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SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES – STANLEY MOSK COURTHOUSE

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

Plaintiff,

vs.

B&V ENTERPRISES, INC., a
California corporation; and DOES 1
through 100, inclusive,

Defendant.

Case No. 20STCV44113

Honorable Wendy Chang
Department 36

**DECLARATION OF JOANNA GHOSH IN
SUPPORT OF MOTION FOR COURT
APPROVAL OF PARTIES' PAGA
SETTLEMENT**

Date: August 13, 2024
Time: 8:30 a.m.
Department: 36

Complaint Filed: November 16, 2020
FAC Filed: February 19, 2021
Trial Date: None Set

DECLARATION OF JOANNA GHOSH

I, Joanna Ghosh, 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 Zakiya Sun Ellis (“Plaintiff Ellis”) in the action entitled *Zakiya Sun Ellis v. B&V Enterprises, Inc. dba Super King Markets*, Los Angeles County Case No. 21GDCV00587 (“*Ellis* PAGA Action”), which is being settled along with *Jose Cortez v. B&V Enterprises, Inc.*, Los Angeles County Case No. 20STCV44113 (“*Cortez* Action”) and *Carla Aguilar v. B&V Enterprises Inc.*, Los Angeles County Case No. 20STCV28012 (“*Aguilar* Action”) (collectively, the *Ellis* PAGA Action, *Cortez* Action and *Aguilar* Action are referred to as the “Actions”). 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.

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

2. For over a decade, *Lawyers for Justice, PC* has almost exclusively focused on the prosecution of consumer and employment representative and class actions, involving wage-and-hour claims, race discrimination, unfair business practices, or consumer fraud. Currently, *Lawyers for Justice, PC* is the attorney of record in 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.

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

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

1 Ninth Circuit. He was admitted to practice law in California in 2010. He is admitted to practice
2 before all courts of the State of California and all United States District Courts in the State of
3 California. He has worked on many wage-and-hour class action and representative action cases,
4 taking the lead in taking and defending depositions, arguing motions, and attending mediations.
5 He has played an integral role in preparing matters for class certification, including and not
6 limited to, successful certification of a class in *Upson v. Sur La Table* (Los Angeles County
7 Superior Court Case No. BC424012), *Montazemi v. Regus Management* (Los Angeles County
8 Superior Court Case No. BC478769), and *Abdulhaqq v. Urban Outfitters* (Alameda County
9 Superior Court Case No. RG13680477). Under his supervision, dozens of class action or
10 representative cases have resulted in settlements that have been granted court approval, including
11 and not limited to, those listed in paragraph 6 herein. 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 5. I am a Managing Member of Lawyers for Justice, PC. I received a Bachelor of
15 Arts degree from California State University, Los Angeles in 2006, a Master of Science degree
16 from the London School of Economics in 2007, and a Juris Doctor degree from Georgetown
17 University Law Center in 2010. I am admitted to practice in California (since 2010) and in New
18 York (since 2013) and I am admitted to practice in all U.S. District Courts in California, the U.S.
19 Bankruptcy Court for the Central District of California, and the U.S. Supreme Court. I have
20 taken and defended dozens of depositions and successfully handled motion practice in class
21 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. I have successfully handled
24 briefing and oral argument on appeal and obtained notable decisions regarding Private Attorneys
25 General Act claims and employer efforts to compel arbitration of such claims, e.g., *Betancourt v.*
26 *Prudential Overall Supply*, 9 Cal.App.5th 439 (Cal. Ct. App., Mar. 7, 2017), cert. denied (Cal.,
27 May 24, 2017), cert. denied (U.S., Dec. 11, 2017) and *ZB, N.A. v. Superior Court*, 8 Cal.5th175
28 (2019). I have 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 preparation in conjunction with co-counsel in a case involving a certified class consisting of approximately 2,600 individuals). I also have extensive experience with class action and/or representative action settlements, and I have handled this process in over five hundred (500) cases. Under Edwin Aiwasian, Arby Aiwasian, and my supervision, Lawyers for Justice, PC has handled the class certification and court approval process for hundreds of class action and/or representative action matters that have successfully resolved. I am a member of the California Employment Lawyers Association and, on several occasions, have been a speaker regarding topics in wage and hour law at the organization's continuing legal education events.

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

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

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

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

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

Case Number is BC430918.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

11 u) LFJ represented the plaintiff in a wage-and-hour class and PAGA
12 representative action against a food company on behalf of non-exempt employees. On June 30,
13 2017, the court granted final approval of the class and PAGA representative action settlement.
14 The Sacramento County Superior Court Case Number is 34-2015-00175871.

15 v) LFJ represented the plaintiffs in a wage-and-hour class and PAGA
16 representative action against a chocolate company on behalf of non-exempt employees. On July
17 19, 2017, the court granted final approval of the class and PAGA representative action
18 settlement. The Alameda County Superior Court Case Number is RG15764300.

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

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

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

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

12 aa) LFJ, in association with co-counsel therein, represented the plaintiffs in a
13 wage-and-hour class and PAGA representative action against a global provider of flexible office
14 space solutions. On February 15, 2018, the court entered an order granting final approval of the
15 class and PAGA representative action settlement. The Los Angeles County Superior Court Case
16 Number is BC498401.

17 bb) LFJ, in association with co-counsel therein, represented the plaintiff in a
18 wage-and-hour class action against a container manufacturer, on behalf of non-exempt
19 employees. On October 15, 2018, the court granted the plaintiff's motion for class certification.
20 On March 10, 2023, the court granted final approval of the class action settlement. The Tulare
21 County Superior Court Case Number is VCU264528.

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

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

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

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

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

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

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1 ii) LFJ, in association with co-counsel therein, on behalf of the plaintiff and
2 respondent in a PAGA representative action, successfully opposed in the trial court, and briefed
3 and argued an appeal with respect to the employer's motion to compel arbitration, resulting in a
4 notable decision from the California Supreme Court clarifying the law regarding PAGA claims,
5 *ZB, N.A. v. Superior Court* (2019) 8 Cal.5th 175. On February 21, 2020, the court granted
6 approval of the PAGA representative action settlement. The San Diego County Superior Court
7 Case Number is 37-2016-00005578-CU-OE-CTL34.

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

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

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

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

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

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

**NOTICE TO THE CALIFORNIA LABOR AND WORKFORCE DEVELOPMENT
AGENCY AND THE EMPLOYER**

7. Plaintiff Ellis has satisfied the prerequisites under California Labor Code section 2699.3(a), including, and not limited to, providing the California Labor and Workforce Development Agency ("LWDA") and the employer with written notice of the specific provisions of the California Labor Code that are alleged to have been violated, including the facts and theories to support the alleged violations, by way of written correspondence on February 19, 2021 ("PAGA Notice"). The PAGA Notice was sent by U.S. Certified Mail to the employer and submitted to the LWDA by way of online submission on the LWDA's website. A true and correct copy of the February 19, 2021 PAGA Notice is attached hereto as "**EXHIBIT 1.**"

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THE LITIGATION AND WORK PERFORMED

BY PLAINTIFFS' COUNSEL

8. Attorneys at Lawyers for Justice, PC have fully and actively participated in the litigation process from the inception of Plaintiff Ellis' putative class action *Zakiya Sun Ellis v. B&V Enterprises, Inc. dba Super King Markets*, Los Angeles County Case No. 21STCV07181 ("Ellis Class Action"), which was filed on February 24, 2021 and dismissed without prejudice on July 2, 2021, and the *Ellis* PAGA Action, which was filed on April 27, 2021. Lawyers for Justice, PC joined forces with other plaintiffs' counsel, Capstone Law APC (who commenced the *Cortez* Action) and Lavi & Ebrahimian LLP (who commenced the *Aguilar* Action) (collectively, the firms are referred to as "Plaintiffs' Counsel"), to coordinate litigation efforts, and Lawyers for Justice, PC has actively participated in the settlement process that resulted in the resolution of the Actions.

9. Before initiating the *Ellis* PAGA Action, Lawyers for Justice, PC conducted extensive investigation and research into the facts and circumstances underlying the pertinent factual and legal issues and applicable law. This required thorough discussions and interviews between attorneys Lawyers for Justice, PC and Plaintiff Ellis, and research into the various legal issues involved in the *Ellis* PAGA Action, namely, the current state of the law as it applied to off-the-clock theory, meal and rest periods, PAGA claims, wage-and-hour enforcement, Plaintiff Ellis' allegations, and potential defenses. Plaintiff Ellis' core allegation is that Defendant has violated the California Labor Code by engaging in a uniform practice and procedure, with respect to Plaintiffs and other aggrieved employees, of, *inter alia*, failing to pay overtime and minimum wages, failing to provide compliant meal and rest periods and associated premiums, failing to pay timely wages during employment and upon termination of employment, failing to provide complete and accurate itemized wage statements, failing to keep complete and accurate payroll records, and failing to reimburse necessary business-related expenses and costs.

10. Lawyers for Justice, PC investigated the veracity, strength, and scope of the PAGA claim in the *Ellis* PAGA Action, and was also preparing the case for trial, prior to reaching the settlement. Lawyers for Justice, PC conducted extensive investigation, research

1 into legal and factual issues, served formal discovery requests (i.e., Form Interrogatories-General
2 (Sets One and Two), Special Interrogatories (Sets One and Two), Requests for Production of
3 Documents (Sets One and Two), and Requests for Admission (Set One)) and notices of
4 deposition, reviewed and analyzed Defendant's responses and objections to discovery requests
5 and notices of deposition, reviewed Defendant's notice of deposition of Plaintiff Ellis, and
6 conducted extensive informal discovery and review and analysis of a volume of information,
7 documents, and data. Lawyers *for* Justice, PC also met and conferred with Defendant's counsel
8 on numerous occasions, e.g., to discuss issues relating to the pleadings in the trial court and
9 appellate filings, motion practice, case management, trial court and appellate court proceedings,
10 formal and informal discovery and the production of information, documents, and data in the
11 course of litigation and in connection with mediation and settlement discussions, and mediation
12 and settlement negotiations. Other work that Lawyers *for* Justice, PC has performed includes,
13 and is not limited to, case strategy and analysis; case management; drafting, reviewing, and
14 revising the pleadings, motion-related and *ex parte* application-related papers (e.g., relating to
15 Defendant's Motion to Stay Proceedings Brought Under the California Private Attorneys'
16 General Act, Defendant's Motion to Compel Individual Claims to Arbitration and to Dismiss or
17 Stay Proceedings Brought Under the California Private Attorneys General Act, Defendant's
18 Motion to Consolidate Cases, Defendant's Motion to Stay, and Defendant's *Ex Parte*
19 Application to Continue the Hearing on Plaintiff's Motion to Compel Further Discovery
20 Responses, and Plaintiff Ellis' *Ex Parte* Application for an Order Lifting Stay, Plaintiff Ellis'
21 Motion to Lift Stay, and Plaintiff Ellis' Consolidated Motion to Compel Defendant to Provide
22 Further Responses to Plaintiff's Discovery Requests and Request for Monetary Sanctions), and
23 appeal-related papers in the *Ellis* PAGA Action; claims assessment and evaluation; and
24 preparing for and attending mediation and settlement negotiations (including and not limited to,
25 the February 16, 2022 mediation conducted by Todd Smith, Esq.). Lawyers *for* Justice, PC also
26 expended time researching applicable law, which is evolving as it relates to PAGA representative
27 actions, arbitration agreements, wage-and-hour enforcement, Plaintiff Ellis' allegations, and
28 Defendant's defenses thereto, as well as the facts discovered.

11. After engaging in extensive investigations and informal discovery and exchange of information, the parties in the Actions participated in settlement negotiations to try to resolve the matter. These efforts included participating in a mediation on February 16, 2022, conducted by Todd A. Smith, Esq., a well-respected mediator experienced in mediating complex labor and employment matters. In the course of mediation and settlement negotiations, the parties discussed all aspects of the Actions, including the risks and delays of further litigation and proceeding with trial, as well as the law relating to representative PAGA actions, off-the-clock theory, meal and rest breaks, wage-and-hour enforcement, the evidence produced and analyzed, and the possibility of bifurcation of discovery and/or trial and appeals, among other things. During all settlement discussions, the parties conducted their negotiations at arm's length in an adversarial position.

12. As set forth more fully in the Motion for Court Approval of Parties' PAGA Settlement, Plaintiffs seek an award of attorneys' fees to Plaintiffs' Counsel in the amount of \$366,667.00, which represents approximately one-third (1/3) of the Gross Settlement Amount, as provided by the Settlement Agreement. Pursuant to the contingency-fee agreement entered into by and between Plaintiff Ellis and Lawyers for Justice, PC, Plaintiff Ellis has agreed to a contingency fee of at least one-third (1/3) of the recovery. The attorneys' fees sought are commensurate with: (1) the risk that Plaintiffs' Counsel took in commencing the cases; (2) the time, effort, and expense that Plaintiffs' Counsel dedicated to the cases; (3) the skill and determination that Plaintiffs' Counsel have shown; (4) the results that Plaintiffs' Counsel have achieved throughout the litigation; (5) value of the settlement that Plaintiffs' Counsel have achieved in the cases; and (6) the other cases that Plaintiffs' Counsel have turned down in order to devote their time and efforts to the cases.

13. While not necessarily required to be demonstrated because a percentage of the fund is proper for the settlement in the above-captioned action, it should be noted that Plaintiffs' Counsel have performed many hours of work in connection with prosecuting the cases such that the requested attorneys' fees award is also justified under a lodestar analysis. Attorneys at Lawyers for Justice, PC have spent a total of **413.50 hours** performing tasks to obtain a recovery

1 in this matter. Attached hereto as “**EXHIBIT 2**” is an Attorney Task and Time Chart that sets
2 forth in detail the nature of the legal services provided by attorneys at Lawyers for Justice, PC
3 and the time incurred in performing those services. These hours include work done by myself
4 and several other attorneys at the firm. Also, separate from the hours referenced herein and in
5 the chart, Lawyers for Justice, PC had litigation support personnel actively engaged in assisting
6 with the prosecution of the matter.

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

23 **LITIGATION COSTS AND EXPENSES INCURRED**

24 **BY LAWYERS for JUSTICE, PC**

25 15. To date, Lawyers for Justice, PC has borne all of the risks and costs of litigation
26 in the *Ellis* PAGA Action and will not receive any compensation until recovery is obtained in the
27 matter. Lawyers for Justice, PC seeks reimbursement of \$11,064.54 for litigation costs and
28 expenses incurred in the *Ellis* PAGA Action, as reflected in the Case Cost Detail attached hereto

as “**EXHIBIT 3.**” These expenses were reasonable and necessary in the prosecution of the *Ellis* PAGA Action and to obtain the Settlement.

GENERAL RELEASE PAYMENT TO PLAINTIFFS

16. For their broader individual waiver and release of claims with a California Civil Code Section 1542 waiver (set forth in Section 25 of the Settlement Agreement), the Settlement provides for General Release Payments to Plaintiffs in the amount of \$10,000.00 each, to be paid out of the Gross Settlement Amount, subject to approval by the Court. It is also worth noting that Plaintiffs undertook significant efforts and work to spearhead the litigation of their respective cases. By initiating and pursuing the cases, Plaintiffs stepped into the shoes of the State of California and undertook the responsibilities of serving in representative capacities. For example, Plaintiff Ellis has spent a substantial amount of time and effort discussing her employment with her counsel, gathering and producing relevant documents and information, and providing the facts and evidence necessary to attempt to prove the allegations. Plaintiff Ellis was available whenever her counsel needed her and actively tried to obtain and provide information that would facilitate the pursuit of the PAGA claim. Accordingly, it is fair and appropriate for Plaintiff Ellis to receive a General Release Payment in addition to her individual portion of the settlement as an aggrieved employee.

17. Undersigned counsel submits that the Settlement fulfills the purpose of the PAGA statute, is within the accepted range of recoveries for this type of litigation, and is fair, reasonable, and adequate given the substantial monetary benefits provided for by the Settlement, the strengths and weaknesses of the cases, and the inherent delay, costs, risks, and uncertainty associated with continued litigation.

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

Executed this 22nd day of July 2024, at Glendale, California.



Joanna Ghosh

EXHIBIT 1

LAWYERS FOR JUSTICE

February 19, 2021

BY ONLINE SUBMISSION

California Labor & Workforce Development Agency
PAGAfilings@dir.ca.gov

Re: B & V ENTERPRISES, INC. DBA SUPER KING MARKETS

Dear Representative:

We have been retained to represent Zakiya Sun Ellis against B & V Enterprises, Inc. dba Super King Markets (including any and all affiliates, subsidiaries, parents, directors, officers, and employees) (collectively referred to as "B & V") for violations of California wage-and-hour laws. Ms. Ellis seeks penalties for violations of the California Labor Code, which are recoverable under California Labor Code section 2698, et seq., the Labor Code Private Attorneys General Act of 2004 ("PAGA") and all other remedies available under PAGA.

Ms. Ellis seeks these remedies on behalf of the State of California and "aggrieved employees," as defined herein. This letter is sent in compliance with the reporting requirements of California Labor Code section 2699.3.

B & V employed Ms. Ellis as an hourly-paid, non-exempt employee from approximately November 2018 to approximately March 2020, in the State of California.

The "aggrieved employees" that Ms. Ellis may seek penalties on behalf of are all current and former hourly-paid or non-exempt employees who worked for any of the above-referenced entities within the State of California.

Based on the following facts and theories, B & V has violated and/or continues to violate, among other provisions of the California Labor Code and applicable wage law, California Labor Code sections 201, 202, 203, 204, 226(a), 226.7, 510, 512(a), 551, 552, 1174(d), 1194, 1197, 1197.1, 1198, 2800 and 2802, and IWC Wage Orders including *inter alia*, Wage Orders 4-2001, and 7-2001.

B & V required aggrieved employees to perform work before their scheduled shifts, after their scheduled shifts, during off-the-clock meal breaks, and/or during rest breaks and failed to compensate aggrieved employees for this time. Such work included, but was not limited to, waiting in line to clock-in and clock-out, making phone calls, and responding to work-related inquiries. B & V rounded the work time recorded by aggrieved employees in a manner that was not fair and neutral on its face and/or that favored B & V over time, resulting in aggrieved employees being underpaid for their time worked.

California Labor Code sections 510 and 1198 require employers to pay time-and-a-half or double time overtime wages, and make it unlawful to work employees for hours longer than eight hours in one day and/or over forty hours in one week without paying the premium overtime rates at one-and-one-half times or double the regular rate of pay, including additional remuneration. During the relevant time period, Ms. Ellis and other aggrieved employees worked in excess of 8 hours in a day and 40 hours in a week. Therefore, Ms. Ellis and other aggrieved employees were entitled to receive certain wages for overtime compensation, but they were not paid for all overtime hours worked.

California Labor Code sections 226.7 and 512 require employers to pay an employee one additional hour of pay at the employee's regular rate for each meal or rest period that is not provided. During the relevant time period, B & V required Ms. Ellis and other aggrieved employees to work during meal and rest periods and failed to compensate them properly for non-compliant meal and rest periods including, *inter alia*, short, late, interrupted, and missed meal and rest periods. B & V also required aggrieved employees to stay on work premises during rest periods.

California Labor Code sections 201 and 202 provide that if an employer discharges an employee, the wages earned and unpaid at the time of discharge are due and payable immediately, and if an employee quits his or her employment, his or her wages shall become due and payable not later than seventy-two (72) hours thereafter, unless the employee has given seventy-two (72) hours' notice of his or her intention to quit, in which case the employee is entitled to his or her wages at the time of quitting. During the relevant time period, B & V failed to pay Ms. Ellis and other aggrieved employees all wages due to them within any time period specified by California Labor Code sections 201 and 202, including earned and unpaid minimum, overtime, and premium wages as discussed above.

California Labor Code section 204 requires that all wages earned by any person in any employment between the 1st and the 15th days, inclusive, of any calendar month, other than those wages due upon termination of an employee, are due and payable between the 16th and the 26th day of the month during which the labor was performed, and that all wages earned by any person in any employment between the 16th and the last day, inclusive, of any calendar month, other than those wages due upon termination of an employee, are due and payable between the 1st and the 10th day of the following month. California Labor Code section 204 also requires that all wages earned for labor in excess of the normal work period shall be paid no later than the payday for the next regular payroll period. During the relevant time period, B & V failed to pay Ms. Ellis and other aggrieved employees all wages due to them within any time period specified by California Labor Code section 204, including earned and unpaid minimum, overtime, and premium wages as discussed above.

California Labor Code section 226 requires employers to make, keep and provide complete and accurate itemized wage statements to their employees. During the relevant time period, B & V did not provide Ms. Ellis and other aggrieved employees with complete and accurate itemized wage statements. The wage statements they received from B & V were in violation of California Labor Code section 226(a). The violations include, but are not limited to, the failure to include the total hours worked by Ms. Ellis and other aggrieved employees, including time spent working off-the-clock and during meal and rest periods as discussed above.

California Labor Code section 2810.5 requires an employer to provide written notice to an employee, at the time of hiring, containing the following information:

The rate or rates of pay and basis thereof, whether paid by the hour, shift, day, week, salary, piece, commission, or otherwise, including any rates for overtime, as applicable. Allowances, if any, claimed as part of the minimum wage, including meal or lodging allowances. The regular payday designated by the employer in accordance with the requirements of this code. The name of the employer, including any "doing business as" names used by the employer. The physical address of the employer's main office or principal place of business, and a mailing address, if different. The telephone number of the employer. The name, address, and telephone number of the employer's workers' compensation insurance carrier. That an employee: may accrue and use sick leave; has a right to request and use accrued paid sick leave; may not be terminated or retaliated against for using or requesting the use of accrued paid sick leave; and has the right to file a complaint against an employer who retaliates. Any other information the Labor Commissioner deems material and necessary.

B & V failed to provide aggrieved employees with the requisite notice in violation of California Labor Code section 2810.5.

California Labor Code sections 551 and 552 require that every person employed in any occupation of labor is entitled to one day's rest in a seven-day workweek, that no employer of labor shall cause his employees to work more than six days in a workweek, and that an employer shall pay a civil penalty in the amounts of fifty dollars (\$50) for each aggrieved employee per pay period for the initial violation and one hundred dollars (\$100) for each aggrieved employee per pay period for each subsequent violation. During the relevant time period, Ms. Ellis and the aggrieved employees were required to regularly and/or consistently work in excess of six (6) days in a workweek. During the relevant time period, Ms. Ellis and the aggrieved employees were required to work in excess of thirty (30) hours in a week and/or six (6) hours in any one (1) day thereof, during workweeks in which they were required to work in excess of six (6) days. During the relevant time period, Ms. Ellis and the aggrieved employees were required to work in excess of six (6) days in a workweek without accumulating or being provided the opportunity to take at least one (1) day of rest, and when Ms. Ellis and the aggrieved employees accumulated days of rest, they were not actually provided the opportunity to take the equivalent of one (1) day's rest in seven (7) during each calendar month.

California Labor Code sections 1174(d) requires an employer to keep, at a central location in the state or at the plants or establishments at which employees are employed, payroll records showing the hours worked daily by and the wages paid to, and the number of piece-rate units earned by and any applicable piece rate paid to, employees employed at the respective plants or establishments. These records shall be kept with rules established for this purpose by the commission, but in any case shall be kept on file for not less than two years. During the relevant time period, B & V failed to keep accurate and complete payroll records showing the actual hours worked daily and the

wages earned by Ms. Ellis and other aggrieved employees, including earned and unpaid minimum, overtime, and premium wages as discussed above.

California Labor Code sections 1194, 1197, and 1197.1 provide the minimum wage to be paid to employees, and the payment of a lesser wage than the minimum so fixed is unlawful. During the relevant time period, B & V did not provide Ms. Ellis and other aggrieved employees with the minimum wages to which they were entitled for work performed “off-the-clock.”

California Labor Code section 1198 provides that “The employment of any employee ... under conditions of labor prohibited by the [Industrial Wage Orders] is unlawful.” The applicable Industrial Wage Orders, including *inter alia*, Wage Orders 4-2001, and 7-2001, require that for each workday an employee is required to report for work and does report, but is not put to work or is furnished less than half said employee’s usual or scheduled day’s work, the employee shall be paid for half the usual or scheduled day’s work, but in no event for less than two (2) hours nor more than four (4) hours, at the employee’s regular rate of pay. Further, if an employee is required to report for work a second time in any one workday and is furnished less than two (2) hours of work on the second reporting, said employee shall be paid for two (2) hours at the employee’s regular rate of pay. During the relevant time period, B & V failed to pay Ms. Ellis and other aggrieved employees half the usual or scheduled day’s work in an amount no less than two (2) hours nor more than four (4) hours at the employee’s regular rate of pay for workdays in which Ms. Ellis and the other aggrieved employees reported to work and were furnished less than half the usual or scheduled day’s work. During the relevant time period, B & V failed to pay Ms. Ellis and other aggrieved employees for two (2) hours at the employee’s regular rate of pay on days in which Ms. Ellis and the other aggrieved employees were required to report for work a second time in one workday and were furnished less than two (2) hours of work upon the second reporting.

California Labor Code sections 2800 and 2802 require an employer to reimburse its employee for all necessary expenditures incurred by the employee in direct consequence of the discharge of his or her job duties or in direct consequence of his or her obedience to the directions of the employer. During the relevant time period, Ms. Ellis and other aggrieved employees incurred necessary business-related expenses and costs that were not fully reimbursed by B & V. These costs include, but are not limited to, the use of personal phones for business-related tasks.

Therefore, on behalf of all aggrieved employees, Ms. Ellis seeks all applicable penalties arising out of the above-referenced wage, hour, and payroll practices, or which could be assessed and collected by the Labor and Workforce Development Agency, for violation of the California Labor Code pursuant to PAGA.

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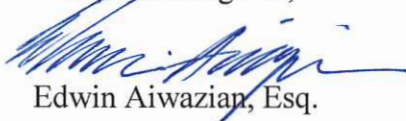
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If you have any questions or require additional information, please do not hesitate to contact us.
Thank you for your attention to this matter and the noble cause you advance each and every day.

With kind regards,

A handwritten signature in blue ink, appearing to read 'Edwin Aiwazian', is written over the typed name.

Edwin Aiwazian, Esq.

Cc: (By U.S. Certified Mail / Return Receipt Requested)

B & V Enterprises, Inc. dba Super King Markets
c/o Chris K. Safarian
Agent for Service of Process
555 S. Flower Street, Suite 650
Los Angeles, CA 90071

EXHIBIT 2

ZAKIYA SUNELLIS V. B&V ENTERPRISES, INC. DBA SUPER KING MARKETS
**Superior Court for the County of Los Angeles Case No. 21GDCV00587 (“PAGA Action”) and California Court of Appeal for
the Second District of California Case No. B320706 (“Appellate Action”)**

ATTORNEY TASK AND TIME CHART

TASK	LAWYERS FOR JUSTICE, PC
Investigation and Research / Due Diligence	
Pre-Notice Investigation of the Merits of Plaintiff Zakiya Sun Ellis’ (“Plaintiff”) Private Attorneys General Act (“PAGA”) Claim on Behalf of the State of California with Respect Plaintiff and the Aggrieved Employees	6.10
Pre-Notice Investigation of Potential Civil Penalties Exposure of Defendant B&V Enterprises, Inc. DBA Super King (“Defendant”) with Respect to Plaintiff and the Aggrieved Employees	5.90
Legal Research and Analysis of Latest Decisions Regarding Off-the-Clock, Meal and Rest Break, Suitable Seating, IWC Wage Orders, and PAGA in California, Including All New and Relevant DLSE Materials	7.20
Investigation of Defendant, Their Business Relationships, and the Industry in Which They Operate	2.80
Investigation of Defendant’s Organizational, Corporate, and Executive Reporting Structures, as They Relate to the Employment and Management of the Aggrieved Employees	3.40
Investigation of Defendant’s Executives, Officers, and Leadership with a Focus on Involvement in Wage-and-Hour Issues, and Defendant’s Litigation History Involving Wage-and-Hour Issues and Other Related Employment Issues, to Evaluate Willfulness and Uniformity	3.10
Analysis of Competitors Within Various Relevant Geographic Areas Within Which Defendant Operates, and Comparing and Contrasting Defendant’s Policies, Practices, and Procedures with the Policies, Practices, and Procedures of Defendant’s Competitors	4.10

Research and Investigation Re: Arbitration Agreements and Analysis of Enforceability	8.50
Research and Investigation Re: Location(s), Division(s), and/or Department(s) Owned, Managed, Serviced, and/or Operated by Defendant in California During the Relevant Time Period, Including Differences Between Them to Determine Whether Those Differences Will Cause Individual Issues to Predominate Over Common Issues	3.70
Comparative Analysis and Cross-Checking of All Available Job Postings, Job Reviews, Customer/Consumer Reviews, and Other Content Regarding Defendant in Order to Determine Any Variation and Identify Job Duties and Responsibilities That Would Be Susceptible to Being Performed Off-the-Clock and/or During Meal or Rest Breaks	2.60
Research and Investigation Re: Workforce and Staffing Levels at Location(s) at Which Aggrieved Employees Worked Throughout California	3.90
Research and Investigation Re: Defendant's Written and Non-Written Policies, Practices, and Procedures Relating to Customer Service, Reporting Time, Timekeeping, Meal/Rest Breaks, On-Premises Breaks, Meal/Rest Premiums, Meal Waivers, Non-Discretionary Bonus/Incentive/Shift Differential Pay, Seating, Uniforms/Dress Code, Footwear, Use of Personal Cell Phones, and Reimbursement of Business-Related Expenses	14.50
Research and Investigation Re: Various Software Programs, Systems, and Other Technology Defendant Uses to Conduct Everyday Business, Including Timekeeping, Point of Sale/Cashier, Inventory, Information and Document Sharing, Communications, Security, and Surveillance Systems with a Focus on What Records (Both Paper and Electronic) Are Created in the Normal Course of Business Relating to Overtime Worked, Off-the-Clock Time Worked Pre/Post-Shift, and Time Worked During Meal and Rest Breaks	2.50
Research and Analysis of Potential Defenses Defendant May Raise, Including <i>De Minimis</i> Work, Non-Compensable Off-the-Clock Work, Waiver, and Compliant Policies	8.10
Research and Investigation Regarding Impact of COVID-19 Pandemic on Defendant, Its Operations, and Aggrieved Employees' Work	4.50
Meet and Communicate with Plaintiff Zakiya Sun Ellis During the Case	11.50

Investigate, Meet, and/or Communicate with Aggrieved Employees and/or Percipient Witnesses	8.50
Pleadings and Court Filings	
Research and Draft Plaintiff's Complaint for Enforcement Under the Private Attorneys General Act, California Labor Code Section 2698, Et Seq. and Legal Research and Analysis of All Allegations Involved (filed on April 27, 2021) (PAGA Action)	7.10
Review Court's Notice of Case Assignment (filed on April 27, 2021) (PAGA Action)	0.10
Review Court's Notice of Case Management Conference and Notice of Order to Show Cause Hearing (filed on April 28, 2021) (PAGA Action)	0.10
Review Defendant's Notice of Related Case (served on May 18, 2021) (PAGA Action)	0.20
Review Court's Notice of Case Reassignment and Order for Plaintiff to Give Notice (filed on June 7, 2021) (PAGA Action)	0.10
Draft Plaintiff's Notice of Related Case (filed on July 16, 2021) (PAGA Action)	0.10
Draft Plaintiff's Declaration of Harry Erganyan in Response to Order to Show Cause for Failure to File Proof of Service (filed on August 11, 2021) (PAGA Action)	0.20
Review Court's Minute Order Re: Order to Show Cause Re: Failure to File Proof of Service (filed on August 16, 2021) (PAGA Action)	0.10
Review Court's Minute Order Re: Non-Appearance Case Review (filed on September 30, 2021) (PAGA Action)	0.10
Draft Plaintiff's Case Management Statement (filed on October 18, 2021) (PAGA Action)	0.80
Review Defendant's Case Management Conference Statement (filed on October 20, 2021) (PAGA Action)	0.10
Review and Analyze Defendant's Answer to Plaintiff's Complaint for Enforcement Under the Private Attorneys General Act, California Labor Code Section 2698, Et Seq. and Research Affirmative Defenses in Defendant's Answer (served on February 15, 2022) (PAGA Action)	1.10

Draft Plaintiff's Notice of Posting of Jury Fees (filed on March 1, 2022) (PAGA Action)	0.10
Review and Analyze Defendant's Notice of Appeal (served on April 27, 2022) (PAGA Action)	0.10
Review Court's Notice of Filing of Notice of Appeal (filed on May 6, 2022) (PAGA Action)	0.10
Review and Analyze Appellant's Notice Designating Record of Appeal (served on May 9, 2022) (Appellate Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation to Consolidate (submitted on May 23, 2022) (PAGA Action)	0.80
Review and Analyze Defendant's Notices of Related Case (submitted on June 9, 2022) (PAGA Action)	0.10
Review and Analyze Appellant's Civil Case Information Statement (served on June 17, 2022) (Appellate Action)	0.10
Review Court's Notice to Court Reporter to Prepare Transcript on Appeal (filed on June 27, 2022) (Appellate Action)	0.10
Review Court's Minute Order Re: Final Status Conference (filed on July 21, 2022) (PAGA Action)	0.10
Review Court's Notice of Fees Due for Clerk's Transcript on Appeal (filed on July 22, 2022) (Appellate Action)	0.10
Review Court's Notice of Case Reassignment and Order for Plaintiff to Give Notice (filed on September 22, 2022) (PAGA Action)	0.10
Review Appellant's Application for Extension of Time (served on November 28, 2022) (Appellate Action)	0.10
Review Court's Order Granting Appellant's Application for Extension of Time (served on November 29, 2022) (Appellate Action)	0.10
Review Court's Minute Order Re: Non-Appearance Case Review (filed on January 6, 2023) (PAGA Action)	0.10
Review Appellant's Application for Extension of Time (served on January 24, 2023) (Appellate Action)	0.10

Review Court's Order Granting Appellant's Application for Extension of Time (served on January 25, 2023) (Appellate Action)	0.10
Review Court's Minute Order Re: Order to Show Cause Re: Status (filed on March 9, 2023) (PAGA Action)	0.10
Review and Analyze Appellant's Motion to Augment Record on Appeal; Declaration of Danielle S. Zobel, and Appellant's Opening Brief (served on May 8, 2023) (Appellate Action)	4.50
Review Court's Order Re: Augmentation (filed on May 26, 2023) (Appellate Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Report in Advance of June 28, 2023 Order to Show Cause Re: Status of Appeal (submitted on June 21, 2023) (PAGA Action)	0.90
Review Court's Minute Order Re: Order to Show Cause Re: Status and Draft Plaintiff's Notice of Ruling From June 28, 2023 Order to Show Cause Regarding Status of Appeal (filed on June 28, 2023) (PAGA Action)	0.10
Review Court's Notice of Fees Due for Clerk's Transcript on Appeal (filed on July 26, 2023) (Appellate Action)	0.10
Research and Draft Respondent's Brief (filed on August 7, 2023) (Appellate Action)	24.50
Meet and Confer with Appellant's Counsel, and Draft Stipulation for Extension of Time to File Brief (submitted on August 10, 2023) (Appellate Action)	0.80
Review Court's Order Re: Augmented Record Filed and Clerk's Transcript (Augmented Record) (filed on August 11, 2023) (Appellate Action)	0.70
Review and Analyze Appellant's Application for Extension of Time (served on September 25, 2023) (Appellate Action)	0.10
Draft Respondent's Opposition to Appellant's Application for Extension of Time to File Reply Brief (filed on September 25, 2023) (Appellate Action)	0.50
Review Court's Order Granting Appellant's Application for Extension of Time (served on September 25, 2022) (Appellate Action)	0.10

Draft Plaintiff's <i>Ex Parte</i> Application for an Order Lifting Stay, Declaration of Charles T. Sweeny in Support Thereof, and [Proposed] Order Thereon (filed on October 19, 2023) (Appeal Action)	7.50
Review and Analyze Defendant's Opposition to Plaintiff's <i>Ex Parte</i> Application for an Order Lifting Stay and Declaration of Hannah Sweiss In Support Thereof (served on October 19, 2023) (PAGA Action)	0.40
Review Court's Minute Order Re: Plaintiff's <i>Ex Parte</i> Application (filed on October 20, 2023) (PAGA Action)	0.10
Review Defendant's Notice of Entry of Order Re: Minute Order Re: <i>Ex Parte</i> Application (served on October 24, 2023) (PAGA Action)	0.10
Review and Analyze Appellant's Reply Brief (served on October 26, 2023) (Appellate Action)	2.50
Draft Plaintiff's Statement in Response to Order to Show Cause Regarding Status of Appeal (filed on November 20, 2023) (PAGA Action)	0.90
Review Defendant's Statement in Response to Order to Show Cause Regarding Status of Appeal (served on November 20, 2023) (PAGA Action)	0.10
Review Court's Minute Order Re: Non-Appearance Case Review (filed on November 28, 2023) (PAGA Action)	0.10
Review and Analyze Defendant's <i>Ex Parte</i> Application to Continue the Hearing on Plaintiff's Motion to Compel Further Discovery Responses, Memorandum or Points and Authorities in Support Thereof, Declaration of Hannah Sweiss in Support Thereof, and [Proposed] Order Thereon (filed on January 4, 2024) (PAGA Action)	1.10
Draft Plaintiff's Opposition to Defendant's <i>Ex Parte</i> Application to Continue Hearing on Plaintiff's Consolidated Motion to Compel Responses to Discovery and Declaration of Charles T. Sweeny in Support Thereof (filed on January 4, 2024) (PAGA Action)	5.80
Review Court's Minute Order Re: Hearing on <i>Ex Parte</i> Application to Continue Hearing on Plaintiff's Motion to Compel Further Discovery Responses (filed on January 5, 2024) (PAGA Action)	0.10
Draft Plaintiff's Notice of Settlement of Entire Case (filed on January 29, 2024) (PAGA Action)	0.10

Review Court's Notice of Order to Show Cause Hearing Re: Dismissal (Settlement) (filed on January 30, 2024) (PAGA Action)	0.10
Draft Plaintiff's Notice of Ruling on Defendant's Motion for Stay of Proceedings (filed on February 1, 2024)	0.20
Review and Analyze Appellant's Notice of Settlement of Appeal (served on February 8, 2024) (Appellate Action)	0.10
Review Court of Appeal's Calendar Notice (filed February 26, 2024) (Appellate Action)	0.20
Draft Respondent's Response to Calendar Notice (filed on March 7, 2024) (Appellate Action)	0.20
Review Defendant's Request for Dismissal of Appeal (served on March 12, 2024) (Appellate Action)	0.20
Review Court's Remittitur – Appeal Dismissed (filed on March 14, 2024) (Appellate Action)	0.20
Review Court's Notice of Case Reassignment and Order for Plaintiff to Give Notice (Dates Remain) (filed on March 27, 2024) (PAGA Action)	0.10
Draft Plaintiff's Notice Re: Case Re-Assignment and Order for Plaintiff to Give Notice (Dates Remain) (filed on April 24, 2024) (PAGA Action)	0.10
Draft Plaintiff's Response to Order to Show Cause Regarding Dismissal (filed on April 25, 2024) (PAGA Action)	0.20
Review Court's Minute Order Re: Court Order (filed on April 30, 2024) (PAGA Action)	0.10
Appearances	
Prepare for and Telephonically Attend Hearing: Order to Show Cause Re: Failure to File Proof of Service (August 16, 2021) (PAGA Action)	0.50
Prepare for and Telephonically Attend Case Management Conference (November 2, 2021) (PAGA Action)	0.90
Prepare for and Telephonically Attend Hearing on Defendant's Motion to Stay Proceedings Brought Under the California Private Attorneys' General Act (April 1, 2022) (PAGA Action)	1.70

Prepare for and Telephonically Attend Hearing on Defendant's Motion to Compel Individual Claims to Arbitration and to Dismiss or Stay Proceedings Brought Under the California Private Attorneys General Act (April 8, 2022) (PAGA Action)	2.50
Prepare for and Telephonically Attend Hearing on Defendant's Motion to Consolidate Cases (May 26, 2022) (PAGA Action)	0.90
Prepare for and Telephonically Attend Hearing: Order to Show Cause Re: Appeal (August 16, 2022) (PAGA Action)	0.80
Prepare for and Telephonically Attend Hearing: Order to Show Cause: Status (March 9, 2023) (PAGA Action)	1.10
Prepare for and Telephonically Attend Hearing on Order to Show Cause Re: Status of Appeal (June 28, 2023) (PAGA Action)	0.90
Prepare for and Telephonically Attend <i>Ex Parte</i> Hearing for an Order Lifting Stay (October 20, 2023) (PAGA Action)	3.90
Prepare for and Telephonically Attend Hearing on Plaintiff's Motion to Lift Stay and Order to Show Cause Re: Status (December 11, 2023) (PAGA Action)	2.10
Prepare for, Travel to/From, and Attend Hearing on Defendant's <i>Ex Parte</i> Application to Continue Plaintiff's Motion to Compel Discovery (January 5, 2024) (PAGA Action)	8.80
Prepare for and Telephonically Attend Hearing on Defendant's Motion to Stay Proceedings (January 23, 2024) (PAGA Action)	5.30
Discovery and Deposition	
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Zakiya Sun Ellis (served on December 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 Zakiya Sun Ellis (served on February 3, 2021)	2.10

Draft Plaintiff's Form Interrogatories - General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), Special Interrogatories (Set Three), and Requests for Production of Documents (Set One) to Defendant (served on February 28, 2022) (PAGA Action)	5.10
Review and Analyze Defendant's Responses to Plaintiff's Form Interrogatories - General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), Special Interrogatories (Set Three), and Requests for Production of Documents (Set One) to Defendant (served on April 4, 2022) (PAGA Action)	4.80
Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (May 9, 2022; Organizational Structure and Document Retention) (served on April 27, 2022) (PAGA Action)	2.10
Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (May 10, 2022; Wage and Hour Practices) (served on April 27, 2022) (PAGA Action)	2.40
Review and Analyze Defendants Objections to Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (May 9, 2022; Organizational Structure and Document Retention) (served on May 2, 2022) (PAGA Action)	0.80
Review and Analyze Defendant's Objections to Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (May 10, 2022; Wage and Hour Practices) (served on May 2, 2022) (PAGA Action)	0.50
Review Defendant's Notice of Deposition of Plaintiff (February 9, 2024) (served December 13, 2023) (PAGA Action)	0.10
Draft Plaintiff's Form Interrogatories - General (Set Two), Requests for Admission (Set One), and Requests for Production of Documents (Set Two) (served on December 15, 2023) (PAGA Action)	3.10
Review and Analyze Defendant's Responses to Plaintiff's Form Interrogatories - General (Set Two), Requests for Admission (Set One), and Requests for Production of Documents (Set Two) (served on January 17, 2024) (PAGA Action)	2.10

Letters and Correspondence	
Draft Notice to California Labor and Workforce Development Agency Re: Claims of Plaintiff Zakiya Sun Ellis for Penalties Under California Labor Code section 2698, et seq. (served on February 19, 2021)	4.50
Meet with, Draft Correspondence to, and Respond to Correspondence from, Defendant's Counsel	12.50
Meet with, Draft Correspondence to, and Respond to Correspondence from, Other Plaintiffs' Counsel	7.50
Mediation/Settlement	
Review and Analyze Information, Data, and Documents Obtained from Plaintiffs, Defendant, and Other Sources Prior to Mediation	26.50
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 Claim Evaluation and Analysis Calculations (submitted on February 15, 2022)	34.50
Telephonically Attend Mediation Session (February 16, 2022; Zoom Video Conference)	10.50
Draft, Review, Revise, Negotiate, and Finalize PAGA Settlement Agreement (executed on June 12, 2024) and Draft Exhibits	3.50
Law and Motion	
Review and Analyze Defendant's Notice of Motion and Motion for Stay Proceedings Brought Under the California Private Attorneys' General Act, Memorandum of Point and Authorities in Support Thereof, Declaration of Hannah Sweiss in Support Thereof, Declaration of Samuel Borrow in Support Thereof, and [Proposed] Order Thereon (served on March 4, 2022) (PAGA Action)	1.90
Research and Analyze Defendant's Notice of Motion and Motion to Compel Individual Claims to Arbitration and to Dismiss or Stay Proceedings Brought Under the California Private Attorneys' General Act, Memorandum of Points and Authorities in Support Thereof, Declaration of Hannah Sweiss in Support Thereof, Declaration of Samuel Borrow in Support Thereof, and [Proposed] Order Thereon (served on March 11, 2022) (PAGA Action)	2.10

Draft Plaintiff's Opposition to Defendant's Motion to Stay Proceedings Brought Under the California Private Attorneys' General Act and Declaration of Charles T. Sweeny in Support Thereof (filed on March 18, 2022) (PAGA Action)	12.50
Review and Analyze Defendant's Reply to Plaintiff's Opposition to Defendant's Motion to Stay Action Brought Under the California Private Attorneys' General Act and Request for Judicial Notice in Support Thereof (served on March 24, 2022) (PAGA Action)	1.50
Draft Plaintiff's Opposition to Defendant's Motion to Compel Individual Claims to Arbitration and to Dismiss or Stay Proceedings Brought Under the California Private Attorneys' General Act, Declaration of Charles T. Sweeny in Support Thereof, Declaration of Zakiya Sun Ellis, and Plaintiff's Objections to Defendant's Purported Evidence in Support of Motion to Compel (filed on March 25, 2022) (PAGA Action)	16.50
Review Court's Tentative Ruling Re: Motion to Stay Action Brought Under the California Private Attorneys' General Act (filed on March 30, 2022) (PAGA Action)	0.10
Review and Analyze Defendant's Reply to Plaintiff's Opposition to Defendant's Motion to Compel Individual Claims to Arbitration and to Dismiss or Stay Proceedings Brought Under the California Private Attorneys' General Act (served on April 1, 2022) (PAGA Action)	1.30
Review Court's Minute Order Re: Hearing on Motion for Stay of Proceedings (filed on April 1, 2022) (PAGA Action)	0.10
Review Court's Tentative Ruling on Defendant's Motion to Compel Individual Claims to Arbitration and to Dismiss or Stay Proceedings Brought Under the California Private Attorneys' General Act (filed on April 7, 2022) (PAGA Action)	0.20
Review Court's Minute Order Re: Hearing on Defendant's Motion to Compel Individual Claims to Arbitration and to Dismiss or Stay Proceedings Brought Under the California Private Attorneys' General Act (filed on April 8, 2022) (PAGA Action)	0.20
Review and Analyze Defendant's Notice of Motion and Motion to Consolidate Cases, Memorandum of Points and Authorities in Support Thereof, Declaration of Hannah Sweiss in Support Thereof, and [Proposed] Order Thereon (served on May 2, 2022) (PAGA Action)	2.30

Draft Plaintiff's Motion to Lift Stay, Declaration of Charles T. Sweeny in Support Thereof, and [Proposed] Order Thereon (filed on November 13, 2023) (PAGA Action)	6.50
Review and Analyze Defendant's Opposition to Plaintiff's Motion to Lift Stay and Request for Sanctions Against Plaintiff and Her Counsel in the Amount of \$4,270.00 and Declaration of Hannah Sweiss in Support Thereof (served on November 13, 2023) (PAGA Action)	1.20
Draft Plaintiff's Amended Notice of Motion to Lift Stay (filed on November 15, 2023) (PAGA Action)	0.10
Review and Analyze Defendant's Opposition to Plaintiff's Amended Motion to Lift Stay and Request for Sanctions Against Plaintiff and Her Counsel in the Amount of \$6,035.00 and Hannah Sweiss in Support Thereof (served on November 28, 2023) (PAGA Action)	0.80
Draft Plaintiff's Reply in Support of Plaintiff's Motion to Lift Stay (filed on December 4, 2023) (PAGA Action)	4.50
Review Court's Order Granting in Part Motion to Lift Stay and Court's Minute Order Re: Hearing on Motion – Other Motion to Lift Stay; Order Show Cause Re: Status (filed on December 11, 2023) (PAGA Action)	0.50
Draft Plaintiff's Notice of Ruling on Plaintiff's Motion to Lift Stay and Order to Show Cause Regarding Status of Appeal (filed on December 13, 2023) (PAGA Action)	0.10
Review and Analyze Defendant's Motion for Stay, Memorandum of Points and Authorities in Support Thereof, Declaration of Hannah Sweiss in Support Thereof, and [Proposed] Order Thereon (served on December 26, 2023) (PAGA Action)	1.30

Draft Plaintiff's Zakiya Sun Ellis's Notice of Consolidated Motion and Consolidated Motion to Compel Defendant to Provide Further Responses to Plaintiff's Discovery Requests (Special Interrogatories (Set One), Special interrogatories (Set Two), Special Interrogatories (Set Three), Form Interrogatories (Set One), and Request for Production of Documents (Set One)), and Request for Monetary Sanctions, Declaration of Charles T. Sweeny In Support Thereof, Rule 3.1345 Separate Statement Regarding Plaintiff's Special Interrogatories (Set One), Rule 3.1345 Separate Statement Regarding Plaintiff's Special Interrogatories (Set Two), Rule 3.1345 Separate Statement Regarding Plaintiff's Special Interrogatories (Set Three), Rule 3.1345 Separate Statement Regarding Plaintiff's Requests For Production (Set One), Rule 3.1345 Separate Statement Regarding Plaintiff's Form Interrogatories (Set One), and [Proposed] Order Thereon (filed on December 28, 2023) (PAGA Action)	22.50
Review Court's Minute Order Re: <i>Ex Parte</i> Application to Continue Hearing on Plaintiff's Motion to Compel Further Discovery Responses (filed on January 5, 2024) (PAGA Action)	0.10
Draft Plaintiff's Opposition to Defendant Motion to Stay and Declaration of Charles T. Sweeny (filed on January 9, 2024) (PAGA Action)	12.50
Review and Analyze Defendant's Reply to Plaintiff's Opposition to Motion to Stay (served on January 16, 2024) (PAGA Action)	0.90
Draft Plaintiff's Declaration of Charles T. Sweeny in Further Opposition to Defendant's Motion to Stay (filed on January 19, 2024) (PAGA Action)	0.50
Review Court's Minute Order Re: Hearing on Motion for Stay of Proceedings (filed on January 23, 2024) (PAGA Action)	0.10
Plaintiff's Notice of Ruling on Defendant's Motion for Stay of Proceedings (filed on February 1, 2024) (PAGA Action)	0.20
Review Motion for Court Approval of the Parties' PAGA Settlement; Memorandum of Points and Authorities in Support Thereof, Declaration of Raul Perez in Support Thereof, Declaration of Eve Howe in Support Thereof, and [Proposed] Order and Judgment Thereon, and Draft Declaration of Joanna Ghosh in Support of Motion for Court Approval of the Parties' PAGA Settlement (filed on July 22, 2024)	2.80
Total Hours:	413.50

EXHIBIT 3

LAWYERS *for* JUSTICE PC CASE COST DETAIL
Ellis v. B&V Enterprises, Inc. dba Super King Markets

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
2/19/2021	Labor & Workforce Development Agency	PAGA Filing Fee	\$75.00
2/19/2021	U.S. Postmaster	Postage	\$7.16
4/28/2021	Legal Document Server, Inc.	Attorney Service	\$30.43
4/28/2021	Los Angeles Superior Court	Complaint Filing Fee	\$435.00
5/7/2021	Legal Document Server, Inc.	Attorney Service	\$110.00
5/13/2021	Legal Document Server, Inc.	Attorney Service	\$15.20
7/16/2021	Legal Document Server, Inc.	Attorney Service	\$15.20
8/11/2021	Legal Document Server, Inc.	Attorney Service	\$15.20
8/11/2021	Legal Document Server, Inc.	Attorney Service	\$15.20
8/11/2021	Los Angeles Superior Court	Attorney Service	\$2.00
10/18/2021	One Legal	Attorney Service	\$16.68
1/31/2022	Todd Smith Esq.	Mediation Fee	\$7,000.00
3/1/2022	Legal Document Server, Inc.	Attorney Service	\$22.33
3/1/2022	Los Angeles Superior Court	Jury Fee	\$150.00
3/18/2022	Legal Document Server, Inc.	Attorney Service	\$239.45
3/28/2022	Legal Document Server, Inc.	Attorney Service	\$249.20
4/8/2022	Kusar Legal Services, Inc.	Court Reporter	\$111.15
8/9/2022	Los Angeles Superior Court	Document Download Fee	\$2.00
8/9/2022	ProLegal	Attorney Service	\$249.18
9/27/2022	Legal Document Server, Inc.	Attorney Service	\$15.95
10/11/2022	Los Angeles Superior Court	Document Download Fee	\$4.00
12/13/2022	Los Angeles Superior Court	Document Download Fee	\$25.60
1/5/2023	Anush Minasyan	Travel Reimbursement	\$12.46
1/26/2023	Los Angeles Superior Court	Document Download Fee	\$4.00
6/29/2023	Legal Document Server, Inc.	Attorney Service	\$16.15
8/1/2023	ProLegal	Attorney Service	\$113.91
8/7/2023	CA 2nd District Court of Appeal	Responsive Fee	\$412.20
8/8/2023	General Logistics Systems, Inc.	Courier Service	\$23.96
9/26/2023	General Logistics Systems, Inc.	Courier Service	\$16.00
9/26/2023	Los Angeles Superior Court	Document Download Fee	\$60.60
10/19/2023	Legal Document Server, Inc.	Attorney Service	\$40.64
10/19/2023	Los Angeles Superior Court	Ex Parte Order Fee	\$120.00
10/25/2023	Los Angeles Superior Court	Motion Fee	\$61.65
11/13/2023	Legal Document Server, Inc.	Attorney Service	\$32.27
11/13/2023	Los Angeles Superior Court	Motion Fee	\$60.00
11/14/2023	Los Angeles Superior Court	Motion Reschedule Fee	\$20.55
11/15/2023	Legal Document Server, Inc.	Attorney Service	\$16.15

LAWYERS *for* JUSTICE PC CASE COST DETAIL
Ellis v. B&V Enterprises, Inc. dba Super King Markets

11/21/2023	Legal Document Server, Inc.	Attorney Service	\$16.15
12/4/2023	Legal Document Server, Inc.	Attorney Service	\$32.30
12/20/2023	Los Angeles Superior Court	Motion Fee	\$61.65
12/21/2023	Los Angeles Superior Court	Document Download Fee	\$11.60
12/22/2023	Los Angeles Superior Court	Motion Reschedule Fee	\$20.55
12/28/2023	ProLegal	Attorney Service	\$911.10
12/29/2023	Legal Document Server, Inc.	Attorney Service	\$16.15
1/3/2024	Legal Document Server, Inc.	Attorney Service	\$16.15
1/5/2024	Charlie Sweeny	Travel Reimbursement	\$20.10
1/5/2024	Legal Document Server, Inc.	Attorney Service	\$16.15
1/9/2024	Los Angeles Superior Court	Document Download Fee	\$3.00
1/10/2024	Legal Document Server, Inc.	Attorney Service	\$16.15
1/19/2024	Legal Document Server, Inc.	Attorney Service	\$32.30
2/1/2024	Legal Document Server, Inc.	Attorney Service	\$16.15
2/1/2024	Los Angeles Superior Court	Document Download Fee	\$2.00
3/7/2024	General Logistics Systems, Inc.	Courier Service	\$16.27
4/25/2024	Legal Document Server, Inc.	Attorney Service	\$16.15
4/26/2024	Legal Document Server, Inc.	Attorney Service	\$16.15
6/20/2024	Los Angeles Superior Court	Document Download Fee	\$8.00
Total:			\$11,064.54

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action. My business address is 410 West Arden Avenue, Suite 203, Glendale, California 91203.

On July 22, 2024, I served the foregoing document(s) described as: **DECLARATION OF JOANNA GHOSH IN SUPPORT OF MOTION FOR COURT APPROVAL OF PARTIES' PAGA SETTLEMENT** on interested parties in this action as follows:

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Attorneys for Plaintiff Carla Aguilar

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[X] BY ELECTRONIC SERVICE

Pursuant to California Code of Civil Procedure sections 1010.6(b)(1) through 1010.6(b)(4), California Rules of Court, rule 251(c)(3), and/or an agreement between the parties to serve all eligible documents electronically, I caused the above-described documents to be electronically mailed to Defendant’s counsel through the above-listed e-mail addresses.

[X] STATE

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

Executed on July 22, 2024, at Glendale, California.



Deven Launbaugh