Plaintiff's Notice of Videotaped Deposition of Person Most Knowledgeable at Defendant Cafeteria 15L (served on September 30, 2021)	0.60
Review Defendants' Objection to Plaintiff's Notice of Videotaped Deposition of Person Most Knowledgeable at Defendant Wok in the Park LLC (served on September 30, 2021) (Class Action)	0.60
Draft Plaintiff's First Amended Notice of Videotaped Deposition of Person Most Knowledgeable at Defendant Cafeteria 15L (filed on October 18, 2021) (Class Action)	1.10
Draft Plaintiff's First Amended Notice of Videotaped Deposition of Person Most Knowledgeable at Defendant Wok in the Park LLC (filed on October 18, 2021) (Class Action)	1.10
Review Defendants' Objection to Plaintiff's First Amended Notice of Videotaped Deposition of Person Most Knowledgeable at Defendant Cafeteria 15L (served on October 28, 2021) (Class Action)	0.60
Review Defendants' Objection to Plaintiff's First Amended Notice of Videotaped Deposition of Person Most Knowledgeable at Defendant Wok in the Park LLC (served on October 28, 2021) (Class Action)	0.60
Prepare for and Take the Deposition of Defendants' Person Most Knowledgeable Phallon Miller (November 3, 2021; Video Conference) and Review Deposition Transcript	8.00

Review and Analyze Defendants' Notice of Taking Deposition of Plaintiff Krystal Camina With Request for Production of Documents at Deposition (served on December 1, 2021) (Class Action)	0.70
Draft Plaintiff's Objection to Defendants' Notice of Taking Deposition of Plaintiff Krystal Camina With Request for Production of Documents at Deposition (filed on December 7, 2021) (Class Action)	0.90
Prepare for and Defend the Deposition of Plaintiff Krystal Camina (December 15, 2021; Zoom Video Conference) and Review Deposition Transcript with Plaintiff	8.00
Letters and Correspondence	
Draft Notice of California Labor and Workforce Development Agency re: Claims of Plaintiff under the Private Attorneys General Act (served September 10, 2020)	4.50
Draft Correspondence to Plaintiff Krystal Camina re: Discovery Responses (sent December 16, 2020)	1.40
Meet with, Draft Correspondence to, and Respond to Correspondence from, Defendants' Counsel	21.30
Mediation/Settlement	
Review and Analyze Information, Data, and Documents Obtained from Plaintiff, Defendants, and Other Sources Prior to Mediation (served December 30, 2021)	62.50
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 February 10, 2022)	27.40
Attend Mediation Session (February 17, 2022; Video Conference)	9.50
Review and Analyze Mediator's Proposal	2.00

Review, Revise, Negotiate, and Finalize Stipulation of Class and Representative Action Settlement Agreement and Release (executed on August 16, 2023), and Notice of Class Action Settlement	24.50
Coordinate Settlement Administration with Settlement Administrator, Ongoing Monitoring of Settlement Administration, and Respond to Class Inquiries	5.50
Law and Motion	
Research and Draft Plaintiff's Motion for Preliminary Approval of Class Action Settlement; Memorandum of Points and Authorities, Declaration of Jeremy Stern in Support Thereof, Declaration of Plaintiff in Support Thereof, and [Proposed] Order Granting Preliminary Approval of Class Action Settlement (filed on March 29, 2024) (Class Action)	21.50
Review and Analyze Defendants' Notice of Non-Opposition to Plaintiff's Motion for Preliminary Approval of Class Action Settlement (served on May 23, 2024) (Class Action)	0.10
Draft Plaintiff's Notice of Continued Hearing on Plaintiff's Motion for Preliminary Approval of Class Action and PAGA Settlement and Case Management Conference (filed on June 11, 2024) (Class Action)	0.20
Draft Declaration of Joanna Ghosh In Support of Plaintiff's Motion for Preliminary Approval of Class Action Settlement, Supplemental Declaration of Krystal Camina in Support Thereof, and [Revised Proposed] Order Granting Preliminary Approval of Class Action Settlement (filed on July 11, 2024) (Class Action)	4.50
Review Court's Tentative Ruling re: Motion for Preliminary Approval (filed on June 6, 2024) (Class Action)	0.20
Review Court's Minute Order re: Motion for Preliminary Approval (filed on June 7, 2024) (Class Action)	0.10
Review Court's Tentative Ruling re: Motion for Preliminary Approval (filed on August 1, 2024) (Class Action)	0.20

Review Court's Order Granting Preliminary Approval of Class Action Settlement (filed on August 2, 2024) (Class Action)	0.10
Review Court's Minute Order re: Motion for Preliminary Approval Hearing (filed on August 2, 2024) (Class Action)	0.10
Draft Notice of Entry of Order Granting Preliminary Approval of Class Action Settlement (filed on August 5, 2024) (Class Action)	0.10
Meet and Confer with Defense Counsel and Draft Joint Stipulation to Authorize Supplemental Class Notice Mailing and Continue Hearing on Plaintiff's Motion for Final Approval; [Proposed Order] thereon (filed on November 13, 2024) (Class Action)	1.60
Review Court Order to Authorize Supplemental Class Notice Mailing and Continue Hearing on Plaintiff's Motion for Final Approval (filed on November 21, 2024) (Class Action)	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 Yasmin Hosseini in Support Thereof, Declaration of Plaintiff in Support Thereof, and [Proposed] Final Approval Order and Judgment, and Review Declaration of Settlement Administrator in Support Thereof (Class Action)	25.50
Total Hours:	381.30

EXHIBIT B

LAWYERS for JUSTICE PC CASE COST DETAIL
Camina v. Wok In The Park, LLC

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
4/27/2020	U.S. Postmaster	Postage	6.95
8/13/2020	Legal Document Server, Inc.	Attorney Service	145.23
8/13/2020	Sacramento Superior Court	Court Filing Fee	435.00
9/1/2020	Legal Document Server, Inc.	Attorney Service	220.00
10/13/2020	Legal Document Server, Inc.	Attorney Service	130.00
11/13/2020	General Logistics Systems US, Inc.	Courier Service	17.63
12/16/2020	General Logistics Systems US, Inc.	Courier Service	28.88
1/22/2021	FedEx Express	Courier Service	34.51
10/18/2021	General Logistics Systems US, Inc.	Courier Service	27.19
11/3/2021	Esquire Deposition Solutions, LLC	Videography Service	1,177.50
11/3/2021	Esquire Deposition Solutions, LLC	Court Reporter	2,105.55
12/7/2021	General Logistics Systems US, Inc.	Courier Service	20.03
12/15/2021	Carol Nygard & Associates	Court Reporter	1,379.49
1/31/2022	Lynn S. Frank	Mediation Fee	9,000.00
2/10/2022	FedEx Express	Courier Service	102.00
3/2/2022	Legal Document Server, Inc.	Attorney Service	120.00
5/30/2023	Legal Document Server, Inc.	Attorney Service	125.00
8/9/2023	Legal Document Server, Inc.	Attorney Service	105.00
10/11/2023	Legal Document Server, Inc.	Attorney Service	125.00
12/21/2023	Legal Document Server, Inc.	Attorney Service	125.00
2/2/2024	Legal Document Server, Inc.	Attorney Service	16.29
2/2/2024	Sacramento Superior Court	Stipulation & Order Fee	20.00
3/29/2024	Legal Document Server, Inc.	Attorney Service	19.07
3/29/2024	Sacramento Superior Court	Motion Fee	60.00
5/23/2024	Legal Document Server, Inc.	Attorney Service	14.90
6/12/2024	Legal Document Server, Inc.	Attorney Service	14.90
7/12/2024	Legal Document Server, Inc.	Attorney Service	14.90
7/19/2024	Legal Document Server, Inc.	Attorney Service	14.90
8/6/2024	Legal Document Server, Inc.	Attorney Service	30.80
11/14/2024	Legal Document Server, Inc.	Attorney Service	16.84
11/14/2024	Sacramento Superior Court	Stipulation & Order Fee	20.00
11/15/2024	Legal Document Server, Inc.	Attorney Service	150.00
Total:			15,822.56

LAWYERS for JUSTICE PC CASE COST DETAIL
Camina v. Work In The Park (PAGA)

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
9/10/2020	Labor & Workforce Development Agency	PAGA Filing Fee	75.00
9/10/2020	U.S. Postmaster	Postage	22.50
11/17/2020	Legal Document Server, Inc.	Attorney Service	165.23
11/17/2020	Sacramento Superior Court	Complaint Filing Fee	435.00
1/8/2021	Legal Document Server, Inc.	Attorney Service	65.00
1/8/2021	Legal Document Server, Inc.	Attorney Service	130.00
2/18/2021	CourtCall, LLC	Attorney Service	94.00
4/7/2021	General Logistics Systems US, Inc.	Courier Service	35.54
4/9/2021	CourtCall, LLC	Attorney Service	94.00
4/23/2021	CourtCall, LLC	Attorney Service	94.00
5/19/2021	Legal Document Server, Inc.	Attorney Service	110.00
10/7/2021	Legal Document Server, Inc.	Attorney Service	110.00
11/4/2021	Legal Document Server, Inc.	Attorney Service	110.00
2/16/2022	CourtCall, LLC	Attorney Service	94.00
3/1/2022	General Logistics Systems US, Inc.	Courier Service	36.76
3/2/2022	Legal Document Server, Inc.	Attorney Service	120.00
5/30/2023	Legal Document Server, Inc.	Attorney Service	125.00
8/9/2023	Legal Document Server, Inc.	Attorney Service	105.00
10/11/2023	Legal Document Server, Inc.	Attorney Service	125.00
12/21/2023	Legal Document Server, Inc.	Attorney Service	125.00
Total:			2,271.03