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*Attorneys for Plaintiff and the Class*

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

MONICA MONTALBO, individually, and  
on behalf of other members of the general  
public similarly situated;

Plaintiff,

vs.

HM.CLAUSE, INC. DBA HARRIS  
MORAN SEED COMPANY, a California  
corporation; and DOES 1 through 100,  
inclusive,

Defendants.

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

Plaintiff,

vs.

HM.CLAUSE, INC. DBA HARRIS  
MORAN SEED COMPANY, a California  
corporation; and DOES 1 through 100,  
inclusive,

Defendants.

Case No. CV-20-004516 [Lead]  
[Consolidated with Case No. CV-20-005703]

Honorable Sonny S. Sandhu  
Department 24

**CLASS ACTION**

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

[Plaintiff's Motion for Final Approval of  
Class Action Settlement, Attorneys' Fees and  
Costs, and Enhancement Award; Declaration  
of Class Representative (Monica Montalbo);  
Declaration of Settlement Administrator  
(Madely Nava of ILYM Group, Inc.) and  
[Proposed] Final Approval Order and  
Judgment filed concurrently herewith]

Date: May 19, 2022  
Time: 8:30 a.m.  
Department: 24

Complaint Filed: October 13, 2020  
Trial Date: None Set

**DECLARATION OF EDWIN AIWAZIAN**

I, Edwin Aiwarzian, 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 Monica Montalbo. The facts set forth in this declaration are within my personal knowledge or based on information and belief, and if called as a witness, I could and would competently testify thereto.

**PRELIMINARY APPROVAL OF SETTLEMENT**

2. On October 14, 2021, in Department 24 of the above-entitled Court, the Honorable Sonny S. Sandhu preliminarily approved the Settlement Agreement and Stipulation to Resolve Class Action and PAGA Claims (“Settlement,” “Agreement,” or “Settlement Agreement”) entered into between Plaintiff and Defendant HM.Clause, Inc. dba Harris Moran Seed Company (“Defendant”), and conditionally certified the Class for settlement purposes. The Court preliminarily appointed Plaintiff Monica Montalbo 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 Class Action Settlement (“Notice”), adopted the notice, opt-out, and objection procedures, and ordered their implementation. The Court appointed ILYM Group, Inc. (“ILYM Group”) to serve as Settlement Administrator for handling 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 Costs, Class Representative Enhancement Award, Settlement 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 this matter since prior to the commencement of Plaintiff’s putative class action, entitled *Montalbo v. HM.Clause, Inc. dba Harris Moran Seed Company*, Stanislaus County Superior Court Case No. CV-20-004516 (“Class Action”), on October 13, 2020, and Plaintiff’s representative action under the Private

1 Attorneys General Act (“PAGA”), entitled *Montalbo v. HM.Clause, Inc. dba Harris Moran*  
2 *Seed Company*, Stanislaus County Superior Court Case No. CV-20-005703 (“PAGA Action”),  
3 on December 16, 2020, as have several other attorneys and members in our firm.

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

15 6. We used the pre-mediation time period to investigate the veracity, strength, and  
16 scope of the claims, and also to prepare the matter for class certification, representative  
17 adjudication, and trial. The parties conducted significant formal and informal discovery and  
18 investigation into the facts of the cases, and also informally exchanged information and data in  
19 preparation for mediation. Class Counsel propounded multiple sets of formal written discovery  
20 requests on Defendant (specifically, Requests for Production of Documents (Set One), Special  
21 Interrogatories (Sets One and Two), and Form Interrogatories-General (Set One)), and noticed  
22 the depositions of Defendant’s Person Most Knowledgeable designees regarding organizational  
23 structure and job duties. Class Counsel also interviewed and obtained information from Plaintiff  
24 and other Class Members, including and not limited to the names of potential witnesses, and  
25 reviewed and analyzed thousands of pages of documents and data obtained from Defendant,  
26 Plaintiff, and other sources. The volume of data and documents that Class Counsel reviewed  
27 and analyzed included and was not limited to: Plaintiff’s employment records, a detailed  
28 sampling of Class Members’ time and pay data, Defendant’s Employee Handbook, Defendant’s

1 operations and employment practices, forms such as Meal Break Waivers, procedures  
2 (including, but not limited to, Meal Break Violations & Penalties for Non-Exempt Employees),  
3 and policies (including, but not limited to, Time Keeping Policy and Meal Period and Rest Break  
4 policy), among other information and documents. Other work performed by Class Counsel  
5 included, and was not limited to, case strategy and analysis; drafting, reviewing, and revising  
6 the pleadings and mediation brief; preparing and appearing for court proceedings; preparing for  
7 and attending mediation and settlement negotiations; and reviewing and revising settlement  
8 papers and drafting and finalizing the motions for preliminary approval and final approval of  
9 the Settlement.

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

18 8. After conducting significant investigation of the facts and law during the  
19 prosecution of the cases, counsel for the parties engaged in extensive settlement negotiations to  
20 try to resolve the entire matter. These efforts included participating in a formal, full-day  
21 mediation conducted by Lynn S. Frank, Esq., a well-regarded mediator experienced in  
22 mediating complex labor and employment matters. During all settlement discussions, the  
23 parties conducted their negotiations at arm's length in an adversarial position. Prior to and  
24 during mediation, the parties exchanged information and data, and discussed all aspects of the  
25 cases, including the risks and delays of further litigation, the risks to the parties of proceeding  
26 with class certification and trial, the law relating to off-the-clock theory, meal and rest periods,  
27 representative PAGA claims, and wage-and-hour enforcement, the evidence produced and  
28 analyzed, and the possibility of appeals, among other things. Arriving at a settlement that was

1 acceptable to the parties was not easy. Defendant contended that individualized questions of  
2 fact predominate over any common issues, and these issues would pose challenges to  
3 certification and representative adjudication. Defendant and its counsel felt very strongly about  
4 Defendant's ability to prevail on the merits and to obtain a denial of class certification, while  
5 Plaintiff and Class Counsel believed that class certification would be obtained and that they  
6 would prevail at trial. With the aid of the mediator's evaluation, the parties agreed that the cases  
7 were well-suited for settlement given the legal issues relating to Plaintiff's principal claims, as  
8 well as the costs and risks to the parties that would attend further litigation. These risks of  
9 further litigation include, and are not limited to, a determination that the claims are unsuitable  
10 for class treatment and/or representative adjudication, failure to obtain certification, class de-  
11 certification after certification of a class, allowing a jury to decide the claims asserted in the  
12 cases, and the real possibility of no recovery after years of litigation.

13 9. As set forth more fully in the accompanying Motion for Final Approval, Class  
14 Counsel seeks attorneys' fees in the amount of \$332,500.00, which is thirty-five percent (35%)  
15 of the Gross Settlement Amount of \$950,000.00, as set forth in the Settlement Agreement and  
16 the Notice. Pursuant to the contingency-fee agreement entered into by and between Plaintiff  
17 and Class Counsel, Plaintiff has agreed to contingency fees of at least thirty-five percent (35%)  
18 of the recovery. The attorneys' fees sought are commensurate with: (1) the risk that Class  
19 Counsel took in commencing the cases; (2) the time, effort, and expense that Class Counsel  
20 dedicated to the cases; (3) the skill and determination that Class Counsel has shown; (4) the  
21 results that Class Counsel has achieved throughout the litigation; (5) the value of the settlement  
22 that Class Counsel has achieved for the Class Members, State of California, and Aggrieved  
23 Employees; and (6) the other cases that Class Counsel has turned down in order to devote its  
24 time and efforts to the cases.

25 10. I am aware that the common and acceptable rate for contingency representation  
26 in wage and hour class action litigation is normally 40% before trial, with the range being from  
27 33.3% up to 50%.

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11. While not necessarily required to be demonstrated because the percentage fee sought in this matter is proper, Class Counsel has incurred so many hours of work in connection with prosecuting the cases such that the attorneys' fees request is also justified under a lodestar analysis. Lawyers for Justice, PC has spent a total of **478.90 hours** performing tasks on behalf of Plaintiff, Class Members, the State of California, and Aggrieved Employees. Attached hereto as "**EXHIBIT A**" is an Attorney Task and Time Chart for Lawyers for Justice, PC describing in detail the nature of the legal services provided by attorneys at the firm, and the time incurred performing those services. The hours attributable to Lawyers for Justice, PC include work done by myself and several other attorneys. Additionally, Lawyers for Justice, PC had litigation support personnel actively engaged in assisting with the prosecution of the cases.

12. The work performed in the cases, the background of our firm, as well as the individual backgrounds, training, and experience of the attorneys who worked on the cases, in litigating complex wage-and-hour class and representative actions, support a reasonable hourly rate of compensation at the rate of at least \$750 for work performed by Lawyers for Justice, PC. Lawyers for Justice, PC has been awarded attorneys' fees, compensating the firm at the rate of at least \$750 per hour for legal services performed, by courts granting final approval in other cases: final approval of the class and representative action settlement in *David Dugan v. TEC Equipment, Inc., et al.* (Los Angeles Superior Court Case No. 19STCV01591) was granted on July 8, 2021, and the award of attorneys' fees involved an hourly rate of \$936.47; final approval of the class and representative action settlement in *Larry Greenwood, et al. v. Scan Health Plan* (Los Angeles Superior Court Case No. BC715157) was granted on April 20, 2021, and the award of attorneys' fees involved an hourly rate of \$919.57; final approval of the class action settlement in *Thereasa Carrozzella v. Basalite Concrete Products, LLC* (Sacramento County Superior Court Case No. 34-2017-00220214-CU-OE-GDS) was granted on February 21, 2020, and the award of attorneys' fees involved an hourly rate of \$766.05; final approval of the class and representative action settlement in *Alice Rutledge, et al. v. Healthport Technologies, LLC* (Alameda County Superior Court Case No. RG16835813) was granted on June 11, 2019, and the award of attorneys' fees involved an hourly rate of \$764.82; final approval of the class and

representative 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 a higher hourly rate of \$855.96; final approval of the class and representative action settlement in *Stanley Bland, et al. v. Telecare Corporation* (Alameda County Superior Court Case No. RG16811450) was granted on November 21, 2018, and the award of attorneys' fees involved a higher hourly rate of \$831.38; 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 a higher hourly rate of \$780.77; final approval of the class and representative action settlement in *Elizabeth Ortiz, et al. v. Ghirardelli Chocolate Company* (Alameda County Superior Court Case No. RG15764300) was granted on July 19, 2017, and the award of attorneys' fees involved a higher hourly rate of \$575; and 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 a higher hourly rate of \$845.64.

## 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 the law firm of *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.

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**EXAMPLES OF RESULTS IN WAGE-AND-HOUR COMPLEX AND CLASS  
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:

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

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

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

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

e. LFJ, in association with co-counsel therein, represented the plaintiff in a wage-and-hour class and PAGA representative action against a bank, involving allegations of misclassification of the “Assistant Branch Manager” position. On August 27, 2013, the court granted final approval of the class and PAGA representative action settlement. The Kern

County Superior Court Case Number is S-1500-CV-273194-LHB.

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

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

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

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

j. 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 upscale hardware and home furnishings, on behalf of non-exempt employees. On April 28, 2016, the court granted final approval of the class and PAGA representative action settlement. The Los Angeles County Superior Court Case Numbers are BC516795 and JCCP4794, and the Judicial

1 Council Coordination Proceeding Number is 4794.

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

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

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

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

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

25 p. LFJ, on behalf of the plaintiff and respondent in a PAGA representative  
26 action, successfully opposed in the trial court, and briefed and argued an appeal with respect to  
27 the employer’s motion to compel arbitration, which resulted in a published opinion by the  
28 California Court of Appeal in favor of employees. *Roberto Betancourt v. Prudential Overall*

1 *Supply* (Cal. App. 4th Dist., Mar. 7, 2017) 9 Cal.App.5th 439, review denied, cert. denied (U.S.  
2 Supreme Court Docket No. 17-254). The Riverside County Superior Court Case Numbers are  
3 RIC1503952 and RICJCCP5046, and the Judicial Council Coordination Proceeding Number is  
4 5046.

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

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

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

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

25 u. LFJ represented the plaintiff in a wage-and-hour class and PAGA  
26 representative action against a food company on behalf of non-exempt employees. On June 30,  
27 2017, the court granted final approval of the class and PAGA representative action settlement.  
28 The Sacramento County Superior Court Case Number is 34-2015-00175871.

1 v. LFJ represented the plaintiffs in a wage-and-hour class and PAGA  
2 representative action against a chocolate company on behalf of non-exempt employees. On July  
3 19, 2017, the court granted final approval of the class and PAGA representative action  
4 settlement. The Alameda County Superior Court Case Number is RG15764300.

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

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

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

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

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

1 Number is BC498401.

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

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

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

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

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

26 gg. LFJ, in association with co-counsel therein, represented the plaintiffs in a  
27 wage-and-hour class and PAGA representative action against a national retailer of apparel and  
28 fashion accessories, on behalf of non-exempt employees. On October 9, 2019, the court granted

1 the plaintiffs' motion for class certification in part and certified a class. On May 14, 2021, the  
2 court granted final approval of the class and PAGA representative action settlement. The  
3 Sacramento County Superior Court Case Number is 34-2015-00175330-CU-OE-GDS.

4 hh. LFJ, in association with co-counsel therein, on behalf of the plaintiff and  
5 respondent in a PAGA representative action, successfully opposed in the trial court, and briefed  
6 and argued an appeal with respect to the employer's motion to compel arbitration, resulting in  
7 a notable decision from the California Supreme Court clarifying the law and finding, in part,  
8 that employer arbitration agreements are unenforceable where they block a PAGA claim from  
9 proceeding, *ZB, N.A. v. Superior Court* (2019) 8 Cal.5th 175. On February 21, 2020, the court  
10 granted approval of the PAGA representative action settlement. The San Diego County  
11 Superior Court Case Number is 34-2015-00175330.

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

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

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

28 ///

1            ll.     LFJ, in association with co-counsel therein, represents the plaintiffs in a  
2 wage-and-hour class and PAGA representative action against a plastic packaging company on  
3 behalf of non-exempt employees. On June 8, 2020, the court granted in part the plaintiffs'  
4 motion for class certification and certified a class. On November 8, 2021, the court granted  
5 approval of the partial settlement of the action. The San Bernardino County Superior Court  
6 Case Number is CIVDS1507361.

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

12            nn. LFJ represents the plaintiff in a wage-and-hour class action against a  
13 nutritional products manufacturer on behalf of non-exempt production line employees. On  
14 December 13, 2021, the court granted the plaintiff's motion for class certification in part and  
15 certified a class. The Solano County Superior Court Case Number is FCS051001.

16            oo. LFJ represents the plaintiff in a wage-and-hour class action against an  
17 iconic lifestyle accessories brand and retailer on behalf of non-exempt employees. On March  
18 15, 2022, the court granted the plaintiff's motion for class certification in part and certified a  
19 class. The San Francisco Superior Court Case Number is CGC-16-550794.

20                    **LITIGATION COSTS AND EXPENSES INCURRED BY**

21                    **LAWYERS FOR JUSTICE, PC**

22            19. To date, Class Counsel have borne all the risks and costs of litigation and will not  
23 receive any compensation until recovery is obtained by Plaintiff, Class Members, State of  
24 California, and Aggrieved Employees. Lawyers for Justice, PC has incurred **\$20,317.28** in  
25 litigation costs and expenses in the case, as reflected in "**EXHIBIT B**" attached hereto. These  
26 expenses were reasonable and necessary in the prosecution of the cases and to obtain the  
27 Settlement. It should be noted that Class Counsel has borne all of the risks and costs of litigation  
28 and will not receive any compensation until recovery is obtained under the Settlement.

**ENHANCEMENT AWARD TO PLAINTIFF**

20. In recognition of her efforts and work serving as the Class Representative, the Settlement provides for an Enhancement Award in the amount of \$7,500.00 to Plaintiff Monica Montalbo to compensate Plaintiff for the time and effort that she expended in the cases. 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 her 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 her claims, describing her work experience with Defendant, and gathering and reviewing documents. Accordingly, it is appropriate for Plaintiff Monica Montalbo to receive \$7,500.00 as a reasonable Enhancement Award, in addition to her Individual Settlement Payment and Individual PAGA Payment, for her services on behalf of the Class, State of California, and Aggrieved Employees.

21. I submit that the Settlement is fair, reasonable, and adequate. In addition, the Settlement is in the best interests of Plaintiff, the Class, State of California, and Aggrieved Employees.

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 April 2022, at Glendale, California.



Edwin Aiwarzian

# **EXHIBIT A**

***MONTALBO V. HM.CLAUSE, INC. DBA HARRIS MORAN SEED COMPANY***  
**(STANISLAUS COUNTY SUPERIOR COURT CASE NO. CV-20-004516) (“CLASS ACTION”) (LEAD)**  
***MONTALBO V HM.CLAUSE, INC. DBA HARRIS MORAN SEED COMPANY***  
**(STANISLAUS COUNTY SUPERIOR COURT CASE NO. CV-20-005703) (“PAGA ACTION”)**

**ATTORNEY TASK AND TIME CHART**

| TASK                                                                                                                                                                                                                                                       | LAWYERS FOR JUSTICE, PC |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------|
| <b>Investigation and Research / Due Diligence</b>                                                                                                                                                                                                          |                         |
| Pre-Lawsuit Investigation of the Key Facts with a Focus on Class Certification Elements, Including Adequacy, Typicality, Superiority, and Commonality                                                                                                      | 13.60                   |
| Pre-Lawsuit Investigation of the Merits of Plaintiff Monica Montalbo’s (“Plaintiff”) Claims and the Merits of the Claims of the Putative Class Members                                                                                                     | 10.30                   |
| Pre-Lawsuit Investigation of the Merits of Plaintiff’s Claim on behalf of State of California with Respect to Aggrieved Employees                                                                                                                          | 9.50                    |
| Pre-Lawsuit Investigation of Potential Damages Exposure of Defendant HM Clause, Inc. dba Harris Moran Seed Company (“Defendant”) with Respect to the Damages Sustained by Plaintiff and the Putative Class Members                                         | 8.40                    |
| Pre-Lawsuit Investigation of Potential Civil Penalties Exposure of Defendant with Respect to Alleged Labor Code and IWC Wage Order Violations with Respect to Plaintiff and the Aggrieved Employees Pursuant to the Private Attorneys General Act (“PAGA”) | 7.50                    |

|                                                                                                                                                                                                                                                                                                                                                                            |       |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------|
| Pre-Lawsuit Legal Research and Analysis of Latest Off-the-Clock, Meal and Rest Break, Wage Order, Exemption, Representative PAGA, and Certification Decisions and Law in California, Including all New and Relevant DLSE Materials                                                                                                                                         | 8.10  |
| Investigation of Defendant, Defendant's Business Relationships, and the Industry in Which Defendant Operates                                                                                                                                                                                                                                                               | 5.30  |
| Investigation of Defendant's Organizational and Corporate Structure, and Executive Reporting Structure as It Relates to the Employment and Management of the Putative Class Members                                                                                                                                                                                        | 5.80  |
| Investigation of Defendant's Executives, Officers, and Leadership with a Focus on Involvement in Wage-and-Hour Issues and Establishing Willfulness and Uniformity                                                                                                                                                                                                          | 3.50  |
| Analysis of Competitors in 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                                                                                                                        | 5.40  |
| Research and Investigation Re: Location(s), Division(s), and/or Department(s) Owned, Managed, and/or Operated by Defendant in California During the Class Period, Including Differences Between Them to Determine Whether Those Differences Will Cause Individual Issues to Predominate Over Common Issues                                                                 | 5.20  |
| 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                                                                                                               | 6.50  |
| Research and Investigation Re: Workforce, Staffing Models, and Staffing Levels at Locations at which Putative Class Members Worked Throughout California                                                                                                                                                                                                                   | 5.80  |
| Research and Investigation Re: Defendant's Policies, Practices, and Procedures Relating to Non-Discretionary Bonus/Incentive/Shift Differential Pay, Timekeeping, Attendance and Scheduling, Meal/Rest Breaks, On Premises Breaks, Group Lunches, Meal Waivers, Overtime Compensation, Personal Cell Phone Use, Dress Code, and Reimbursement of Business-Related Expenses | 14.50 |

|                                                                                                                                                                                                                                                                                                                                                                                                                             |       |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------|
| Research and Investigation Re: Various Software Programs, Systems, and Other Technology Defendant Uses to Conduct Its Everyday Business, Including Timekeeping, Inventory, and Project Management 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 Time Worked During Meal Breaks | 5.90  |
| Research and Analysis of Potential Defenses Defendant May Raise, Including <i>De Minimis</i> Work, Non-Compensable Off-the-Clock Work, Waiver, and Compliant Policies                                                                                                                                                                                                                                                       | 8.10  |
| Research and Investigation 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                                                                                                                                                                                                                                                | 7.30  |
| Research and Analysis of Defendant's Litigation History Involving Wage-and-Hour Issues and Other Related Employment Issues                                                                                                                                                                                                                                                                                                  | 4.90  |
| Prepare a Discovery Strategy Plan of Action, Including Topics of Inquiry Important to Certification, Liability, and Damages/Civil Penalties                                                                                                                                                                                                                                                                                 | 7.60  |
| Research and Investigation of Impact of COVID-19 Pandemic on Defendant, Its Operations, and Putative Class Members' Work                                                                                                                                                                                                                                                                                                    | 6.80  |
| Meet and Communicate with Plaintiff Monica Montalbo Throughout the Pendency of the Case                                                                                                                                                                                                                                                                                                                                     | 41.50 |
| Meet and Communicate with Putative Class Members                                                                                                                                                                                                                                                                                                                                                                            | 26.50 |
| <b>Pleadings and Court Filings</b>                                                                                                                                                                                                                                                                                                                                                                                          |       |
| Research and Draft Plaintiff's Class Action Complaint for Damages and Legal Research and Analysis of All Claims Involved (filed on October 13, 2020)                                                                                                                                                                                                                                                                        | 9.60  |
| Review Court's Notice of Case Management Conference (filed on October 13, 2020)                                                                                                                                                                                                                                                                                                                                             | 0.10  |

|                                                                                                                                                                                                                                                              |      |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------|
| Review and Analyze Defendant's Answer to Class Action Complaint for Damages and Research Affirmative Defenses in Defendant's Answer (served on December 14, 2020)                                                                                            | 2.10 |
| Research and Draft Plaintiff's Class Action Complaint for Enforcement Under the Private Attorneys General Act, California Labor Code Section 2698, Et Seq. and Legal Research and Analysis of All Claims Involved (filed on December 16, 2020) (PAGA Action) | 8.30 |
| Review Court's Notice of Case Management Conference (filed on December 16, 2020) (PAGA Action)                                                                                                                                                               | 0.10 |
| Review Court's Minute Order Re: Case Management Conference (filed on December 31, 2020) (PAGA Action)                                                                                                                                                        | 0.10 |
| Review Court's Minute Order Re: Case Reassignment (filed on January 21, 2021) (PAGA Action)                                                                                                                                                                  | 0.10 |
| Draft Plaintiff's Case Management Statement (filed on February 1, 2021)                                                                                                                                                                                      | 1.90 |
| Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation to Continue Case Management Conference and [Proposed] Order Thereon (submitted on February 1, 2021)                                                                                    | 2.80 |
| Draft Plaintiff's Case Management Statement (filed on April 9, 2021)                                                                                                                                                                                         | 1.50 |
| Draft Notice of Ruling Re: Initial Status Conference (filed on April 27, 2021) (PAGA Action)                                                                                                                                                                 | 0.50 |
| Review Defendant's Notice and Acknowledgement of Receipt (served on May 6, 2021) (PAGA Action)                                                                                                                                                               | 0.10 |
| Review and Analyze Defendant's Answer to Complaint and Research Affirmative Defenses in Defendant's Answer (served on June 1, 2021) (PAGA Action)                                                                                                            | 2.50 |
| Review Defendant's Notice of Related Case (filed on June 11, 2021)                                                                                                                                                                                           | 0.20 |
| Review Defendant's Notice of Related Case (filed on June 11, 2021) (PAGA Action)                                                                                                                                                                             | 0.20 |

|                                                                                                                                                                                                                                            |      |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------|
| Meet and Confer with Defendant's Counsel, and Draft Joint Notice of Settlement and Case Management Statement (submitted on June 18, 2021)                                                                                                  | 1.50 |
| Meet and Confer with Defendant's Counsel, and Draft Joint Notice of Settlement and Case Management Statement (submitted on June 18, 2021) (PAGA Action)                                                                                    | 0.80 |
| Meet and Confer with Defendant's Counsel, and Draft Joint Stipulation to Consolidate CV-20-004516 and CV-20-005703 for Purposes of Class Action and PAGA Settlement; [Proposed] Order (submitted on July 8, 2021) (Class and PAGA Actions) | 2.10 |
| Review Court's Order Granting Stipulation to Consolidate CV-20-004516 and CV-20-005703 for Purposes of Class Action and PAGA Settlement (filed on July 8, 2021) (Class and PAGA Actions)                                                   | 0.20 |
| <b>Appearances</b>                                                                                                                                                                                                                         |      |
| Prepare for and Telephonically Attend Initial Status Conference (April 26, 2021) (PAGA Action)                                                                                                                                             | 1.50 |
| Prepare for and Telephonically Attend Case Management Conference (July 6, 2021) (PAGA Action)                                                                                                                                              | 1.90 |
| Prepare for and Telephonically Attend Case Management Conference (July 12, 2021)                                                                                                                                                           | 1.50 |
| Prepare for and Telephonically Attend Hearing on Plaintiff's Motion for Preliminary Approval of Class Action Settlement (October 14, 2021)                                                                                                 | 2.30 |
| Prepare for, Travel to/from, and Attend Hearing on Plaintiff's Motion for Final Approval of Class Action Settlement, Attorneys' Fees, Costs, and Enhancement Award (May 19, 2022) (Anticipated)                                            | 2.50 |
| <b>Discovery and Deposition</b>                                                                                                                                                                                                            |      |
| Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Monica Montalbo (served on April 27, 2020)                                                                                             | 1.90 |

|                                                                                                                                                                                                                                 |       |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------|
| Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Monica Montalbo (served on June 2, 2020)                                            | 3.60  |
| Review and Analyze Documents Produced by Defendant (served on June 11, 2020)                                                                                                                                                    | 0.30  |
| Draft Follow-Up Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Monica Montalbo (dated July 6, 2020)                                                                              | 1.60  |
| Review and Analyze Defendant's Notice of Deposition of Monica Montalbo (served on November 25, 2020)                                                                                                                            | 0.70  |
| Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (noticed for January 21, 2021; Organizational Structure) (served on December 16, 2020)                | 4.90  |
| Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (noticed for January 22, 2021; Job Duties) (served on December 16, 2020)                              | 5.60  |
| Draft Plaintiff's Form Interrogatories - General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), and Requests for Production of Documents (Set One) to Defendant (served on December 16, 2020) | 11.30 |
| <b>Letters and Correspondence</b>                                                                                                                                                                                               |       |
| Draft Notice to California Labor and Workforce Development Agency Re: Claims of Plaintiff Monica Montalbo for Penalties Under California Labor Code section 2698, <i>et seq.</i> (served on October 7, 2020)                    | 4.10  |
| Meet and Confer with, Draft Correspondence to, and Respond to Correspondence from, Defendant's Counsel                                                                                                                          | 22.50 |

| <b>Mediation/Settlement</b>                                                                                                                                                                                                                                                                                                          |       |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------|
| Review and Analyze Mediation Data and Documents Produced by Defendant (served on May 13, 2021, May 23, 2021, and June 2, 2021) <ul style="list-style-type: none"> <li>• Employee Handbooks and Policies</li> <li>• Sampling of Employee Time Data</li> <li>• Sampling of Employee Pay Data</li> <li>• Redacted Class List</li> </ul> | 34.80 |
| Prepare for Mediation, Including Researching Settlement-Related Issues and Merits of Claims, Drafting the Mediation Brief, Compiling the Mediation Exhibits in Support of Mediation Brief, Performing Violation, Damages, and Penalties Analysis and Calculations, and Conferring with Consulting Expert (submitted on May 15, 2021) | 22.60 |
| Attend Mediation Session (June 10, 2021; Zoom Video Conference)                                                                                                                                                                                                                                                                      | 16.80 |
| Draft, Review, Revise, Negotiate, and Finalize Settlement Agreement and Stipulation to Resolve Class Action and PAGA Claims (executed on September 14, 2021) and Draft Exhibits                                                                                                                                                      | 25.20 |
| Coordinate Settlement Administration with Settlement Administrator, Ongoing Monitoring of Settlement Administration, and Respond to Inquiries                                                                                                                                                                                        | 7.60  |
| <b>Law and Motion</b>                                                                                                                                                                                                                                                                                                                |       |
| Research and Draft Plaintiff's Notice of Motion and Motion for Preliminary Approval of Class Action Settlement, Declaration of Edwin Aiwasian in Support Thereof, Declaration of Monica Montalbo in Support Thereof, and [Proposed] Order Thereon (filed on September 21, 2021)                                                      | 24.20 |
| Review Court's Order Granting Preliminary Approval of Class Action Settlement (filed on October 15, 2021)                                                                                                                                                                                                                            | 0.30  |

|                                                                                                                                                                                                                                                                                                                                                                                          |        |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------|
| Review and Analyze Settlement Administrator's Declaration Regarding Settlement Notice Administration; and 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 (filed on April 27, 2022) (Anticipated) | 28.50  |
| <b>Total Hours:</b>                                                                                                                                                                                                                                                                                                                                                                      | 478.90 |

# **EXHIBIT B**

**LAWYERS for JUSTICE PC CASE COST DETAIL**  
**Montalbo v. HM Clause, Inc. (CLASS and PAGA)**

| <u>Date</u>   | <u>Payee</u>                       | <u>Expense Description</u>           | <u>Amount</u>    |
|---------------|------------------------------------|--------------------------------------|------------------|
| 10/15/2020    | Legal Document Server, Inc.        | Attorney Service                     | 64.98            |
| 10/15/2020    | Stanislaus Superior Court          | Filing Fee                           | 435.00           |
| 10/15/2020    | Stanislaus Superior Court          | Complex                              | 1,000.00         |
| 10/28/2020    | Legal Document Server, Inc.        | Attorney Service                     | 110.00           |
| 11/20/2020    | Legal Document Server, Inc.        | Attorney Service                     | 14.60            |
| 12/16/2020    | General Logistics Systems US, Inc. | Courier Service                      | 17.58            |
| 12/17/2020    | Legal Document Server, Inc.        | Attorney Service                     | 41.79            |
| 12/17/2020    | Stanislaus Superior Court          | Filing Fee                           | 435.00           |
| 1/6/2021      | Legal Document Server, Inc.        | Attorney Service                     | 14.60            |
| 1/29/2021     | Legal Document Server, Inc.        | Attorney Service                     | 14.60            |
| 2/1/2021      | General Logistics Systems US, Inc. | Courier Service                      | 15.34            |
| 2/3/2021      | Legal Document Server, Inc.        | Attorney Service                     | 14.60            |
| 4/7/2021      | Legal Document Server, Inc.        | Attorney Service                     | 11.00            |
| 4/8/2021      | Legal Document Server, Inc.        | Attorney Service                     | 155.25           |
| 4/8/2021      | Stanislaus Superior Court          | Jury Fee                             | 150.00           |
| 4/9/2021      | General Logistics Systems US, Inc. | Courier Service                      | 15.56            |
| 4/9/2021      | Legal Document Server, Inc.        | Attorney Service                     | 14.75            |
| 4/27/2021     | Legal Document Server, Inc.        | Attorney Service                     | 14.75            |
| 5/18/2021     | Lynn S. Frank                      | Mediation Fee                        | 7,500.00         |
| 5/20/2021     | Legal Document Server, Inc.        | Attorney Service                     | 11.00            |
| 6/10/2021     | Robert A. Parris                   | Damages Consulting Expert            | 8,700.00         |
| 6/21/2021     | Legal Document Server, Inc.        | Attorney Service                     | 29.50            |
| 7/2/2021      | Stanislaus Superior Court          | Remote Hearing Fee                   | 96.35            |
| 7/8/2021      | Stanislaus Superior Court          | Remote Hearing Fee                   | 96.35            |
| 9/23/2021     | One Legal                          | Attorney Service                     | 19.53            |
| 9/23/2021     | Stanislaus Superior Court          | Filing Fee                           | 60.00            |
| 10/12/2021    | Stanislaus Superior Court          | Remote Hearing Fee                   | 96.35            |
| 1/21/2022     | Numerical Company                  | Analysis of Sampling of Time Records | 1,168.80         |
| <b>Total:</b> |                                    |                                      | <b>20,317.28</b> |