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Attorneys for Plaintiffs

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

CRUZELMA MARTINEZ, RENEE
ROBINSON, LISA STEINER, and RONALD
PIGRAM, 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;

Plaintiffs,

v.

BURGER REHABILITATION SYSTEMS,
INC., a California corporation; BURGER
ASSOCIATES, INC., a California corporation;
BURGER PHYSICAL THERAPY SERVICES,
INC., a California corporation; BURGER
PHYSICAL THERAPY AND
REHABILITATION AGENCY, INC., a
California corporation; CAROL BURGER, an
individual, and DOES 4 through 100, inclusive,

Defendants.

Case No.: 34-2020-00286930

**DECLARATION OF SELENA
MATAVOSIAN IN SUPPORT OF
PLAINTIFFS' MOTION FOR
APPROVAL OF PRIVATE
ATTORNEYS GENERAL ACT
SETTLEMENT**

Date: October 2, 2026
Time: 9:00 a.m.
Department: 8A

Complaint Filed: October 13, 2020
FAC Filed: September 27, 2022
Trial Date: None Set

DECLARATION OF SELENA MATAVOSIAN

I, Selena Matavosian, hereby declare as follows:

1. I am an attorney licensed to practice law in the State of California. I am a member of Lawyers *for* Justice, PC, attorneys of record for Plaintiffs Cruzelma Martinez, Renee Robinson, and Ronald Pigram (collectively, “Plaintiffs”), along with my Co-Counsel, Domb & Rauchwerger LLP. 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.

2. I attest that I have reviewed the Court’s August 9, 2024 Checklist for Approval of Class Action and/or Private Attorney General Act (“PAGA”) Settlements, and Plaintiffs’ briefing complies with the checklist, as required by Sacramento County Superior Court Local Rule 2.99.05.

WORK PERFORMED BY PAGA COUNSEL

3. Several attorneys at Lawyers *for* Justice, PC have been actively engaged in litigating this matter since the inception of the above-captioned action (the “Action”), which was filed on October 13, 2020.

4. Once Lawyers *for* Justice, PC joined forces with Domb & Rauchwerger, LLP (together, “PAGA Counsel”), who were associated in as co-counsel for Plaintiffs in the Action, Lawyers *for* Justice, PC fully and actively participated in the litigation of the Action, including and not limited to, preparing the pleadings, undertaking investigation, performing legal research, and conducting claims evaluation and analysis. PAGA Counsel have worked cooperatively to strategize and prosecute the Action. Ultimately, PAGA Counsel’s efforts and Plaintiffs’ efforts have been successful in reaching the Settlement.

5. Before initiating the Action, Lawyers *for* Justice, PC investigated and researched the facts and circumstances underlying the pertinent factual and legal issues and applicable law. This required thorough discussions and interviews between attorneys at Lawyers *for* Justice, PC and Plaintiffs, and research into the various legal issues involved in the case, namely, the current state of the law as it applied off-the-clock theory, rounding, meal and rest periods, wage-and-

1 hour enforcement, arbitration agreements, Private Attorneys General Act (“PAGA”) claims,
2 Plaintiffs’ claims and allegations, and potential defenses. After conducting initial investigation,
3 Lawyers for Justice, PC determined that the claims of Plaintiffs were well-suited for representative
4 adjudication owing to what appeared to be a common course of conduct affecting a similarly
5 situated group of persons employed by Defendants as hourly paid or non-exempt employees in the
6 State of California, who were not properly compensated for, *inter alia*, all hours worked, non-
7 compliant meal and rest periods, and unreimbursed business expenses.

8 6. Collectively, PAGA Counsel investigated the veracity, strength, and scope of the
9 claims and were preparing the Action for trial prior to reaching the Settlement. PAGA Counsel
10 conducted significant informal discovery and investigation into the facts of the cases, reviewing
11 and analyzing a volume of information, documents, and data obtained from Plaintiffs, Defendants,
12 and other sources, in the course of litigation and mediation and settlement negotiations. PAGA
13 Counsel researched applicable law, developed liability and damages valuation models in
14 connection with mediation and settlement negotiations, and met and conferred with Defendants’
15 counsel on numerous occasions, e.g., to discuss issues relating to the pleadings, case management,
16 discovery, depositions, motion practice, and production of various information, documents, and
17 data in the course of litigation and in connection with the mediation and settlement negotiations.
18 Other work performed by PAGA Counsel included, and was not limited to, case strategy and
19 analysis; drafting, reviewing, and revising pleadings and mediation briefs and materials; preparing
20 and appearing for court proceedings; preparing for and attending mediation and engaging in
21 extensive settlement negotiations; and preparing for trial, among other tasks.

22 7. As outlined herein, the parties have conducted significant informal discovery and
23 investigation in the Action. PAGA Counsel analyzed a volume of information, documents, and
24 data obtained from Plaintiffs, Defendants, or other sources, that provided a critical understanding
25 of the nature of the work performed by the Aggrieved Employees, as well as Defendants’
26 operations and employment policies, practices, and procedures. The information, documents, and
27 data were used in analyzing liability, damages, and valuation issues in connection with all phases
28 of litigation, and ultimately with the mediation and settlement negotiation process. PAGA Counsel

1 also performed significant research into the applicable law, which is evolving as it relates to off-
2 the-clock theory, rounding, meal and rest periods, representative PAGA claims, wage-and-hour
3 enforcement, arbitration agreements, Plaintiffs' claims and allegations, and Defendants' defenses
4 thereto, as well as facts discovered. Accordingly, sufficient investigation and review of
5 information have taken place in order for the parties to be adequately informed of the nature and
6 extent of the claims, and to enable all parties to fully evaluate the Settlement for its fairness,
7 adequacy, and reasonableness.

8 8. After conducting significant investigation of the facts and law during the prosecution
9 of the cases, the parties engaged in extensive settlement negotiations to try to resolve the Action.
10 These efforts included participating in three formal private mediations. The first mediation
11 occurred on December 6, 2021, conducted by respected mediator Jeffrey A. Ross. The second
12 mediation occurred on January 24, 2024, conducted by respected mediator Brandon McKelvey,
13 Esq.. The third mediation occurred on September 19, 2025, conducted by respected mediator
14 Brandon McKelvey, Esq.. During all settlement discussions, the parties conducted their
15 negotiations at arm's length in an adversarial position. During mediation, the Parties continued to
16 negotiate and ultimately reached an agreement to settle the action as is now memorialized in the
17 parties' Settlement Agreement.

18 9. Plaintiffs move for an award of attorneys' fees to PAGA Counsel in the amount of
19 one third (1/3rd) of the Gross Settlement Amount of \$285,000.00, which is currently estimated to
20 be \$95,000.00. Pursuant to the contingency-fee agreement entered into by and between Plaintiffs
21 and PAGA Counsel, Plaintiffs have each agreed to a contingency fee of at least thirty-five percent
22 (35%) of the recovery.

23 10. The attorneys' fees sought are commensurate with: (1) the risk that PAGA Counsel
24 took in commencing and/or pursuing the Action; (2) the time, effort, and expense that PAGA
25 Counsel dedicated to the Action; (3) the skill and determination that PAGA Counsel have shown;
26 (4) the substantial results that PAGA Counsel have achieved throughout the litigation of the
27 Action; (5) the value of the settlement that PAGA Counsel have achieved; and (6) the other cases
28 that PAGA Counsel have turned down in order to devote their time and efforts to the Action.

ATTORNEYS' FEES REQUESTED BY PAGA COUNSEL

11. By way of the accompanying Motion for Final Approval, PAGA Counsel seeks attorneys' fees in the amount of \$95,000.00, which is one-third (1/3rd) of the Gross Settlement Amount of \$285,000.00.

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

13. The nature of the work performed, skill exercised, and the outcome in this matter support the percentage fee sought. This matter involves an outstanding monetary recovery involving a Gross Settlement Amount of \$285,000.00.

14. While not necessarily required to be demonstrated because the percentage fee is proper for this settlement, PAGA Counsel have incurred many hours of work in connection with prosecuting the matter, such that the requested award of attorneys' fees is also justified under a lodestar analysis. Attorneys at Lawyers *for* Justice, PC have spent a total of **309.00 hours** performing tasks and obtaining recovery in this matter. Attached hereto as "**EXHIBIT A**" is an Attorney Task and Time Chart for Lawyers *for* Justice, PC that sets forth in detail the nature of the legal services provided by attorneys at Lawyers *for* Justice, PC, and the time incurred by them in performing those services. These hours include work done by several other attorneys at Lawyers *for* Justice, PC. Also, separate from the hours of work referenced herein and in the chart, Lawyers *for* Justice, PC had litigation support personnel actively engaged in assisting with the prosecution of this matter.

15. The attorneys identified below have worked on this matter, and they have performed their work in this matter exclusively on a contingency basis.

Attorneys	Titles	Bar Nos.	Years Admitted & Practicing in CA	Rate	Total Hours	Lodestar
Edwin Aiwasian	CEO	232943	2004 (22 years)	\$1,495	45.30	\$67,723.50
Arby Aiwasian	Senior Partner	269827	2010 (16 years)	\$1,295	33.20	\$42,994.00
Joanna Ghosh	Senior Partner	272479 (CA); 518149 (NY)	2010 (CA); 2013 (NY) (16 years)	\$1,295	1.00	\$1,295.00
Elizabeth M. R-H Parker- Fawley	Partner	301592	2014 (12 years)	\$850	22.00	\$18,700.00
Tara Zabehi	Partner	314706	2017 (9 years)	\$850	3.30	\$2,805.00
Brian J. St. John	Senior Attorney	304112	2015 (11 years)	\$850	0.80	\$680.00
Aliza Grossman	Senior Attorney	311067	2018 (8 years)	\$850	13.40	\$11,390.00
Vartan S. Madoyan	Senior Attorney (former)	279015	2011 (15 years)	\$850	3.40	\$2,890.00
Charles Sweeny	Senior Attorney (former)	325167	2020 (6 years)	\$850	43.50	\$36,975.00
Melissa A. LeBlanc- Mansell	Senior Attorney (former)	283080	2012 (14 years)	\$850	31.40	\$26,690.00
Selena Matavosian	Attorney	348044	2022 (4 years)	\$725	0.90	\$652.50
Scarlet Tunney	Attorney	359178	2024 (2 years)	\$575	15.30	\$8,797.50
Won Christina Chang	Attorney (former)	327168	2019 (7 years)	\$725	6.40	\$4,640.00
Melissa Rinehart	Attorney (former)	331315	2020 (6 years)	\$725	41.30	\$29,942.50
Harry Erganyan	Attorney (former)	333091	2021 (5 years)	\$575	1.00	\$575.00
Julia Franco	Attorney (former)	334676	2021 (5 years)	\$575	33.70	\$19,377.50
Jacquelyn Silva	Attorney (former)	342302	2024 (2 years)	\$575	0.50	\$287.50
Margaux Gundzik	Attorney (former)	340116	2021 (5 years)	\$575	12.60	\$7,245.00
Total:					309	\$283,660

1 16. Each of the attorneys identified above performed their work in this matter
2 exclusively on a contingency basis. Plaintiffs have not been billed for, and have not paid for, any
3 of the work performed in the instant action to date by attorneys at Lawyers *for* Justice, PC (i.e.,
4 Plaintiffs have not been billed for or paid the hourly rates of the various attorneys who performed
5 work in the instant action). Lawyers *for* Justice, PC will receive compensation for the work
6 performed by attorneys at the firm thus far, if attorneys’ fees are awarded by the Court as a part of
7 the Settlement.

8 17. The billing rates for each of the attorneys listed above, who worked on this matter,
9 are reasonable, usual, and commensurate with the individual backgrounds, training, and
10 experience of the attorneys, in litigating complex wage-and-hour actions, and in particular,
11 employment class actions. These rates are the reasonable and usual hourly rates for the referenced
12 attorneys’ services in wage and hour class action cases handled by Lawyers *for* Justice, PC, and
13 are commensurate with rates charged in the community by other plaintiffs-side and defense-side
14 attorneys in this practice area. Lawyers *for* Justice, PC almost exclusively handles the prosecution
15 of plaintiffs’ side cases. To the best of undersigned counsel’s knowledge, Lawyers *for* Justice, PC
16 has not billed nor required any of its clients, who are usually workers who do not have the financial
17 means to pay a retainer or otherwise fund the prosecution or litigation of their wage-and-hour cases
18 against their current or former employers, to pay the firm out of pocket for the legal work
19 performed by attorneys at the firm (and thus, has not billed any clients using any hourly rates)..

20 **EXPERIENCE AND ADEQUACY OF**

21 **LAWYERS *for* JUSTICE, PC**

22 18. For over a decade, Lawyers *for* Justice, PC has almost exclusively focused on the
23 prosecution of consumer and employment class actions, involving wage-and-hour claims, race
24 discrimination, unfair business practices, or consumer fraud. Currently, Lawyers *for* Justice, PC
25 is the attorney of record in well over a dozen employment-related putative class actions in both
26 state and federal courts in the State of California. Lawyers *for* Justice, PC is comprised of
27 attorneys who focus on litigating complex wage-and-hour class and Private Attorneys General Act
28 (“PAGA”) representative actions. The firm has successfully litigated cases involving nearly every

1 aspect of California wage and hour law, including payment of overtime and minimum wages,
2 provision of meal and rest breaks and/or premiums wages for same, timely payment of wages,
3 provision of compliant wage statements, reimbursement of business expenses, executive,
4 administrative, and other overtime exemptions to the State of California and federal overtime
5 compensation requirements, PAGA claims, and sister statutes under federal law. During a
6 relatively short time, in association with other law firms, Lawyers *for* Justice, PC has recovered
7 millions of dollars on behalf of thousands of individuals in California.

8 19. Edwin Aiwarzian is the Chief Executive Officer of Lawyers *for* Justice, PC. He
9 received his Bachelor of Arts degree from Pepperdine University in April of 1999 and earned a
10 Juris Doctor degree from Pepperdine University School of Law in May of 2004. He has extensive
11 formal training in dispute resolution and negotiation from the Straus Institute for Dispute
12 Resolution as part of its Masters in Dispute Resolution degree program. In addition, he has
13 previously served as a pro bono mediator for the Los Angeles County Superior Court. In October
14 of 2000, he obtained a Litigation Paralegal Certificate from the UCLA Extension Program. During
15 the summer of 2000, he studied Legal Writing at Harvard University. From approximately
16 September 2002 to approximately December 2002, he served as a Judicial Extern to the Honorable
17 Kim McLane Wardlaw of the United States Court of Appeals for the Ninth Circuit. From
18 approximately June 2002 to approximately August 2002, he served as a Judicial Extern to the
19 Honorable Earl Johnson, Jr. of the California Court of Appeal for the Second Appellate District.
20 In December of 2004, he obtained a license to practice law from the California State Bar. Since
21 in or around October of 2008, through his work at Lawyers *for* Justice, PC, he has almost
22 exclusively focused on the prosecution of consumer and employment class actions. While
23 employed by Lawyers *for* Justice PC, he has argued over one hundred (100) motions, taken or
24 defended over one hundred fifty (150) depositions, prepared dozens of expert witnesses for
25 deposition or trial, and attended over one hundred seventy-five (175) mediations. Together with
26 other attorneys at the firm, and in some cases in conjunction with co-counsel, he has successfully
27 litigated cases involving the executive, administrative, and other overtime exemptions to the State
28 of California and federal overtime compensation requirements. Under his supervision, Lawyers

1 *for* Justice, PC has successfully obtained class certification by contested motion practice in
2 approximately sixteen (16) cases in the last decade, and litigated over 1,000 class action or
3 representative action cases.

4 20. Arby Aiwazian is a Member and Shareholder of Lawyers *for* Justice, PC. He
5 received his Bachelor of Arts degree from University of California, Los Angeles and graduated
6 magna cum laude. He earned a Juris Doctor degree, cum laude, from Southwestern Law School.
7 From approximately May 2007 to approximately July 2007, he served as a Judicial Extern to the
8 Honorable Earl Johnson, Jr. of the California Court of Appeal for the Second Appellate District.
9 From approximately August 2008 to approximately December 2008, he served as a Judicial Extern
10 to the Honorable Kim McLane Wardlaw of the United State Court of Appeals for the Ninth Circuit.
11 He was admitted to practice law in California in 2010. He is admitted to practice before all courts
12 of the State of California and all United States District Courts in the State of California. He has
13 worked on many wage-and-hour class action and representative action cases, taking the lead in
14 taking and defending depositions, arguing motions, and attending mediations. He has played an
15 integral role in preparing matters for class certification, including and not limited to, successful
16 certification of a class in *Upson v. Sur La Table* (Los Angeles County Superior Court Case No.
17 BC424012), *Montazemi v. Regus Management* (Los Angeles County Superior Court Case No.
18 BC478769), and *Abdulhaqq v. Urban Outfitters* (Alameda County Superior Court Case No.
19 RG13680477). Under his supervision, dozens of class action or representative action cases have
20 resulted in settlements that have been granted court approval. He has handled over one hundred
21 and fifty (150) mediations and worked on over two hundred and fifty (250) class action or
22 representative action cases which have resulted in settlement.

23 21. Joanna Ghosh is a Senior Partner of Lawyers *for* Justice, PC. She received a
24 Bachelor of Arts degree from California State University, Los Angeles in 2006, a Master of
25 Science degree from the London School of Economics in 2007, and a Juris Doctor degree from
26 Georgetown University Law Center in 2010 She is admitted to practice in California (since 2010),
27 in New York (since 2013), and in Washington (since 2026), and is admitted to practice in all U.S.
28 District Courts in California, the U.S. Bankruptcy Court for the Central District of California, U.S.

1 District Court for the Western District of Washington, and the U.S. Supreme Court. She has taken
2 and defended dozens of depositions and successfully handled motion practice in class action cases
3 regarding discovery (including and not limited to, regarding class contact information), class
4 certification (both contested class certification and stipulated class certification), arbitration
5 agreements, coordination, and intervention. She has successfully handled briefing and oral
6 arguments on appeal and obtained notable decisions regarding Private Attorneys General Act
7 claims and employer efforts to compel arbitration of such claims, e.g., *Roberto Betancourt v.*
8 *Prudential Overall Supply* (Cal. Ct. App., Mar. 7, 2017) 9 Cal.App.5th 439, cert. denied (Cal.,
9 May 24, 2017), cert. denied (U.S., Dec. 11, 2017) and *ZB, N.A. v. Superior Court* (2019) 8
10 Cal.5th175. She has significant experience with class actions, including and not limited to,
11 working on cases to obtain class certification through contested motion practice and working on
12 cases in the post-certification stage (e.g., post-certification discovery, appeal, statistical sampling
13 and pilot study, and trial preparation in conjunction with co-counsel in a case involving a certified
14 class consisting of approximately 2,600 individuals). She has extensive experience with class
15 action and/or representative action settlements, and has handled this process in over five hundred
16 (500) cases. Under her, Edwin Aiwasian, and Arby Aiwasian's supervision, Lawyers for Justice,
17 PC has handled the class certification and court approval process for hundreds of class action
18 and/or representative action matters that have successfully resolved. Joanna Ghosh is a member
19 of the California Employment Lawyers Association and, on several occasions, has been a speaker
20 regarding topics in wage and hour law at the organization's continuing legal education events.

21 22. Brian J. St. John is a Member of Lawyers for Justice, PC. He received his Bachelor's
22 degree from the University of California, San Diego in 2010 and earned his Juris Doctor degree
23 from the University of California, Berkeley, School of Law in 2013. He was admitted to practice
24 law in California in 2015. He is admitted to practice before all courts of the State of California and
25 all federal district courts in the State of California. He has worked on many wage and hour class
26 action and PAGA representative matters, and his work has included, inter alia, researching and
27 drafting pleadings, administrative notice exhaustion, drafting, negotiating, and finalizing
28 stipulations and settlement agreements, engaging in motion practice, claims evaluation and

1 analysis, and making court appearances. Prior to working at Lawyers *for* Justice, PC, he spent
2 several years working for a boutique employment and labor law firm representing employers, and,
3 in 2019 and 2020, he was employed as general counsel for a DMHC licensed discount dental plan.

4 23. I am an Associate Attorney of Lawyers *for* Justice, PC. I received my Bachelor of
5 Science degree from California State University, Northridge in 2019, and was the recipient of the
6 Wildman Schumacher Scholarship. I earned a Juris Doctor degree from Southwestern Law School
7 in 2022, and I was the recipient of the Witkin Award for Academic Excellence. I was admitted to
8 practice law in California in 2022. I am admitted to practice before all courts of the State of
9 California and all U.S. Federal District Courts in the State of California. I have worked on many
10 wage-and-hour class action and PAGA representative cases, and my work on these cases has
11 included, *inter alia*, researching and drafting pleadings and motion-related papers, administrative
12 notice exhaustion, drafting, negotiating, and finalizing stipulations and settlement agreements,
13 performing claims evaluation and analysis, and making court appearances.

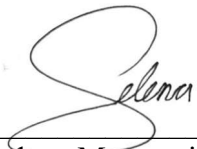
14 **LITIGATION COSTS AND EXPENSES INCURRED BY**
15 **LAWYERS *for* JUSTICE, PC**

16 24. To date, PAGA Counsel have borne all the risks and costs of litigation and will not
17 receive any compensation until recovery is obtained in the Action. Lawyers *for* Justice, PC seeks
18 reimbursement of **\$30,979.76** in litigation costs and expenses incurred in the Action, as reflected
19 in **“EXHIBIT B”** attached hereto. These expenses were reasonable and necessary in the
20 prosecution of the Action and to obtain the Settlement.

21 25. PAGA Counsel submits that the Settlement fulfills the purpose of the PAGA statute,
22 is within the accepted range of recoveries for this type of litigation, and is fair and reasonable, and
23 adequate given the substantial monetary benefit provided for by the Settlement, the strengths and
24 weaknesses of this case, and the inherent delay, costs, risks, and uncertainty associated with
25 continued litigation. I declare under penalty of perjury under the laws of the State of California
26 that the foregoing is true and correct.

27 Executed on this 11th day of September 2026, at Glendale, California.
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Selena Matavosian

EXHIBIT A

CRUZELMA MARTINEZ V BURGER REHABILITATION SYSTEMS, INC.
Sacramento County Superior Court Case No. 34-2020-00286930 (“Martinez Class Action”)

CRUZELMA MARTINEZ V BURGER REHABILITATION SYSTEMS, INC.
Sacramento County Superior Court Case No. 34-2020-00290702 (“Martinez PAGA Action”)

LISA STEINER V. BURGER REHABILITATION SYSTEMS, INC., ET AL
Sacramento County Superior Court Case No. 34-2021-00310481 (“Steiner Action”)

RENEE ROBINSON V. BURGER ASSOCIATES, INC., ET AL
Sacramento County Superior Court Case No. 34-2021-00304629 (“Robinson Action”)

ATTORNEY TASK AND TIME CHART

TASK	LAWYERS <i>for</i> JUSTICE, PC
Investigation and Research / Due Diligence	
Meet, Communicate, and/or Review Communication with Plaintiff Cruzelma Martinez (“Plaintiff Martinez”)	14.80
Meet, Communicate, and/or Review Communication with Plaintiff Lisa Steiner (“Plaintiff Steiner”)	10.10
Meet, Communicate, and/or Review Communication with Plaintiff Renee Robinson (“Plaintiff Robinson”)	8.20
Investigate, Communicate with, Interview, and/or Review Communication with Putative Class Members, Aggrieved Employees, and/or Percipient Witnesses	9.50

Pleadings and Court Filings	
Investigate the Merits of Plaintiff Martinez’s Class Action Claims, Conduct Legal Research and Analysis Regarding Class Claims, and Draft, Review, and/or Revise Plaintiff Martinez’s Class Action Complaint for Damages (filed on October 13, 2020) (Martinez Class Action)	7.50
Review Court’s Notice and Order of Complex Case Determination (filed on November 10, 2020) (Martinez Class Action)	0.20
Review and Analyze Defendant Burger Rehabilitation Systems, Inc.’s Answer to Plaintiff Martinez’s Class Action Complaint for Damages, and Research Affirmative Defenses in Defendant Burger Rehabilitation Systems, Inc.’s Answer (served on November 12, 2020) (Martinez Class Action)	1.10
Review Court’s Notice of Case Management Conference and Complex Case Management Procedures Including COVID-19 Procedures (filed on November 17, 2020) (Martinez Class Action)	0.20
Draft, Review, and/or Revise Declaration of Charles T. Sweeny Regarding Automatic 30-Day Extension for Plaintiff Martinez to File Responsive Pleading to Defendant Burger Rehabilitation Systems, Inc.’s Answer (filed on November 30, 2020) (Martinez Class Action)	0.80
Investigate the Merits of Plaintiff Martinez’s Private Attorneys General Act (“PAGA”) Claim, Conduct Legal Research and Analysis Regarding the PAGA Claim, and Draft, Review, and/or Revise Plaintiff Martinez’s Complaint for Enforcement Under the Private Attorneys General Act, California Labor Code § 2698, Et Seq. (filed on December 15, 2020) (Martinez PAGA Action)	6.70
Review Court’s Order Re: Delay in Scheduling Initial Case Management Conference (filed on December 15, 2020) (Martinez PAGA Action)	0.10
Review and Analyze Defendant Burger Rehabilitation Systems, Inc.’s First Amended Answer to Class Action Complaint for Damages, and Research Affirmative Defenses	0.90

in Defendant Burger Rehabilitation, Inc.'s Answer (served on January 4, 2021) (Martinez Class Action)	
Review Defendant Burger Rehabilitation Systems, Inc.'s Notice of Change of Address (served on February 2, 2021) (Martinez Class Action)	0.10
Meet and Confer with Defendant Burger Rehabilitation Systems, Inc.'s Counsel, and Draft, Review, and/or Revise Joint Stipulation to Continue Case Management Conference; [Proposed] Order (submitted on April 29, 2021) (Martinez Class Action)	1.40
Review Court's Order to Continue Case Management Conference (filed on May 4, 2021) (Martinez Class Action)	0.10
Review and Analyze Defendant Burger Rehabilitation Systems, Inc.'s Answer to Plaintiff Martinez's Complaint for Enforcement Under the Private Attorneys General Act, California Labor Code § 2698, Et Seq., and Research Affirmative Defenses in Defendant Burger Rehabilitation Systems, Inc.'s Answer (served on June 14, 2021) (Martinez PAGA Action)	1.10
Meet and Confer with Defendant Burger Rehabilitation Systems, Inc.'s Counsel, and Draft, Review, and/or Revise Stipulated Confidentiality Agreement and Protective Order (submitted on June 15, 2021) (Martinez Class Action)	0.80
Review Court's Order Re: Stipulated Confidentiality Agreement and Protective Order (filed on June 21, 2021) (Martinez Class Action)	0.10
Investigate the Merits of Plaintiff Robinson's Class Action Claims, Conduct Legal Research and Analysis Regarding All Class Claims, and Draft, Review, and/or Revise Plaintiff Robinson's Class Action Complaint for Damages (filed on July 22, 2021) (Robinson Action)	6.90
Review Court's Notice and Order of Complex Case Determination (filed on August 9, 2021) (Robinson Action)	0.20
Review Court's Notice of Case Management Conference and Complex Case Management Procedures (filed on August 12, 2021) (Robinson Action)	0.10

Review and Analyze Defendant Burger Rehabilitation Systems, Inc.’s Answer to Plaintiff Robinson’s Class Action Complaint for Damages, and Research Affirmative Defenses in Defendant Burger Rehabilitation Systems, Inc.’s Answer (served on October 18, 2021) (Robinson Action)	1.10
Investigate the Merits of Plaintiff Steiner’s Private Attorneys General Act (“PAGA”) Claim, Conduct Legal Research and Analysis Regarding the PAGA Claim, and Draft, Review, and/or Revise Plaintiff Steiner’s Complaint for Enforcement Under the Private Attorneys General Act, California Labor Code § 2698, Et Seq. (filed on October 29, 2021) (Steiner Action)	6.50
Review Court’s Order Re: Delay in Scheduling Initial Case Management Conference (filed on October 29, 2021) (Steiner Action)	0.10
Review Court’s Minute Order Re: Case Management Conference (filed on December 1, 2021) (Martinez PAGA Action)	0.20
Meet and Confer with Defendant Burger Rehabilitation Systems, Inc.’s Counsel, and Draft, Review, and/or Revise Joint Stipulation to Continue Case Management Conference; [Proposed] Order (submitted on December 17, 2021) (Martinez PAGA Action & Martinez Class Action)	1.20
Review Court’s Order to Continue Case Management Conference (filed on December 22, 2021) (Martinez PAGA Action)	0.20
Review and Analyze Defendant Burger Rehabilitation Systems, Inc.’s Answer to Plaintiff Steiner’s Complaint for Enforcement Under the Private Attorneys General Act, California Labor Code § 2698, Et Seq., and Research Affirmative Defenses in Defendant Burger Rehabilitation Systems, Inc.’s Answer (served on December 30, 2021) (Steiner Action)	1.10
Draft, Review, and/or Revise Plaintiff Martinez’s Case Management Statement (filed on January 6, 2022) (Martinez Class Action)	0.80
Review Defendant Burger Rehabilitation Systems, Inc.’s Case Management Statement (served on January 6, 2022) (Martinez Class Action)	0.40

Review Court's Minute Order and Notice Reassigning Case (filed on January 14, 2022) (Robinson Action)	0.20
Review Court's Tentative Ruling Re: Case Management Conference (issued on January 20, 2022) (Martinez Class Action)	0.20
Review Court's Minute Order Re: Case Management Conference (filed on January 21, 2022) (Martinez Class Action)	0.20
Review Court's Minute Order Re: <i>Ex Parte</i> Non-Appearance and Order/Notice Reassigning Case (filed on January 26, 2022) (Martinez Class Action)	0.20
Review Defendant Burger Rehabilitation Systems, Inc.'s Case Management Statement (served on March 10, 2022) (Martinez PAGA Action)	0.40
Draft, Review, and/or Revise Plaintiff Martinez's Case Management Statement (filed on March 11, 2022) (Martinez PAGA Action)	0.70
Review Court's Tentative Ruling Re: Case Management Conference (issued on March 15, 2022) (Martinez PAGA Action)	0.20
Review Defendant Burger Rehabilitation Systems, Inc.'s Case Management Statement (served on March 24, 2022) (Robinson Action)	0.40
Review Court's Minute Order Re: Case Management Conference (filed on March 25, 2022) (Martinez PAGA Action)	0.10
Draft, Review, and/or Revise Plaintiff Robinson's Case Management Statement (filed on March 30, 2022) (Robinson Action)	0.70
Review Court's Minute Order Re: Complex Designation (filed on March 30, 2022) (Martinez Class Action)	0.10
Review Court's Order Re: Case Management Conference (filed on April 4, 2022) (Steiner Action)	0.10

Draft, Review, and/or Revise Plaintiff Robinson's Notice of Posting Jury Fees (filed on April 7, 2022) (Robinson Action)	0.20
Review Court's Tentative Ruling Re: Case Management Conference (issued on April 7, 2022) (Robinson Action)	0.20
Review Court's Minute Order Re: Case Management Conference (filed on April 8, 2022) (Robinson Action)	0.20
Review Court's Minute Order Re: Notice Assigning Complex Case for All Purposes (filed on April 11, 2022) (Robinson Action)	0.20
Draft, Review, and/or Revise Plaintiff Steiner's Case Management Statement (filed on May 12, 2022) (Steiner Action)	0.50
Review Defendant Burger Rehabilitation Systems, Inc.'s Case Management Statement (served on May 12, 2022) (Steiner Action)	0.40
Review Defendant Burger Rehabilitation Systems, Inc.'s Case Management Statement (served on May 12, 2022) (Martinez Class Action)	0.40
Review Court's Tentative Ruling Re: Case Management Conference (issued on May 16, 2022) (Steiner Action)	0.20
Draft, Review, and/or Revise Plaintiff Martinez's Case Management Statement (filed on May 18, 2022) (Martinez Class Action)	0.60
Meet and Confer with Defendant Burger Rehabilitation Systems, Inc.'s Counsel, and Draft, Review, and/or Revise Joint Case Management Statement (filed on May 18, 2022) (Robinson Action)	1.20
Review Court's Tentative Ruling Re: Case Management Conference (issued on May 26, 2022) (Martinez Class Action)	0.20
Review Court's Minute Order Re: Case Management Conference (filed on May 27, 2022) (Martinez Class Action)	0.20

Review Court's Minute Order Re: Case Management Conference (filed on May 27, 2022) (Steiner Action)	0.20
Review Court's Tentative Ruling Re: Case Management Conference (issued on June 1, 2022) (Robinson Action)	0.20
Review Court's Minute Order Re: Case Management Conference (filed on June 2, 2022) (Robinson Action)	0.20
Draft, Review, and/or Revise Notice of Association of Counsel (filed on June 14, 2022) (Robinson Action, Martinez PAGA Action, Martinez Class Action, & Steiner Action)	0.20
Review and Analyze Defendant Burger Associates, Inc.'s Answer to Plaintiff Robinson's Class Action Complaint for Damages, and Research Affirmative Defenses in Defendant Burger Associates, Inc.'s Answer (served on June 20, 2022) (Robinson Action)	0.40
Meet and Confer with Defendant Burger Rehabilitation Systems, Inc. and Burger Associates, Inc.'s Counsel, and Draft, Review, and/or Revise Joint Case Management Statement (filed on July 20, 2022) (Robinson Action)	1.30
Review Court's Tentative Ruling Re: Case Management Conference (issued on August 3, 2022) (Robinson Action)	0.20
Review Court's Minute Order Re: Case Management Conference (filed on August 4, 2022) (Robinson Action)	0.20
Review Defendant Burger Rehabilitation Systems, Inc.'s Case Management Statement (served on August 11, 2022) (Martinez PAGA Action)	0.20
Draft, Review, and/or Revise Plaintiff Martinez's Case Management Statement (filed on August 12, 2022) (Martinez PAGA Action)	0.20
Review Court's Tentative Ruling Re: Case Management Conference (issued on August 16, 2022) (Martinez PAGA Action)	0.20

Draft, Review, and/or Revise Plaintiff Martinez, Plaintiff Robinson, and Plaintiff Steiner's (collectively, "Plaintiffs") First Amended Class Action Complaint for Damages and Complaint for Enforcement Under the California Private Attorneys General Act (filed on September 27, 2022) (Martinez Class Action); Meet and Confer with Defendant Burger Rehabilitation Systems, Inc.'s Counsel, and Draft, Review, and/or Revise Joint Stipulation and [Proposed] Order Granting Plaintiff Martinez Leave to File First Amended Class Action Complaint for Damages and Enforcement Under the Private Attorneys General Act (submitted on August 24, 2022) (Martinez Class Action)	0.30
Meet and Confer with Defendant Burger Rehabilitation Systems, Inc.'s Counsel, and Draft, Review, and/or Revise Joint Case Management Statement (filed on August 24, 2022) (Martinez Class Action)	0.20
Review Court's Minute Order Re: Case Management Conference (filed on August 26, 2022) (Martinez PAGA Action)	0.10
Review Court's Tentative Ruling Re: Case Management Conference (issued on September 7, 2022) (Martinez Class Action)	0.10
Review Court's Minute Order Re: Case Management Conference (filed on September 8, 2022) (Martinez Class Action)	0.10
Review Court's Order Granting Plaintiff Martinez Leave to File First Amended Class Action Complaint for Damages and Enforcement Under the Private Attorneys General Act (filed on September 13, 2022) (Martinez Class Action)	0.10
Draft, Review, and/or Revise Notice of Entry of Judgment or Order Re: Order Granting Plaintiff Martinez Leave to File First Amended Class Action Complaint for Damages and Enforcement Under the Private Attorneys General Act (filed on September 22, 2022) (Martinez Class Action)	0.10
Review Court's Tentative Ruling Re: Case Management Conference (issued on October 4, 2022) (Robinson Action)	0.10

Review Court's Minute Order Re: Case Management Conference (filed on October 6, 2022) (Robinson Action)	0.10
Review and Analyze Defendants Burger Rehabilitation Systems, Inc., Burger Associates, Inc., and CVPT Corporation's (collectively, "Defendants") Answer to First Amended Class Action Complaint for Damages and Complaint for Enforcement Under the California Private Attorneys General Act, and Research Affirmative Defenses in Defendants' Answer (served on October 26, 2022) (Martinez Class Action)	0.30
Review Court's Notice of Hearing of Settlement Conference and Notice of Hearing (filed on November 1, 2022) (Martinez PAGA Action)	0.10
Draft, Review, and/or Revise Plaintiff Martinez's Request for Dismissal, Declaration of Devin Rauchwerger in Support Thereof, and [Proposed] Dismissing Action Without Prejudice (submitted on November 3, 2022) (Martinez PAGA Action)	0.30
Draft, Review, and/or Revise Plaintiff Steiner's Request for Dismissal, Declaration of Devin Rauchwerger in Support Thereof, and [Proposed] Dismissing Action Without Prejudice (submitted on November 14, 2022) (Steiner Action)	0.30
Draft, Review, and/or Revise Plaintiff Robinson's Request for Dismissal, Declaration of Devin Rauchwerger in Support Thereof, and [Proposed] Dismissing Action Without Prejudice (submitted on November 10, 2022) (Robinson Action)	0.30
Meet and Confer with Defendants' Counsel, and Draft, Review, and/or Revise Joint Case Management Statement (filed on November 16, 2022) (Martinez Class Action)	0.20
Review Court's Order Dismissing Action Without Prejudice (filed on November 17, 2022) (Steiner Action)	0.20
Review Court's Order Dismissing Action Without Prejudice (filed on November 28, 2022) (Robinson Action)	0.20
Review Court's Tentative Ruling Re: Case Management Conference (issued on November 30, 2022) (Martinez Class Action)	0.10

Review Court's Minute Order Re: Case Management Conference (filed on December 1, 2022) (Martinez Class Action)	0.10
Review Court's Order Dismissing Action Without Prejudice (filed on February 17, 2023) (Martinez PAGA Action)	0.20
Draft, Review, and/or Revise Notice of Order and Case Management Conference (filed on March 7, 2023) (Martinez Class Action)	0.10
Meet and Confer with Defendants' Counsel, and Draft, Review, and/or Revise Joint Case Management Statement (filed on March 15, 2023) (Martinez Class Action)	0.10
Review Court's Minute Order Re: Notice of Change in Departments (filed on March 22, 2023) (Martinez Class Action)	0.10
Review Court's Tentative Ruling Re: Case Management Conference (issued on March 29, 2023) (Martinez Class Action)	0.10
Review Court's Minute Order Re: Case Management Conference (filed on March 30, 2023) (Martinez Class Action)	0.10
Review Defendants' Substitution of Attorney (served on April 14, 2023) (Martinez Class Action)	0.20
Draft, Review, and/or Revise Notice of Order and Case Management Conference (filed on April 19, 2023) (Martinez Class Action)	0.10
Meet and Confer with Defendants' Counsel, and Draft, Review, and/or Revise Joint Case Management Statement (filed on June 7, 2023) (Martinez Class Action)	0.10
Review Court's Tentative Ruling Re: Case Management Conference (issued on June 21, 2022) (Martinez Class Action)	0.10
Review Court's Minute Order Re: Case Management Conference (filed on June 22, 2023) (Martinez Class Action)	0.10

Draft, Review, and/or Revise Notice of Ruling Re: Case Management Conference (filed on June 23, 2023) (Martinez Class Action)	0.10
Meet and Confer with Defendants' Counsel, and Draft, Review, and/or Revise Joint Case Management Statement (filed on September 21, 2023) (Martinez Class Action)	0.10
Review Court's Tentative Ruling Re: Case Management Conference (issued on October 4, 2023) (Martinez Class Action)	0.10
Review Court's Minute Order Re: Case Management Conference (filed on October 5, 2023) (Martinez Class Action)	0.10
Review Court's Notice of Department Relocation (filed on January 8, 2024) (Martinez Class Action)	0.10
Draft, Review, and/or Revise Notice of Department Relocation (filed on January 19, 2024) (Martinez Class Action)	0.10
Meet and Confer with Defendants' Counsel, and Draft, Review, and/or Revise Joint Case Management Statement (filed on February 9, 2024) (Martinez Class Action)	0.10
Review Court's Tentative Ruling Re: Case Management Conference (issued on February 15, 2024) (Martinez Class Action)	0.10
Review Court's Minute Order Re: Case Management Conference (filed on February 16, 2024) (Martinez Class Action)	0.10
Draft, Review, and/or Revise Notice of Further Case Management Conference (filed on March 1, 2024) (Martinez Class Action)	0.10
Meet and Confer with Defendants' Counsel, and Draft, Review, and/or Revise Joint Case Management Statement (filed on March 28, 2024) (Martinez Class Action)	0.10
Review Court's Tentative Ruling Re: Case Management Conference (issued on April 11, 2024) (Martinez Class Action)	0.10

Review Court's Minute Order Re: Case Management Conference (filed on April 12, 2024) (Martinez Class Action)	0.10
Meet and Confer with Defendants' Counsel, and Draft, Review, and/or Revise Joint Case Management Statement (filed on July 3, 2024) (Martinez Class Action)	0.10
Review Court's Tentative Ruling Re: Case Management Conference (issued on July 18, 2024) (Martinez Class Action)	0.10
Review Court's Minute Order Re: Case Management Conference (filed on July 19, 2024) (Martinez Class Action)	0.10
Draft, Review, and/or Revise Notice of Further Case Management Conference (filed on July 25, 2024) (Martinez Class Action)	0.10
Meet and Confer with Defendants' Counsel, and Draft, Review, and/or Revise Joint Case Management Statement (filed on August 8, 2024) (Martinez Class Action)	0.10
Review Court's Tentative Ruling Re: Case Management Conference (issued on August 22, 2024) (Martinez Class Action)	0.10
Review Court's Minute Order Re: Case Management Conference (filed on August 23, 2024) (Martinez Class Action)	0.10
Meet and Confer with Defendants' Counsel, and Draft, Review, and/or Revise Joint Stipulation to Extend Time to Bring Action to Trial (filed on October 4, 2024) (Martinez Class Action)	0.20
Meet and Confer with Defendants' Counsel, and Draft, Review, and/or Revise Joint Case Management Statement (filed on December 26, 2024) (Martinez Class Action)	0.10
Review Court's Tentative Ruling Re: Case Management Conference (issued on January 9, 2025) (Martinez Class Action)	0.10
Review Court's Minute Order Re: Case Management Conference (filed on January 10, 2025) (Martinez Class Action)	0.10

Meet and Confer with Defendants' Counsel, and Draft, Review, and/or Revise Joint Case Management Statement (filed on February 7, 2025) (Martinez Class Action)	0.10
Review Court's Tentative Ruling Re: Case Management Conference (issued on February 13, 2025) (Martinez Class Action)	0.10
Review Court's Minute Order Re: Case Management Conference (filed on February 14, 2025) (Martinez Class Action)	0.10
Meet and Confer with Defendants' Counsel, and Draft, Review, and/or Revise Joint Case Management Statement (filed on March 20, 2025) (Martinez Class Action)	0.10
Review Court's Tentative Ruling Re: Case Management Conference (issued on April 3, 2025) (Martinez Class Action)	0.10
Review Court's Minute Order Re: Case Management Conference (filed on April 4, 2025) (Martinez Action)	0.10
Meet and Confer with Defendants' Counsel, and Draft, Review, and/or Revise Joint Statement of Issues for Informal Discovery Conference (filed on April 17, 2025) (Martinez Class Action)	0.10
Review Court's Tentative Ruling Re: Informal Discovery Conference (filed on April 17, 2025) (Martinez Class Action)	0.10
Review Court's Minute Order Re: Informal Discovery Conference (filed on April 18, 2025) (Martinez Class Action)	0.10
Review Court's Minute Order Re: Informal Discovery Conference (filed on April 24, 2025) (Martinez Class Action)	0.10
Review Court's Tentative Ruling Re: Case Management Conference (issued on May 1, 2025) (Martinez Class Action)	0.10
Review Court's Minute Order Re: Case Management Conference (filed on May 2, 2025) (Martinez Class Action)	0.10

Review Court's Tentative Ruling Re: Informal Discovery Conference (filed on May 7, 2025) (Martinez Class Action)	0.10
Review Court's Minute Order Re: Informal Discovery Conference (filed on May 8, 2025) (Martinez Class Action)	0.10
Review Court's Tentative Ruling Re: Informal Discovery Conference (issued on May 15, 2025) (Martinez Class Action)	0.10
Review Court's Minute Order Re: Informal Discovery Conference (filed on May 16, 2025) (Martinez Class Action)	0.10
Draft, Review, and/or Revise Plaintiffs' Second Amended Class Action Complaint for Damages and Complaint for Enforcement Under the California Private Attorneys General Act (filed on May 23, 2025) (Martinez Class Action)	0.30
Draft, Review, and/or Revise Request for Dismissal (filed on May 27, 2025) (Martinez Class Action)	0.20
Review Court's Tentative Ruling Re: Case Management Conference (issued on June 18, 2025) (Martinez Class Action)	0.10
Review Court's Minute Order Re: Case Management Conference (filed on June 20, 2025) (Martinez Class Action)	0.10
Review and Analyze Defendants Burger Rehabilitation Systems, Inc. and Burger Associates, Inc.'s Answer to Second Amended Complaint, and Research Affirmative Defenses in Defendants Burger Rehabilitation Systems, Inc. and Burger Associates, Inc.'s Answer (served on June 24, 2025) (Martinez Class Action)	0.40
Meet and Confer with Defendants' Counsel, and Draft, Review, and/or Revise Joint Case Management Statement (filed on July 18, 2025) (Martinez Class Action)	0.10
Review Court's Tentative Ruling Re: Case Management Conference (issued on July 24, 2025) (Martinez Class Action)	0.10

Review Court's Minute Order Re: Case Management Conference (filed on July 25, 2025) (Martinez Class Action)	0.10
Meet and Confer with Defendants' Counsel, and Draft, Review, and/or Revise Joint Case Management Statement (filed on October 3, 2025) (Martinez Class Action)	0.10
Review Court's Tentative Ruling Re: Case Management Conference (issued on October 9, 2025) (Martinez Class Action)	0.10
Review Court's Minute Order Re: Case Management Conference (filed on October 10, 2025) (Martinez Class Action)	0.10
Meet and Confer with Defendants' Counsel, and Draft, Review, and/or Revise Joint Case Management Statement (filed on November 14, 2025) (Martinez Class Action)	0.10
Review Court's Tentative Ruling Re: Case Management Conference (issued on November 20, 2025) (Martinez Class Action)	0.20
Review Court's Minute Order Re: Case Management Conference (filed on November 21, 2025) (Martinez Class Action)	0.20
Draft, Review, and/or Revise Notice of Ruling (filed on November 24, 2025) (Martinez Class Action)	0.10
Meet and Confer with Defendants' Counsel, and Draft, Review, and/or Revise Joint Case Management Statement (filed on February 26, 2026) (Martinez Class Action)	0.20
Review Court's Tentative Ruling Re: Case Management Conference (issued on March 12, 2026) (Martinez Class Action)	0.20
Review Court's Minute Order Re: Case Management Conference (filed on March 13, 2026) (Martinez Class Action)	0.20
Draft, Review, and/or Revise Notice of Ruling (filed on March 19, 2026) (Martinez Class Action)	0.10

Review Court's Notice of Department Relocation (filed on April 6, 2026) (Martinez Class Action)	0.20
Draft, Review, and/or Revise Notice of Ruling (filed on April 9, 2026) (Martinez Class Action)	0.10
Meet and Confer with Defendants' Counsel, and Draft, Review, and/or Revise Joint Case Management Statement (filed on June 11, 2026) (Martinez Class Action)	0.20
Review Court's Tentative Ruling Re: Case Management Conference (issued on June 25, 2026) (Martinez Class Action)	0.10
Draft, Review, and/or Revise Notice of Ruling (filed on June 26, 2026) (Martinez Class Action)	0.10
Review Court's Minute Order Re: Case Management Conference (filed on June 26, 2026) (Martinez Class Action)	0.10
Appearances	
Prepare for and Remotely Attend Case Management Conference (March 25, 2022) (Martinez PAGA Action)	1.90
Prepare for and Remotely Attend Case Management Conference (April 8, 2022) (Robinson Action)	1.80
Discovery and Deposition	
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Ashley Hanson	4.40
Draft, Review, and/or Revise Plaintiff Martinez's Notice of Deposition of Person Most Knowledgeable at Defendant Burger Rehabilitation Systems, Inc., and Requests for Production of Documents (Organizational Structure; noticed for December 28, 2020) (served on November 24, 2020) (Martinez Class Action)	1.20
Draft, Review, and/or Revise Plaintiff Martinez's Notice of Deposition of Person Most Knowledgeable at Defendant Burger Rehabilitation Systems, Inc., and Requests	1.40

for Production of Documents (Wage and Hour Practices; December 29, 2020) (served on November 24, 2020) (Martinez Class Action)	
Draft, Review, and/or Revise Plaintiff Martinez's Form Interrogatories – General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), and Requests for Production of Documents (Set One) to Defendant Burger Rehabilitation Systems, Inc. (served on November 24, 2020) (Martinez Class Action)	4.50
Review and Analyze Defendant Burger Rehabilitation Systems, Inc.'s Objections to Plaintiff Martinez's Notice of Deposition of Person Most Knowledgeable at Defendant Burger Rehabilitation Systems, Inc., and Requests for Production of Documents (served on December 18, 2020) (Martinez Class Action)	1.10
Review and Analyze Defendant Burger Rehabilitation Systems, Inc.'s Form Interrogatories – Employment Law (Set One), Special Interrogatories (Set One), Request for Admissions (Set One), and Requests for Production of Documents (Set One) to Plaintiff Martinez, and Declaration for Additional Discovery Re: First Set of Special Interrogatories (served on January 26, 2021) (Martinez Class Action)	1.10
Review and Analyze Defendant Burger Rehabilitation Systems, Inc.'s Responses to Plaintiff Martinez's Form Interrogatories – General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), and Requests for Production of Documents (Set One) (served on January 28, 2021) (Martinez Class Action)	1.80
Draft, Review, and/or Revise Plaintiff Martinez's Responses to Defendant Burger Rehabilitation System, Inc.'s Form Interrogatories – Employment Law (Set One), Special Interrogatories (Set One), Request for Admissions (Set One), and Requests for Production of Documents (Set One) (served on March 29, 2021) (Martinez Class Action)	5.10
Review and Analyze Documents Produced by Defendants (served on March 12, 2021)	2.80
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Renee Robinson (served on April 26, 2021) (Robinson Action)	1.70

Review and Analyze Defendant Burger Rehabilitation Systems, Inc.’s Notice of Videotaped Deposition of Plaintiff Cruzelma Martinez and Request for Production of Documents (noticed for April 15, 2022) (served on March 28, 2022) (Martinez Class Action)	0.20
Review and Analyze Defendant Burger Rehabilitation Systems, Inc.’s Amended Notice of Videotaped Deposition of Plaintiff Cruzelma Martinez and Request for Production of Documents (noticed for May 27, 2022) (served on April 6, 2022) (Martinez Class Action)	0.20
Review and Analyze Defendant Burger Rehabilitation Systems, Inc.’s Form Interrogatories – Employment Law (Set One), Special Interrogatories (Set One), Request for Admissions (Set One), and Requests for Production of Documents (Set One) to Plaintiff Steiner, and Declaration for Additional Discovery (served on April 8, 2022) (Steiner Action)	0.90
Review and Analyze Defendant Burger Rehabilitation Systems, Inc.’s Form Interrogatories – Employment Law (Set One), Special Interrogatories (Set One), Request for Admissions (Set One), and Requests for Production of Documents (Set One) to Plaintiff Robinson, and Declaration for Additional Discovery (served on April 8, 2022) (Robinson Action)	0.80
Draft, Review, and/or Revise Plaintiff Robinson’s Notice of Deposition of Person Most Knowledgeable at Defendant Burger Associates, Inc., and Requests for Production of Documents (Organizational Structure; noticed for August 23, 2022) (served on April 25, 2022) (Robinson Action)	1.20
Draft, Review, and/or Revise Plaintiff Robinson’s Notice of Deposition of Person Most Knowledgeable at Defendant Burger Associates, Inc., and Requests for Production of Documents (Wage and Hour Practices; noticed for August 24, 2022) (served on April 25, 2022) (Robinson Action)	1.40
Draft, Review, and/or Revise Plaintiff Robinson’s Notice of Deposition of Person Most Knowledgeable at Defendant Burger Rehabilitation Systems, Inc., and Requests	1.10

for Production of Documents (Organizational Structure; noticed for August 25, 2022) (served on April 25, 2022) (Robinson Action)	
Draft, Review, and/or Revise Plaintiff Robinson's Notice of Deposition of Person Most Knowledgeable at Defendant Burger Rehabilitation Systems, Inc., and Requests for Production of Documents (Wage and Hour Practices; noticed for August 26, 2022) (served on April 25, 2022) (Robinson Action)	1.30
Draft, Review, and/or Revise Plaintiff Robinson's Form Interrogatories – General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), and Requests for Production of Documents (Set One) to Defendant Burger Associates, Inc. (served on April 25, 2022) (Robinson Action)	4.10
Draft, Review, and/or Revise Plaintiff Robinson's Form Interrogatories – General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), and Requests for Production of Documents (Set One) to Defendant Burger Rehabilitation Systems, Inc. (served on April 25, 2022) (Robinson Action)	3.80
Review and Analyze Defendant Burger Rehabilitation Systems, Inc.'s Second Amended Notice of Videotaped Deposition of Plaintiff Cruzelma Martinez and Request for Production of Documents (noticed for June 10, 2022) (served on May 11, 2022) (Martinez Class Action)	0.20
Review and Analyze Defendant Burger Rehabilitation Systems, Inc.'s Third Amended Notice of Videotaped Deposition of Plaintiff Cruzelma Martinez and Request for Production of Documents (noticed for June 9, 2022) (served on May 20, 2022) (Martinez Class Action)	0.20
Draft, Review, and/or Revise Plaintiff Martinez's Objections to Defendant Burger Rehabilitation Systems, Inc.'s Third Amended Notice of Deposition of Plaintiff Martinez and Request for Production of Documents (noticed for June 9, 2022) (served on June 1, 2022) (Martinez Class Action)	3.40
Review and Analyze Defendant Burger Rehabilitation Systems, Inc.'s Fourth Amended Notice of Videotaped Deposition of Plaintiff Cruzelma Martinez and	0.20

Request for Production of Documents (noticed for August 25 & 26, 2022) (served on June 24, 2022) (Martinez Class Action)	
Review and Analyze Documents Produced by Defendants (served on August 22, 2022) (Steiner Action)	2.30
Draft, Review, and/or Revise Plaintiff Steiner's Responses to Defendant Burger Rehabilitation Systems, Inc.'s Form Interrogatories – Employment Law (Set One), Special Interrogatories (Set One), Request for Admissions (Set One), and Requests for Production of Documents (Set One) (served on August 22, 2022) (Steiner Action)	0.30
Prepare for and Defend the Deposition of Plaintiff Cruzelma Martinez (Video Conference; August 25, 2022) and Review Deposition Transcript	0.50
Review and Analyze Defendant Burger Rehabilitation Systems, Inc.'s Notice of Continued Videotaped Deposition of Cruzelma Martinez and Request for Production of Documents (noticed for September 8, 2022) (served on August 29, 2022) (Martinez Class Action)	0.20
Review and Analyze Defendant Burger Rehabilitation Systems, Inc.'s Notice of Videotaped Deposition of Plaintiff Lisa Steiner and Requests for Production of Documents (noticed for November 14 & 15, 2022) (served on September 20, 2022) (Steiner Action)	0.20
Review and Analyze Defendant Burger Rehabilitation Systems, Inc.'s Notice of Videotaped and In-Person Deposition of Renee Robinson and Request for Production of Documents (notice for November 15, 2022) (served on November 9, 2022) (Martinez Class Action)	0.20
Review and Analyze Defendant Burger Rehabilitation Systems, Inc.'s Amended Notice of Videotaped and In-Person Deposition of Renee Robinson and Request for Production of Documents (noticed for December 16, 2022) (served on November 16, 2022) (Martinez Class Action)	0.20

Draft, Review, and/or Revise Plaintiff Martinez's Special Interrogatories (Set Three) and Requests for Production of Documents (Set Two) to Defendant Burger Rehabilitation Systems, Inc. (served on June 26, 2024) (Martinez Class Action)	0.20
Draft, Review, and/or Revise Plaintiff Martinez's Supplemental Interrogatory (Set One) and Request for Production of Documents (Set One) to Defendant Burger Rehabilitation Systems, Inc. (served on June 26, 2024) (Martinez Class Action)	0.20
Draft, Review, and/or Revise Plaintiff Martinez's Notice of Taking Deposition of Person(s) Most Knowledgeable of Defendant Burger Rehabilitation Systems, Inc. (noticed for July 24 & 25, 2024) (served on June 26, 2024) (Martinez Class Action)	0.20
Review and Analyze Defendant Burger Rehabilitation Systems, Inc.'s Responses to Plaintiff Cruzelma Martinez's Special Interrogatories (Set Three) and Requests for Production of Documents (Set Two) (served on September 3, 2024) (Martinez Class Action)	0.20
Review and Analyze Defendant Burger Rehabilitation Systems, Inc.'s Supplemental Responses to Plaintiff Cruzelma Martinez's Special Interrogatories (Set Two) and Requests for Production of Documents (Set One) (served on September 3, 2024) (Martinez Class Action)	0.20
Draft, Review, and/or Revise Plaintiff Martinez's Notice of Taking Deposition of Person(s) Most Knowledgeable of Defendant Burger Rehabilitation Systems, Inc. (noticed for March 18-19, 25-26, 2025) (served on February 27, 2025) (Martinez Class Action)	0.20
Draft, Review, and/or Revise Plaintiff Martinez's Special Interrogatories (Set Four) and Requests for Production of Documents (Set Three) to Defendant Burger Rehabilitation Systems, Inc. (served on February 27, 2025) (Martinez Class Action)	0.20
Review and Analyze Defendant Burger Rehabilitation Systems, Inc.'s Supplemental Responses to Plaintiff Cruzelma Martinez's Special Interrogatories (Set Three) (served on March 10, 2025) (Martinez Class Action)	0.20

Review and Analyze Defendant Burger Rehabilitation Systems, Inc.’s Objections to Notice of Taking Deposition of Person(s) Most Knowledgeable of Defendant Burger Rehabilitation Systems, Inc. and Requests for Production of Documents (served on March 13, 2025) (Martinez Class Action)	0.20
Review and Analyze Defendant Burger Rehabilitation Systems, Inc.’s Responses to Plaintiff Cruzelma Martinez’s Special Interrogatories (Set Four) and Requests for Production of Documents (Set Three) (served on April 2, 2025) (Martinez Class Action)	0.20
Draft, Review, and/or Revise Plaintiff Ronald Pigram’s Special Interrogatories (Set One) and Requests for Production of Documents (Set One) to Defendant Burger Rehabilitation Systems, Inc. (served on April 2, 2025) (Martinez Class Action)	0.20
Review and Analyze Defendant Burger Rehabilitation Systems, Inc.’s Supplemental Responses to Plaintiff Cruzelma Martinez’s Special Interrogatories (Set Four) and Requests for Production of Documents (Set Two) (served on April 15, 2025) (Martinez Class Action)	0.20
Review and Analyze Defendant Burger Rehabilitation Systems, Inc.’s Amended Supplemental Responses to Plaintiff Cruzelma Martinez’s Special Interrogatories (Set Two), Special Interrogatories (Set Three), Special Interrogatories (Set Four), and Requests for Production of Documents (Set Two) (served on April 23, 2025) (Martinez Class Action)	0.20
Review and Analyze Documents Produced by Defendants (served on April 23, 2025)	0.10
Review and Analyze Defendant Burger Rehabilitation Systems, Inc.’s Supplemental Responses to Plaintiff Cruzelma Martinez’s Special Interrogatories (Set Four), No. 58 (served on April 25, 2025) (Martinez Class Action)	0.20
Draft, Review, and/or Revise Plaintiff Martinez’s Notice of Taking Deposition of Kim Morton (noticed for May 23, 2025) (served on May 12, 2025) (Martinez Class Action)	0.10
Review and Analyze Documents Produced by Defendants (served on August 12, 2025)	0.80

Letters and Correspondence	
Research, Draft, Review, and/or Revise Notice to California Labor and Workforce Development Agency Re: Claim of Plaintiff Cruzelma Martinez under the Private Attorneys General Act (served on October 7, 2020)	4.50
Research, Draft, Review, and/or Revise Notice to California Labor and Workforce Development Agency Re: Claim of Plaintiff Lisa Steiner under the Private Attorneys General Act (served on August 25, 2021)	4.50
Meet with, Draft Correspondence to, Respond to Correspondence from, and/or Review Correspondence with, Defendants' Counsel	12.80
Mediation/Settlement	
Review and Analyze Information, Data, and Documents Obtained from Plaintiffs, Defendants (approximately 10,442 pages), and Other Sources Prior to Mediations	61.50
Prepare for Mediation, Including Researching Settlement and Merits-Related Issues, Drafting the Mediation Brief, and Compiling Exhibits in Support Thereof, and Performing, Reviewing, and/or Revising Damages and Penalties Analyses and Calculations Prior to December 6, 2021 Mediation (submitted on November 29, 2021)	37.50
Attend Mediation Session (December 6, 2021; via Zoom Video Conference)	16.50
Draft, Review, and/or Revise Plaintiffs' Mediation Brief (submitted on January 22, 2024)	0.90
Review and/or Analyze Mediator's Proposal (issued September 19, 2025)	0.20
Draft, Review, Revise, and/or Analyze Memorandum of Understanding (executed on October 27, 2025)	0.20
Draft, Review, Revise, Negotiate, and Finalize Joint Stipulation of Class Action and PAGA Settlement and Release (executed on May 9, 2025), and Draft, Review, and/or Revise Court Approved Notice of Class Action Settlement and Hearing Date for Final Court Approval	1.20

Law and Motion	
Meet and Confer with Defendants' Counsel, and Draft, Review, and/or Revise Stipulation to Continue Deadline to File Motion for Class Certification; and [Proposed] Order Thereon (submitted on November 14, 2023) (Martinez Class Action)	0.40
Review Court's Order to Continue Deadline to File Motion for Class Certification (filed on November 21, 2023) (Martinez Class Action)	0.20
Draft, Review, and/or Revise Plaintiffs' Notice of Motion and Motion for Leave to File Second Amended Complaint, Declaration of Devin E. Rauchwerger, and [Proposed] Order (submitted on April 10, 2025) (Martinez Class Action)	0.50
Review and Analyze Defendant Burger Rehabilitation Systems, Inc.'s Opposition to Plaintiffs' Motion for Leave to File Second Amended Complaint and Declaration of Ellen Bronchetti (served on April 21, 2025) (Martinez Class Action)	0.40
Draft, Review, and/or Revise Plaintiffs' Reply to Motion for Leave to File Second Amended Complaint (filed on April 25, 2025) (Martinez Class Action)	0.30
Review Court's Tentative Ruling Re: Motion for Leave to Amend Complaint (issued on May 1, 2025) (Martinez Class Action)	0.10
Review Court's Minute Order Re: Motion for Leave to Amend Complaint (filed on May 2, 2025) (Martinez Class Action)	0.10
Review Court's Tentative Ruling Re: Hearing on Motion for Leave to Amend Complaint (filed on May 15, 2025) (Martinez Class Action)	0.10
Review Court's Minute Order Re: Hearing on Motion for Leave to Amend Complaint (filed on May 16, 2025) (Martinez Class Action)	0.10
Meet and Confer with Defendants' Counsel, and Draft, Review, and/or Revise Joint Stipulation to Continue Deadline for Plaintiff to File a Motion for Class Certification and Extending the Time to Bring the Action to Trial; and [Proposed] Order Thereon (submitted on August 20, 2025) (Martinez Class Action)	0.20

Review Court's Order Continue Deadline for Plaintiff to File Motion for Class Certification and Extending the Time to Bring the Action to Trial (filed on August 26, 2025) (Martinez Class Action)	0.10
Review Court's Tentative Ruling Re: Hearing on Motion for Class Certification (issued on October 9, 2025) (Martinez Class Action)	0.20
Review Court's Minute Order Re: Hearing on Motion for Class Certification (filed on October 10, 2025) (Martinez Class Action)	0.20
Review Court's Tentative Ruling Re: Hearing on Motion for Class Certification (issued on November 20, 2025) (Martinez Class Action)	0.20
Review Court's Minute Order Re: Hearing on Motion for Class Certification (filed on November 21, 2025) (Martinez Class Action)	0.20
Meet and Confer with Defendants' Counsel, and Draft, Review, and/or Revise Joint Stipulation to Shorten Time for Filing Plaintiffs' Motion for Approval of Private Attorneys General Act Settlement; [Proposed] Order (submitted on September 8, 2026) (Martinez Class Action)	0.20
Review Declaration of Deven E. Rauchwerger, and Draft, Review, and/or Revise Plaintiffs' Notice of Motion and Motion for Approval of PAGA Settlement, Declaration of Selena Matavosian in Support Thereof, and [Proposed] Order (submitted on September 11, 2026) (Martinez Class Action)	3.70
Total Hours:	309.00

EXHIBIT B

LAWYERS *for* JUSTICE, PC CASE COST DETAIL
Martinez v. Burger Rehabilitation System, Inc.

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
10/7/2020	U.S. Postmaster	Postage	\$7.50
10/7/2020	Labor & Workforce Development Agency	PAGA Filing Fee	\$75.00
10/13/2020	Legal Document Server, Inc.	Attorney Service	\$165.23
10/13/2020	Sacramento Superior Court	Complaint Filing Fee	\$435.00
10/27/2020	Legal Document Server, Inc.	Attorney Service	\$110.00
11/24/2020	General Logistics Systems US, Inc.	Courier Service	\$27.48
11/25/2020	Legal Document Server, Inc.	Attorney Service	\$120.00
11/30/2020	Legal Document Server, Inc.	Attorney Service	\$130.00
2/2/2021	General Logistics Systems US, Inc.	Courier Service	\$27.54
2/10/2021	FedEx Express	Courier Service	\$34.59
4/27/2021	Jeffrey A. Ross	First Mediation Fee	\$9,000.00
4/29/2021	Legal Document Server, Inc.	Attorney Service	\$110.70
4/29/2021	Sacramento Superior Court	Stipulation & Order Fee	\$20.00
5/20/2021	Legal Document Server, Inc.	Attorney Service	\$110.00
5/30/2021	Legal Document Server, Inc.	Attorney Service	\$110.00
12/9/2021	Legal Document Server, Inc.	Attorney Service	\$110.00
12/17/2021	Legal Document Server, Inc.	Attorney Service	\$351.90
12/17/2021	Sacramento Superior Court	Stipulation & Order Fee	\$20.00
12/17/2021	Sacramento Superior Court	Stipulation & Order Fee	\$20.00
1/6/2022	Legal Document Server, Inc.	Attorney Service	\$175.00
2/3/2022	Legal Document Server, Inc.	Attorney Service	\$110.00
2/9/2022	Legal Document Server, Inc.	Attorney Service	\$175.00
2/14/2022	Legal Document Server, Inc.	Attorney Service	\$220.00
3/11/2022	Legal Document Server, Inc.	Attorney Service	\$120.00
4/18/2022	Legal Document Server, Inc.	Attorney Service	\$120.00
5/18/2022	Legal Document Server, Inc.	Attorney Service	\$155.00
5/27/2022	Legal Document Server, Inc.	Attorney Service	\$120.00
6/1/2022	General Logistics Systems US, Inc.	Courier Service	\$53.00
6/2/2022	Melissa Rinehart	Travel Reimbursement	\$265.18
6/13/2022	Legal Document Server, Inc.	Attorney Service	\$240.00
8/24/2022	Legal Document Server, Inc.	Attorney Service	\$146.35
8/24/2022	Sacramento Superior Court	Stipulation & Order Fee	\$20.00
9/21/2022	Sacramento Superior Court	Document Download Fee	\$20.20
9/22/2022	Legal Document Server, Inc.	Attorney Service	\$145.00
11/17/2023	Medina McKlevey LP	Second Mediation Fee	\$8,250.00
8/14/2024	Drogin, Kakigi & Associates	Expert	\$8,950.00
8/6/2025	Riverside Superior Court	Document Download Fee	\$2.00
9/19/2025	Scarlet Tunney	Travel Reimbursement	\$58.08
Total:			<u>\$30,329.75</u>

LAWYERS *for* JUSTICE, PC CASE COST DETAIL
Martinez vs. Burger Rehabilitation System, Inc (PAGA) - CLOSED

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
12/15/2020	Legal Document Server, Inc.	Attorney Service	\$165.23
12/15/2020	Sacramento Superior Court	Complaint Filing Fee	\$435.00
7/11/2022	General Logistics Systems US, Inc.	Courier Service	\$49.78
Total:			<u>\$650.01</u>