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Attorneys for Plaintiff and the Class

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

TREVOR JOHNSON, individually, and on
behalf of other members of the general public
similarly situated and on behalf of other
aggrieved employees pursuant to the California
Private Attorneys General Act,

Plaintiff,

v.

RENAUD'S BAKERY AND BISTRO, INC., a
California corporation; and DOES 1 through
100, inclusive,

Defendants.

Case No.: 19STCV35046

Honorable Carolyn B. Kuhl
Department SSC12

CLASS ACTION

**DECLARATION OF EDWIN
AIWAZIAN IN SUPPORT OF
PLAINTIFF'S MOTION FOR FINAL
APPROVAL OF CLASS ACTION
SETTLEMENT, ATTORNEYS' FEES,
COSTS, AND ENHANCEMENT AWARD**

[Notice of Motion and Motion for Final
Approval of Class Action Settlement,
Attorneys' Fees, Costs, and Enhancement
Award; Declaration of Class Representative
(Trevor Johnson); Declaration of Settlement
Administrator (Taylor Mitzner); and
[Proposed] Final Approval Order and
Judgment filed concurrently herein]

Date: June 28, 2022
Time: 10:30 a.m.
Department: SSC12

Complaint Filed: October 2, 2019
FAC Filed: January 14, 2022
Trial Date: None Set

DECLARATION OF EDWIN AIWAZIAN

I, Edwin Aiwazian, 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 Trevor Johnson (“Plaintiff”) and the Class. 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 January 29, 2022, in Department SSC12 of the above-entitled Court, the Honorable Carolyn B. Kuhl preliminarily approved the Stipulation of Settlement and Release and Amendment No. 1 to Stipulation of Settlement and Release (together, “Settlement,” “Agreement,” or “Settlement Agreement”) entered into between Plaintiff and Defendant Renaud’s Bakery and Bistro, Inc. (“Defendant”), and conditionally certified the Class for settlement purposes. The Court preliminarily appointed Plaintiff Trevor Johnson as Class Representative. The Court also preliminarily appointed and designated Lawyers for Justice, PC as Class Counsel. The Court approved and ordered the mailing of the Notice of Pendency of Class Action Settlement (“Notice”), adopted the notice, opt-out, and objection procedures, and ordered their implementation. The Court appointed Phoenix Class Action Administration Solutions (“Phoenix” or “Settlement Administrator”) to handle the notice and settlement administration process.

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

WORK PERFORMED BY CLASS COUNSEL

4. I have been actively engaged in litigating the above-captioned action since prior to the commencement of the action on October 2, 2019, as have several other attorneys and members in our firm.

1 5. Lawyers *for* Justice, PC has actively participated in all phases of the litigation
2 process. Before initiating the action, Class Counsel investigated and researched the facts and
3 circumstances underlying the pertinent factual and legal issues and applicable law. This required
4 thorough discussions and interviews between attorneys at our firm and Plaintiff, and research
5 into the various legal issues involved in the case, namely, the current state of the law as it applied
6 to certification, off-the-clock theory, meal and rest periods, wage-and-hour enforcement, the
7 claims of Plaintiff, and potential defenses. After conducting initial investigation, our firm
8 determined that the claims of Plaintiff were well-suited for class-wide adjudication owing to
9 what appeared to be a common course of conduct affecting a similarly situated group of current
10 and former hourly-paid or non-exempt employees who worked for Defendant, who were not
11 properly compensated for, *inter alia*, all hours worked, and non-compliant meal and rest periods.

12 6. Prior to reaching the Settlement, the parties used the pre-mediation time period to
13 investigate the veracity, strength, and scope of the claims, and were actively preparing the matter
14 for class certification and trial. The parties conducted significant investigation into the facts of
15 the case and informal discovery and exchange of information and data in preparation for
16 mediation. Class Counsel interviewed and obtained information from Plaintiff and other Class
17 Members, including and not limited to the names of potential witnesses, and reviewed and
18 analyzed thousands of pages of documents and data obtained from Defendant, Plaintiff, and
19 other sources. The documents and data reviewed and analyzed by Class Counsel included, and
20 were not limited to, Plaintiff's employment records, Class Members' time and pay data, multiple
21 iterations of Defendant's Employee Handbook, Handbook Addendums, company policy
22 acknowledgements, internal memoranda, new hire orientation checklists, Defendant's operations
23 and employment practices, procedures, and policies (including but not limited to Defendant's
24 Employment Application, Waiver of Meal Period Form, Company Dress Code, and Company
25 Cell Phone Policy), and Defendant's financial documents, among other information, documents,
26 and data. Class Counsel researched applicable law, developed damages and penalties valuation
27 models in preparation for mediation, and met and conferred with Defendant's counsel on
28 numerous occasions, e.g., to discuss issues relating to the pleadings, case management, and

1 production of various documents and data prior to mediation. Other work performed by Class
2 Counsel included, and was not limited to, case strategy and analysis; drafting, reviewing, and
3 revising pleadings and Plaintiff's mediation brief; preparing and appearing for court proceedings;
4 and preparing for and attending mediation and settlement negotiations.

5 7. As outlined herein, the parties have conducted significant investigation and
6 informal discovery during the course of litigating the case. Class Counsel analyzed thousands of
7 pages of documents and data obtained from Plaintiff, Defendant, or through other sources.
8 These documents and data provided a critical understanding of the nature of the work performed
9 by the Class Members, as well as Defendant's operations and employment policies, practices,
10 and procedures, and were used in analyzing liability, damages, penalties, and valuation issues in
11 connection with all phases of the litigation, and ultimately with the mediation and settlement
12 negotiation process. Class Counsel also performed significant research into the law concerning
13 Defendant's defenses.

14 8. After conducting significant investigation of the facts and law during the
15 prosecution of the case, counsel for the parties engaged in extensive settlement negotiations to
16 try to resolve the entire matter. These efforts included participating in a formal, full-day
17 mediation conducted by Jeff Krivis, Esq., a well-regarded mediator experienced in mediating
18 complex labor and employment matters. During all settlement discussions, the parties conducted
19 their negotiations at arm's length in an adversarial position. Prior to and during mediation and
20 settlement discussions, the parties exchanged class information and data, and discussed all
21 aspects of the case, including the risks and delays of further litigation, the risks to the parties of
22 proceeding with class certification and trial, the law relating to off-the-clock theory, meal and
23 rest periods, civil penalties and representative PAGA claims, wage-and-hour enforcement,
24 Defendant's financial condition, the evidence produced and analyzed, and the possibility of
25 appeals, among other things. Arriving at a settlement that was acceptable to the parties was not
26 easy. Defendant contended that individualized questions of fact predominate over any common
27 issues, and these issues would pose challenges to certification and representative adjudication.
28 Defendant and its counsel felt very strongly about Defendant's ability to prevail on the merits

1 and to obtain a denial of class certification, while Plaintiff and Class Counsel believed that class
2 certification would be obtained and that they would prevail at trial. With the aid of the
3 mediator's evaluation, the parties agreed that the case was well-suited for settlement given the
4 legal issues relating to Plaintiff's principal claims, as well as the costs and risks to the parties that
5 would attend further litigation. These risks of further litigation include, and are not limited to, a
6 determination that the claims are unsuitable for class treatment and/or representative
7 adjudication, failure to obtain certification, class de-certification after certification of a class,
8 allowing a jury to decide the claims asserted in the case, and the real possibility of no recovery
9 after years of litigation.

10 9. As set forth more fully in the accompanying Motion for Final Approval, Class
11 Counsel seeks attorneys' fees in the amount of \$92,750.00, which is thirty-five percent (35%) of
12 the Gross Fund Value of \$265,000.00, as set forth in the Settlement Agreement and the Notice.
13 Pursuant to the contingency-fee agreement entered into by and between Plaintiff and Class
14 Counsel, Plaintiff has agreed to a contingency fee of at least thirty-five percent (35%) of the
15 recovery. The attorneys' fees sought are commensurate with: (1) the risk that Class Counsel
16 took in commencing the case; (2) the time, effort, and expense that Class Counsel dedicated to
17 the case; (3) the skill and determination that Class Counsel has shown; (4) the results that Class
18 Counsel has achieved throughout the litigation; (5) the value of the settlement that Class Counsel
19 has achieved for the Class Members and State of California; and (6) the other cases that Class
20 Counsel has turned down in order to devote its time and efforts to this matter.

21 10. I am aware that the common and acceptable rate for contingency representation in
22 wage and hour class action litigation is normally 40% before trial, with the range being from
23 33.3% up to 50%.

24 11. While not necessarily required to be demonstrated because the contingent fee is
25 proper for this settlement, Class Counsel has incurred many hours of work in connection with
26 prosecuting the case such that the attorneys' fees requested is also justified under a simple
27 lodestar analysis. Class Counsel has spent a total of **396.10 hours** performing tasks, and
28 obtaining recovery, on behalf of Plaintiff and the Class Members. Attached hereto as

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

6 12. The work performed in this particular matter, the background of our firm, as well
7 as the individual backgrounds, training, and experience of the attorneys who worked on this
8 matter, in litigating complex wage-and-hour matters, and in particular, employment class actions,
9 support a reasonable hourly rate of compensation at the blended rate of \$600 for work performed
10 by Class Counsel. Lawyers for Justice, PC has been awarded attorneys’ fees, compensating the
11 firm at the blended rate of at least \$600 per hour for legal services performed, by courts granting
12 final approval in other cases: final approval of the class and representative action settlement in
13 *David Dugan v. TEC Equipment, Inc., et al.* (Los Angeles Superior Court Case No.
14 19STCV01591) was granted on July 8, 2021, and the award of attorneys’ fees involved an hourly
15 rate of \$936.47; final approval of the class and representative action settlement in *Larry*
16 *Greenwood, et al. v. Scan Health Plan* (Los Angeles Superior Court Case No. BC715157) was
17 granted on April 20, 2021, and the award of attorneys’ fees involved an hourly rate of \$919.57;
18 final approval of the class action settlement in *Thereasa Carrozzella v. Basalite Concrete*
19 *Products, LLC* (Sacramento County Superior Court Case No. 34-2017-00220214-CU-OE-GDS)
20 was granted on February 21, 2020, and the award of attorneys’ fees involved an hourly rate of
21 \$766.05; final approval of the class and representative action settlement in *Alice Rutledge, et al.*
22 *v. Healthport Technologies, LLC* (Alameda County Superior Court Case No. RG16835813) was
23 granted on June 11, 2019, and the award of attorneys’ fees involved an hourly rate of \$764.82;
24 final approval of the class and representative action settlement in *Seth Swan v. Pace Supply*
25 *Corp.* (Sonoma County Superior Court Case No. SCV258764) was granted on February 6, 2019,
26 and the award of attorneys’ fees involved an hourly rate of \$855.96; final approval of the class
27 and representative action settlement in *Stanley Bland, et al. v. Telecare Corporation* (Alameda
28 County Superior Court Case No. RG16811450) was granted on November 21, 2018, and the

award of attorneys' fees involved an hourly rate of \$831.38; approval of the Private Attorneys General Act settlement in *Roberta Robles v. Altamed Health Services Corporation* (Los Angeles County Superior Court Case No. BC639623) was granted on October 31, 2018, and the award of attorneys' fees involved an hourly rate of \$602.22; final approval of the class and representative action settlement in *Samuel Guerra, et al v. Graphic Packaging International, Inc.* (Sacramento County Superior Court Case No. 34-2016-00203789) was granted on June 5, 2018, and the award of attorneys' fees involved an hourly rate of \$600; final approval of the class and representative action settlement in *Maryjo Ungerbuhler Anderson v. Boyett Petroleum* (Stanislaus County Superior Court Case No. 2020582) was granted on May 15, 2018, and the award of attorney's fees involved an hourly rate of \$780.77; final approval of the class and representative action settlement in *Demetrius Camarillo v. Blue Diamond Growers* (Sacramento County Superior Court Case No. 34-2015-00175871) was granted on June 30, 2017, and the award of attorneys' fees involved an hourly rate of \$845.64; and final approval of the class and representative action settlement in *Kevin Coonce v. Ferguson Enterprises, Inc.* (Sacramento County Superior Court Case No. 34-2021-00136285) was granted on May 22, 2014, and the award of attorneys' fees involved a higher hourly rate of \$625.

ADEQUACY OF LAWYERS *for* JUSTICE, PC

EDUCATION

13. In May of 2004, I graduated from *Pepperdine University School of Law* with a Juris Doctor degree. I have 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, I have previously served as a *pro bono* mediator for the Los Angeles County Superior Court. In October of 2000, I obtained a Litigation Paralegal Certificate from the *UCLA Extension Program*. During the summer of 2000, I studied Legal Writing at *Harvard University*. In April of 1999, I obtained a Bachelor of Arts degree in Communication with a concentration in Natural Sciences from *Pepperdine University*.

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JUDICIAL EXTERNSHIPS

14. From approximately September 2002 to approximately December 2002, I 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, I served as a Judicial Extern to the Honorable Earl Johnson, Jr. of the *California Court of Appeal for the Second Appellate District*.

LITIGATION AND CLASS ACTION EXPERIENCE

15. In December of 2004, I obtained a license to practice law from the California State Bar. From approximately December 2004 to approximately August 2008, I was employed by *Girardi & Keese*.

16. At *Girardi & Keese*, my practice focused on class actions and other complex cases involving toxic torts and products liability. In addition, I gained substantial experience on cases involving insurance bad faith, premises liability, and medical negligence. While employed by *Girardi & Keese*, I argued approximately 100 motions, took or defended approximately 150 depositions, and prepared dozens of expert witnesses for deposition or trial.

17. Since its inception, in or around October of 2008, *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, we are the attorneys of record in over a dozen employment-related putative class actions in both state and federal courts in the State of California. Our firm has successfully litigated cases involving the executive, administrative, and other overtime exemptions to the State of California and federal overtime compensation requirements. During this relatively short time, in association with other law firms, we have recovered millions of dollars on behalf of thousands of individuals in California.

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

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

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

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

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

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

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

26 f) LFJ, in association with co-counsel therein, represented the plaintiff in a
27 wage-and-hour class and PAGA representative action against a national wholesale distributor of
28 plumbing and builder supplies, involving allegations of misclassification of multiple salaried

1 “manager” positions. On May 22, 2014, the court granted final approval of the class and PAGA
2 representative action settlement. The Sacramento County Superior Court Case Number is 34-
3 2012-00136285.

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

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

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

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

26 k) LFJ, in association with co-counsel therein, represented the plaintiffs in a
27 wage-and-hour class action against a national retailer of apparel and fashion accessories, on
28 behalf of non-exempt employees. On August 5, 2016, the court granted final approval of the

1 class action settlement. The Los Angeles County Superior Court Case Number is BC488069.

2 l) LFJ, in association with co-counsel therein, represented the plaintiffs in a
3 wage-and-hour class action against a national retailer of apparel, accessories, and home products,
4 involving allegations of misclassification of the “Department Manager” position. On August 12,
5 2016, the court granted the plaintiffs’ motion for class certification in part and certified a class.
6 On August 6, 2019, the court granted final approval of the class action settlement. The Alameda
7 County Superior Court Case Number is RG13680477.

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

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

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

21 p) LFJ, on behalf of the plaintiff and respondent in a PAGA representative
22 action, successfully opposed in the trial court, and briefed and argued an appeal with respect to
23 the employer’s motion to compel arbitration, which resulted in a published opinion by the
24 California Court of Appeal in favor of employees. *Roberto Betancourt v. Prudential Overall*
25 *Supply* (Cal. App. 4th Dist., Mar. 7, 2017) 9 Cal.App.5th 439, review denied, cert. denied (U.S.
26 Supreme Court Docket No. 17-254). The Riverside County Superior Court Case Numbers are
27 RIC1503952 and RICJCCP5046, and the Judicial Council Coordination Proceeding Number is
28 5046.

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

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

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

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

21 u) LFJ represented the plaintiff in a wage-and-hour class and PAGA
22 representative action against a food company on behalf of non-exempt employees. On June 30,
23 2017, the court granted final approval of the class and PAGA representative action settlement.
24 The Sacramento County Superior Court Case Number is 34-2015-00175871.

25 v) LFJ represented the plaintiffs in a wage-and-hour class and PAGA
26 representative action against a chocolate company on behalf of non-exempt employees. On July
27 19, 2017, the court granted final approval of the class and PAGA representative action
28 settlement. The Alameda County Superior Court Case Number is RG15764300.

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

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

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

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

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

26 bb) LFJ, in association with co-counsel therein, represents the plaintiff in a
27 wage-and-hour class action against a container manufacturer, on behalf of non-exempt
28 employees. On October 15, 2018, the court granted the plaintiff's motion for class certification.

1 The Tulare County Superior Court Case Number is VCU264528.

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

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

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

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

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

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1 hh) 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 and finding, in part, that
5 employer arbitration agreements are unenforceable where they block a PAGA claim from
6 proceeding, *ZB, N.A. v. Superior Court* (2019) 8 Cal.5th 175. On February 21, 2020, the court
7 granted approval of the PAGA representative action settlement. The San Diego County Superior
8 Court Case Number is 34-2015-00175330.

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

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

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

25 ll) LFJ, in association with co-counsel therein, represents the plaintiffs in a
26 wage-and-hour class action against manufacturer and supplier of power products and services on
27 behalf of non-exempt employees. On July 31, 2020, the court granted in part the plaintiffs'
28 motion for class certification and certified a class. The San Diego County Superior Court Case

Number is 37-2015-00025968-CU-OE-CTL.

mm) 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.

nn) LFJ represents the plaintiff in a wage-and-hour class action against an iconic lifestyle accessories brand and retailer on behalf of non-exempt employees. On March 15, 2022, the court granted the plaintiff's motion for class certification in part and certified a class. The San Francisco Superior Court Case Number is CGC-16-550794.

LITIGATION COSTS AND EXPENSES INCURRED BY CLASS COUNSEL

19. To date, Class Counsel has borne all the risks and costs of litigation and will not receive any compensation until recovery is obtained in the above-captioned action. Lawyers *for* Justice, PC has incurred **\$15,017.40** in litigation costs and expenses as reflected in **"EXHIBIT B"** attached hereto. These expenses were reasonable and necessary in the prosecution of this matter and to obtain the Settlement.

ENHANCEMENT AWARD TO PLAINTIFF

20. In recognition of his efforts and work serving as the Class Representative, the Settlement provides for an Enhancement Award in the amount of \$6,500.00 to Plaintiff Trevor Johnson to compensate Plaintiff for the time and effort that he expended on behalf of the Class and State of California. The requested Enhancement Award is fair and appropriate. Plaintiff spent a substantial amount of time and effort in producing relevant documents and past employment records and provided the facts and evidence necessary to attempt to prove the allegations. Plaintiff was available whenever Class Counsel needed him and actively tried to obtain information that would facilitate the pursuit of the class and PAGA claims. Plaintiff spent numerous hours speaking with Class Counsel about his claims, describing his work experience with Defendant, and gathering and reviewing documents. Accordingly, it is appropriate for Plaintiff Trevor Johnson to receive \$6,500.00 as a reasonable Enhancement Award, in addition to his Settlement Share, for his services on behalf of the Class and State of California.

Executed this 6th day of June 2022, at Glendale, California.

Edwin Aiwarzian

EXHIBIT A

JOHNSON V. RENAUD’S BAKERY AND BISTRO, INC.
(LOS ANGELES SUPERIOR COURT CASE NO. 19STCV35046)
ATTORNEY TASK AND TIME CHART

TASK	LAWYERS <i>for</i> JUSTICE, PC
Investigation and Research / Due Diligence	
Pre-Lawsuit Investigation of the Key Facts with a Focus on Class Certification Elements, including Adequacy, Typicality, Superiority, and Commonality	13.10
Pre-Lawsuit Investigation of the Merits of Plaintiff Trevor Johnson’s (“Plaintiff”) Claims and the Merits of the Claims of the Putative Class Members	11.40
Pre-Lawsuit Investigation of Potential Damages Exposure of Defendant Renaud’s Bakery and Bistro, Inc. (“Defendant”) with Respect to the Damages Sustained by Plaintiff Trevor Johnson and the Putative Class	10.50
Pre-Lawsuit Legal Research & Analysis of Latest Off-the-Clock, Meal and Rest Break Law, and Certification Decisions in California, including all Relevant and New Guidance and DLSE Materials	8.80
Investigation of Defendant, Defendant’s Business Relationships, and the Industry in which Defendant Operates	5.70
Investigation of Defendant’s Organizational, Corporate, and Executive Reporting Structures as They Relate to the Employment and Management of the Putative Class Members	4.90
Investigation of Defendant’s Executives, Officers, and Leadership with a Focus on Involvement in Wage-and-Hour Issues and Establishing Willfulness and Uniformity	5.50

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	3.20
Research and Investigation Re: Location(s), Division(s), and/or Department(s) Owned, Managed or Operated by Defendant in California During the Class Period, Including Differences Between the Various Locations, Division(s), and/or Department(s) to Determine Whether Those Differences Will Cause Individual Issues to Predominate Over Common Issues	4.80
Comparative Analysis and Cross-Checking of All Available Job Postings by Defendant in Order to Determine Any Variation and Identify Job Duties and Responsibilities That Would be Susceptible to Being Performed Off-the-Clock or During Meal or Rest Breaks	2.10
Comparative Analysis and Cross-Checking of All Available Job Reviews and Consumer Reviews for Defendant in Order to Determine Wage and Hour Issues, Variation, and Job Duties and Responsibilities Involving Performance of Work Off-the-Clock or During Meal or Rest Breaks	2.60
Research and Investigation Re: Workforce, Staffing Models, and Staffing Levels at Locations at Which Putative Class Members Worked Throughout California	5.20
Research and Investigation Re: Defendant's Written and Unwritten Policies, Practices, and Procedures Relating to Bonuses/Incentive/Production/Performance/Shift Differential Pay, Opening and Closing Procedures, Customer Service, Timekeeping, Scheduling, Meal/Rest Breaks, Meal/Rest Premiums, On Premises Breaks, Overtime Compensation, Health and Safety, Donning and Doffing, Uniform/Footwear, Personal Cell Phone Usage, Reimbursement of Business-Related Expenses, and Wage and Hour Compliance	20.50
Research and Investigation Re: Software Programs and Technology Defendant Uses to Conduct Its Everyday Business, Including Timekeeping, Inventory, Point of Sales, and CRM	7.50

Systems, with a Focus on What Documents (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 During Meal Breaks	
Research and Analysis of Potential Defenses Defendant May Raise, Including De Minimis Work, Non-Compensable Off-the-Clock Work, Waiver, and Compliant Policies	8.30
Research and Investigation Re: Post- <i>Duran</i> vs. <i>U.S. Bank</i> Trial Manageability Issues, including Research Regarding Which Experts to Retain and For What Purpose	7.20
Research and Analysis of Defendant's Past and Recent History Involving Wage-and-Hour Issues and Other Related Employment Issues and Complaints in Court and/or Other Forums (e.g., Administrative Agencies)	4.50
Prepare a Discovery Strategy Plan of Action, including Topics of Inquiry Important to Certification, Liability, and Damages/Civil Penalties	8.20
Meet and Communicate with Plaintiff Trevor Johnson throughout the Pendency of the Case	35.10
Meet and Communicate with Putative Class Members	16.50
Pleadings and Court Filings	
Draft Plaintiff's Class Action Complaint for Damages and Legal Research and Analysis of All Claims Involved (filed on October 2, 2019)	8.10
Review Court's Notice of Case Assignment (filed October 2, 2019)	0.10
Review Court's Minute Order Re: Continuance (filed on October 8, 2019)	0.20

Meet and Confer with Defense Counsel, and Review and Revise Defendant's Joint Stipulation Extending Time to Respond to Complaint and [Proposed] Order Thereon (served on November 14, 2019)	1.10
Review Court's Notice re: Continuance of Hearing and Order (filed on November 18, 2019)	0.10
Meet and Confer with Defense Counsel, and Review and Revise Defendant's Joint Stipulation to Continue Initial Status Conference; [Proposed] Order Thereon (served on November 26, 2019)	1.10
Review Court's Order Granting Defendant's Stipulation Extending Time to Respond to Complaint (filed on December 3, 2019)	0.10
Draft Plaintiff's Notice of Posting Jury Fees (filed on December 4, 2019)	0.20
Review Court's Order Granting Stipulation to Continue Initial Status Conference (filed on December 19, 2019)	0.10
Review Defendant's Notice of Entry of Order (served on January 6, 2020)	0.10
Meet and Confer with Defense Counsel, and Draft Joint Notice of Class Action Settlement (submitted on April 27, 2020)	1.10
Review Court's Minute Order Re: Continuance (filed on April 27, 2020)	0.10
Review Court's Minute Order Re: Notice of Class Action Settlement (filed on June 17, 2020)	0.10
Review Court's Minute Order Re: Nunc Pro Tunc Order (filed on November 17, 2020)	0.10
Draft Plaintiff's Notice of Continuance (filed on January 6, 2022)	0.20

Draft Plaintiff's First Amended Complaint for Enforcement Under the Private Attorneys General Act, California Labor Code § 2698, Et Seq. and Legal Research and Analysis of All Claims Involved (filed on January 14, 2022)	4.10
Appearances	
Prepare for and Telephonically Attend Hearing on Plaintiff's Motion for Preliminary Approval of Class Action Settlement (November 17, 2020)	0.50
Prepare for and Telephonically Attend Hearing on Plaintiff's Motion for Preliminary Approval of Class Action Settlement (July 6, 2021)	0.40
Prepare for and Telephonically Attend Hearing on Plaintiff's Motion for Preliminary Approval of Class Action Settlement (November 18, 2021)	0.60
Prepare for and Telephonically Attend Hearing on Plaintiff's Motion for Preliminary Approval of Class Action Settlement (January 11, 2022)	0.80
Prepare for and Telephonically Attend Hearing on Plaintiff's Motion for Final Approval of Class Action Settlement, Attorneys' Fees, Costs, and Enhancement Award (June 28, 2022) (Anticipated)	1.50
Discovery and Deposition	
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Trevor Johnson (served on June 7, 2019)	1.90
Review and Analyze Documents Produced by Defendant in Response to Request for Personnel Files, Pay Stubs, and Time Records for Plaintiff Trevor Johnson (served on July 2, 2019)	3.70

Review and Analyze Documents Produced by Defendant in Response to Request for Personnel Files, Pay Stubs, and Time Records for Plaintiff Trevor Johnson (served on February 14, 2020)	4.20
Letters and Correspondence	
Draft Notice to California Labor and Workforce Development Agency re: Claims of Plaintiff Trevor Johnson for Penalties Under California Labor Code section 2698, <i>et seq.</i> (“PAGA”) (served on October 26, 2020)	4.40
Meet with, Draft Correspondence to, and Respond to Correspondence from, Defense Counsel	20.10
Mediation/Settlement	
Review and Analyze Pre-Mediation Documents Produced by Defendant (served on February 14, 2020, February 26, 2020, February 27, 2020, March 12, 2020, and March 18, 2020) • Employee Handbooks and Policies • Employee Time Records • Employee Payroll Records • Financial Documents	41.50
Prepare for Mediation Session, Including Researching Merits of Claims, Drafting the Mediation Brief, Performing Violation, Damages, and Penalties Analysis and Calculations, and Compiling the Mediation Exhibits in Support of Plaintiff’s Mediation Brief (submitted on March 17, 2020)	24.30
Attend Mediation Session (March 20, 2020; Zoom Video Conference)	9.50
Review, Revise, Negotiate, and Finalize Joint Stipulation of Settlement and Release (fully executed on December 2, 2020)	18.40

Draft, Negotiate, and Finalize Amendment No. 1 Joint Stipulation of Settlement and Release (fully executed on January 20, 2022)	4.20
Monitor Settlement Administration Process and Review Administrator's Weekly Reports	3.80
Law and Motion	
Meet and Confer with Defense Counsel, and Draft Joint Stipulation to Continue Hearing on Motion for Preliminary Approval; [Proposed] Order Thereon (submitted on November 16, 2020)	1.10
Review Court's Minute Order Re: Motion for Preliminary Approval (filed on November 17, 2020)	0.10
Review Court's Minute Order Re: Motion for Preliminary Approval (filed on July 6, 2021)	0.10
Research and Draft Plaintiff's Motion for Preliminary Approval of Class Action Settlement, Declaration of Edwin Aiwarzian in Support Thereof, Declaration of Trevor Johnson in Support Thereof, and [Proposed] Order Granting Preliminary Approval of Class Action Settlement (filed on November 15, 2021)	19.20
Review Court's Minute Order Re: Motion for Preliminary Approval (filed on November 15, 2021)	0.10
Review Court's Minute Order Re: Motion for Preliminary Approval (filed on January 11, 2021)	0.10
Draft Plaintiff's Supplemental Brief in Support of Motion for Preliminary Approval of Class Action Settlement, Supplemental Declaration of Edwin Aiwarzian in Support Thereof, and [Revised Proposed] Order Granting Preliminary Approval of Class Action Settlement (filed on January 25, 2022)	10.80

Review Defendant's Declaration of Alison M. Bernal re Class Member Language Capabilities (served on January 25, 2022)	0.60
Review Court's Order Granting Motion for Preliminary Approval (filed on January 29, 2022)	0.20
Research and Draft Plaintiff's Motion for Final Approval of Class Action Settlement, Attorneys' Fees, Costs, and Enhancement Award, Declaration of Edwin Aiwasian in Support Thereof, and [Proposed] Final Approval Order and Judgment; and Review Declaration of Settlement Administrator in Support Thereof (filed on June 6, 2022) (Anticipated)	21.50
Total Hours:	396.10

EXHIBIT B

LAWYERS for JUSTICE PC CASE COST DETAIL
Johnson v. Renaud's Bakery and Bistro, Inc.

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
10/1/2019	Los Angeles Superior Court	Complex Fee	1,000.00
10/1/2019	Los Angeles Superior Court	Filing Fee	435.00
10/8/2019	Legal Document Server	Attorney Service	150.00
10/30/2019	Pure Legal, Inc.	Attorney Service	196.50
10/30/2019	Pure Legal, Inc.	Attorney Service	195.60
12/4/2019	Pure Legal, Inc.	Attorney Service	195.90
12/4/2019	Los Angeles Superior Court	Jury Fee	150.00
12/11/2019	Los Angeles Superior Court	Document Download Fee	3.00
2/18/2020	General Logistics Systems US, Inc.	Courier Service	29.85
3/6/2020	First Mediation Corporation	Mediation Fee	7,500.00
3/20/2020	Robert A. Parris	Damages Consulting Expert	4,200.00
4/27/2020	Legal Document Server, Inc.	Attorney Service	90.00
6/18/2020	Legal Document Server, Inc.	Attorney Service	110.00
8/7/2020	Stats Company	Analysis of Sampling of Time Records	150.00
11/16/2020	Legal Document Server, Inc.	Attorney Service	110.70
11/16/2020	Legal Document Server, Inc.	Attorney Service	95.00
11/16/2020	Los Angeles Superior Court	Filing Fee	20.00
11/17/2020	Los Angeles Superior Court	Remote Hearing Fee	15.00
7/6/2021	Los Angeles Superior Court	Remote Hearing Fee	15.00
11/16/2021	Legal Document Server, Inc.	Attorney Service	17.75
11/16/2021	Legal Document Server, Inc.	Attorney Service	126.75
11/16/2021	Los Angeles Superior Court	Filing Fee	60.00
1/6/2022	Legal Document Server, Inc.	Attorney Service	15.20
1/18/2022	Legal Document Server, Inc.	Attorney Service	15.20
1/26/2022	Legal Document Server, Inc.	Attorney Service	15.20
1/26/2022	Legal Document Server, Inc.	Attorney Service	105.75
Total:			15,017.40