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Attorneys for Plaintiffs Brandon Gay and Israel Berber and the Class

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN BERNARDINO

DANIELA GARIBAY, individually, and on
behalf of other members of the general public
similarly situated,

Plaintiff,

vs.

PACIFIC STEEL GROUP, a California
corporation; and DOES 1 through 10,
inclusive,

Defendants.

Case No.: CIVDS2011129

Honorable Christian Towns
Department S26

CLASS ACTION

**DECLARATION OF ARMAN
MARUKYAN IN SUPPORT OF
PLAINTIFFS' MOTION FOR FINAL
APPROVAL OF CLASS ACTION
SETTLEMENT, FEES AND COSTS
AWARD, AND ENHANCEMENT
PAYMENTS**

Date: April 22, 2025
Time: 8:30 a.m.
Department: S26

DECLARATION OF ARMAN MARUKYAN

I, Arman Marukyan, 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 Plaintiffs Brandon Gay and Israel Berber (“Plaintiffs Gay and Berber”) 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.

PRELIMINARY APPROVAL OF SETTLEMENT

2. On November 18, 2024, in Department S26 of the above-entitled Court, the Honorable Christian Towns preliminarily approved the Joint Stipulation of Class Action and PAGA Settlement and Release (“Settlement,” “Agreement,” or “Settlement Agreement”) entered into between Plaintiffs Daniela Garibay, Darren Morris, Brandon Gay, and Israel Berber (together, “Plaintiffs”) and Defendant Pacific Steel Group (“Defendant”) (together with Plaintiffs, the “Parties”), and conditionally certified the Class for settlement purposes. The Court preliminarily appointed Plaintiffs as the representatives of the Class (“Class Representatives”). The Court also preliminarily appointed and designated Lawyers *for* Justice, PC (“LFJ”), Capstone Law APC (“Capstone”), Diversity Law Group, P.C. (“DLG”), Polaris Law Group (“PLG”), Hyun Legal, APC (“Hyun Legal”), and Law Offices of Choi & Associates (“Choi & Associates”) (collectively, “Class Counsel”). The Court approved and ordered the mailing of the Notice of Class Action Settlement (“Notice”), adopted the notice, opt-out, and objection procedures, and ordered their implementation. The Court appointed ILYM Group, Inc. (“ILYM” or “Settlement Administrator”) to serve as the third-party settlement administrator and handle the notice and settlement administration process.

WORK PERFORMED BY CLASS COUNSEL

3. Several attorneys at Lawyers *for* Justice, PC have been actively engaged in performing work in these matters. Since joining forces with Capstone, DLG, PLG, Hyun Legal, and Choi & Associates we have worked cooperatively with them to strategize and prosecute the

cases, and our work with them has been a coordinated and combined effort. Ultimately, Class Counsel's efforts and the efforts of Plaintiffs have been successful in reaching the Settlement.

4. Before initiating the lawsuits on behalf of Plaintiffs Gay and Berber, Lawyers for Justice, PC investigated and researched the facts and circumstances underlying the pertinent factual and legal issues and applicable law. This required thorough discussions and interviews between attorneys at Lawyers for Justice, PC and Plaintiffs Gay and Berber and research into the various legal issues involved in the cases, namely, the current state of the law as it applied to class certification, off-the-clock theory, meal and rest periods, wage-and-hour enforcement, representative PAGA claims, and manageability, Plaintiffs Gay's and Berber's claims and allegations, and potential defenses. After conducting an initial investigation, Lawyers for Justice, PC determined that the claims of Plaintiffs Gay and Berber were well-suited for class-wide adjudication, owing to what appeared to be a common course of conduct affecting a similarly situated group of current and former hourly-paid or non-exempt employees of Defendant in California, who were not properly compensated for, *inter alia*, all hours worked, non-compliant meal and rest periods, and business expenses.

5. Collectively, Class Counsel investigated the veracity, strength, and scope of the claims, and was preparing the cases for class certification and trial prior to reaching the Settlement. This matter involved extensive and ongoing investigations, research into legal and factual issues, formal and informal discovery, and court proceedings. Class Counsel reviewed and analyzed a volume of information, documents, and data obtained from Plaintiffs, Defendant, and other sources, researched applicable law, and undertook analyses and calculations of the value of claims, damages, and penalties exposure. Class Counsel propounded multiple sets of written discovery requests on Defendant, and the Parties eventually agreed to engage in, and did engage in, formal and informal discovery. Class Counsel also met and conferred with Defendant's counsel on numerous occasions, e.g., to discuss issues relating to the pleadings, discovery and the production of information, documents, and data in the course of litigation and in connection with mediation and settlement negotiations, and mediation and settlement negotiations. Other work that Class Counsel has performed includes, and is not limited to, case

strategy and analysis; drafting, reviewing, and revising the pleadings and motion-related papers; claims assessment and evaluation; and preparing for and attending mediation and settlement negotiations.

6. As outlined herein, the Parties have conducted significant investigation and formal and informal discovery. The Parties exchanged, reviewed, and analyzed a volume of information, documents, and data obtained from Plaintiffs, Defendant, and other sources during the course of litigating the cases and in connection with mediation and settlement negotiations, which provided a critical understanding of the nature of the work performed by the Class Members and PAGA Members, as well as Defendant's operations and employment policies, practices, and procedures. The information, documents, and data were used in analyzing liability, damages, penalties, and valuation issues in connection with all phases of the litigation, and ultimately, in connection with the mediation and settlement negotiation process. Class Counsel also performed significant research into the applicable law, which is evolving as it relates to class certification, manageability, off-the-clock theory, meal and rest periods, representative PAGA claims and penalties, wage-and-hour law and enforcement, Plaintiffs' claims and allegations, and Defendant's defenses thereto, as well as facts discovered. Accordingly, there has been sufficient investigation and review of information in order for the parties to be informed of the nature and extent of the claims and to enable all parties to evaluate the Settlement for its fairness, adequacy, and reasonableness.

7. By way of the accompanying motions, Class Counsel seeks attorneys' fees in the amount of \$1,225,000.00, which is thirty-five percent (35%) of the Gross Settlement Amount of \$3,500,000.00. Pursuant to the contingency-fee agreement entered into by and between Plaintiffs Gay and Berber and Lawyers *for* Justice, PC, Plaintiffs Gay and Berber have agreed to a contingency fee of at least thirty-five percent (35%) of the recovery.

8. The attorneys' fees sought are commensurate with: (1) the risk that Class Counsel took in commencing the cases; (2) the time, effort, and expense that Class Counsel dedicated to the cases; (3) the skill and determination that Class Counsel has shown; (4) the results that Class Counsel has achieved throughout the litigation; (5) the value of the settlement that Class Counsel

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

3 9. While not necessarily required to be demonstrated because the percentage fee is
4 proper for this settlement, Class Counsel has incurred many hours of work in connection with
5 prosecuting the cases such that the award of attorneys' fees is also justified under a lodestar
6 analysis. Attorneys at Lawyers *for* Justice, PC have spent a total of **419.80 hours** performing
7 tasks and obtaining recovery in these matters. Attached hereto as "**EXHIBIT A**" is an Attorney
8 Task and Time Chart that sets forth in detail the nature of the legal services provided by attorneys
9 at Lawyers *for* Justice, PC and the time incurred by them in performing those services. The hours
10 attributable to Lawyers *for* Justice, PC include work done by me and several other attorneys at
11 the firm. Additionally, separate from the hours referenced herein and in the chart, Lawyers *for*
12 Justice, PC had litigation support personnel actively engaged in assisting with the prosecution of
13 this matter.

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

SCV258764) was granted on February 6, 2019, and the award of attorneys' fees involved compensation at the rate of \$855.96 per hour. As such, Lawyers *for* Justice, PC's lodestar for these actions is *at least* \$356,830.00 (419.80 hours x \$850.00 blended hourly rate).

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

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

12. Edwin Aiwarzian 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. Since in or around October of 2008, through his work at Lawyers *for* Justice, PC, he has almost exclusively focused on the prosecution of consumer and employment class actions. While employed by Lawyers *for* Justice PC, he has argued over one hundred (100) motions, taken or defended over one hundred fifty (150) depositions, prepared dozens of expert witnesses for deposition or trial, and attended over one hundred seventy-five (175) mediations. 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.

13. 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 Ninth Circuit. He was admitted to practice law in California in 2010. He is admitted to practice before all courts of the State of California and all United States District Courts in the State of California. He has worked on many wage-and-hour class action and representative action cases, taking the lead in taking and defending depositions, arguing motions, and attending mediations. He has played an integral role in preparing matters for class certification, including and not limited to, successful certification of a class in *Upson v. Sur La Table* (Los Angeles County

Superior Court Case No. BC424012), *Montazemi v. Regus Management* (Los Angeles County Superior Court Case No. BC478769), and *Abdulhaqq v. Urban Outfitters* (Alameda County Superior Court Case No. RG13680477). Under his supervision, dozens of class action or representative cases have resulted in settlements that have been granted court approval, including and not limited to, those listed in paragraph 16 herein. He has handled over one hundred and fifty (150) mediations and worked on over two hundred and fifty (250) class action or representative action cases which have resulted in settlement.

14. Joanna Ghosh is a Managing Member of Lawyers *for* Justice, PC. She received a Bachelor of Arts degree from California State University, Los Angeles in 2006, a Master of Science degree from the London School of Economics in 2007, and a Juris Doctor degree from Georgetown University Law Center in 2010. She is admitted to practice in California (since 2010) and in New York (since 2013) and is also admitted to practice in all U.S. District Courts in California, the U.S. Bankruptcy Court for the Central District of California, and the U.S. Supreme Court. She has taken and defended dozens of depositions and successfully handled motion practice in class action cases regarding discovery (including and not limited to, regarding class contact information), class certification (both contested class certification and stipulated class certification), arbitration agreements, coordination, and intervention. She has successfully handled briefing and oral argument on appeal and obtained notable decisions regarding Private Attorneys General Act claims and employer efforts to compel arbitration of such claims, e.g., *Betancourt v. Prudential Overall Supply*, 9 Cal.App.5th 439 (Cal. Ct. App., Mar. 7, 2017), cert. denied (Cal., May 24, 2017), cert. denied (U.S., Dec. 11, 2017) and *ZB, N.A. v. Superior Court*, 8 Cal.5th 175 (2019). She has significant experience with class actions, including and not limited to working on cases to obtain class certification through contested motion practice and working on cases in the post-certification stage (e.g., post-certification discovery, appeal, statistical sampling and pilot study, and trial preparation in conjunction with co-counsel in a case involving a certified class consisting of approximately 2,600 individuals). She also has extensive experience with class action and/or representative action settlements, and have handled this process in over three hundred (300) cases. Under her, Edwin Aiwazian, Arby Aiwazian's

1 supervision, Lawyers *for* Justice, PC has handled the class certification and court approval
2 process for hundreds of class action and/or representative action matters that have successfully
3 resolved. She is a member of the California Employment Lawyers Association and, on several
4 occasions, has been a speaker regarding topics in wage and hour law at the organization's
5 continuing legal education events.

6 15. I am a Member of Lawyers for Justice, PC. I received my Bachelor of Arts degree
7 from Loyola Marymount University, Los Angeles in 2015 and earned my Juris Doctor degree
8 from Pennsylvania State University, Penn State Law in 2019. I was admitted to practice law in
9 California in 2019. I am admitted to practice before all courts of the State of California and all
10 federal district courts in the State of California. During my employment with Lawyers for Justice,
11 PC, I have worked on over one hundred (100) wage-and-hour class actions and PAGA
12 representative actions, and my work has included, inter alia: researching and drafting pleadings;
13 administrative notice exhaustion; drafting, negotiating, and finalizing stipulations and settlement
14 agreements; taking and defending depositions; propounding and responding to written discovery;
15 engaging in motion practice (including and not limited to, motions to compel arbitration, motions
16 to compel discovery responses, motions for summary judgment and/or adjudication, and motions
17 to remand); claims evaluation and analysis; making court appearances; and attending mediation.
18 I have also successfully handled briefing and oral argument in the California Courts of Appeal. I
19 am a member of the California Employment Lawyers Association, and California Lawyers
20 Association's Labor and Employment Section and Litigation Section.

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

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

25 a) LFJ, in association with co-counsel therein, represented the plaintiffs in a
26 wage-and-hour class action against a major property management company involving allegations
27 of misclassification of various "manager" positions. On September 20, 2010, the court granted
28

1 final approval of the class action settlement. The Los Angeles County Superior Court Case
2 Number is BC400414.

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

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

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

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

23 f) LFJ, in association with co-counsel therein, represented the plaintiff in a
24 wage-and-hour class and PAGA representative action against a national wholesale distributor of
25 plumbing and builder supplies, involving allegations of misclassification of multiple salaried
26 “manager” positions. On May 22, 2014, the court granted final approval of the class and PAGA
27 representative action settlement. The Sacramento County Superior Court Case Number is 34-
28 2012-00136285.

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

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

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

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

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

27 l) LFJ, in association with co-counsel therein, represented the plaintiffs in a
28 wage-and-hour class action against a national retailer of apparel, accessories, and home products,

1 involving allegations of misclassification of the “Department Manager” position. On August 12,
2 2016, the court granted the plaintiffs’ motion for class certification in part and certified a
3 class. On August 6, 2019, the court granted final approval of the class action settlement. The
4 Alameda County Superior Court Case Number is RG13680477.

5 m) LFJ represented the plaintiff in a PAGA representative action against a real
6 estate and property management company, on behalf of non-exempt employees. On November
7 4, 2016, the court granted approval of the PAGA representative action settlement. The Orange
8 County Superior Court Case Number is 30-2015-00775439-CU-OE-CXC.

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

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

18 p) LFJ, on behalf of the plaintiff and respondent in a PAGA representative
19 action, successfully opposed in the trial court, and briefed and argued an appeal with respect to
20 the employer’s motion to compel arbitration, which resulted in a published opinion by the
21 California Court of Appeal in favor of employees. *Roberto Betancourt v. Prudential Overall*
22 *Supply* (Cal. App. 4th Dist., Mar. 7, 2017) 9 Cal.App.5th 439, review denied, cert. denied (U.S.
23 Supreme Court Docket No. 17-254). The Riverside County Superior Court Case Numbers are
24 RIC1503952 and RICJCCP5046, and the Judicial Council Coordination Proceeding Number is
25 5046.

26 q) LFJ, in association with co-counsel therein, represented the plaintiffs in a
27 wage-and-hour class and PAGA representative action against a consumer packaging company,
28 on behalf of non-exempt employees. On March 10, 2017, the court granted final approval of the

1 class and PAGA representative action settlement. The Los Angeles County Superior Court Case
2 Number is BC590429.

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

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

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

18 u) LFJ represented the plaintiff in a wage-and-hour class and PAGA
19 representative action against a food company on behalf of non-exempt employees. On June 30,
20 2017, the court granted final approval of the class and PAGA representative action settlement.
21 The Sacramento County Superior Court Case Number is 34-2015-00175871.

22 v) LFJ represented the plaintiffs in a wage-and-hour class and PAGA
23 representative action against a chocolate company on behalf of non-exempt employees. On July
24 19, 2017, the court granted final approval of the class and PAGA representative action settlement.
25 The Alameda County Superior Court Case Number is RG15764300.

26 w) LFJ represented the plaintiff in a PAGA representative action, against the
27 parent company of several restaurants, on behalf of hourly-paid, non-exempt employees. On
28 October 18, 2017, the court granted approval of the PAGA representative action settlement. The

Los Angeles County Superior Court Case Number is BC569664.

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

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

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

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

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

cc) LFJ represented the plaintiffs in a wage-and-hour class and PAGA representative action against a behavioral health service provider on behalf of non-exempt

employees. On November 13, 2018, the court granted final approval of the class and PAGA representative action settlement. The Alameda County Superior Court Case Number is RG16811450.

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

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

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

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

hh) LFJ, in association with co-counsel therein, represents the plaintiff in a wage-and-hour class and PAGA representative action against a medical equipment supplier on behalf of non-exempt employees. On February 13, 2020, the court granted the plaintiff's motion

1 for class certification and certified a class. The San Bernardino County Superior Court Case
2 Number is CIVDS1505744.

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

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

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

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

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 represents 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. 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.

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

LITIGATION COSTS AND EXPENSES INCURRED BY

LAWYERS FOR JUSTICE, PC

17. To date, Class Counsel has borne all of the risks and costs of litigation and will not receive any compensation until recovery is obtained in this matter. Lawyers for Justice, PC seeks reimbursement of **\$28,924.36** in litigation costs and expenses incurred in the cases, as reflected in "EXHIBIT B" attached hereto. These expenses were reasonable and necessary in the prosecution of the cases and to obtain the Settlement.

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SERVICE PAYMENTS TO PLAINTIFFS

18. In recognition of their efforts and work serving as the Class Representatives, the Settlement provides for service payments in the amount of \$10,000.00 each to Plaintiffs. The requested service payments are fair and appropriate. Plaintiffs spent a considerable amount of time and effort to produce relevant documents and information and provided facts and evidence necessary to attempt to prove the allegations. Plaintiffs were available whenever Class Counsel needed them and actively tried to obtain and provide information that would facilitate the pursuit of the cases. Accordingly, it is appropriate for Plaintiffs to receive \$10,000.00 each as reasonable service payments for their services in the cases, in addition to their individual settlement payment.

19. I submit that the Settlement is fair, reasonable, and adequate, and is in the best interests of Plaintiffs, Class Members, PAGA 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 27th day of March 2025, at Glendale, California.



Arman Marukyan

EXHIBIT A

BRANDON GAY, ET AL. V. PACIFIC STEEL GROUP
Alameda Superior Court Case No. RG20075009 (“GAY SUPERIOR COURT CASE”)
United States District Court, North District of California Docket No. 4:20-CV-08442-HSG (“GAY FEDERAL ACTION”)

ISRAEL BERBER V. PACIFIC STEEL GROUP
San Francisco Superior Court Case No. CGC-21-589556 (“BERBER SUPERIOR COURT ACTION”)
United States District Court, North District of California Docket No. 3:21-CV-03446-DMR / 4:21-CV-03446-HSG (“BERBER FEDERAL ACTION”)

DANIELA GARIBAY V. PACIFIC STEEL GROUP (“GARIBAY ACTION”)
San Bernardino Superior Court Case No. CIVDS2011129

ATTORNEY TASK AND TIME CHART

TASK	LAWYERS <i>for</i> JUSTICE, PC
Investigation and Research / Due Diligence	
Meet and Communicate with Plaintiff Brandon Gay (“Plaintiff Gay”) during the Cases	26.50
Meet and Communicate with Plaintiff Israel Berber (“Plaintiff Berber”) during the Case	24
Investigate, Communicate with, and/or Interview Putative Class Members and Percipient Witnesses	40
Review and Analyze Court Filings in <i>Darren Morris v. Pacific Steel Group</i> , San Diego Case No. 37-2020-00021541-CU-OE-CTL and <i>Daniela Garibay v. Pacific Steel Group</i> , San Bernardino Superior Court Case No. CIVDS2011129	5

Pleadings and Court Filings	
Investigate the Merits of Plaintiff Gay's Claims, Legal Research and Analysis of All Claims Involved, Draft Plaintiff's Class Action Complaint for Damages (filed on September 22, 2020) (Gay Superior Court Case)	7.50
Draft Plaintiff Brandon Gay's Notice of Posting Jury Fees (filed on October 30, 2020) (Gay Superior Court Action)	0.20
Draft Plaintiff Gay's and Plaintiff Berber's (together as "Plaintiffs") First Amended Class Action Complaint for Damages (filed on November 25, 2020) (Gay Superior Court Action)	1.50
Review and Analyze Defendant Pacific Steel Group's ("Defendant") Answer to Plaintiff Gay's Unverified Complaint (served on November 30, 2020), and Research Affirmative Defenses in Defendant's Answer. Review and Analyze Defendant's Notice to State Court and Adverse Parties of Removal of This Action to Federal Court (Gay Superior Court Action)	1.50
Review and Analyze Defendant's Notice of Removal by Defendant Pacific Steel Group, Declaration of David A. Perkins In Support Thereof, and Notice of Interested Parties (filed on November 30, 2020) (Gay Federal Action)	2.50
Review and Analyze Court's Notice of Case Assigned to Magistrate Judge Joseph C. Spero (filed on November 30, 2020) Review and Analyze Civil Standing Orders for Magistrate Judge Joseph C. Spero (Gay Federal Action)	0.50
Review and Analyze Court's Order Setting Initial Case Management Conference and ADR Deadlines (filed on December 1, 2020) (Gay Federal Action)	0.20
Review and Analyze Court's Case Management Order (filed on December 11, 2020) (Gay Superior Court Action)	0.10

Draft Plaintiffs' Declination to Magistrate Judge Jurisdiction (filed on December 14, 2020) (Gay Federal Action)	0.10
Review and Analyze Clerk's Notice of Impending Reassignment to a U.S. District Court Judge (filed on December 15, 2020) (Gay Federal Action)	0.10
Review and Analyze Court's Order Regarding Complex Determination Hearing (filed on December 15, 2020) (Gay Superior Court Action)	0.10
Review and Analyze Court's Order Reassigning Case and Clerk's Notice Setting Case Management Conference for Reassigned Civil Case (filed on December 16, 2020) (Gay Federal Action)	0.10
Review and Analyze Court's Notice of Assignment of Judge for All Purposes (filed on December 16, 2020) (Gay Superior Court Action)	0.20
Review and Analyze Defendant's Answer to Plaintiffs' First Amended Complaint (filed on December 29, 2020), and Research Affirmative Defenses in Defendant's Answer (Gay Federal Action)	1
Investigate the Merits of Plaintiff Berber's Claims, Legal Research and Analysis of All Claims Involved, Draft Plaintiff Berber's Complaint for Enforcement Under the Private Attorneys General Act, California Labor Code § 2698, Et Seq. (filed on February 2, 2021) (Berber Superior Court Action)	6.50
Review and Analyze Court's Notice to Plaintiff Regarding Case Management Conference (filed on February 2, 2021) (Berber Superior Court Action)	0.10
Draft Plaintiffs' Certification and Notice of Interested Parties (filed on February 23, 2021) (Gay Federal Action)	0.50
Review and Analyze Clerk's Notice Regarding Case Management Conference to be Held Telephonically (filed on February 25, 2021) (Gay Federal Action)	0.10

Meet and Confer with Defendant's Counsel, and Draft Joint Rule 26(F) Report (filed on March 2, 2021) (Gay Federal Action)	1.50
Review and Analyze Court's Minute Entry Regarding Telephonic Initial Case Management Conference (filed on March 10, 2021) (Gay Federal Action)	0.10
Meet and Confer with Defendant's Counsel and Draft Joint Status Report Re: Removal (filed on April 7, 2021) (Gay Superior Court Action)	0.50
Draft Plaintiff Israel Berber's Notice of Posting Jury Fees (served on April 7, 2021) (Berber Superior Court Action)	0.20
Review and Analyze Court's Tentative Case Management Order (issued on April 12, 2021) (Gay Superior Court Action)	0.10
Review and Analyze Court's Case Management Order and Court's Minute Order Regarding Compliance Hearing (filed on April 13, 2021) (Gay Superior Court Action)	0.10
Review and Analyze Defendant's Answer to Plaintiff Berber's Unverified Complaint (served on May 6, 2021), and Research Affirmative Defenses in Defendant's Answer (Berber Superior Court Action)	1
Review and Analyze Defendant's Notice of Removal by Pacific Steel Group, Declaration of David Perkins In Support of Defendant Pacific Steel Group's Notice of Removal, and Defendant Pacific Steel Group's Certification of Interested Entities or Persons (served on May 7, 2021) (Berber Federal Action)	2
Review and Analyze Court's Notice of Assignment to Magistrate Judge Donna M. Ryu, Order Setting Initial Case Management Conference and ADR Deadlines (filed on May 10, 2021) (Berber Federal Action)	0.50
Review and Analyze Defendant's Notice to State Court and Adverse Parties of Removal of This Action to Federal Court (served on May 11, 2021) (Berber Superior Court Action)	0.50

Review and Analyze Court's Order Reassigning Case (filed on May 19, 2021) (Berber Federal Action)	0.10
Review and Analyze Clerk's Notice Setting Case Management Conference for Reassigned Civil Case (filed on May 20, 2021) (Berber Federal Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft Case Management Statement (filed on June 18, 2021) (Gay Federal Action)	1
Review and Analyze Court's Case Management Order (filed on June 18, 2021) (Berber Superior Court Action)	0.10
Review and Analyze Court's Minute Entry Regarding Telephonic Initial Case Management Conference (filed on June 23, 2021) (Gay Federal Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft Stipulation and [Proposed] Order Selecting ADR Process and Joint Stipulation Re: Case Schedule; [Proposed] Order (filed on June 29, 2021) (Gay Federal Action)	1
Review and Analyze Court's Order Selecting ADR Process and Court's Scheduling Order (filed on June 30, 2021) (Gay Federal Action)	0.20
Draft Plaintiffs' Status Report Re: Removal (filed on July 9, 2021) (Gay Superior Court Action)	0.20
Review and Analyze Court's Case Management Order and Court's Minute Order Regarding Compliance Hearing (filed on July 13, 2021) (Gay Superior Court Action)	0.20
Review and Analyze Clerk's Notice Re Case Management Conference to be Held Telephonically (filed on August 3, 2021) (Berber Federal Action)	0.10
Review and Analyze Clerk's Notice Setting Zoom Hearing (filed on August 11, 2021) (Berber Federal Action)	0.10

Meet and Confer with Defendant's Counsel, and Draft Joint Rule 26(F) Report (filed on August 11, 2021) (Berber Federal Action)	1
Draft Plaintiff Berber's Certification and Notice of Interested Parties (filed on August 11, 2021) (Berber Federal Action)	0.30
Review and Analyze Court's Minute Entry Regarding Initial Case Management Conference (filed on August 18, 2021) (Berber Federal Action)	0.10
Review and Analyze Court's Order Directing the Parties to File by September 24, 2021, the Stipulation and Proposed Order Regarding ADR Process and Case Schedule (filed on September 21, 2021) (Berber Federal Action)	0.20
Meet and Confer with Defendant's Counsel, and Draft Stipulation and [Proposed] Order Selecting ADR Process and Joint Stipulation Re: Case Schedule; [Proposed] Order (filed on September 24, 2021) (Berber Federal Action)	1
Review and Analyze Court's Order Selecting ADR Process and Court's Scheduling Order (filed on September 29, 2021) (Berber Federal Action)	0.20
Review and Analyze Court's Notice of Mail Returned as Undeliverable (filed on October 22, 2021) (Berber Federal Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation Re: Case Schedule; [Proposed] Order (filed on October 27, 2021) (Gay Federal Action)	1
Review and Analyze Clerk's Notice Setting Telephonic Case Management Conference (filed on October 28, 2021) (Gay Federal Action)	0.10
Review and Analyze Court's Minute Entry Regarding Telephonic Further Case Management Conference (filed on November 4, 2021) (Gay Federal Action)	0.10

Meet and Confer with Defendant's Counsel, and Draft Revised Joint Stipulation Re: Case Schedule; [Proposed] Order (filed on November 12, 2021) (Gay Federal Action)	1
Review and Analyze Court's Order Regarding Revised Joint Stipulation Re: Case Schedule (filed on November 15, 2021) (Gay Federal Action)	0.10
Review and Analyze Court's Tentative Ruling Regarding Compliance Hearing (issued on November 29, 2021) (Gay Superior Court Action)	0.10
Review and Analyze Court's Minute Order Regarding Compliance Hearing (filed on November 30, 2021) (Gay Superior Court Action)	0.10
Draft Plaintiffs' Appearance of Counsel (Kenyon Harbison) (filed on December 22, 2021) (Gay Federal Action and Berber Federal Action)	0.40
Draft Plaintiffs' Status Report Re: Removal (filed on February 7, 2022) (Gay Superior Court Action)	0.30
Review and Analyze Court's Tentative Ruling Regarding Compliance Hearing (issued on February 10, 2022) (Gay Superior Court Action)	0.10
Review and Analyze Court's Order Regarding Compliance Hearing and Minute Order Regarding Compliance Hearing (filed on February 15, 2022) (Gay Superior Court Action)	0.10
Review and Analyze Defendant's Notice of Change of Handling Attorney Within-Firm (served on May 12, 2022) (Gay Superior Court Case)	0.20
Review and Analyze Court's Order Regarding Compliance Hearing and Court's Minute Order Regarding Compliance Hearing (filed on May 17, 2022) (Gay Superior Court Action)	0.20
Review and Analyze Defendant's Appearance of Counsel (Travis Jang-Busby) (filed on May 17, 2022) (Gay Federal Action and Berber Federal Action)	0.10

Draft Plaintiffs' Notices of Withdrawal of Certain Counsel (Kenyon Harbison) (Jenay Younger) (filed on June 3, 2022) (Gay Federal Action and Berber Federal Action)	0.40
Review and Analyze Defendant's Notice of Withdrawal of Certain Counsel (Tyler Paetkau) (filed on June 8, 2022) (Gay Federal Action and Berber Federal Action)	0.10
Draft Plaintiff Berber's Appearance of Counsel (Melissa Rinehart) (filed on July 29, 2022) (Gay Federal Action and Berber Federal Action)	0.40
Review and Analyze Clerk's Notice Setting Case Management Conference (filed on August 17, 2022) (Gay Federal Action and Berber Federal Action)	0.20
Review and Analyze Defendant's Appearance of Counsel (Clint S. Engleson) (filed on August 23, 2022) (Gay Federal Action)	0.10
Review and Analyze Court's Minute Entry Regarding Telephonic Further Case Management Conference (filed on August 24, 2022) (Gay Federal Action and Berber Federal Action)	0.20
Draft Plaintiffs' Request for Remote Appearance; [Proposed] Order (filed on August 26, 2022) (Gay Federal Action and Berber Federal Action)	0.40
Review and Analyze Clerk's Notice Regarding Plaintiffs' Request for Remote Appearance (filed on August 29, 2022) (Gay Federal Action and Berber Federal Action)	0.20
Review and Analyze Court's Orders Regarding Plaintiffs' Requests for Remote Appearance (as modified) (filed on August 29, 2022) (Gay Federal Action and Berber Federal Action)	0.20
Draft Plaintiff Berber's Appearance of Counsel (Jacob Karczewski) (filed on August 29, 2022) (Gay Federal Action and Berber Federal Action)	0.40

Review and Analyze Defendant's Motion to Appear Remotely and [Proposed] Order Thereon (filed on August 29, 2022) (Gay Federal Action and Berber Federal Action)	0.20
Review and Analyze Clerk's Notice to Counsel Regarding Defendant's Motion to Appear Remotely and [Proposed] Order Thereon and Court's Order Granting Defendant's Motion to Appear Remotely (filed on August 30, 2022) (Gay Federal Action and Berber Federal Action)	0.20
Meet and Confer with Defendant's Counsel, and Draft Joint Case Management Conference Statement (served on September 13, 2022) (Gay Superior Court Action)	0.50
Review and Analyze Court's Tentative Ruling Regarding Compliance Hearing (issued on September 19, 2022) (Gay Superior Court Action)	0.10
Review and Analyze Court's Order Regarding Compliance Hearing and Minute Order Regarding Compliance Hearing (filed on September 20, 2022) (Gay Superior Court Action)	0.20
Review and Analyze Defendant's Appearance of Counsel (Lindsay David) (filed on September 14, 2023) (Gay Federal Action and Berber Federal Action)	0.10
Review and Analyze Clerk's Notice Regarding In-Person Case Management Conference (filed on October 6, 2023) (Gay Federal Action and Berber Federal Action)	0.10
Draft Plaintiffs' Notice of Motion and Motion to Appear Telephonically for Case Management Conference and Proposed Order Thereon (filed on October 6, 2023) (Gay Federal Action and Berber Federal Action)	1
Review and Analyze Clerk's Notice Regarding Plaintiffs' Notice of Motion and Motion to Appear Telephonically for Case Management Conference and Court's Order Granting Plaintiffs' Motion to Appear Telephonically for Case Management Conference (as modified) (filed on October 10, 2023) (Gay Federal Action and Berber Federal Action)	0.20

Review and Analyze Defendant's Motion to Appear Telephonically for Case Management Conference and [Proposed] Order Thereon (filed on October 10, 2023) (Gay Federal Action and Berber Federal Action)	0.30
Review and Analyze Court's Order Granting Defendant's Motion to Appear Telephonically for Case Management Conference (as modified) (filed on October 11, 2023) (Gay Federal Action)	0.20
Review and Analyze Clerk's Notice Regarding Defendant's Motion to Appear Telephonically for Case Management Conference and Court's Order Granting Defendant's Motion to Appear Telephonically for Case Management Conference (as modified) (filed on October 11, 2023) (Berber Federal Action)	0.10
Review and Analyze Clerk's Notice Regarding October 19, 2023 Further Case Management Conference (filed on October 11, 2023) (Gay Federal Action and Berber Federal Action)	0.10
Review and Analyze Court's Minute Entry Regarding Further Case Management Conference (filed on October 20, 2023) (Gay Federal Action and Berber Federal Action)	0.10
Review and Analyze Defendant's Appearance of Counsel (Janna Jamil) (filed on December 27, 2023) (Gay Federal Action)	0.10
Draft Plaintiffs' Appearance of Counsel (Joanna Burstedt) (filed on January 9, 2024) (Gay Federal Action and Berber Federal Action)	0.40
Meet and Confer with Defendant's Counsel, and Draft Joint Notice of Settlement and Stipulation Vacating Hearing Dates and Deadlines Associated with Plaintiffs' Motion for Class Certification and Trial, and [Proposed] Order Thereon (filed on May 6, 2024) (Gay Federal Action and Berber Federal Action)	1
Review and Analyze Clerk's Notice Setting Telephonic Case Management Conference (filed on May 7, 2024) (Gay Federal Action and Berber Federal Action)	0.20
Review and Analyze Court's Minute Entry Regarding Telephonic Case Management Conference (filed on May 7, 2024) (Gay Federal Action and Berber Federal Action)	0.20

Review and Analyze Court's Order Terminating Regarding Parties' Stipulation to Vacate Case Deadlines (filed on May 15, 2024) (Gay Federal Action and Berber Federal Action)	0.20
Meet and Confer with Defendant's Counsel, and Draft Joint Statement (filed on June 6, 2024) (Gay Federal Action and Berber Federal Action)	1
Review and Analyze Court's Order Directing Parties to File Further Status Report Regarding Settlement Finalization (filed on June 7, 2024) (Gay Federal Action and Berber Federal Action)	0.20
Review and Analyze Defendant's Notice of Appearance and Substitution (filed on June 7, 2024) (Gay Federal Action and Berber Federal Action)	0.20
Meet and Confer with Defendant's Counsel, and Draft Joint Statement (filed on July 8, 2024) (Gay Federal Action and Berber Federal Action)	0.50
Review and Analyze Court's Order Directing Parties to File Final Status Report Regarding Settlement Finalization (filed on July 9, 2024) (Gay Federal Action and Berber Federal Action)	0.20
Meet and Confer with Defendant's Counsel, and Draft Joint Statement (filed on August 8, 2024) (Gay Federal Action)	1
Review and Analyze Court's Order Directing Parties, in Light of Joint Statement, to Submit Stipulation (filed on August 9, 2024) (Gay Federal Action and Berber Federal Action)	0.20
Review and Analyze Court's Order to Show Cause Regarding Why Parties Should Not Be Sanctioned for Failing to Timely File a Stipulation (filed on August 26, 2024) (Gay Federal Action and Berber Federal Action)	0.40
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation to Stay and Administratively Close Actions; [Proposed] Order (filed on August 27, 2024) (Gay Federal Action and Berber Federal Action)	1.50

Review Court's Order to Stay and Administratively Close Actions (filed on August 28, 2024) (Gay Federal Action and Berber Federal Action)	0.50
Meet and Confer with Plaintiff Garibay's Counsel and Plaintiff Morris's Counsel, and Draft Second Amended Class Action Complaint & Enforcement Action Under the Private Attorneys General Act, California Labor Code §§ 2698, <i>Et Seq.</i> (served on February 5, 2025) (Garibay Action)	1.50
Appearances	
Prepare for and Telephonically Attend Initial Case Management Conference (March 9, 2021) (Gay Federal Action)	0.30
Prepare for and Telephonically Attend Case Management Conference (June 22, 2021) (Gay Federal Action)	0.30
Prepare for and Telephonically Attend Case Management Conference (August 17, 2021) (Berber Federal Action)	0.30
Prepare for and Telephonically Attend Case Management Conference (November 2, 2021) (Gay Federal Action)	0.30
Prepare for and Telephonically Attend Case Management Conference (August 23, 2022) (Gay Federal Action and Berber Federal Action)	1
Prepare for and Telephonically Attend Hearing on Defendant's Motion for Judgment on the Pleadings (September 1, 2022) (Gay Federal Action and Berber Federal Action)	4.80
Prepare for and Telephonically Attend Case Management Conference (October 19, 2023) (Gay Federal Action and Berber Federal Action)	0.70

Prepare for and Telephonically Attend Case Management Conference (May 7, 2024) (Gay Federal Action and Berber Federal Action)	1.30
Prepare for and Telephonically Attend Hearing on Plaintiffs' Motion for Preliminary Approval of Class Action Settlement (November 18, 2024)	0.90
Prepare for and Telephonically Attend Hearing on Plaintiffs' Motion for Final Approval of Class Action Settlement, Attorneys' Fees, Costs, and Class Representative Service Awards (April 22, 2025) (Anticipated)	1
Discovery and Deposition	
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Israel Berber (served on August 17, 2020)	0.50
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Brandon Gay (served on August 18, 2020)	0.50
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Israel Berber (served on September 1, 2020)	1.50
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Brandon Gay (served on September 2, 2020)	3
Draft Plaintiff Gay's Interrogatories (Set One), Interrogatories (Set Two), and Requests for Production of Documents (Set One) to Defendant (served on July 9, 2021) (Gay Federal Action)	3.20
Draft Plaintiffs' Notice of Rule 30(B)(6) Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (Organizational Structure; August 19, 2021) (served on July 9, 2021) (Gay Federal Action)	1.50

Draft Plaintiffs' Notice of Rule 30(B)(6) Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (Job Duties; August 20, 2021) (served on July 9, 2021) (Gay Federal Action)	1.50
Review and Analyze Defendant's Objections to Notice of Deposition of Person(s) Most Knowledgeable and Requests for Documents by Plaintiffs for August 19, 2021, and Objections to Notice of Deposition of Person(s) Most Knowledgeable and Requests for Documents by Plaintiffs for August 20, 2021 (served on August 16, 2021) (Gay Federal Action)	2
Draft Plaintiffs' Notice of Rule 30(B)(6) Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (May 27, 2022) (served on May 6, 2022) (Gay Federal Action)	1.50
Review and Analyze Defendant's Objections and Responses to Plaintiffs' Notice of Rule 30(B)(6) Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (served on May 17, 2022) (Gay Federal Action)	2
Draft Plaintiffs' Amended Notice of Rule 30(B)(6) Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (June 8, 2022) (served on May 20, 2022) (Gay Federal Action)	1
Draft Plaintiffs' Amended Notice of Rule 30(B)(6) Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (September 8, 2022) (served on August 16, 2022) (Gay Federal Action)	1
Review and Analyze Defendant's Objection to Deposition Notice (served on August 25, 2022) (Gay Federal Action)	2
Draft Plaintiffs' Interrogatories (Set Three), Requests for Admissions (Set One), and Requests for Production of Documents (Set Two) to Defendant (served on September 14, 2022) (Gay Federal Action)	2.80

Draft Plaintiff Berber's Interrogatories (Set Three), Requests for Admissions (Set One), and Requests for Production of Documents (Set Two) to Defendant (served on September 14, 2022) (Berber Federal Action)	2.80
Review and Analyze Defendant's Interrogatories (Set One) and Requests for Admissions (Set One) to Plaintiff Berber. Review and Analyze Defendant's Interrogatories (Set One) and Requests for Admissions (Set One) to Plaintiff Gay. Review and Analyze Defendant's Requests for Production of Documents (Set One) to Plaintiffs (served on September 14, 2022) (Gay Federal Action and Berber Federal Action)	2
Draft Plaintiff Berber's Responses to Defendant's Interrogatories (Set One), Requests for Admissions (Set One), and Requests for Production of Documents (Set One) (served on September 23, 2022) (Gay Federal Action)	3.50
Draft Plaintiff Gay's Responses to Defendant's Interrogatories (Set One), Requests for Admissions (Set One), and Requests for Production of Documents (Set One) (served on September 23, 2022) (Berber Federal Action)	3.50
Review and Analyze Defendant's Responses to Plaintiffs' Interrogatories (Set Three), Requests for Admission (Set One), and Requests for Production of Documents (Set Two) (served on September 23, 2022) (Gay Federal Action)	3
Review and Analyze Defendant's Response to Plaintiff Berber's Interrogatories (Set Three), Requests for Admission (Set One), and Requests for Production of Documents (Set Two) (served on September 23, 2022) (Berber Federal Action)	1
Review and Analyze Documents Produced by Defendant (served on September 23, 2022) (Gay Federal Action and Berber Federal Action)	2.50
Review and Analyze Defendant's Supplemental Responses to Plaintiffs' Interrogatories (Set Three) and Requests for Admission (Set One) (served on October 27, 2022) (Gay Federal Action)	2

Review and Analyze Defendant's Supplemental Response to Plaintiff Berber's Interrogatories (Set Three) and Requests for Admission (Set One) (served on October 27, 2022) (Berber Federal Action)	1
Draft Plaintiffs' Interrogatories (Set Four), Interrogatories (Set Five), and Requests for Production of Documents (Set Three) to Defendant (served on November 6, 2023) (Gay Federal Action)	2.50
Review and Analyze Defendant's Responses to Plaintiffs' Interrogatories (Set Four), Interrogatories (Set Five), and Requests for Production of Documents (Set Three) (served on December 7, 2023) (Gay Federal Action)	3.50
Draft Plaintiffs' Notice of Rule 30(B)(6) Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (January 11, 2024) (served on December 21, 2023) (Gay Federal Action)	1
Review and Analyze Defendant's Objections and Responses to Plaintiffs' Notice of Rule 30(B)(6) Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (served on January 8, 2024) (Gay Federal Action)	1
Draft Plaintiffs' First Amended Notice of Rule 30(B)(6) Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (February 9, 2024) (served on January 22, 2024) (Gay Federal Action)	0.50
Review and Analyze Additional Documents Produced by Defendant (served on January 26, 2024) (Gay Federal Action and Berber Federal Action)	10.50
Review and Analyze Documents Produced by Defendant (served on January 29, 2024) (Gay Federal Action and Berber Federal Action)	9.80

Review and Analyze Defendant's Supplemental Responses to Plaintiffs' Interrogatories (Set Four), Interrogatories (Set Five), and Requests for Production of Documents (Set Three) (served on February 15, 2024) (Gay Federal Action)	2
Review and Analyze Class List Produced by Defendant (served on March 1, 2024) (Gay Federal Action)	1
Review and Analyze Additional Documents Produced by Defendant (served on March 18, 2024) (Gay Federal Action and Berber Federal Action)	8.50
Draft Plaintiffs' Second Amended Notice of Rule 30(B)(6) Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (March 28, 2024) (served on March 18, 2024) (Gay Federal Action)	0.50
Draft Plaintiffs' Third Amended Notice of Rule 30(B)(6) Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (April 12, 2024) (served on March 26, 2024) (Gay Federal Action)	0.50
Draft Plaintiffs' Fourth Amended Notice of Rule 30(B)(6) Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (May 2, 2024) (served on April 15, 2024) (Gay Federal Action)	0.50
Letters and Correspondence	
Draft Notice of California Labor and Workforce Development Agency re: Claims of Plaintiff Berber under the Private Attorneys General Act (served on October 28, 2020)	1.50
Draft Meet and Confer Letter to Defendant's Counsel Regarding Motion to Remand (served on December 21, 2020) (Gay Federal Action)	1
Review and Analyze Defendant's Meet and Confer Letter Regarding Plaintiffs' Motion to Remand (served on December 27, 2020) (Gay Federal Action)	1

Draft Meet and Confer Letter to Defendant's Counsel Regarding Motion to Remand (served on February 24, 2021) (Gay Federal Action)	1.50
Review and Analyze Defendant's Response Letter Regarding Plaintiffs' Motion to Remand (served on March 3, 2021) (Gay Federal Action)	2
Draft Letter to Plaintiff Gay and Letter to Plaintiff Berber Regarding Court's Alternative Dispute Resolution Procedures Handbook and Certification (served on March 25, 2021) (Gay Federal Action)	0.50
Draft Letter to Plaintiff Gay Regarding Court's Alternative Dispute Resolution Procedures Handbook and Certification (served on June 3, 2021) (Gay Federal Action)	0.50
Draft Letter to Defendant's Counsel Regarding Mediation (served on August 3, 2021) (Gay Federal Action and Berber Federal Action)	1
Mediation/Settlement	
Review and Analyze Information, Data, and Documents Obtained from Plaintiff, Defendant, and Other Sources Prior to Mediation	13
Prepare for First Mediation, Including Researching Settlement Related Issues and Merits of Claims, and Performing Damages Analysis/Calculations	5
Attend First Mediation Session (January 25, 2022; via Video Conference)	8
Prepare for Second Mediation, Including Researching Settlement Related Issues and Merits of Claims, and Performing Damages Analysis/Calculations (submitted on July 26, 2022)	2.50
Attend Second Mediation Session (August 2, 2022; via Video Conference)	8

Prepare for Third Mediation, Including Researching Settlement Related Issues and Merits of Claims, Drafting the Mediation Brief, and Compiling the Mediation Exhibits in Support of Plaintiff's Mediation Brief, and Performing Damages Analysis/Calculations (submitted on March 19, 2024)	6
Attend Third Mediation Session (March 26, 2024; via Video Conference)	8
Attend Fourth Mediation Session (April 11, 2024; via Video Conference)	8
Review, Analyze, and Confer with Co-Counsel regarding the Mediator's Proposal	2.50
Review, Revise, Negotiate, and Finalize Term Sheet (executed on April 30, 2024)	2
Review, Revise, Negotiate, and Finalize Stipulation of Class Action Settlement (executed on October 11, 2024), and Draft Notice of Class Action Settlement	7
Review Weekly Reports from Administrator	1
Law and Motion	
Draft Plaintiffs' Notice of Motion and Motion to Remand Pursuant to 28 U.S.C. § 1447; Memorandum of Points and Authorities In Support Thereof, Declaration of Jenay Younger In Support Thereof, and Proposed Order Thereon (filed on December 23, 2020) (Gay Federal Action)	3.50
Draft Plaintiffs' Notice of Withdrawal of Motion to Remand (filed on January 5, 2021) (Gay Federal Action)	0.30
Draft Plaintiffs' Notice of Motion and Motion to Remand Pursuant to 28 U.S.C. § 1447; Memorandum of Points and Authorities In Support Thereof, Declaration of Jenay Younger In Support Thereof, and Proposed Order Thereon (filed on March 21, 2021) (Gay Federal Action)	4

Review and Analyze Defendant's Opposition to Plaintiff's Second Motion to Remand (ECF No. 17) and Declaration of David Perkins In Support Thereof (filed on March 26, 2021) (Gay Federal Action)	1.50
Draft Plaintiffs' Reply In Support of Plaintiffs' Notice of Motion and Motion to Remand Pursuant to 28 U.S.C. § 1447 (Docket No. 19), Plaintiffs' Objections to Evidence, and [Proposed Order] on Plaintiffs' Objections to Evidence (filed on April 2, 2021) (Gay Federal Action)	3
Review and Analyze Defendant's Administrative Motion to Consider Whether Cases Should Be Related (Docket No. 20) (filed on May 12, 2021) (Gay Federal Action)	0.50
Draft Plaintiffs' Opposition to Defendant's Administrative Motion to Consider Whether Cases Should Be Related (Docket No. 21) (filed on May 17, 2021) (Gay Federal Action)	1.50
Review and Analyze Court's Related Case Order (filed on May 18, 2021) (Gay Federal Action and Berber Federal Action)	0.20
Review and Analyze Court's Order Denying Motion to Remand (filed on June 15, 2021) (Gay Federal Action)	1
Review and Analyze Defendant's Motion for Judgment on the Pleadings, Request for Judicial Notice In Support Thereof, and Declaration of David A. Perkins In Support Thereof (filed on May 18, 2022) (Gay Federal Action)	5.50
Review and Analyze Defendant's Motion for Judgment on the Pleadings, Declaration of David A Perkins in Support of Defendant Pacific Steel Group's Motion for Judgment on the Pleadings, and Request for Judicial Notice In Support Thereof (filed on May 18, 2022) (Berber Federal Action)	4.50
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation Pursuant to LR 6-2 to Extend Plaintiffs' Deadline to File Plaintiffs' Opposition to Defendant's Motion For Judgment on the Pleadings,	1

and for Defendant to File Its Reply in Support of the Same. Draft Declaration of Jacob Karczewski In Support Thereof (filed on May 25, 2022) (Gay Federal Action)	
Review and Analyze Court's Order to Extend Plaintiffs' Deadline to File Plaintiffs' Opposition to Defendant's Motion For Judgment on the Pleadings, and for Defendant to File Its Reply in Support of the Same (filed on May 26, 2022) (Gay Federal Action)	0.20
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation Pursuant to LR 6-2 to Extend Plaintiffs' Deadline to File Plaintiffs' Opposition to Defendant's Motion For Judgment on the Pleadings, and for Defendant to File Its Reply in Support of the Same. Draft Declaration of Jacob Karczewski In Support Thereof (filed on May 26, 2022) (Berber Federal Action)	0.50
Review and Analyze Court's Order to Extend Plaintiffs' Deadline to File Plaintiffs' Opposition to Defendant's Motion For Judgment on the Pleadings, and for Defendant to File Its Reply in Support of the Same (filed on May 27, 2022) (Berber Federal Action)	0.20
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation to Extend Plaintiff Brandon Gay's Deadline to File Plaintiffs' Motion For Class Certification, Defendant to File Its Opposition, and Plaintiff to File His Reply to the Same. Draft Declaration of Jacob Karczewski In Support Thereof (filed on June 17, 2022) (Gay Federal Action)	1
Review and Analyze Court's Order Denying Joint Stipulation to Extend Plaintiff Brandon Gay's Deadline to File Plaintiffs' Motion For Class Certification, Defendant to File Its Opposition, and Plaintiff to File His Reply to the Same (filed on June 21, 2022) (Gay Federal Action)	0.30
Draft Plaintiffs' Opposition to Defendant Pacific Steel Group's Motion for Judgment on the Pleadings, Declaration of Israel Berber In Support Thereof, Declaration of Brandon Gay In Support Thereof (filed on July 1, 2022) (Gay Federal Action and Berber Federal Action)	6
Review and Analyze Defendant's Reply In Support of Motion for Judgment on the Pleadings (filed on July 15, 2022) (Gay Federal Action and Berber Federal Action)	1.50

Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation to Extend Plaintiff Brandon Gay's Deadline to File Plaintiffs' Motion for Class Certification, Defendant to File Its Opposition, and Plaintiff to File His Reply to the Same. Draft Declaration of Jacob Karczewski In Support Thereof (filed on August 30, 2022) (Gay Federal Action)	0.50
Review and Analyze Clerk's Notice to Counsel Re Joint Stipulation to Extend Plaintiff Brandon Gay's Deadline to File Plaintiffs' Motion for Class Certification, Defendant to File Its Opposition, and Plaintiff to File His Reply to the Same and Declaration of Jacob Karczewski In Support Thereof (filed on August 31, 2022) (Gay Federal Action)	0.10
Review and Analyze Court's Minute Entry Regarding Defendant's Hearing on Motion for Judgment on the Pleadings (filed on September 1, 2022) (Gay Federal Action and Berber Federal Action)	0.10
Draft Plaintiffs' Transcript Order Regarding September 1, 2022 Motion Hearing (filed on September 7, 2022) (Gay Federal Action)	0.20
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation Regarding Briefing and Discovery Schedule for Defendant's Motion for Summary Judgment (filed on September 8, 2022) (Gay Federal Action and Berber Federal Action)	1
Review and Analyze Court's Transcript of Proceedings Held on 09/01/2022 and Court's Order Regarding Briefing and Discovery Schedule for Defendant's Motion for Summary Judgment (filed on September 9, 2022) (Gay Federal Action and Berber Federal Action)	1.50
Review and Analyze Defendant's Notice of Motion and Motion for Summary Judgment, Declaration of David A. Perkins In Support Thereof, Declaration of Clint Engleson In Support Thereof, Request for Judicial Notice In Support Thereof, and Proposed Order Thereon (filed on November 2, 2022) (Gay Federal Action)	3.50
Review and Analyze Defendant's Notice of Motion and Motion for Summary Judgment, Declaration of David A. Perkins In Support Thereof, Declaration of Clint Engleson In Support, Request for Judicial	4

Notice In Support Thereof, and Proposed Order Thereon (filed on November 2, 2022) (Berber Federal Action)	
Draft Plaintiffs' Opposition to Defendant's Notice of Motion and Motion for Summary Judgment, Declaration of Melissa R. Rinehart In Support Thereof, Declaration of Plaintiff Gay In Support Thereof, and Declaration of Plaintiff Berber In Support Thereof (filed on November 23, 2022) (Gay Federal Action and Berber Federal Action)	6.50
Review and Analyze Defendant's Reply In Support of Motion for Summary Judgment and Reply Declaration of Clint Engleson In Support Thereof (filed on November 30, 2022) (Gay Federal Action and Berber Federal Action)	1.50
Review and Analyze Defendant's Reply In Support of Motion for Summary Judgment and Reply Declaration of Clint Engleson In Support Thereof (filed on November 30, 2022) (Berber Federal Action)	1.50
Review and Analyze Clerk's Notice Regarding Motion for Summary Judgment Taken Under Submission (filed December 2, 2022) (Gay Federal Action and Berber Federal Action)	0.10
Draft Plaintiffs' Notice of New Authority Related to Plaintiff's Opposition to Defendant's Notice of Motion and Motion for Summary Judgment Taken Under Submission By This Court on December 2, 2022 (filed on September 5, 2023) (Gay Federal Action and Berber Federal Action)	2
Review and Analyze Court's Order Granting In Part and Denying In Part Defendant's Motions for Summary Judgment (filed on September 15, 2023) (Gay Federal Action and Berber Federal Action)	1
Draft Plaintiffs' Separate Statement (filed on October 12, 2023) (Gay Federal Action and Berber Federal Action)	1
Review and Analyze Defendant's Separate Statement Following September 15, 2023 Order on Motion for Summary Judgment (filed on October 12, 2023) (Gay Federal Action and Berber Federal Action)	0.50

Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation Regarding Briefing Schedule for Plaintiffs' Motion for Class Certification and Trial and Proposed Order Thereon (filed on October 25, 2023) (Gay Federal Action and Berber Federal Action)	1
Review and Analyze Court's Scheduling Order (filed on October 31, 2023) (Gay Federal Action and Berber Federal Action)	0.20
Meet and Confer with Defendant's Counsel, and Draft Stipulated Protective Order (filed on November 16, 2023) (Gay Federal Action)	2
Review Clerk's Notice to Counsel Re Docket Stipulated Protective Order (filed on November 16, 2023) (Gay Federal Action)	0.10
Review and Analyze Court's Order on Stipulated Protective Order (filed on November 17, 2023) (Gay Federal Action)	1
Meet and Confer with Defendant's Counsel, and Draft Joint Letter Brief (Regarding Discovery Dispute) (filed on December 26, 2023) (Gay Federal Action)	2.50
Review and Analyze Court's Order of Reference to Magistrate Judge (Regarding Discovery Dispute) (filed on January 3, 2024) (Gay Federal Action)	0.10
Review and Analyze Court's Order Regarding Referral to Judge Kang (Regarding Discovery Dispute) and Order Re: Joint Letter Brief (filed on January 8, 2024) (Gay Federal Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation Requesting the Court Vacate the January 17, 2024 Discovery Hearing and Proposed Order Thereon (filed on January 11, 2024) (Gay Federal Action)	1
Review and Analyze Court's Vacating the January 17, 2024 Discovery Hearing (filed on January 12, 2024) (Gay Federal Action)	0.30

Review and Analyze Court's Order Finding the Discovery Letter Brief Moot (filed on January 17, 2024) (Gay Federal Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation Regarding Release of Putative Class Contact Information and Amended Stipulated Protective Order (filed on January 25, 2024) (Gay Federal Action)	2.50
Review and Analyze Court's Amended Stipulated Protective Order (filed on January 26, 2024) (Gay Federal Action)	0.10
Draft Plaintiffs' Unopposed Motion for Administrative Relief Seeking Revisions to the Court's Scheduling Order Pursuant to L.R. 7-11, Proposed Order Thereon, Declaration of Jacob Karczewski In Support Thereof, and Declaration of Lindsay David In Support Thereof (filed on January 28, 2024) (Gay Federal Action)	2.50
Review and Analyze Clerk's Notice to Counsel Regarding Plaintiffs' Unopposed Motion for Administrative Relief Seeking Revisions to the Court's Scheduling Order Pursuant to L.R. 7-11 (filed on January 29, 2024) (Gay Federal Action)	0.10
Draft Plaintiffs' Unopposed Motion for Administrative Relief Seeking Revisions to the Court's Scheduling Order Pursuant to L.R. 7-11, Declaration of Jacob Karczewski In Support Thereof, Declaration of Lindsay David In Support Thereof, and Proposed Order Thereon (filed on January 29, 2024) (Gay Federal Action)	0.50
Review and Analyze Clerk's Notice to Counsel Regarding Plaintiffs' Unopposed Motion for Administrative Relief Seeking Revisions to the Court's Scheduling Order Pursuant to L.R. 7-11 (filed on January 29, 2024) (Gay Federal Action)	0.10
Draft Plaintiffs' Unopposed Motion for Administrative Relief Seeking Revisions to the Court's Scheduling Order Pursuant to L.R. 7-11, Declaration of Jacob Karczewski In Support Thereof, Declaration of Lindsay	0.50

David In Support Thereof, and Proposed Order Thereon (filed on January 31, 2024) (Gay Federal Action and Berber Federal Action)	
Review and Analyze Court's Order Granting Plaintiffs' Unopposed Motion for Administrative Relief Seeking Revisions to the Court's Scheduling Order Pursuant to L.R. 7-11 (as modified) (filed on February 8, 2024) (Gay Federal Action and Berber Federal Action)	0.20
Draft Plaintiffs' Unopposed Motion for Administrative Relief Seeking Further Revisions to the Court's Scheduling Order Pursuant to L.R. 7-11, Declaration of Jacob Karczewski In Support Thereof, Declaration of Lindsay David In Support Thereof, and Proposed Order Thereon (filed on February 27, 2024) (Gay Federal Action)	1
Review and Analyze Clerk's Notice to Counsel Regarding Plaintiffs' Unopposed Motion for Administrative Relief Seeking Further Revisions to the Court's Scheduling Order Pursuant to L.R. 7-11 (filed on February 28, 2024) (Gay Federal Action)	0.10
Draft Plaintiffs' Unopposed Motion for Administrative Relief Seeking Further Revisions to the Court's Scheduling Order Pursuant to L.R. 7-11, Declaration of Jacob Karczewski In Support Thereof, Declaration of Lindsay David In Support Thereof, and Proposed Order Thereon (filed on February 28, 2024) (Berber Federal Action)	0.50
Review and Analyze Clerk's Notice to Counsel Regarding Plaintiffs' Unopposed Motions for Administrative Relief Seeking Further Revisions to the Court's Scheduling Order Pursuant to L.R. 7-11 (filed on February 29, 2024) (Gay Federal Action and Berber Federal Action)	0.10
Draft Plaintiffs' Unopposed Motion for Administrative Relief Seeking Further Revisions to the Court's Scheduling Order Pursuant to L.R. 7-11, Declaration of Jacob Karczewski In Support Thereof, Declaration of Lindsay David In Support Thereof, and Proposed Order Thereon (filed on February 29, 2024) (Gay Federal Action and Berber Federal Action)	0.50

Review and Analyze Court's Order Granting Plaintiffs' Unopposed Motion for Administrative Relief Seeking Further Revisions to the Court's Scheduling Order Pursuant to L.R. 7-11 (as modified) (filed on February 29, 2024) (Gay Federal Action and Berber Federal Action)	0.20
Draft Plaintiffs' Unopposed Motion for Administrative Relief Seeking Further Revisions to the Court's Scheduling Order Pursuant to L.R. 7-11, Declaration of Jacob Karczewski In Support Thereof, Declaration of Lindsay David In Support Thereof, and Proposed Order Thereon (filed April 5, 2024) (Gay Federal Action and Berber Federal Action)	1
Review and Analyze Court's Order Granting Plaintiffs' Unopposed Motion for Administrative Relief Seeking Further Revisions to the Court's Scheduling Order Pursuant to L.R. 7-11 (filed on April 8, 2024) (Gay Federal Action and Berber Federal Action)	0.20
Meet and Confer with Plaintiff Garibay's Counsel and Plaintiff Morris's Counsel, and Research and Collectively Draft Plaintiffs' Notice of Motion and Motion for Preliminary Approval of Class Action Settlement, Declaration of Arman Marukyan in Support Thereof, Declaration of Plaintiff Brandon Gay in Support Thereof, and Proposed Order Granting Preliminary Approval of Class Action Settlement. Review Declaration of Dennis S. Hyun In Support Thereof, Declaration of Edward W. Choi In Support Thereof, Declaration of Larry W. Lee In Support Thereof, Declaration of Raul Perez In Support Thereof, Declaration of Daniela Garibay In Support Thereof, and Declaration of Darren Morris In Support Thereof (served on October 22, 2024) (Garibay Action)	5.50
Draft Declaration of Plaintiff Israel Berber In Support of Plaintiffs' Motion for Preliminary Approval of Class Action Settlement (served on October 23, 2024) (Garibay Action)	1
Review and Analyze Court's Order Granting Plaintiffs' Motion for Preliminary Approval of Class Action Settlement and Court's Minute Order Regarding Motion for Preliminary Approval of Class Action Settlement (filed on November 18, 2024) (Garibay Action)	0.50
Meet and Confer with Plaintiff Garibay's Counsel, and Research and Draft Plaintiffs' Motion for Final Approval of Class Action Settlement, Attorneys' Fees, Costs, and Class Representative Service Awards,	5

Declaration of Arman Marukyan in Support Thereof, and [Proposed] Final Approval Order and Judgment; and Review Declaration of Settlement Administrator in Support Thereof (filed on March 28, 2025)	
Total Hours:	419.80

EXHIBIT B

LAWYERS *for* JUSTICE, PC CASE COST DETAIL
Gay vs. Pacific Steel Group

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
8/18/2020	U.S. Postmaster	Postage	\$7.00
9/22/2020	Legal Document Server, Inc.	Attorney Service	\$130.00
9/29/2020	Alameda Superior Court	Complex Filing Fee	\$1,000.00
9/29/2020	Alameda Superior Court	Complaint Filing Fee	\$435.00
10/27/2020	Legal Document Server, Inc.	Attorney Service	\$110.00
10/28/2020	General Logistics Systems US, Inc.	Courier Service	\$11.98
10/29/2020	Legal Document Server, Inc.	Attorney Service	\$55.00
10/30/2020	Legal Document Server, Inc.	Attorney Service	\$65.00
11/9/2020	Alameda Superior Court	Jury Fee	\$150.00
11/10/2020	Legal Document Server, Inc.	Attorney Service	\$120.00
11/11/2020	Legal Document Server, Inc.	Attorney Service	\$130.00
11/24/2020	Alameda Superior Court	Document Download Fee	\$5.50
11/25/2020	Legal Document Server, Inc.	Attorney Service	\$165.00
12/4/2020	Legal Document Server, Inc.	Attorney Service	\$150.00
12/9/2020	San Diego Superior Court	Document Download Fee	\$7.57
12/24/2020	General Logistics Systems US, Inc.	Courier Service	\$36.85
12/26/2020	San Bernardino Superior Court	Document Download Fee	\$27.50
1/7/2021	General Logistics Systems US, Inc.	Courier Service	\$28.86
3/12/2021	General Logistics Systems US, Inc.	Courier Service	\$21.33
3/25/2021	General Logistics Systems US, Inc.	Courier Service	\$27.77
4/2/2021	General Logistics Systems US, Inc.	Courier Service	\$19.00
4/7/2021	Legal Document Server, Inc.	Attorney Service	\$120.00
4/16/2021	Legal Document Server, Inc.	Attorney Service	\$80.00
5/17/2021	General Logistics Systems US, Inc.	Courier Service	\$80.14
6/3/2021	General Logistics Systems US, Inc.	Courier Service	\$31.65
6/30/2021	General Logistics Systems US, Inc.	Courier Service	\$33.36
7/9/2021	Legal Document Server, Inc.	Attorney Service	\$130.00
1/14/2022	Signature Resolution LLC	First Mediation Fee	\$4,450.00
2/8/2022	Legal Document Server, Inc.	Attorney Service	\$17.95
2/11/2022	Orange County Superior Court	Document Download Fee	\$7.50
5/9/2022	General Logistics Systems US, Inc.	Courier Service	\$30.81
6/15/2022	Alameda Superior Court	Document Download Fee	\$2.00
6/16/2022	Alameda Superior Court	Document Download Fee	\$2.00
7/25/2022	Jams, Inc.	Second Mediation Fee	\$4,875.00
9/7/2022	General Logistics Systems US, Inc.	Courier Service	\$34.62
9/8/2022	Pamela Hebel	Court Reporter	\$111.55
9/14/2022	General Logistics Systems US, Inc.	Courier Service	\$14.79
3/8/2024	Jams, Inc.	Third Mediation Fee	\$5,660.00

LAWYERS *for* JUSTICE, PC CASE COST DETAIL
Gay vs. Pacific Steel Group

3/26/2024	Melissa LeBlanc	Travel Reimbursement	\$20.75
4/11/2024	Melissa LeBlanc	Travel Reimbursement	\$27.68
4/12/2024	Esquire Deposition Solutions, LLC	Court Reporter	\$825.00
4/12/2024	Jams, Inc.	Fourth Mediation Fee	\$5,477.50
11/19/2024	CourtCall, LLC	Attorney Service	\$72.00
Total:			<u><u>\$24,807.66</u></u>

LAWYERS *for* JUSTICE, PC CASE COST DETAIL
Berber vs. Pacific Steel Group (PAGA)

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
8/17/2020	U.S. Postmaster	Postage	\$7.00
10/28/2020	U.S. Postmaster	Postage	\$7.50
10/28/2020	Labor & Workforce Development Agency	PAGA Filing Fee	\$75.00
1/11/2021	Legal Document Server, Inc.	Attorney Service	\$150.00
2/2/2021	San Francisco Superior Court	Complaint Filing Fee	\$450.00
2/10/2021	File & ServeXpress	Attorney Service	\$7.00
4/5/2021	FedEx Express	Courier Service	\$27.98
4/22/2021	Legal Document Server, Inc.	Attorney Service	\$16.25
4/22/2021	San Francisco Superior Court	Jury Fee	\$150.00
12/17/2021	San Diego Superior Court	Document Download Fee	\$7.80
4/1/2022	General Logistics Systems US, Inc.	Courier Service	\$17.58
9/14/2022	General Logistics Systems US, Inc.	Courier Service	\$14.79
3/7/2024	U.S. Postmaster	Postage for Outreach Mass Mailing	\$3,185.80
Total:			<u>\$4,116.70</u>

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501 San Benito Street, Suite 200
Hollister, CA 95023

Attorneys for Plaintiffs Brandon Gay, Israil Berber, and Darren Morris

☐ **BY MAIL (ENCLOSED IN A SEALED ENVELOPE):** I deposited the envelope(s) for mailing in the ordinary course of business at Los Angeles, California. I am “readily familiar” with this firm’s practice of collection and processing correspondence for mailing. Under that practice, sealed envelopes are deposited with the U.S. Postal Service that same day in the ordinary course of business with postage thereon fully prepaid at Los Angeles, California.

☒ **BY E-MAIL:** I hereby certify that this document was served from Los Angeles, California, by e-mail delivery on the parties listed herein at their most recent known e-mail address or e-mail of record in this action.

☐ **BY PERSONAL SERVICE:** I delivered the document, enclosed in a sealed envelope, by hand to the offices of the addressee(s) named herein.

☐ **BY ELECTRONIC SERVICE:** I caused the document(s) to be transmitted electronically via One Legal eService to the individuals listed above, as they exist on that database. This will constitute service of the document(s).

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

Executed this **March 28, 2025**, at Los Angeles, California.

Stacy Winberg

Type or Print Name

/s/ *Stacy Winberg*

Signature